



Australian and New Zealand Podiatry  
Accreditation Council (ANZPAC)

# Accreditation Procedures for Podiatry Programs in Australia and New Zealand

Version 3.0 – November 2016

**DISCLAIMER:** The information contained in this guide, associated forms and documents and on the ANZPAC website is accurate at the date of publication. Small changes that may occur to the content and processes contained within this guide, associated forms and documents and on the ANZPAC website are not routinely notified to education providers unless they are substantive in any way, or alter the process in any significant way.

# Table of Contents

<b>1. Accreditation</b> .....	<b>3</b>
1.1 Introduction .....	3
1.2 Accreditation Standards .....	3
1.3 Accreditation Outcomes .....	4
1.4 Accreditation Process .....	6
<b>2. Accreditation Procedures</b> .....	<b>9</b>
2.1 Application for Accreditation.....	9
2.2 Assessment of Application .....	9
2.3 Multiple Campus Applications .....	10
2.4 Major Change.....	10
<b>3. Suspension or Closure of Podiatry Programs of Study</b> .....	<b>12</b>
<b>4. Annual Reporting Requirements</b> .....	<b>13</b>
4.1 Annual Reports .....	13
<b>5. Management of Appeals and Complaints</b> .....	<b>14</b>

# 1. Accreditation

## 1.1 Introduction

The title “podiatrist” is protected under the *Health Practitioner Regulation National Law Act* as in force in each Australian state and territory (National Law). To practice as a podiatrist and use the title “podiatrist” in Australia, a person must be registered with the Podiatry Board of Australia (“Board”). In New Zealand, under the *Health Practitioners Competence Assurance Act 2003*, a “podiatrist” means a health practitioner who is, or is deemed to be, registered with the Podiatrists Board of New Zealand as a practitioner of the profession of podiatry.

In Australasia, only graduates of an approved program of study are eligible for general registration. The Australian and New Zealand Podiatry Accreditation Council (ANZPAC) prior to the Board determining it as an approved program of study that meets the qualification required for general registration must accredit a program of study leading to a podiatry qualification, and the education provider that provides that program of study.

It is the responsibility of an education provider to inform potential and current students of the current accreditation status of the program and how it may impact on the ability of graduates of the program to qualify for registration to practise as a podiatrist in Australia. The Board maintains the list of approved programs of study (available from <http://www.podiatryboard.gov.au/Accreditation.aspx>)

## 1.2 Accreditation Standards

The accreditation standards (available from <http://www.anzpac.org.au/accreditation.html>) are developed by ANZPAC and approved by the Board and the Podiatrists Board of New Zealand. The accreditation standards are reviewed every five years and were most recently reviewed in May 2015.

Each overarching accreditation standard has sub-areas or **specific accreditation standards** within it. Each specific accreditation standard (the left hand column of the standards table) corresponds with **accreditation criteria** (the middle column in the standards table) or outcome statements that demonstrate achievement of that accreditation standard. Each accreditation criterion must be met.

The final column (ie far right) contains **possible examples of evidence** that could be produced or requested to demonstrate that one or more accreditation criteria are met. These possible examples of evidence are not exhaustive or prescriptive, but serve as a guide to the types of evidence that may be gathered by the education provider to present to the accreditation assessment team that the accreditation standards have been met.

Any changes to the accreditation standards will be conducted in accordance with the AHPRA document *Procedures for development of accreditation standards*.

### **1.3 Accreditation Outcomes**

Under the National Law, an accreditation authority for a health profession may accredit a program of study if, after assessing the program, the authority is reasonably satisfied that:

- The program of study, and the education provider that provides the program of study, meets an approved accreditation standard for the profession, **OR**
- The program of study, and the education provider that provides the program of study, substantially meets an approved accreditation standard for the profession and the imposition of conditions on the approval will ensure the program meets the standard within a reasonable time.

In the case of a *new* program applying for accreditation, the outcome of accreditation may be:

- Accreditation with conditions; **OR**
- Not accredited/accreditation refused

In the case of an *existing* program of study applying for re-accreditation, the outcome of accreditation may be:

- Accreditation; **OR**
- Accreditation with conditions; **OR**
- Not accredited/accreditation refused; **OR**
- Accreditation revoked.

#### **Accreditation**

Where each specific accreditation standard has been met

#### **Accreditation with conditions**

Where each specific accreditation standard has not been met, an assessment will be made against the following questions:

- Has the standard been substantially met (noting that a definition of substantially does not currently exist under the National Law)?
- By imposition of a condition/s, can evidence to demonstrate compliance with the specific accreditation standard be produced in a reasonable time?
- Can the program of study deliver graduates with the knowledge, skills and professional attributes essential for an accredited program not having satisfied that specific accreditation standard?

#### **Not accredited/accreditation refused**

A program will be not be accredited where the application for accreditation of a new program does not supply sufficient evidence to satisfy ANZPAC that the specific accreditation standards have been met

## ***Accreditation revoked***

The accreditation of an existing program of study may be revoked when the program:

- Fails to meet a condition in the prescribed time frame; **AND/OR**
- Fails to provide ongoing evidence that specific accreditation standards continue to be met or substantially met

**Table 1      Summary of accreditation outcomes**

<b>Application</b>	<b>Accreditation Outcome</b>
New Program	<ul style="list-style-type: none"><li>• Accreditation with conditions</li><li>• Not accredited/accreditation refused</li></ul>
Report on Accreditation Conditions	<ul style="list-style-type: none"><li>• Accreditation – <i>condition(s) met, and removed</i></li><li>• Accreditation with conditions – <i>successful progress that one or more of the conditions imposed has been met</i></li><li>• Accreditation revoked</li></ul>
Annual Report	<ul style="list-style-type: none"><li>• Accreditation – <i>standards continue to be met</i></li><li>• Accreditation with conditions – <i>standards substantially met, condition/s imposed</i></li><li>• Major change identified – <i>trigger re-accreditation application</i></li></ul>
Re-accreditation (of an existing program of study)	<ul style="list-style-type: none"><li>• Accreditation</li><li>• Accreditation with conditions/s</li><li>• Accreditation revoked</li></ul>

## **1.4 Accreditation Process**

The purpose of accreditation is to assure the quality of education and training in podiatry, so the community and the profession can be confident Australian and New Zealand podiatry graduates have the appropriate knowledge, skills, professional attributes and experience for independent practice. Regular monitoring and review of each program against the accreditation standards seeks to promote continuous quality improvement. ANZPAC aims to have rigorous, fair, consistent, and transparent processes for accrediting programs of study and their education providers.

### ***New program of study***

The application for accreditation of a new program should commence twenty-four months prior to the enrolment of students with the lodgment of a Self Evaluation Report (SER). Ideally, successful progress through the accreditation pathway will result in a decision of “Accreditation with Conditions” six (6) months prior to the commencement of the program to enroll students.

Accreditation of a new program of study will always have conditions in place, as the program will only be able to substantially meet the specific accreditation standards on commencement. The required evidence to meet the specific accreditation standards can only be provided through demonstration of outcomes as students’ progress through the program, and completed evaluations have been reported.

### ***Existing program of study***

A program of study will be accredited without conditions when all of the accreditation standards have been met.

Six months prior to the expiration of the approved program of study period, the education provider will be required to submit an application for re-accreditation in the form of a SER.

This is a comprehensive application for accreditation. The education provider is expected to demonstrate the program meets all of the specific accreditation standards. Commentary of how the accreditation criteria have progressed/changed during the accreditation period should be included in demonstrating that the specific accreditation standards have been met.

The processing and outcome of this application must be provided by ANZPAC to the Board no later than one month prior to the expiration of the approved program of study period.

The period of accreditation for which a program can successfully gain accreditation will usually be five years. This period may be less, if there is evidence that a major change, or circumstances that impact on the accreditation decision exist. The period of accreditation may also be altered by the outcome of annual report monitoring during the accreditation period.

**Table 2 Summary of Accreditation Process**

Activity	Responsibility	Timeline
Initial assessment for new programs or existing programs of study - In accordance with <i>Accreditation Status of Australian and New Zealand Programs of Study</i>	Education Provider/ANZPAC	24 months prior
Documentation negotiation for accreditation - ANZPAC advises education provider of documentation required - Negotiation occurs regarding timelines, site visit dates	Education Provider/ANZPAC	18 months prior
Self Evaluation Report (SER) completion - Provides comprehensive self-evaluation of how the course meets accreditation standards	Education Provider	12 months prior
Assessment Team Appointment/Review of SER - Assessment team appointment - Notification to education provider - Conflict of interest notification opportunity (if needed by education provider) - Assessment team reviews SER - As required, education provider asked to provide additional information with sufficient time allowed for the education provider to provide this information back to the team (generally 2 – 4 weeks) - Initial site visit (if required to confirm or provide additional information regarding facilities and other aspects and providing opportunity for response to SER) - Initial report recommendations: <ul style="list-style-type: none"> <li>o Satisfactory report: proceed to formal site visit</li> <li>o Unsatisfactory report: SER format aspects/additional information required</li> <li>o Unsatisfactory content: Education provider not ready for formal inspection, deficiencies outlined and recommendations made</li> </ul>	Accreditation Committee/Assessment Team	12 months prior
Formal Site Visit and Reporting - Assessment team spends 1-3 days on campus studying all aspects of the program including: - Facilities inspection, staff/management interviews, financial/corporate records, student credentials/grading/promotion/graduation records - Assessment team may offer suggestions for improvement - Exit interview with education provider/Head of Program regarding initial findings - First draft report to be provided within 2 months of site visit	Assessment Team	6 - 12 months prior

Activity	Responsibility	Timeline
Formal Site Visit and Reporting (continued) <ul style="list-style-type: none"> <li>- Education provider/Head of Program receives report and forwards amended version (corrected for factual errors) to Assessment Team leader</li> <li>- Assessment Team completes report and indicates recommendations and reasons</li> </ul>		
Report Finalisation and Recommendations <ul style="list-style-type: none"> <li>- Assessment team report distributed to Accreditation Committee</li> <li>- Accreditation Committee finalises report and makes a recommendation to ANZPAC Board of Directors</li> <li>- Report sent to education provider seeking review and written response</li> <li>- Education provider provides response to ANZPAC</li> </ul>	Accreditation Committee	6 months prior
Outcome of Accreditation <ul style="list-style-type: none"> <li>- Accreditation determined according to options available</li> </ul>	Accreditation Committee/Board of Directors	3 months prior
Notification of Outcome <ul style="list-style-type: none"> <li>- Determination of accreditation notified to education provider, Podiatry Board of Australia and Podiatrists Board of New Zealand (where relevant)</li> <li>- Review available in accordance with Appeals Policy</li> </ul>	ANZPAC	No later than 1 month prior
Ongoing Monitoring <ul style="list-style-type: none"> <li>- Annual report on each program of study</li> </ul>	ANZPAC	Annually

## **2. Accreditation Procedures**

### **2.1 Application for Accreditation**

Applications for accreditation must be submitted using the *Provider Guidelines for Completion of the Self-Evaluation Report* and include appendices and attachments as indicated. These are available for download from <http://www.anzpac.org.au/publications.html>

On receipt, the SER will be reviewed by the Executive Officer in the first instance to ensure that information required in the application has been provided and appendices listed in the application have also been provided.

Where the required information has been supplied, the Executive Officer will distribute copies of the SER to the appointed Accreditation Assessment Team for independent assessment. Where a SER is assessed as incomplete, the Executive Officer will notify the education provider that the application is incomplete and provide them with an opportunity to re-submit the application once again under the same accreditation application fee.

### **2.2 Assessment of Application**

Each Accreditation Assessment Team member (“member”) independently reviews the application. Members review the scope, depth, and quality of the evidence provided by the education provider to determine whether the specific accreditation standards have been met. A site visit may be conducted as part of the accreditation process. The purpose of a site visit may include:

- Evaluation of aspects of the resources and the program that are not able to be assessed adequately from the written application, for example, physical spaces, resources and equipment
- Conducting interviews with a sample of clinical providers in relation to the provision of clinical education, facilities and capacity
- Conducting interviews with senior Education Provider and academic unit staff in relation to assessment of resourcing
- Conducting interviews with students and/or graduates for the purpose of determining satisfaction with the educational program
- Addressing other matters as identified by the assessment team

Following the site visit, the Accreditation Assessment Team Leader (“team leader”) will collate responses from each member and prepare a final report.

Prior to submission to the Accreditation Committee, the draft final report will be forwarded to the education provider for identification of any omissions or errors of fact pertaining to evidence previously provided. No comment on any of the recommendations or any new evidence will be considered by the Accreditation Committee at this stage.

The education provider has 14 days from the date of the report is forwarded to submit any such amendments. Any omissions or error of fact should be notified in writing to the Executive

Officer, with specific reference to the page number, paragraph and line (track changes acceptable). At the expiration of the 14 days, the report, and any omissions or errors of fact received, will be returned to the team leader for evaluation.

On acceptance of the report, the team leader will submit the final report to the Accreditation Committee who will meet to determine the accreditation outcome. The Accreditation Committee may seek additional information from the accreditation assessment team or the education provider in the decision making process.

The Accreditation Committee will recommend to the ANZPAC Board of Directors an accreditation decision. Once the ANZPAC Board of Directors has made this decision, written notification of the outcome will be provided to the education provider, the Board and the Podiatrists Board of New Zealand (as appropriate). Where conditions have been placed on the accreditation of a program, the specific condition and the reporting time frame will be documented in the decision letter. A copy of the Final Report will accompany the letter. The Board will then either approve or not approve the program of study for the purpose of registration.

### **2.3 Multiple Campus Applications**

Each campus requires separate assessment and reporting, to clearly identify the ability of each campus to produce outcomes that meet the accreditation standards. The need for separate applications does not preclude the recognition across campuses of specific accreditation standards and accreditation criteria that are usually in common, for example, indicative curriculum. Such protocol does not preclude an accreditation assessment team from imposing a condition/s for any campus to enable assessment against the accreditation standards.

### **2.4 Major Change**

ANZPAC requires an education provider to lodge in writing notification of changes to an accredited program of study. ANZPAC defines a major change as:

*“Substantive matters that will affect the policy or practices of an education provider and that could impact upon the delivery of a program of study, including modification, alteration, addition, amendment, substitution or deletion of any aspect of the program or education provider, that causes the changes to the substance, structure, form, delivery or outcomes of the program such that students are completing a program of study that is different to the program that was accredited.”*

ANZPAC should be consulted if there is doubt as to whether a proposed change may constitute a major change. Education providers contemplating such changes are ideally required to consult ANZPAC at least 12 months prior to any changes being introduced noting that this may not always be possible. ANZPAC must also be kept informed of significant steps in the change process. Failure to do so may result in insufficient time for ANZPAC to assess the program changes resulting in a change of accreditation status.

Changes to an accredited program considered to be a major change are detailed in Table 3.

**Table 3: Modifications considered a major program change**

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- Merger with another entity
  - Contracting with another body to deliver a significant proportion of a course or services
  - Significant organisational changes such as those which have a major impact on governance, quality assurance and staffing (such as restructuring of academic governance arrangements, or changes involving senior academic or administrative staff)
  - A decline in financial position
  - Changes to delivery location by moving to a new site, adding an additional site (including any offshore sites) or withdrawing from an existing site
  - Changes to the mode of delivery of a course, such as from face-to-face to distance education or online
  - Increase or decrease in duration of a program
  - Changes to course entry requirements
  - A substantive change in enrolments numbers
  - Changes to learning outcomes for a course, or core subjects within the course
  - Changes to core subjects within a course
  - Changes to course structure, such as to the proportion of core to elective subjects
  - Changes to elective subjects, including addition, substitution or deletion of subjects in a course, where such changes affect more than 25% of the total number of subjects in the course, measured over the duration of the course accreditation period
  - Change to the composition of staffing such as substitution of full time staff by sessional staff, or change in academic level of teaching staff
  - Major alterations to teaching premises
  - A reduction or increase in student contact hours in a course
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### **3. Suspension or Closure of Podiatry Programs of Study**

In the event that an education provider decides to suspend or cease provision of education leading to the award of a recognised qualification in podiatry, the education provider should advise ANZPAC as soon as practicable of the decision. Arrangements will need to be agreed for monitoring the provision of the accredited course to remaining cohorts of students.

## **4. Annual Reporting Requirements**

### **4.1 Annual Reports**

Under section 50 of the National Law, ANZPAC is required to monitor programs of study to ensure that they continue to satisfy the program and that the education provider meets the approved accreditation standards.

All programs of study, whether accredited with or without conditions, must submit an annual report to ANZPAC in the prescribed format (available for download from <http://www.anzpac.org.au/publications.html>). Programs that have been accredited with conditions must report annually on progress towards meeting the requirements of the condition/s. In the case of an education provider conducting a new program, the annual report must provide detailed comments on the final arrangements in the later years of the program including the success of the first year of the program and details of the preparation for the final years of the program.

#### ***Procedures following consideration of annual reports***

The Accreditation Committee that reports to the ANZPAC Board of Directors considers the annual reports. If the Accreditation Committee considers any reported changes in a program or any reduction in the resources available to the school are likely to have a significant effect on the standards, or if it considers that an education provider's progress in meeting any conditions of its accreditation to be unsatisfactory, it will inform the education provider of its concerns and the grounds on which they are based and request a site visit.

If the site visit report is favourable, ANZPAC may confirm the accreditation of the program for a specified period subject to satisfactory annual reports. If the report is unfavourable, ANZPAC may:

- Place conditions on the accreditation status granted and/or restrict the period of accreditation
- Revoke accreditation for the program if it considers that the education provider is unable to deliver the program at a standard or in a manner compatible with the standards.

## **5. Management of Appeals and Complaints**

ANZPAC is required by section 48(4) of the National Law to have a process for managing appeals.

ANZPAC's policy on the management of appeals and complaints is included as Appendix 1.

<b>Manual:</b>	<b>Policies and Procedures</b>	<b>Issue Date:</b>	<b>Nov 2014</b>
<b>Section:</b>	<b>Accreditation</b>	<b>Review Date:</b>	<b>Nov 2016</b>
<b>Subject:</b>	<b>MANAGEMENT OF APPEALS &amp; COMPLAINTS</b>	<b>Version No:</b>	<b>2.0</b>

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## Introduction

1. Under the *Health Practitioner Regulation National Law Act 2009* (the National Law) if the Australian and New Zealand Podiatry Accreditation Council (ANZPAC) decides to refuse to accredit a program of study it must give written notice of the decision to the education provider that provides the program. The notice will state the reasons for the decision and that, within 30 days after receiving the notice, the education provider may apply to ANZPAC for an internal review of the decision. The notice must also state how the education provider may apply for an internal review.
2. The policy also applies where there is an unresolved disagreement between ANZPAC and an education provider regarding an accreditation decision made by ANZPAC. ANZPAC will not accept appeals considered to be frivolous or vexatious.

## Appeals Process (Education Providers)

3. ANZPAC has in place a process of independent review of accreditation decisions. There are two types of review – a review of process or a review of decision.
4. An application for review of process would be lodged if an education provider believed there was evidence that the manner in which the accreditation process was conducted was procedurally unfair. The review of process is limited to review of the procedures related to the accreditation process of the program of study and may include consideration of matters such as the sequence and timing of the accreditation process, the process of review and evaluation of documentation and the conduct of the site visit. Again, education providers are encouraged to discuss any queries or concerns at this stage with the Executive Officer and/or the Chairperson of the Accreditation Committee.
5. An application for review of decision would be lodged if an education provider believed there was evidence that the decision of the ANZPAC Board of Directors was unjustified or patently unreasonable in the circumstances. The onus is on the education provider to prove that the decision was not supported by substantial evidence on the record or that the decision was made on capricious or arbitrary grounds and not the application of objective standards.
6. An application for review must be lodged within 30 days from the date of the letter advising the program of study of the decision made by the ANZPAC Board of Directors. The application must set out the precise grounds for the request and include the necessary evidence.
7. Upon receipt of an application, a Review Panel will be set up by the ANZPAC Accreditation Committee and agreed by the education provider. It must include at least two senior academics from an ANZPAC accredited podiatry program of study (one of whom must have demonstrated working knowledge of the ANZPAC accreditation process) and one person with experience in the practice of podiatry.
8. The members of the Review Panel must not have been involved in the accreditation of the program that is the subject of the review. Each member will be asked to sign a non-disclosure agreement applicable to all outside of the review process.

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9. The Review Panel will review the education provider's submission, relevant reports and documentation. It will have the discretion to interview staff, students and other relevant people, and to inspect facilities where it concludes that such actions are necessary for it to make an informed judgement.
10. A report prepared by the Review Panel will be forwarded to both the education provider and ANZPAC. The education provider will be given the opportunity to respond to any issues raised in the report before ANZPAC makes a final decision on the program accreditation status and/or conditions. This final decision will be made within 90 days of the appointment of the Review Panel. The decision of Review Panel is final.
11. The education provider concerned prior to the establishment of the Review Panel must meet the cost of the review. Please refer to the Fee Schedule shown on the ANZPAC website [www.anzpac.org.au](http://www.anzpac.org.au)

### **Complaints (Individuals)**

12. The functions of ANZPAC do not include a role in investigating the complaints of individual students, staff or trainees. Education providers accredited by ANZPAC are expected to have processes for addressing grievances, complaints and appeals.

Date approved: Board of Directors – 21 November 2014