

# PROCESS FOR RAISING A CONCERN ABOUT AN ACCREDITED PROGRAM

## 1. Purpose

1.1 This document sets out the Australian Physiotherapy Council (the Council) process for considering concerns about accredited programs. The Council welcomes concerns about accredited programs as one source of information which can help ensure that programs continue to meet the Accreditation Standard for Entry-level Physiotherapy Practitioner Programs.

1.2 This process has been developed in line with the 'Management of complaints relating to accreditation functions under the National Law – a guidance document' (AHPRA/HPACF 2021; referred to in this policy as the 'Management of Complaints Guidance').

## 2. Definition of a concern<sup>i</sup>

2.1 For the purpose of this process, the Council will investigate, 'Concerns about systemic matters, which may indicate a failure of a program or provider to meet one or more accreditation standards.'

2.2 The Council will not consider, 'Complaints by individuals, where the complainant seeks a matter related to their personal situation be investigated and addressed to bring about a change to that situation. This includes matters such as: employment decisions, selection decisions, recognition of prior learning/experience, allocation of training posts, examination results, or dismissal from training.'

2.3 The Council normally expects that concerns have been raised with the education provider first. Many concerns about accredited programs will not raise any issues about a program's ongoing accreditation and can be most effectively handled by the education provider and/or escalated to other appropriate bodies.

## 3. Process

3.1 The Council is committed to handling concerns about programs in a proportionate and transparent manner that ensures fairness and confidentiality to both complainants and education providers.

3.2 The Council will follow this process when a concern is received:

### **Step 1: Acknowledge**

Concerns will normally be made in writing. The Council aims to acknowledge all concerns within 10 working days of receipt; and keep complainants informed about likely timescales. Where a complainant is unable to put their complaint in writing, the Council will put in place any reasonable adjustments. The complaint will be recorded in a confidential and secure manner.

### Step 2: Assess and Prioritise

The concern will be assessed by the Chief Executive Officer (CEO) and General Manager, Accreditation to consider whether the concern should be investigated further because it appears to bring into doubt whether an accredited program continues to meet the Accreditation Standard. Further information may be requested from the complainant if necessary. Advice may also be sought from the Chair, Accreditation Committee (or another Committee member if appropriate).

Where it is determined that a concern meets the definition of a 'personal situation', or is otherwise of a minor nature such that it does not raise any issues which might reasonably bring into doubt whether the program concerned meets the Accreditation Standard, the Council will write to the complainant to explain its assessment and the matter will be closed. Where appropriate, the complainant may be directed to other concerns and complaints procedures.

The assessment of concerns will consider whether a concern indicates a high potential risk to public safety. If a concern indicates a high potential risk, the CEO and General Manager, Accreditation may decide to expedite the investigation.

### Step 3: Investigate

If it is determined that there may be issues which bring into doubt whether the program concerned meets the Accreditation Standard, the CEO and General Manager, Accreditation will determine the scope of the subsequent investigation required. The Council may contact the complainant to request further information and/or contact other individuals or organisations if they are able to provide information. For example, this might include contacting other regulators of education providers.

The Council will contact the education provider to discuss the concerns that have been raised, whilst maintaining the privacy of the complainant. The education provider will be provided with a copy of information about the concern raised and invited to send written comments in response.

### Step 4: Review

An investigation report comprising the original concern, any other information gathered in the investigation, the education provider's response and a recommended outcome will be considered by the Council Accreditation Committee. There are three possible outcomes:

- **No action:** The Accreditation Committee is satisfied that no further action is required to ensure the Accreditation Standard is met. This will be an appropriate outcome where the investigation has not substantiated the concerns raised; the Accreditation Committee concludes that the issues raised do not affect compliance with the Accreditation Standard; or where the education provider has already taken corrective action and no further ongoing monitoring is required.
- **Monitoring requirement:** The Accreditation Committee is satisfied that the Accreditation Standard continues to be met but requires further information as part of program monitoring to ensure that issues raised in the investigation are addressed. This will be an appropriate outcome where, for example, an education provider is putting in place changes to a program because of the concern and further assurance is required of their

implementation and effectiveness.

- **Targeted review:** The Accreditation Committee has concerns that a program may not be meeting the Accreditation Standard and determines that a targeted review by a Council Accreditation assessment panel is required. A targeted review would focus on the accreditation criteria that may not be fully met. The targeted review will be either a paper-based assessment or a site visit, determined by the nature of the concerns, the standards in question and the appropriate tool to achieve the required level of assurance. The education provider and complainant will be informed of the outcome.

#### Step 5: Respond

A response will be provided to the complainant upon completion of the investigation. This may include the particulars of the investigation, any findings and the decision reached.

## 4. Anonymous Concerns

4.1 There may be occasions when the Council receives concerns about a program which are made anonymously. The Council will be limited in the action it can take in relation to information which is received anonymously as this imposes limits on the further investigation that is possible. The Council will assess whether there is sufficient basis to investigate the concern further, taking into account the need for the education provider to be able to respond to the concerns raised. In many cases, the concern will be recorded but no further action will be taken.

4.2 There may be occasions where it would be appropriate and proportionate to investigate an anonymous concern. This includes, for example, where it is possible to gather documentary evidence which might support the concern; and/or where the same or similar concerns about a program are raised by multiple complainants.

## 5. Notification to the Physiotherapy Board of Australia

Where an initial assessment of a concern indicates a high potential risk to public safety, the Physiotherapy Board of Australia will be notified promptly. In all matters where the Accreditation Committee determines that a monitoring requirement or targeted review is necessary, the Council will notify the Physiotherapy Board of Australia of its decision and the eventual outcome.

## References

Australian Health Practitioner Regulation Agency (AHPRA) and Health Professions Accreditation Collaborative Forum (HPACF) (2021). Management of complaints relating to accreditation functions under the National Law – a guidance document.

<https://www.ahpra.gov.au/Publications/Accreditation-publications.aspx>

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<sup>i</sup> Ahpra, 'Management of complaints relating to accreditation functions under the National Law – a guidance document', September 2021