

Bronwyn Clark Submission to ADC Draft Accreditation Standards Consultation

Respondent details	
Name:	Bronwyn Clark
Organisation:	The Australian Pharmacy Council (APC)
Role/capacity:	CEO
Location:	Metro
Do you identify as Aboriginal and/or Torres Strait Islander?	No
Response to consultation questions	
Do you consider that the draft Standards are at the threshold level to deliver competent graduates who are safe to practise?	Yes
(Yes, Somewhat, No, Unsure)	
Additional comments:	
Do you agree with the specific proposals as incorporated in the draft Standards?	Yes
(Yes, Somewhat, No, Unsure)	
Additional comments:	APC notes the clear rationale for changes provided in the draft standards document to support understanding. The additional criterion relating to evolving developments and potential risks in educational assessment as a result of rapid technological advancements (new Criterion 5.2) is seen as an important inclusion. Proposed changes to improve readability and flow of the overall document are also supported.
Are there any additional Standards or Criteria that should be added?	No
(Yes, No, Unsure)	

Additional comments:

Are there any Standards or Criteria that should be deleted or reworded?

Yes

(Yes, No, Unsure)

Additional comments related to your response, and clearly reference the specific criteria you are referring to for refinement.

Regarding specific proposals incorporated in the draft Standards, please consider our comments below:

- Criterion 1.6 in the draft standards
Patients consent to care by students

APC suggests that the councils review the current wording of this criterion as it seems unfinished. Please clarify that this refers to patients providing informed consent to care delivered by students during the period of practice or placement.

Do you have any other questions or comments on the Standards?

Thank you for the opportunity to provide feedback on the proposed changes to the Australian Dental Council (ADC) and Dental Council (New Zealand) (DC(NZ)) Accreditation Standards for dental practitioner programs.

APC has reviewed the proposed draft Standards and agrees that it meets the threshold level required for public safety and appear to be applicable across all dental education programs delivering accredited programs.

We note that the Councils have adopted the use of 'cultural responsiveness' as distinct from cultural safety because it enables assessment of practitioner's behaviours whereas cultural safety can only be determined by those receiving the care. We support this move and are aligned with this approach as it emphasises cultural responsiveness, strengthens clarity, accountability, and accessibility within the standards.

We look forward to further developments with the Standards.