



The Australian Council of Professions

Professions Australia is a national organisation of professional associations. These associations represent more than 350,000 professionals across Australia and cover the professions in the broad areas of: the built environment; business services; human and animal health; and resources.

We exist to champion the importance of professions to the economic, social and environmental well being of Australia.

We seek to achieve a strong, collective and national voice in the interests of organisations representing professionals.

By providing: a forum for members to *interact* with peers; *information* on current issues; and *influence* we:

- communicate with, and facilitate the sharing of ideas among members for the advancement of the Professions;
- promote the interests and welfare of the Australian community through the combined influence and expertise of the Professions;
- maintain and advance the standards of the Professions consistent with the public interest;
- promote and advance ethical and responsible behaviour to foster community confidence in the integrity of the Professions;
- act as the national peak body for communicating with government on issues of concern to the Professions.

High on the list of the strategic priorities for Professions Australia is skills supply and demand. In this regard, we believe that the relationship between the members of Professions Australia and the Industry Skills Councils (ISCs) is a matter of some importance. Our members recognise that well trained par-professionals are vital for efficient operation of professionals in a number of fields. However, some of our members raise concerns about the boundaries of the roles and responsibilities of the para-professionals in their fields of professional competence.

The issues go to both the appropriateness of the competencies which some of the courses developed by the ISCs seek to impart and to the delivery of the courses.

There is scope for improved communication between the industry skills councils and the relevant professions.

We believe that the outcomes of the ISCs' efforts could be improved if some general principles as set out below were followed.

1. Any proposed training course must first be shown to be filling a demand by a commissioned scoping study to assess the current situation in the field.
 - i. A scoping study that does not demonstrate a need for appropriately trained para-professionals indicates the development of a national training program is wasteful and unnecessary.
2. The level of education and training of para-professionals.
 - i. Recognition may be given for applicants that have worked in the area of proposed study, but there needs to be acknowledgement of the academic requirements to achieve the level of competencies aimed for.
 - ii. Training methods and length of training required need to be uniform and consistent to allow portability of the learned skills between jurisdictions.
3. Determination of levels of competency.
 - i. These levels can only be determined by qualified experts in the field of study and at a higher level than the course undertaken.
 - ii. Professional input is needed to ensure the attainment of accumulated competencies is met by the level of training required.
4. Whether para-professionals are accredited, licensed and accountable.
 - i. The public needs protection by ensuring there are mechanisms in place to hold para-professionals accountable as with other professions and there is a transparent registration and deregistration pathway.
 - ii. An equivalent regulatory Board is needed to adjudicate on disputes and enforce accountability.
 - iii. For example many professions are required to be registered and are controlled by practitioners' boards. The public has assurance of training, accreditation and statutory oversight. Professionals can be investigated and disciplined in the event of incompetence or malpractice. They are required to undertake extensive continuing education.
5. The development and delivery of training programs.
 - i. Expert and professional input is required to develop the list of competencies to achieve the desired standard. Lay persons need guidance by professional experts in each area of study in the development of competencies and also in the teaching of these programs.
 - ii. Training programs need a mechanism of update and review to ensure that realistic and achievable competencies are being delivered.

- iii. There also needs to be more focus on the delivery of the training for attainment of the competencies with some recognition of the need for those delivering the practical and clinical components to the trainee to possess not only the knowledge of the technical aspects of the subject matter but also a training qualification such as a Cert IV Workplace Trainer and Assessor.
6. Arrangements for consultation with professionals to monitor standards of students completing the training packages.
- i. Wide variations in the abilities of persons who complete certification and diploma level courses must be addressed with assessment protocols.
 - ii. Lack of quality assurance across the various training providers is a risk factor.
 - iii. Schemes designed for non-professionals need to be based on training programs following consultation with industry and skilled professionals.
7. Demands for access to scheduled poisons.
- i. This involves the actions of examination and diagnosis
 - ii. Prescription of scheduled poisons is limited by law.
 - iii. A knowledge of physiology, pharmacology, anatomy and chemistry are all required for the use of scheduled poisons.
 - iv. The ability to institute emergency reversal agents or maintain body functions is beyond the scope of an unsupervised para-professional.
8. Roles and limitations on the activities of para-professionals.
- i. A blurring of the limitations and role of para-professionals can lead to poor welfare outcomes. The roles and limitations of practice by para-professionals need to be clearly defined.

Two case studies which illustrate the issues outlined above are in Attachments 1 and 2. Attachment 1 relates to Equine Dentistry and Attachment 2 relates to Audiometry. These are given just as examples. The issue of the boundaries of the roles and responsibilities of para-professionals is not limited to these professions. Some other members of Professions Australia will also making submissions.

The membership of Professions Australia is set out in Attachment 3.

Attachment 1

Equine Dentistry

The Australian Veterinary Association Ltd (AVA) is the national representative body for the veterinary profession in Australia. Membership exceeds 6000 and represents all sectors of registered veterinarians in Australia. The AVA is involved with the Industry Skills Councils in the development of the descriptions of the appropriate competencies and the training requirements for para-professionals, but has grave concerns regarding the processes employed to develop and deliver competency-based training programs that involve animals.

A case study in point is the recent development process of the Certificate IV Equine dentistry package:

Some important facts in equine dentistry:

- Equine dentistry has been performed at basic level for many years by persons trained by apprenticeship or personal experience without any formal oversight.

These persons have performed a physical task using basic tools such as rasps to remove sharp points that develop on horse teeth and in the process they may cause lacerations or other trauma.

- In recent times great advances have been made in understanding the dental needs of horses.
- There has been a surge in the use of power driven instruments to treat a greater range of abnormalities as with human dentistry.
- Such instruments can very rapidly cause life-threatening damage to the oral cavity, bones and the health of horses, and affect their ability to masticate feed.
- Horses are the only species where dental procedures can be carried out without the background of at least a broad-based undergraduate training program.

All other species (including humans) have the benefit this broad-based education for dental providers. Furthermore, all persons who seek to perform dental procedures must be registered with an appropriate statutory authority to ensure that dental practitioners are properly educated and trained, and can be held accountable for their actions.

For some reason, horses are exempt from these provisions when they are subjected to dental procedures. Currently untrained, uncertified, unexamined persons can

perform dental procedures on horses and they operate outside any direct statutory oversight. Currently they are unregistered and unregulated in all jurisdictions.

The AVA, being the peak body representing veterinarians in Australia, has been the initiator of a consultation process to develop such a course in equine dental procedures for non-veterinarians.

It represents veterinarians that perform the bulk of equine dentistry in Australia and have specialist expertise that can be called upon for informed comment. The AVA Special Interest Group Equine Veterinarians Australia (EVA) ensures that AVA members have access to ongoing training to upgrade skills of veterinarians who undertake equine dentistry.

AgriFood Skills Australia has been tasked by the Department of Education, Employment and Workplace Relations (DEEWR) to develop a proposed national training package in equine dentistry for non-veterinarians.

The AVA has been dissatisfied with the consultation and development phases of this project from the outset. It is crucial that views wider than existing non-professional practitioners and users of services be deeply involved.

The AVA has always been more than willing to contribute to this process and has participated in;

- meetings with AgriFood Skills Australia and their consultant,
- has assisted with setting up consultative meetings with interested parties, and
- has displayed a clear commitment to remain engaged in the development phase of this training package.

There are some disturbing trends in the development of this training package.

- 1) We feel that our ability to contribute to the process has been largely ignored.
- 2) Work on this proposed Certificate IV Equine dentistry course for non-veterinarians to date does not appear to take essential issues of animal welfare and consumer protection into account.
- 3) The proposed package seeks to elevate a certificate level course to equivalence of a university bachelor degree in human dentistry, or veterinary medicine.
- 4) The course seeks to circumvent established international protocols and standards of training regarding animal welfare, surgical and medical care, and use of Scheduled Poisons.

Conclusions

Our overriding concern is the welfare of horses, and the development of a world class system that promotes excellent dental practice for horses based on current scientific knowledge.

Training programs for individuals who want to be trained in these complex dental procedures are already available in the established university bachelor degree courses.

This training is well established within the veterinary degree curriculum at undergraduate and postgraduate levels, and interested individuals can take advantage of those opportunities.

On the basis of these highlighted issues, the AVA encourages AgriFood Skills Australia to re-evaluate its role in the development of a course that has yet to be demonstrated as filling a need for a vocational training package.

Such courses must fill a demonstrated gap to meet the needs of an industry. To this time there has been no demonstrated gap in the training of persons who wish to be trained in the complete suite of skills needed to practise equine dentistry. There are already seven bachelor level courses available to any person who wishes to apply for admission for study. Several hundred persons enter these courses annually and graduate after five or six years when they are eligible for registration as a veterinarian.

All nationally recognised and accredited courses must be provided by properly resourced registered training organisations.

The roles and limitations of practice for para-professionals need to be defined in addition to those currently included in Veterinary Surgeons Acts in some jurisdictions to address limits of training and competency.

Some form of accreditation / licensing must be put in place for para-professionals to ensure levels of competency, responsibility and redress by the general public.

Attachment 2 - Audiometry



Response to Industry Skills Council Review

Observations specific to Audiometry:

Having been involved in the review and redevelopment of a Cert IV qualification – HLT02 Review of Audiometry Qualifications – it became obvious that the Community Service and Health ISC saw its role as developing courses for as many pathways into health for the VET sector as it could possibly manage regardless of how this course would ultimately be delivered and by whom.

The qualification that existed at the time for audiometrists (hearing aid technicians) was a Cert IV that was delivered essentially as an on-the-job qualification with a small amount of face to face course work delivered through OTEN (NSW TAFE). Although RMIT had been accredited to deliver audiometry training it had not been delivering this for quite some time and to my knowledge still doesn't offer it.

So while working cooperatively with Macquarie University and the professional bodies that represent audiometrists (HAASA and ACAud) it became obvious that any decisions about how a future course was to be delivered, and by whom, was not a responsibility for the ISC nor was it in their brief to recommend any conditions that should be required to ensure the highest standards of clinical practice would be the eventual outcome of the acquisition of qualifications under any such course.

The problem:

- The ISC initiated and auspiced an improved Cert IV in Audiometry and a 'new' "Diploma in Hearing Device Prescription and Evaluation".
- Development of curriculum and responsibility for curriculum delivery becomes the responsibility of a Registered Training Organisation (RTO).
- To the best of our knowledge the only RTO who has taken up this Diploma is OTEN.
- OTEN does not have enough staff to adequately perform the tasks of an RTO i.e. to personally liaise regularly with the employer and trainee to ensure that the on-the-job 'training' required for this course is within the requirements and standards for a course at Diploma level.
- OTEN does not require or mandate for those in the workplace who are charged with delivering the practical and clinical components of the program to the trainee, possess at minimum a training qualification such as Cert IV Workplace Trainer and Assessor.
- OTEN does not employ enough staff engaged in the delivery of this course to perform the liaison duties and responsibilities that are required of an RTO where an on-the-job approach to course delivery is the chosen delivery mode.

Trainers deemed suitable by OTEN?

- OTEN allows audiologists who have a Qualified Practitioner (QP) designation through the Office of Hearing Services (OHS) to take on the role of trainers for the purposes of delivery of this ONJ course.
- QP audiologists provide no qualification information to OHS to allow such a conclusion to be drawn. They have achieved, at best, a Master's degree in Audiology that does not bring with it ANY exposure to training and/or assessing qualifications. They have no evidenced knowledge of even the 'principles of adult learning' other than having – hopefully – experienced them in their own qualification.
- ASA does not allow its members who hold a QP for OHS purposes to accrue any CPD credit for their role with audiometrists – unless they are suitably qualified - on the grounds that they are not capable of training as they do not hold appropriate training credentials.

Recommendation: That ISCs be responsible for ensuring the appropriateness of the **entire** process of qualification delivery to ensure quality outcomes for the trainee, the employer and the community.

Attachment 3

The member associations comprising Professions Australia are:

Australian Dental Association
CPA Australia
Pharmaceutical Society of Australia
The Pharmacy Guild of Australia
Australian Institute of Quantity Surveyors
Australasian Institute of Mining and Metallurgy
Audiological Society of Australia
Australian Veterinary Association
Australian Computer Society
Australian Marketing Institute
Institute of Chartered Accountants in Australia
National Institute of Accountants
Institute of Management Consultants
Australian Institute of Radiography
Records Management Association of Australasia
Australian Sonographers Association
Dietitians Association of Australia
Australasian College of Health Informatics
Speech Pathology Australia
Australasian Council of Security Professionals

Associate Members

The System Administrators Guild of Australia
The Institution of Surveyors NSW South Wales Inc
The Victorian Institute of Teaching
Australian Dental Council
Australian Medical Council
Australian Nursing and Midwifery Council
Australian Pharmacy Council