

## Concerns about accredited programs policy

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#### Document Version Control

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## Concerns about accredited programs policy

### 1. Introduction

- 1.1. This document sets out the Australian Dental Council (ADC) policy for considering concerns about accredited programs.
- 1.2. The ADC welcomes concerns about accredited programs as one source of information which can help ensure that programs continue to meet the ADC/Dental Council (New Zealand) (DC(NZ)) Accreditation Standards for Dental Practitioner Programs.
- 1.3. This policy has been developed in line with 'Management of complaints relating to accreditation functions under the National Law – a guidance document' (AHPRA/HPACF 2015; referred to in this policy as the 'Management of complaints guidance').
- 1.4. Complaints about the ADC are addressed separately in the ADC 'Complaints policy'.

### 2. Definition of a concern

- 2.1. For the purpose of this policy, the ADC will investigate concerns about an ADC accredited program which meets the definition of a 'systemic complaint' in the Management of complaints guidance:  

'A systemic complaint [is information] which may evidence some systemic matter that could signify a failure of a program or provider to meet accreditation standards.'
- 2.2. The ADC will not consider 'personal complaints':  

'A personal complaint [is where] the complainant seeks to have a matter investigated and addressed so as to bring about a change to their personal situation. This could include, for example, matters such as selection, recognition of prior learning/experience, training post allocation, assessment outcomes or dismissal from training.'
- 2.3. The ADC 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 ADC is committed to handling concerns about programs in a proportionate and transparent manner that ensures fairness to both complainants and education providers.
- 3.2. The ADC will follow this process when a concern is received.

#### Acknowledgement

- Concerns will normally be made in writing. All concerns will be recorded. The ADC will acknowledge receipt of the concern and provide information about the process that will be followed.
- Where a complainant is unable to put their complaint in writing because of a disability, the ADC will put in place any reasonable adjustments.

## Assessment

- The concern will be assessed by the Chief Executive Officer (CEO) and Director, Accreditation and Quality Assurance 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 Standards. 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 complaint', 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 Standards, the ADC 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.

## Investigation

- If it is determined that there may be issues which bring into doubt whether the program concerned meets the Accreditation Standards, the CEO and Director, Accreditation and Quality Assurance will determine the scope of the subsequent investigation required. The ADC 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 regulators of education providers.
- The ADC will contact the education provider to discuss the concerns that have been raised. The education provider will be provided with a copy of / information about the concern raised and invited to send written comments in response.

## Consideration by Accreditation Committee

- 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 ADC/DC(NZ) Accreditation Committee. There are three possible outcomes:
  - **No action.** The Accreditation Committee is satisfied that no further action is required to ensure the Accreditation Standards are met. This will be an appropriate outcome where the investigation has not substantiated the concerns raised; the Committee concludes that the issues raised do not affect compliance with the Accreditation Standards; 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 Standards continue 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 as a result 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 Standards and determines that a targeted review by an ADC Site Evaluation Team (SET) is required. A targeted

review would focus on the standard or standards 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.

### Concerns received before a site visit

- If the concern relates to a program for which a site visit is shortly due to take place, it may be appropriate (subject to the steps outlined in assessment and acknowledgement above) for that concern to be shared with the Site Evaluation Team (SET) reviewing the program. This means the concern would be considered alongside other evidence gathered at the visit to inform the SET's assessment of the program against the Accreditation Standards.
- If the CEO and Director, Accreditation and Quality Assurance consider this to be an appropriate course of action, the complainant will be notified of the intention to handle their concern in this way. If the concern is handled in this way, the education provider will also be sent a copy of / information about the concern and invited to submit any further information in response. The complainant will be sent a copy of the published report of the site visit.

## 4. Anonymous concerns

- 4.1. There may be occasions when the ADC receives concerns about a program which are made anonymously.
- 4.2. The ADC will be limited in the action it can take in relation to information which is received anonymously as this limits the further investigation that is possible.
- 4.3. The ADC 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.
- 4.4. However, 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. Timeliness and prioritisation

- 5.1. The ADC aims to:
  - acknowledge all concerns within five working days of receipt; and
  - keep complainants informed about likely timescales and updated at regular intervals about the progress of any investigation.
- 5.2. 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 Director, Accreditation and Quality Assurance may decide to expedite the investigation and, with the agreement of the Chair, Accreditation Committee (or another Committee member if appropriate), escalate the matter to an out-of-session meeting of the Accreditation Committee.
- 5.3. The timescales for any targeted review required will also be influenced by the Accreditation Committee's assessment of the potential risk.

## 6. Notification to the Dental Board of Australia (DBA)

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

## 7. References

Australian Health Practitioner Regulation Agency (AHPRA) and Health Professions Accreditation Collaborative Forum (HPACF) (2015). Management of complaints relating to accreditation functions under the National Law – a guidance document.

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