



## Appeals, Complaints and Non-Conformance Policy

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### 1. Universities

#### Appeal Process

A University may seek independent review of recommendations and decisions concerning accreditation of pharmacy school at two stages:

- within one month of receipt by the Head of School of a draft SET report; or
- within one month of receipt by the Vice-Chancellor and Head of School of a letter of notification of failure to grant accreditation.

A Review Committee will be set up by the Australian Pharmacy Council (APC) Accreditation Committee and agreed by the University. It must include at least one head of an accredited school of pharmacy, one senior academic of another accredited school of pharmacy and one other person from another profession with experience in accreditation.

The Review Committee will review the submission, relevant reports and documentation. It will have 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 judgment.

The costs of review must be met by the University concerned. A report prepared by the Review Committee will be forwarded to both the University and the APC. The University will be given the opportunity to respond to any issues raised in the report, before APC makes a final decision on accreditation status.

All members of the Review Committee will not have been involved in the original assessment of the pharmacy program.

#### Management of a school or program that loses accreditation

Should schools fail to continue to comply with the APC Accreditation Standards (within an agreed period and/or following independent review) the APC will commence proceedings to discontinue accreditation. The school, faculty and Vice-Chancellor, Pharmacy Board of Australia and professional pharmacy groups will be notified that the school no longer meets APC Standards and therefore is no longer accredited.

The school must then undertake the following process for students currently enrolled:

- Make arrangements with another university to transfer students into an accredited program
- Ensure that the alternative university is able to satisfy the APC that it has adequate resources, sufficient academic staff and clinical placements to incorporate the extra students
- Students would graduate under the banner of the alternative accredited University and be eligible for provisional registration under the Pharmacy Board of Australia.

#### Complaints Process

The APC may receive complaints from the public or other stakeholders with regards to accredited pharmacy schools. A process for lodging complaints and the mechanisms to address and respond to complaints follows.

- Only complaints in writing will be considered by the APC
- Complaints should be addressed to the CEO 'in confidence'
- Only complaints pertaining to accreditation matters will be considered

- Complaints of a personal nature are not within the purview of the APC and would not be considered
- The accreditation matter(s) outlined in the complaint will be discussed between the CEO, Accreditation Manager, Chair of the Accreditation Committee, and the relevant body or persons to agree a course of action
- Should the course of action resolve the matter, or find the complaints unsustainable, the matter will be deemed resolved and all parties to the complaint notified

If following the course of action the complaint is sustained the school will be provided with an opportunity to respond to allegations. Should an unsatisfactory response ensue from the school further action may be implemented until such time that APC is satisfied that all allegations have been addressed. This may include imposing conditional accreditation requirements on the school.

## **2. Intern Training Programs Appeal Process**

An Intern Training Program (ITP) provider may seek independent review of recommendations and decisions concerning accreditation of the ITP within one month of receipt of a letter of notification of failure to grant accreditation.

A Review Committee will be set up by the APC Accreditation Committee and agreed by the ITP provider. It must include at least two pharmacists who between them have experience with education and accreditation issues, and one other person from another profession with experience in accreditation and adult learning.

The Review Committee will review the submission, relevant reports and documentation. It will have discretion to interview the ITP provider and to inspect facilities where it concludes that such actions are necessary for it to make an informed judgment.

The costs of review must be met by the ITP provider concerned. A report prepared by the Review Committee will be forwarded to both the ITP provider and the APC. The ITP provider will be given the opportunity to respond to any issues raised in the report, before APC makes a final decision on accreditation status.

All members of the Review Committee will not have been involved in the original assessment of the ITP program.

### **Management of an ITP that loses accreditation**

Should an ITP provider fail to continue to meet the APC *Accreditation Standards for Australian ITPs 2010* (within an agreed period and/or following independent review) the APC will commence proceedings to discontinue accreditation. The Pharmacy Board of Australia, graduating students and professional pharmacy groups will be notified that the ITP no longer meets APC Standards and therefore is no longer accredited.

The ITP must then undertake the following process for interns currently enrolled:

- Make arrangements with another ITP to transfer interns into an accredited program
- Ensure that the alternative ITP is able to satisfy the APC that it has adequate resources and sufficient staff to incorporate the extra interns
- Interns would graduate under the banner of the alternative ITP and, if they have met all other Pharmacy Board of Australia requirements, be eligible full registration.

### **Complaints Process**

The APC may receive complaints from interns and stakeholders with regards to accredited ITP. A process for lodging complaints and the mechanisms to address and respond to complaints follows.

- Only complaints in writing will be considered by the APC
- Complaints should be addressed to the CEO 'in confidence'
- Only complaints pertaining to accreditation matters will be considered
- Complaints of a personal nature are not within the purview of the APC and would not be considered
- The accreditation matter(s) outlined in the complaint will be discussed between the CEO, Accreditation and Policy Coordinator, Chair of the Accreditation Committee, and the relevant body or person(s) to agree a course of action
- Should the course of action resolve the matter, or find the complaints unsustainable, the matter will be deemed resolved and all parties to the complaint notified

If following the course of action the complaint is sustained the ITP provider will be given an opportunity to respond to allegations. Should an unsatisfactory response ensue further action may be implemented until such time that APC is satisfied that all allegations have been addressed. This may include imposing conditional accreditation requirements on the ITP provider.

### **3. Continuing Professional Development - Authorisation Process**

Authorisation to accredit providers of Continuing Professional Development (CPD) may be withheld where an applicant organisation:

- has failed to demonstrate robust processes against the criteria;
- has failed to comply with requests for additional information, or satisfactorily address conditions which the APC has placed upon the granting of authorisation; or
- has no capacity to take the necessary remedial action.

In such cases the APC will advise the executive of the organisation in writing drawing his/her attention to the APC's concerns and the organisation's option to request a review of the process leading to the decision (see below). The APC will seek discussions with a view to agreeing a plan of action for addressing deficiencies within a reasonable period.

Notwithstanding the above, the APC may revoke or deny authorisation in the event of the APC being dissatisfied regarding the organisations commitment and capacity to remedy deficiencies within a reasonable period.

#### **Appeals Process**

An organisation may seek independent review of the process that resulted in the recommendations and decisions concerning authorisation within four weeks of receiving a letter of failure to grant authorisation. Upon being notified that the organisation is requesting a review, the APC will defer further action until the Independent Review Committee has reported.

An Independent Review Committee will be nominated by the APC and agreed by the applicant organisation. It must include three people, two of whom are external to the APC and have experience with accreditation.

Within two months of the organisation seeking a review, the Committee will review the process used by the original evaluation team to assess the submission, relevant reports and documentation. It will have discretion to interview a representative of the original evaluation team, the applicant organisation, staff and other relevant people, and to inspect processes and procedures where it concludes that such actions are necessary for it to make an informed judgment.

The applicant organisation will be required to meet the costs of a review and will be advised of the amount as soon as possible following the review request. A report prepared by the Independent Review Committee will be forwarded to both the APC and the applicant organisation. The applicant organisation will be given opportunity to respond to any issues raised in the report, before the APC makes a final decision on authorisation status.