

Concerns about accredited programs policy

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1. Purpose

This document sets out the Australian Dental Council's (ADC) policy for considering concerns about accredited programs.

2. Overview

The ADC receives concerns about accredited programs as one source of information which can help to ensure that programs continue to meet the ADC Accreditation standards for dental practitioner programs.

Section 50(1) of the *Health Practitioner Regulation National Law* (National Law) requires the ADC to monitor programs of study approved by the Dental Board to ensure that the program and the education provider continue to meet the [ADC/DC\(NZ\) Accreditation standards for dental practitioner programs](#) (2021). One of the ways that the ADC may become aware that the accreditation standards are not continuing to be met by an approved program or an education provider is through the receipt of a concern about an accredited program or the education provider.

This policy has been developed in line with the [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').

Complaints about the ADC are addressed separately in the [ADC Complaints policy](#) (2018).

3. Scope

3.1. In scope

This policy may be used by any person or entity who has a concern about an ADC accredited program. This includes, but is not limited to:

- Education provider staff members
- Students
- Clinical placement supervisors
- Patients treated by students
- Health service providers offering placement opportunities for students
- Graduates of accredited programs
- Employers of graduates
- Members of the community
- Other external parties.

The ADC will only consider and investigate concerns about an ADC accredited program which meet the definition of a systemic complaint. A systemic complaint is information that may be evidence of a systemic issue that may signify a failure of an ADC accredited program or provider to meet one or more of the [ADC/DC\(NZ\) Accreditation standards for dental practitioner programs \(Accreditation Standards\)](#) (2021).

3.2. Out of scope

The ADC will not investigate a complaint, grievance or concern relating to a personal complaint and/or a complaint about a registered dental practitioner.

3.2.1. Personal complaints

A personal complaint is where the complainant seeks to have a matter investigated and addressed 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 an education or training program, or an employment or industrial relations issue between staff and an education provider, unless this has a direct relationship to the Standards.

3.2.2. Complaints about a registered dental practitioner

Complaints about registered dental practitioners are handled by the [Australian Health Practitioner Regulation Agency \(Ahpra\)](#), [Dental Council of New South Wales](#) (for NSW practitioners), or via the Health Complaints Commissioner or ombudsman in the relevant state.

4. Guiding Principles

The concerns about accredited programs policy aims to contribute to the protection of the public through ensuring that accredited programs or education providers continue to meet the Accreditation Standards during the accreditation period.

4.1. Fair and transparent

The ADC is committed to handling concerns about ADC accredited programs in a proportionate and transparent manner that ensures fairness to both the complainant and education provider. Decisions will be founded on reliable, verified, relevant and appropriate evidence.

4.2. Timely

The ADC aims to acknowledge all concerns in a timely manner and will provide updates to all parties involved on a regular basis. For concerns that indicate a potential high risk to public safety, the ADC will provide an immediate response and escalate the matter to an out-of-session meeting of the ADC's Accreditation Committee.

5. Process

The ADC will follow this process when a concern is received:

5.1. Submitting a concern

Concerns must be made in writing and can be submitted via the following channels:

- Completing the ['raising concern'](#) form and submitting this via the ADC website
- Sending an email to accreditation@adc.org.au; or,
- Writing to the ADC at Australian Dental Council, PO Box 13278, Law Courts VIC 8010

Where a complainant is unable to put their complaint in writing because of a disability, the ADC will put in place any reasonable adjustments.

All concerns will be recorded. The ADC will acknowledge receipt of the concern and provide information about the process that will be followed.

5.2. Assessment

The concern will be assessed by the Chief Executive Officer (CEO) and Director, Accreditation, Policy and Research to consider whether the concern 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 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 policies and procedures.

5.3. Investigation

If it is determined that there may be issues which bring into doubt whether the program meets the Accreditation Standards, the CEO and Director, Accreditation, Policy and Research 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 other regulators.

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 submit a written response.

5.4. Consideration by the 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 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 puts 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 Accreditation Team (AT) 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.

5.5. Subsequent concern

If the ADC receives a subsequent concern about an existing issue, the ADC will contact the education provider to discuss the additional concern(s) raised prior to taking any other action. The education provider will be provided with a copy of / information about the subsequent concern raised and invited to submit a written response.

An investigation report comprising of the original concern, the subsequent concern and any other information gathered in the investigation, including the education provider's response, will be considered by the ADC Accreditation Committee. There are three possible outcomes, as outlined in section 5.4 of this policy.

5.6. 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 for that concern to be shared with the AT reviewing the program. This means the concern will be considered alongside other evidence gathered at the visit to inform the AT's assessment of the program against the Accreditation Standards.

If the CEO and Director, Accreditation, Policy and Research consider this to be an appropriate course of action, the complainant will be notified of the intention to handle their concern 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 writing. The complainant will be sent a copy of the published report of the site visit.

6. Anonymous Concerns

There may be occasions when the ADC receives anonymous concerns about a program. The ADC will be limited in the action and investigation it can take in relation to information which is received anonymously.

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.

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.

7. Timelines

The ADC aims to:

- acknowledge all concerns within five working days of receipt; and
- keep the complainant(s) and the education provider concerned informed about likely timescales and updated at regular intervals about the progress of any investigation.

The time it takes to investigate a concern will vary depending on the nature of the concern. Factors include, the amount and type of information required, the availability of the education provider and the meeting dates scheduled for the Accreditation Committee.

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, Policy and Research 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 ADC Accreditation Committee.

The timescales for any targeted review required will also be influenced by the ADC Accreditation Committee's assessment of the potential risk.

8. Notifications

8.1. Dental Board of Australia (DBA)

Where an initial assessment of a concern indicates a high potential risk to public safety, the DBA will be notified promptly. A high or extreme risk to the safety of the community is one that could / is reasonably likely to result in the registration of graduates from an Australian ADC accredited program who do not possess the knowledge, skills and professional competencies to practice the profession in Australia.

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.

8.2. Other regulatory organisations

Other regulatory organisations in Australia with related roles and functions to the ADC include:

- Tertiary Education Quality and Standards Agency (TEQSA) for matters relating to higher education providers.

- Australian Standards and Quality Authority (ASQA) for issues arising in the vocational education and training (VET) sector.).
- Other accreditation authorities/bodies
- Australian Commission on Safety and Quality in Healthcare

To facilitate effective resolution of concerns the ADC may refer complaints (or complainants) to these organisations where appropriate.

8.3. Reporting

The ADC may include de-identified information in its annual report, or other relevant reports, regarding the number and/or nature of concerns the ADC has received about accredited programs.

9. Roles and responsibilities

ADC Staff

All ADC employees are required to:

- Act in accordance with the ADC values
- Ensure privacy and confidentiality are maintained
- Observe the principles of natural justice and procedural fairness
- Be compliant with this policy in the performance of their duties
- Keep the education provider and complainant informed of the process as appropriate.

ADC Accreditation Committee

ADC Accreditation Committee members are required to:

- Act in accordance with the ADC values
- Ensure privacy and confidentiality are maintained
- Observe the principles of natural justice and procedural fairness
- Make decisions in line with this policy
- Determine actions to be undertaken, in line with this policy and in accordance with the National Law, as a result of their deliberations.

10. Related documents

- [How to raise a concern about an accredited program guide](#)
- [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')
- [ADC Complaints Policy](#)
- [ADC Complaints Management Framework](#)
- [Australian Dental Council/Dental Council \(New Zealand\) Accreditation standards for dental practitioner programs \(the Standards\)](#)
- [ADC Privacy Policy](#)

11. Document information

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*unless otherwise indicated, this policy will continue to apply beyond the review date