



Complaints Policy Regarding APC Accredited Programs

June 2020 | Version 1.3

Table of Contents

Table of Contents	2
Glossary of Terms	3
List of Abbreviations	3
1. Purpose.....	4
2. Scope.....	4
3. Complaints	4
3.1. Complaints we will consider.....	4
3.2. Complaints we will not consider	4
3.3. How will complaints be handled?	4
3.4. Why do we share the complaint with the accredited program/program provider?	4
3.5. What happens after the investigation?	5
4. Roles and responsibilities	5
5. Related documents/Links	5

Glossary of Terms

Term	Meaning
National Law	Refers to the Health Practitioner Regulation National Law Act 2009 .
Personal Complaint	'A personal complaint, in which the complainant seeks to have a matter investigated and addressed so as to bring about a change to their personal situation. This would include, for example, matters such as selection, recognition of prior learning/experience, training post allocation, assessment outcomes, or dismissal from training'. ¹
Systemic Complaint	'A systemic complaint, which may evidence some systemic matter that could signify a failure of a program or provider to meet accreditation standards'. ¹
Quality Framework	The Quality Framework for the Accreditation Function is a document drafted by the Health Professions Accreditation Councils Forum (HPAC) and endorsed by accreditation authorities, national boards and Ahpra to outline the way in which accreditation authorities will undertake the functions related to the National Law.

List of Abbreviations

Abbreviation	Term
Ahpra	Australian Health Practitioner Regulation Agency
APC	Australian Pharmacy Council
ASQA	Australian Skills Quality Authority
HPAC	Health Professions Accreditation Councils' Forum
TEQSA	Tertiary Education Quality Standards Agency

¹ This definition is adopted from the HPAC Forum and Ahpra [Management of complaints relating to accreditation functions under the National Law – a guidance document](#).

Complaints Policy Regarding APC Accredited Programs

1. Purpose

To ensure that we handle complaints related to APC accredited programs in a transparent and equitable way that is consistent with the requirements of the National Law and the Quality Framework.

2. Scope

This policy applies to the APC Accreditation Business Unit for the handling of systemic complaints regarding third party organisations (accredited programs and their providers). This policy does not cover the handling of personal complaints against an accredited program or provider.

General complaints against APC can be lodged via our contact us page.

3. Complaints

3.1. Complaints we will consider

Complaints regarding systemic concerns related to accredited programs, where the complaint may highlight non-compliance against the approved accreditation standards.

3.2. Complaints we will not consider

Complaints of a personal nature, where an individual is seeking an investigation into aspects of an accredited program. Complaints of this nature should be addressed via the complaints processes offered by the accredited provider. APC will not address personal complaints against accredited programs or program providers.

Complaints regarding the advertising of an accredited program, where that advertising does not violate existing APC policies regarding the promotion of programs. These complaints should be addressed to the [Australian Skills Quality Authority](#) or [Tertiary Education Quality Standards Agency](#) for investigation.

3.3. How will complaints be handled?

Complaints regarding an accredited program must be submitted in writing to the APC Executive Director Professional Services (EDPS) at accreditation@pharmacycouncil.org.au. The EDPS will determine if the complaint falls within the jurisdiction of APC. If so, APC will confirm if the complainant is willing to share the details and nature of their complaint with the provider before proceeding with an investigation.

3.4. Why do we share the complaint with the accredited program/program provider?

In order to conduct an investigation of an accredited program, APC must be able to share the details regarding the complaint with the program provider. Investigations will be conducted against the relevant Accreditation Standards using examples from the complaint in an effort to substantiate the claims made by the complainant. In line with the rules of natural justice and procedural fairness, APC will be unable to undertake an investigation where permission has not been granted by the complainant to provide details of the complaint to the provider. The APC intends to maintain the complainant's anonymity in the course of investigating a complaint, however the program provider may become aware of the source of the complaint.

3.5. What happens after the investigation?

Both the complainant and the program provider will be given information regarding the outcome of the complaint. In the event of a complaint being upheld, the investigation could result in a modification of the accreditation status of an accredited program. Such an outcome would result in further monitoring by APC as detailed in our Accreditation Quality Assurance and Monitoring Policy.

The details and outcomes of complaints will also be reported to Ahpra as part of APC's reporting schedule.

4. Roles and responsibilities

The Accreditation Business Unit is responsible for implementing and ensuring compliance with this policy through the creation and maintenance of effective procedures.

5. Related documents/Links

1. Australian Health Practitioners Regulation Agency 2009, *Health Practitioners Regulation National Law Act 2009*, viewed online 12 May 2020, <https://www.ahpra.gov.au/about-ahpra/what-we-do/legislation.aspx>
2. Australian Health Practitioners Regulation Agency 2018, *Quality Framework for the Accreditation Function*, viewed online 12 May 2020, <https://www.ahpra.gov.au/education/accreditation-authorities.aspx#quality>
3. Australian Pharmacy Council 2020, *Accreditation Quality Assurance and Monitoring Policy*, Australian Pharmacy Council, viewed online 1 July 2020, <https://www.pharmacycouncil.org.au/policies-procedures/>
4. Health Professions Accreditation Councils Forum and Australian Health Practitioners Regulation Agency 2015, *Management of complaints relating to accreditation functions under the National Law – a guidance document*, viewed online 12 May 2020, <https://www.ahpra.gov.au/Publications/Accreditation-publications.aspx>

