

## 5. Your submission

**Name of person or organisation**

**making the submission:** Pharmacy Council of New Zealand

**Contact person:** Claire Paget-Hay

**Telephone:** [REDACTED]

**Email:** [REDACTED]

### Information about you

#### ❖ Are you responding as a/an (please tick all that apply)

- Education provider
- Peak professional organisation
- Health consumer
- Community member
- Employer
- Government eg Health Department
- Government agency
- Health Workforce Australia
- TEQSA
- ASQA/State based VET sector regulatory authority
- Individual practitioner
- Other  
–please specify Pharmacy Council of NZ - responsible authority for pharmacist registration NZ

#### ❖ What experience have you had with the accreditation council? (please tick all that apply)

##### Education Providers -

- The Council has undertaken an accreditation assessment of one or more of our education programs since the introduction of the National Scheme
- The Council undertook an accreditation assessment of one or more of our education programs before the introduction of the National Scheme
- We are currently planning for, or undergoing, an accreditation assessment on one or more of our education programs
- We are new to the accreditation process
- We have been through an accreditation process previously with a different accreditation body previously

❖ **Stage of accreditation assessment** (if you are currently involved in an accreditation process)

- Nearing completion
- Half way
- Just commenced
- Intention to apply submitted
- Planning and preparation underway
- Have sought information or advice from the Council

❖ **Overseas qualified practitioner:**

- Assessment completed
- Assessment nearing completion
- Assessment just commencing
- Have sought information or advice from the Council

❖ **Other stakeholders**

- Have sought information or advice from the Council on other matters
- Council has consulted with us/me on Accreditation Standards, policy or individual accreditation assessments
- Involved Council activities e.g. accreditation or assessment processes
- Little or no direct engagement with Council
- Other – please specify

## Review of Accreditation Council against the Quality Framework for the Accreditation Function

### 5.1 Governance (Domain 1):

The Accreditation Council effectively governs itself and demonstrates competence and professionalism in the performance of its accreditation role.

#### Attributes

- The Accreditation Council is a legally constituted body and registered as a business entity.
- The Accreditation Council's governance and management structures give priority to its accreditation function relative to other activities (or relative to its importance).
- The Accreditation Council is able to demonstrate business stability, including financial viability.
- The Accreditation Council's accounts meet relevant Australian accounting and financial reporting standards.
- There is a transparent process for selection of the governing body.
- The Accreditation Council's governance arrangements provide for input from stakeholders including input from the community, education providers and the profession/s.
- The Accreditation Council's governance arrangements comply with the National Law and other applicable legislative requirements.

#### Governance – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about governance is primarily at pages 4 - 7 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

#### ❖ Comments

The APC has a New Zealand member; the Pharmacy Council of New Zealand (PCNZ). This allows the New Zealand viewpoint to be considered. PCNZ considers the selection criteria is clear and managed appropriately.

## 5.2 Independence (Domain 2):

The Accreditation Council carries out its accreditation operations independently.

### Attributes

- Decision making processes are independent and there is no evidence that any area of the community, including government, higher education institutions, business, industry and professional associations - has undue influence.
- There are clear procedures for identifying and managing conflicts of interest.

### Independence – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about independence is primarily at pages 8 – 12 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

### ❖ Comments

PCNZ views the independent role of the Accreditation Council as important to ensure there are no conflicts of interest with various stakeholders, and that processes are transparent and objective. We agree that this standard is met.

### 5.3 Operational Management (Domain 3):

The Accreditation Council effectively manages its resources to carry out its accreditation function.

#### Attributes

- The Accreditation Council manages the human and financial resources to achieve objectives in relation to its accreditation function.
- There are effective systems for monitoring and improving the authority's accreditation processes, and identification and management of risk.
- The authority can operate efficiently and effectively nationally.
- There are robust systems for managing information and contemporaneous records, including ensuring confidentiality.
- In setting its fee structures, the Accreditation Council balances the requirements of the principles of the National Law and efficient business processes.

#### Operational management – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about operational management is primarily at pages 13 – 19 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

#### ❖ Comments

PCNZ agrees that this standard is met.

#### 5.4 Accreditation standards (Domain 4):

The Accreditation Council develops accreditation standards for the assessment of programs of study and education providers.

##### Attributes

- Standards meet relevant Australian and international benchmarks.
- Standards are based on the available research and evidence base.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The Accreditation Council reviews the standards regularly.
- In reviewing and developing standards, the Accreditation Council takes account of AHPRA's Procedures for Development of Accreditation Standards and the National Law.

##### Accreditation standards - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about accreditation standards is primarily at pages 20 – 21 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

#### ❖ Comments

## 5.5 Processes for accreditation of programs of study and education providers (Domain 5):

The Accreditation Council applies the approved accreditation standards and has rigorous, fair and consistent processes for accrediting programs of study and their education providers.

### Attributes

- The Accreditation Council ensures documentation on the accreditation standards and the procedures for assessment is publicly available.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessment team members. It's policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess professional programs of study and their providers against the accreditation standards.
- There are procedures for identifying, managing and recording conflicts of interest in the work of accreditation assessment teams and working committees.
- The Accreditation Council follows documented processes for decision-making and reporting that comply with the National Law and enable decisions to be made free from undue influence by any interested party.
- Accreditation processes facilitate continuing quality improvement in programs of study by the responsible education provider.
- There is a cyclical accreditation process with regular assessment of accredited education providers and their programs to ensure continuing compliance with standards.
- The Accreditation Council has defined the changes to programs and to providers that may affect the accreditation status, how the education provider reports on these changes and how these changes are assessed.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

### Processes for accreditation of programs of study and education providers – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about processes for accreditation of programs of study and education providers is primarily at pages 22 - 24 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx) and is also based on the experience of the National Board in receiving accreditation reports for the accreditation decisions reported to the Board in the period 1 July 2010 to 1 August 2012.

#### ❖ Comments

PCNZ agrees that this standard is met.

## 5.6 Assessing authorities in other countries (than Australia) (Domain 6):

Where this function is exercised by the Accreditation Council, the authority has defined standards and procedures to assess examining and/or accrediting authorities in other countries

### Attributes

- The assessment standards aim to determine whether these authorities' processes result in practitioners who have the knowledge, clinical skills and professional attributes necessary to practice in the equivalent profession in Australia.
- Stakeholders are involved in the development and review of standards and there is wide ranging consultation.
- The procedures for initiating consideration of the standards and procedures of authorities in other countries are defined and documented.
- There is a cyclical assessment process to ensure recognised authorities in other countries continue to meet the defined standards.
- The Accreditation Council follows documented systems for decision-making and reporting that enable decisions to be made free from undue influence by any interested party.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

### Assessing authorities in other countries (than Australia) – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing authorities in other countries is primarily at pages 25 – 26 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

### ❖ Comments



## 5.7 Assessing overseas qualified practitioners (Domain 7):

Where this function is exercised by the Accreditation Council, the authority has processes to assess and/or oversee the assessment of the knowledge, clinical skills and professional attributes of overseas qualified practitioners who are seeking registration in the profession under the National Law and whose qualifications are not approved qualifications under the National Law for the profession.

### Attributes

- The assessment standards define the required knowledge, clinical skills and professional attributes necessary to practise the profession in Australia.
- The key assessment criteria, including assessment objectives and standards, are documented.
- The Accreditation Council uses a recognised standard setting process and monitors the overall performance of the assessment.
- The procedures for applying for assessment are defined and published.
- The Accreditation Council publishes information that describes the structure of the examination and components of the assessments.
- The Accreditation Council has policies on the selection, appointment, training and performance review of assessors. Its policies provide for the use of competent persons who are qualified by their skills, knowledge and experience to assess overseas qualified practitioners.
- There are published complaints, review and appeals processes which are rigorous, fair and responsive.

### Assessing overseas qualified practitioners – Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about assessing overseas qualified practitioners is primarily at pages 27 – 28 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

#### ❖ Comments

Overseas qualified pharmacists seeking registration in New Zealand are assessed using the exams developed and administered by APC. PCNZ has input into examinations processes and agrees that the exams and processes have the attributes listed.

## 5.8 Stakeholder collaboration (Domain 8):

The Accreditation Council works to build stakeholder support and collaborates with other national, international and/or professional accreditation authorities.

### Attributes

- There are processes for engaging with stakeholders, including governments, education institutions, health professional organisations, health providers, national boards and consumers/community.
- There is a communications strategy, including a website providing information about the Accreditation Council's roles, functions and procedures.
- The Accreditation Council collaborates with other national and international accreditation organisations.
- The Accreditation Council collaborates with accreditation authorities for the other registered health professions appointed under the National Law.
- The Accreditation Council works within overarching national and international structures of quality assurance/accreditation.

### Stakeholder collaboration - Accreditation Council submission

The evidence that the Board has taken into account in forming its preliminary view about stakeholder collaboration is primarily at pages 29 – 30 of the report from the Council published on the Board's website at [www.pharmacyboard.gov.au/News/Current-Consultations.aspx](http://www.pharmacyboard.gov.au/News/Current-Consultations.aspx).

### ❖ Comments

PCNZ agrees that this standard is met.

## 6. Preliminary conclusion of the National Board about whether current arrangements are satisfactory

The National Board has undertaken a preliminary review of the current arrangements, including an analysis of risks, benefits and costs. The review was based on the submission provided by the Australian Pharmacy Council against the Quality Framework for the Accreditation Function as referenced in section 5 above and the Board's experience working with the Council over the last two years.

### **Proposed decision of the National Board based on a preliminary review of current arrangements including analysis of risks, benefits and costs**

Based on its preliminary review, the view of the National Board is to continue the current arrangements of exercising accreditation functions through the Australian Pharmacy Council.

#### ❖ **To what extent are you in agreement with the preliminary view of the Board?**

Strongly disagree

1

2

3

4

5

Strongly agree

#### ❖ **Please provide comments about the Board's preliminary view**

The Pharmacy Council of New Zealand (PCNZ) strongly supports the view of the National Board to continue the current arrangements. APC has demonstrated sound processes and is responsive to the needs of the pharmacy profession.

New Zealand and Australian pharmacy practice is very similar, and NZ works collaboratively with the Australian Pharmacy Council to develop standards for the accreditation of university programmes, intern training programmes, examinations for overseas applicants for registration, and continuing professional development programmes. New Zealand relies on this collaborative process and there are considerable advantages for the Australasian pharmacy profession with this approach. New Zealand has also assisted with the development of assessment material and accreditation processes for the pharmacy profession and therefore is an interested party.

This collaboration is also essential to the implementation of the Trans Tasman Mutual Recognition Agreement. This Government level legislation allows for pharmacist qualifications and registration to be recognised without further examination. It is important to the safe, effective, practise of pharmacy across both countries.

The independent perspective of the Australian Pharmacy Council is essential to provide an overarching and objective view for accreditation. PCNZ unequivocally supports the continuation of the current arrangements of exercising accreditation functions through the Australian Pharmacy Council.