



Aboriginal and Torres Strait
Islander Health Practice
Chinese Medicine
Chiropractic
Dental
Medical
Medical Radiation Practice
Nursing and Midwifery
Occupational Therapy
Optometry
Osteopathy
Pharmacy
Physiotherapy
Podiatry
Psychology

Australian Health Practitioner Regulation Agency

20 March 2019

Professor Peter Noonan
Chair, Australian Qualifications
Framework Review Panel

Via email: AQFReview@education.gov.au

Dear Professor Noonan

Australian Qualifications Framework Review

Thank you for the opportunity to participate in the consultation on the Australian Qualifications Framework (AQF) Review. This submission from the Australian Health Practitioner Regulation Agency (AHPRA) provides:

- some background on AHPRA's role and an outline of aspects of our work which are particularly relevant to the review of the Australian Qualifications Framework; and
- a response to the key questions posed by the Review Panel.

Background

As you may be aware, the Australian Health Practitioner Regulation Agency (AHPRA) is the organisation responsible for the implementation of the National Registration and Accreditation Scheme (the Scheme) across Australia. AHPRA's operations are governed by the Health Practitioner Regulation National Law Act as in force in each State and Territory (the National Law).

AHPRA works in partnership with fifteen National Boards to regulate health practitioners in sixteen professional groups across the Scheme. The National Law requires AHPRA and National Boards to have regard to the objectives of the National Scheme. Several objectives relate to education and qualifications – we have highlighted these below:

- to protect the public by ensuring that only health practitioners who are suitably trained and qualified to practice in a competent and ethical manner are registered;
- to facilitate the provision of high quality education and training of health practitioners;
- to facilitate rigorous and responsive assessment of overseas trained health practitioners; and
- to enable the continuous development of a flexible, responsive and sustainable Australian health workforce and to enable innovation in the education of, and service delivery by, health practitioners.

The AQF is particularly relevant in determining if an individual applying for registration is suitably trained and qualified to practise the profession in Australia.

For Australian-qualified applicants, the suitability of their training and qualifications is determined, in part, through the assessment of their qualification against accreditation standards that specify a minimum AQF level for qualifications in the profession to be approved for registration purposes.

Australian Health Practitioner Regulation Agency

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For overseas-trained applicants, determination of the suitability of their training and qualifications generally includes assessment of the comparable AQF level of their qualifications.

Changes to the AQF may have consequences for accreditation of domestic education programs, recognition of qualifications issued in other countries and registration of health practitioners.

Responses to Key Questions

In response to the key questions posed by the Review Panel and discussed in the Consultation Paper, AHPRA makes the following brief submissions:

1. In what ways is the AQF fit, or not fit, for purpose?

It is AHPRA's view that the AQF is broadly fit for the purpose of specifying the minimum level of knowledge and skills necessary to accredit a health practitioner education program, and to assist in determining whether an individual is suitably trained and qualified for registration as a Health Practitioner.

The Accreditation Authorities within the National Registration and Accreditation Scheme develop accreditation standards and use those standards to assess whether education providers and their programs give students the knowledge, skills and professional attributes to competently practise the relevant profession in Australia. The accreditation standards link to the AQF by specifying a minimum level for qualifications in the profession to be approved for registration purposes, for example, requiring an education program to address the specifications of AQF level 7 or higher.

2. Where it is not fit for purpose, what reforms should be made to the AQF and what are the most urgent priorities? Please be specific, having regard to the possible approaches suggested in this paper and other approaches.

As with all policy frameworks, it is timely to review and update the AQF to reflect contemporary approaches to education. For example, the volume of learning specifications may no longer reflect program structure including innovative approaches to delivering accelerated programs or trimester schedules.

3. In relation to approaches suggested by the Panel or proposed in submissions or through consultations, what are the major implementation issues the Review should consider? Please consider regulatory and other impacts

A priority area for health practitioner regulation is clear alignment between the AQF and International frameworks to determine comparability of qualifications issued in other countries. This is relevant to AHPRA's work in assessing applicants for registration who have qualified outside Australia and we strongly support work in this area.

AHPRA generally supports the proposed move away from using years of learning as the primary measure to determine AQF level. Accreditation standards have already moved away from using years (volume of learning) as a measurement tool and instead apply outcomes focussed accreditation standards that allow for contemporary approaches to education including blended and flexible learning models.

AHPRA supports in principle the proposed inclusion of enterprise and social skills to replace generic skills. Current accreditation standards either include or refer to a professional capabilities statement, which include 'soft skills' such as communication, critical thinking, collaboration, empathy and global mindset.

AHPRA supports the proposed removal of duplication in the AQF taxonomy.

AHPRA supports in principle the proposal to recognise shorter form credentials/micro-credentials, within the AQF and we note that quality assurance of short form credentials could be relevant to health practitioners' ongoing professional development.

AHPRA generally supports the development of a shared credit transfer system between education providers, and we note that it may enable greater workforce flexibility, responsiveness, and retention, by facilitating health practitioners to re-train in other areas of need, or to pursue individual interests.

If you wish to discuss this response, please contact Chris Robertson, Executive Director Strategy and Policy Directorate on (03) 8708 9037.

We look forward to participating further in the review of the Australian Qualifications Framework, as your work progresses, and would be grateful if you keep us updated on any opportunities for further comment. Thank you again for the opportunity to comment

Yours sincerely



Martin Fletcher
Chief Executive Officer