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B-09.05 Skills Assessment Appeal and Review

Policy

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About this policy

Terms:

Underlined terms are words that are defined in the Glossary of Terms section of this policy.

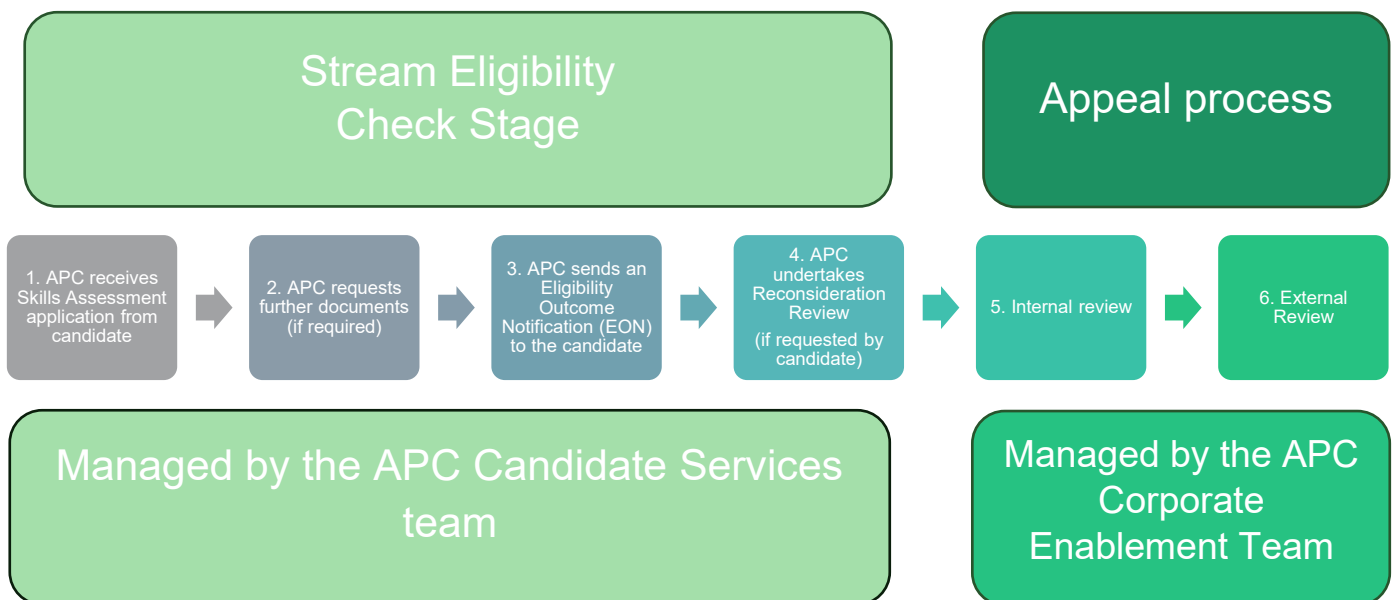
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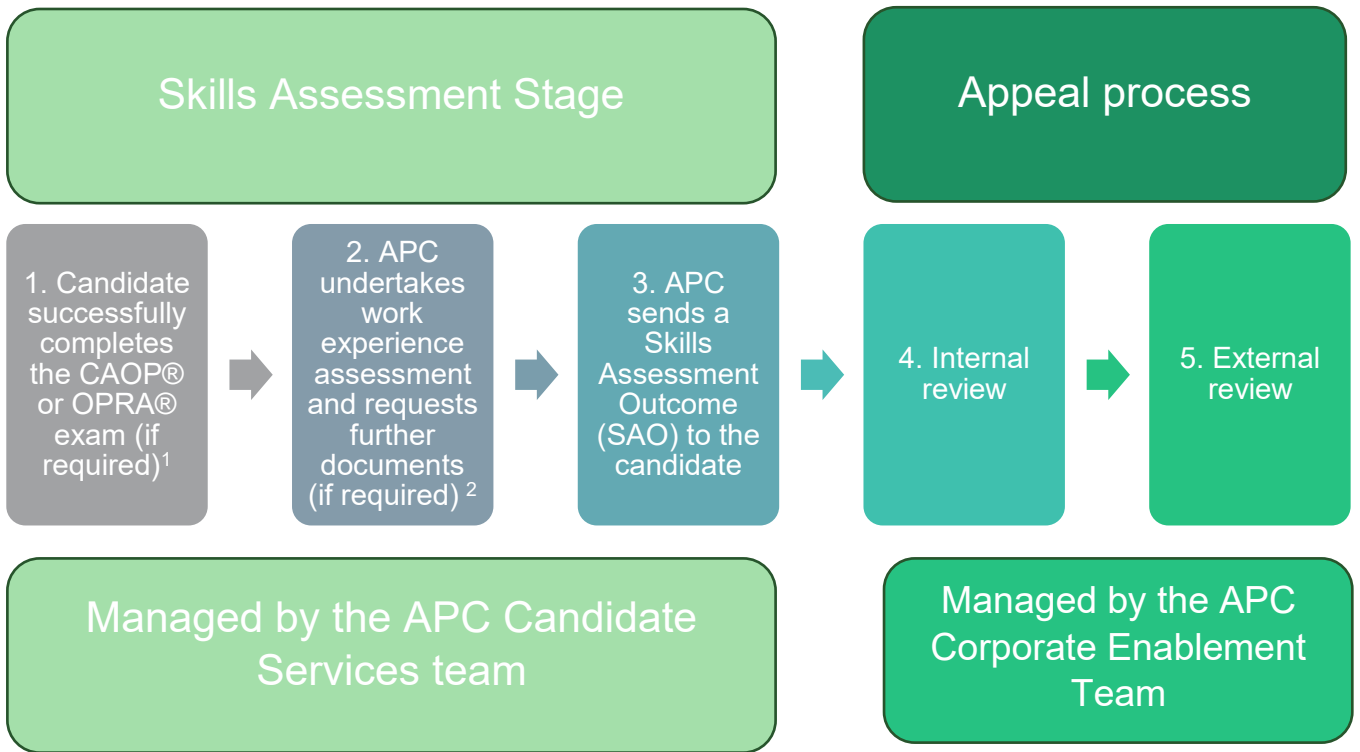
The APC Skills assessment process involves two stages:

- a) Stage 1: Stream Eligibility Check, and
- b) Stage 2: Skills Assessment

The key steps in each of these stages is summarised below.

Decisions at both stages can be appealed by candidates on eligible grounds.





¹ This step is only required for candidates in the [Competency Stream](#) and [Knowledge Stream](#).

² This step is optional and only currently applicable to candidates from the International Student Stream and NZ-Registered Pharmacist Stream who request an evaluation of work experience.

Skills Assessment Appeal and Review Policy

1. Purpose

The purpose of this policy and its appendices is to provide information about how the APC manages Skills Assessment reviews and appeals.

The APC always strives to make correct and/or preferable skills assessment decisions. The review processes described in this policy ensure that candidates can appeal decisions they believe are not correct or preferable.

2. Overview

The APC undertakes the [skills assessment](#) of overseas trained pharmacists (OTP), international graduates (IG) of [approved](#) or [substantially](#) equivalent pharmacy degree programs and NZ-registered pharmacists. The APC completes this work through delegation from the Pharmacy Board of Australia ([PharmBA](#)) and in accordance with s. 42(d) of the National Health Practitioner Regulation National Law ([the National Law](#)). The APC undertakes skills assessments for migration purposes through delegation from the [Department of Home Affairs](#) and the [Migration Regulations 1994](#).

Please note: The APC is not responsible for and does **not** determine eligibility requirements for registration as a pharmacist. The PharmBA is responsible for setting the requirements for and registering pharmacists to practise in Australia via the Australian Health Practitioner Regulation Agency (Ahpra).

The APC skills assessment process is managed by the Candidate Services Team. This team completes its work in accordance with the [DEWR Guidelines for Skilled Migration Assessing Authorities](#) and APC's [Skills Assessment Standards](#).

There are two stages in the APC skills assessment process:

- a) [Stream Eligibility check](#) (resulting in an [Eligibility Outcome Notification](#)), and
- b) [Skills assessment](#) (resulting in a [Skills Assessment Outcome](#)).

The APC has four distinct [skills assessment Streams](#). An individual's eligibility for a skills assessment Stream depends on their qualifications and/or registration status and purpose for applying.

[Candidates](#) self-assess their Stream eligibility as part of their skills assessment application to the APC via the [candidate portal](#).

There are three steps involved in APC Skills Assessment appeals:

- 1) Reconsideration Review,
- 2) Internal Review, and
- 3) External Review

3. Scope

This policy applies to any candidates who have applied for a skills assessment with the APC and:

- a) have received an Eligibility Outcome Notification, or
- b) have received a Skills Assessment Outcome, and
- c) believe they have eligible grounds for appeal.

This policy also applies to any APC staff member or external contractor involved in a skills assessment review or appeals process.

This policy does not apply to APC exams or accreditation review or appeal processes.

4. Principles

This Skills Assessment Appeal and Review policy is based on the following five principles:

Right of appeal

Candidates who have experienced genuine grounds for appeal have a right to appeal. Candidates will not be disadvantaged or penalised in any way for lodging an appeal with the APC. Vexatious or anonymous appeals will not be accepted.

Confidential

All information provided by the candidate and used to review the appeal will be treated sensitively, confidentially and in accordance with the Privacy Act 1988 and the APC's Privacy Policy.

Transparent

At all times, APC will provide candidates with clear, concise information about how to appeal, the progress of their appeal and the outcome of their appeal.

Timely

Appeals will be processed in a timely and efficient manner. The APC will seek to provide the earliest outcome possible.

Fair

Appeals will be processed consistently, impartially and after the collection of all relevant information. Appeals will be managed in the interests of natural justice and in accordance with the APC's values, policies and obligations under the National Law.

5. Eligible grounds for appeal

Candidates can lodge an appeal for an Internal or External review on one or more of the following grounds. These grounds are not exhaustive or exclusive. Candidates can appeal skill assessment decisions where the APC:

- a) Breached the principles of natural justice,
- b) Made a decision based on error(s) of fact,
- c) Made a procedural or administrative error in assessing the candidate,
- d) Made an improper decision outside of its delegation,
- e) Incorrectly applied the relevant standards or evidence in making its decision,
- f) Failed to consider relevant evidence available at the time of the decision,
- g) Did not appropriately manage conflict of interest during the decision-making process,
- h) Failed to provide sufficient evidence to support its decision, or
- i) Made an illegal decision.

The following are **not** eligible grounds for appeal under this policy:

- The content or purpose of the [APC's Skills Assessment Standards](#)
- The [evidence required by the APC](#) to support skills assessment applications
- Requirements, policies, processes or decisions made by the [Department of Home Affairs](#) regarding migration or visas
- Requirements, policies, processes or decisions made by the [Pharmacy Board of Australia](#) regarding registration as a pharmacist in Australia

6. Process

There are up to three steps for appealing skills assessment decision. For a summary diagram of the whole appeal process, please see Appendix 1.

6.1. Step 1: Reconsideration Review (Stream Eligibility Outcome decisions only)

If a candidate receives an Eligibility Outcome Notification, they believe is incorrect, they can request a Reconsideration Review via email to the Candidate Services Team. Candidates do not need to provide grounds for a Reconsideration Review.

Reconsideration Reviews are early, informal reviews of a Stream eligibility decision that provide the candidate with the fastest process for a resolution. Candidates do not need to apply for Reconsideration Reviews if they do not wish to – they can instead apply directly for an Internal Review.

A Reconsideration Review involves the original APC decision makers re-evaluating all documentation and correspondence provided by the candidate in support of their skills assessment application.

The Reconsideration Review will involve the APC:

- a) Confirming the information used to reach the decision, and
- b) Considering any new information provided by the candidate.

The individual(s) undertaking the Reconsideration Review will be the same individual(s) who made the original decision. They may request any further documentation from the candidate

to inform their decision making. They may also consult other experts or specialists if appropriate in order to make the correct or preferable decision.

Candidates will be provided with 14 calendar days to provide additional information.

6.1.1. Reconsideration Review outcomes

Following a Reconsideration Review, the APC can decide either to:

- a) Uphold the original decision, or
- b) Vary the original decision, or
- c) Set aside the original decision and make a new decision.

The APC will provide the candidate with a written summary of the reasons for their decision upon completion of the Reconsideration Review.

6.2. Step 2: Internal Review

If the Reconsideration Review upholds the original Eligibility Outcome decision, or the candidate does not wish to apply for a Reconsideration Review, the candidate can apply for an Internal Review. The candidate must identify the eligible grounds for their appeal.

An Internal Review involves the re-evaluation of all documentation and correspondence provided by the candidate in support of their skills assessment application by a different APC decision maker(s) to the original decision makers.

The individual(s) undertaking the Internal Review (Internal Reviewer(s)) will not have been previously involved in any aspect of the decision-making process regarding the candidate's application, Eligibility Outcome Notification or Reconsideration Review. The Internal Reviewer(s) can request further information from the candidate, APC staff or other experts as required.

Candidates will be provided with 14 calendar days to provide additional information.

6.2.1. Internal Review outcomes

There are one of three possible outcomes from an Internal Review.

The Internal Reviewer(s) can decide to:

- a) Uphold the original decision, or
- b) Vary the original decision, or
- c) Set aside the original decision and make a new decision.

The Internal Reviewer(s) will provide the candidate with a written summary of the reasons for their decision upon completion of their review.

6.3. Step 3: Appeal for External Review

If the candidate is dissatisfied with the outcome of the Internal Review, they can appeal for an External Review. The candidate must identify the eligible grounds for their appeal.

An External Review involves the re-evaluation of all documentation and correspondence provided by the candidate in support of their skills assessment application by a panel of individuals who are independent of the APC (External Reviewers, or External Review panel)

External Reviewers cannot hold a primary role with the APC or be a Director of AP. They also cannot have been involved in any aspect of the original assessment of the candidate's application, Eligibility Outcome decision or the outcomes of the Reconsideration or Internal Reviews.

The External Reviewers can request further information from the candidate, APC staff or other experts as required.

Candidates will be provided with 14 calendar days to provide additional information.

6.3.1. External Review outcomes

There are one of three possible outcomes from an External Review.

The External Reviewers can:

- a) Uphold the original decision, or
- b) Vary the original decision, or
- c) Set aside the original decision and make a new decision.

The External Reviewer Panel will provide the candidate and APC with a written summary of the reasons for its decision following its review.

7. Lodging an appeal

All applications for Internal and External review must be made in writing and in accordance with this policy.

Verbal or anonymous applications for appeal will not be accepted.

Candidates can lodge an appeal in writing in one of two ways:

- Online appeal application via the candidate portal
- Prepaid post: GM, Corporate Enablement (Skills Assessment appeal)
Australian Pharmacy Council
PO Box 1227
Fyshwick ACT 2609

8. Timeframes

The APC must receive applications for Reconsideration Reviews from candidates within 14 calendar days of the Eligibility Outcome Notification date. The APC will advise the candidate of the outcome of the review within 14 calendar days of the receipt of the candidate's request or from the date any further documentation requested by the APC is received by the APC (whichever is later).

The APC must receive applications for Internal Reviews within 30 calendar days of the Eligibility Outcome Notification date or Reconsideration Review Notification date. The APC will

advise the candidate of the outcome of the Internal Review within 30 calendar days of the receipt of the candidate's application for review or the date any further documentation is requested by the APC is received by the APC (whichever is later).

The APC must receive applications for External Review within 30 calendar days of the Internal Review notification date. The APC will conduct the External Review of the candidate's appeal within 30 calendar days of the receipt of the candidate's application for review or from the date any further documentation requested by the APC is received by the APC (whichever is later).

For complete appeal and review timelines, please see Appendix 1.

9. Late appeals

The APC reserves, in its absolute discretion, its right to:

- a) accept requests for Reconsideration Reviews received more than 14 calendar days from the Eligibility Outcome Notification (EON), and
- b) accept appeals for Internal or External reviews received more than 30 days after Eligibility Outcome Notification date or Internal Review Notification date.

The APC is under no obligation to accept late appeals.

10. Management of Internal and External Reviews

The Candidate Services Team manages Reconsideration Reviews.

The APC Corporate Enablement Team manages Internal and External Reviews. This team handles all correspondence with the candidate once an application for Internal or External Review is made. This team is not responsible for or involved with the delivery of any aspects of APC skills assessment processes.

11. Internal and External Reviewers

The CEO or their delegate will appoint the Internal Reviewer(s) and/or External Reviewers.

The CEO or their delegate will adhere to the required skills and experience as per the Glossary of Terms in this policy.

Internal and External Reviewers will be required to adhere to all APC policies and procedures, including maintaining confidentiality.

12. Information provided

When lodging an application for an Internal or External Review, candidates will be asked to provide a range of information. The candidate will need to provide all requested information in order to initiate the appeal process. Incomplete applications will not be considered.

For details about the information candidates will be required to provide as part of this policy, and how this information will be handled, see Appendix 2.

13. Reporting

Information collected from the candidate and through the appeals handling process will be recorded on APC systems. The number and type of appeals may be reported to the APC Board or its committees. Where such reporting takes place, candidate confidentiality will be maintained. Appeals information will be used to inform quality improvements to APC business processes where relevant.

14. After the External Review

The outcome of the External Review will not be subject to further review by or appeal to the APC.

The National Health Practitioner Ombudsman (NHPO) is the independent body that is responsible for handling complaints about entities within the National Registration and Accreditation Scheme, including the APC.

Candidates can make a complaint about the APC's processes for assessment of overseas qualified pharmacists by contacting the [NHPO](#). The NHPO does not have the power to review the merits of a decision made by the APC.

15. Appeal fees

There are no fees for Reconsideration, Internal or External Reviews

Glossary of Terms

Term	Meaning
Appeal	A process that allows an individual to ask for a review of a decision or outcome.
Approved pharmacy qualification	A qualification awarded upon the successful completion of an APC Accreditation and Pharmacy Board of Australia approved program of study .
Candidate	An individual who applies to the APC for a skills assessment for registration and/or migration purposes. They are either an: <ol style="list-style-type: none"> overseas trained pharmacist, or international graduate of an Australian or New Zealand pharmacy program, or an individual requiring pharmacy document verification to support a visa application to migrate to Australia.
Competency Stream	The skills assessment stream for candidates holding current general registration as a pharmacist in a comparable jurisdiction. Individuals who successfully complete all requirements for this stream are issued with:

Term	Meaning
	<p>A Skills Assessment Outcome to support a visa application with the Department of Home Affairs upon completion of the Stream eligibility check process, and</p> <ul style="list-style-type: none"> An exam results certificate upon successful completion of the Competency Assessment of Overseas Pharmacists (CAOP®) exam to support an application for registration with the Pharmacy Board of Australia under s.53(c) of the National Law.
Eligibility Outcome Notification (EON)	An official notice from APC confirming its decision about a candidate's eligibility for one of the four skills assessment streams upon the conclusion of the Stream Eligibility Check process.
Eligibility Outcome Notification (EON) date	The date in Canberra, Australia that the APC sends the candidate their EON.
External Review	A formal, independent review of the APC's skills assessment decision-making process to determine if the correct and preferable Eligibility Outcome or Skills Assessment Outcome was reached.
External Review Notification date	The date in Canberra, Australia that the APC notifies the candidate of the External Reviewers' decision.
External Reviewers	<p>A panel consisting of a minimum of three individuals with the following collective skills and experience:</p> <ol style="list-style-type: none"> Two Australian pharmacy academics or pharmacists with experience in pharmacy education and assessment, and One expert from another health profession with experience in education and health practitioner skills assessments. <p>External Reviewers cannot hold a primary role with the APC, cannot be an APC Director and cannot have been involved in any aspect of the original Eligibility Outcome or the outcomes of the Reconsideration and Internal Reviews. They must agree to adhere to all APC values, codes and policies including its Privacy and Conflict of Interest policies.</p>
Internal Review	A formal review undertaken by different APC decision-makers of the original Stream Eligibility Check or Skills Assessment decisions.
Internal Review Notification date	The date in Canberra, Australia that the APC notifies the candidate of the Internal Reviewer's decision.
Internal Reviewer(s)	<p>An individual or individuals who undertakes the Internal Review.</p> <p>The Internal Reviewer(s) will be a senior member of the APC management team (Director or above) who:</p> <ol style="list-style-type: none"> Is not the direct supervisor of any of the original decision makers, Has experience and understanding of administrative review or appeal processes,

Term	Meaning
	<ul style="list-style-type: none"> c) Has knowledge of health practitioner skill assessment processes, d) Has knowledge and expertise in assessing pharmacy programs of study and qualifications, e) Will be delegated authority to request further information from APC staff involved in the skills assessment process, f) Agrees to adhere to all APC values, codes and policies including its Privacy and Conflict of Interest policies, and g) Was not involved in any portion of the decision-making process regarding the candidate's skills assessment, Eligibility Outcome Notification or Reconsideration Review
International student stream	<p>The skills assessment stream for candidates with an approved or substantially equivalent pharmacy qualification.</p> <p>Individuals who successfully complete the eligibility check process for this pathway are issued with:</p> <ul style="list-style-type: none"> • A Skills Assessment Outcome to support a visa application with the Department of Home Affairs
Knowledge Stream	<p>The skills assessment stream for candidates with a relevant pharmacy qualification awarded outside of a comparable jurisdiction, Australia or New Zealand.</p> <p>Individuals who successfully complete all requirements for this pathway are issued with:</p> <p>A Skills Assessment Outcome to support a visa application with the Department of Home Affairs upon completion of the Stream Eligibility Check process, and</p> <ul style="list-style-type: none"> • An exam results certificate upon successful completion of the Overseas Pharmacist Readiness Assessment (OPRA®) exam to support an application for registration with the Pharmacy Board of Australia under s.53(c) of the National Law.
NZ Registered stream	<p>The skills assessment stream for candidates holding current registration with the Pharmacy Council of New Zealand.</p> <p>Individuals who successfully complete the eligibility check process for this stream are issued with:</p> <ul style="list-style-type: none"> • A Skills Assessment Outcome to support a visa application with the Department of Home Affairs
Reconsideration Review	<p>Reconsideration Reviews are early, informal reviews of a Stream eligibility decision that provide the candidate with the fastest process for a resolution.</p> <p>A Reconsideration Review involves the original APC decision makers re-evaluating of all documentation and correspondence provided by the candidate in support of their skills assessment application. It can</p>

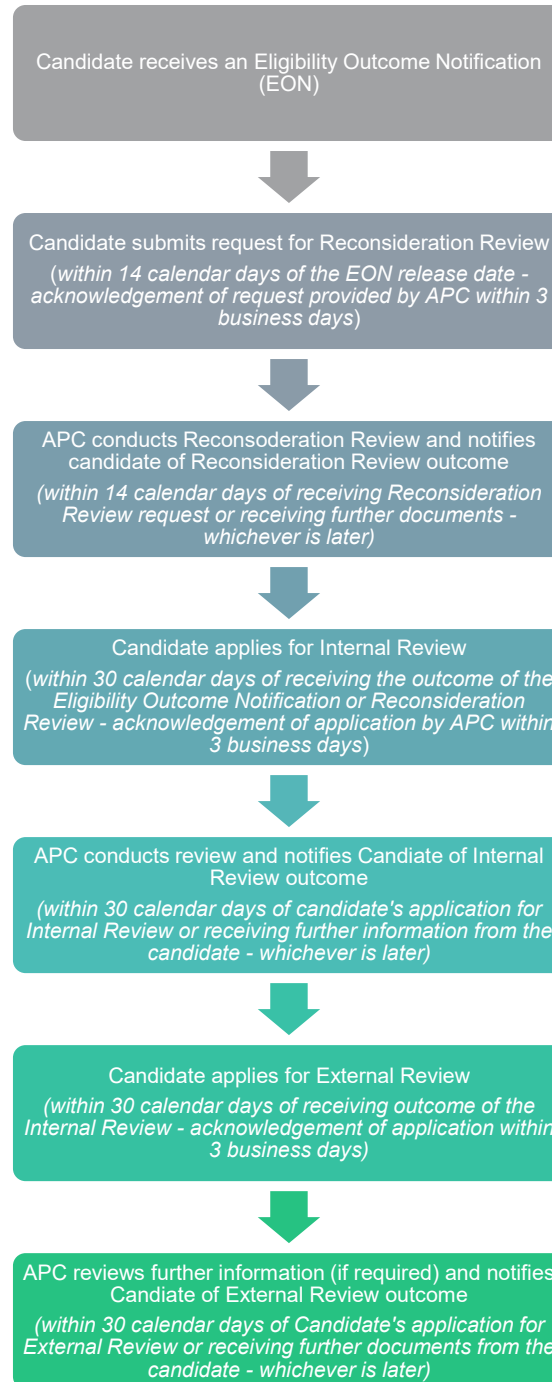
Term	Meaning
	also involve the consideration of further information from the candidate.
Reconsideration Review Notification date	The date in Canberra, Australia that the APC notifies the candidate of the Reconsideration Review outcome.
Skills assessment	<p>An evaluation process undertaken by the APC for candidates who wish to register with the Pharmacy Board of Australia or apply to the Department of Home Affairs for a visa for migration purposes.</p> <p>APC skills assessments involve:</p> <ol style="list-style-type: none"> A Stream eligibility check process, and A skills assessment
Skills assessment stream	<p>A specific evaluation pathway for candidates wishing to register with the Pharmacy Board of Australia or apply to the Department of Home Affairs for a visa for migration purposes.</p> <p>Eligibility for each stream is set out in the APC Skills Assessment Standards.</p> <p>The four skills assessment streams are as follows:</p> <ul style="list-style-type: none"> Knowledge Stream Competency Stream International Student Stream New Zealand Registered Pharmacist Stream
Skills Assessment Outcome (SAO)	<p>An official document issued by APC that can be used by an individual to support a registration application with the Pharmacy Board of Australia or visa application with the Department of Home Affairs (DHA).</p> <p>The SAO is issued to candidates who successfully complete the entire skills assessment process.</p>
Stream Eligibility check	The APC's process used to establish a candidate's eligibility for a particular skills assessment stream using the APC Skills Assessment Standards. It involves the APC's review of a candidate's documentation submitted via its candidate portal . It is a separate process to determining a candidate's eligibility for registration which is undertaken by the PharmBA and Ahpra.

List of Abbreviations

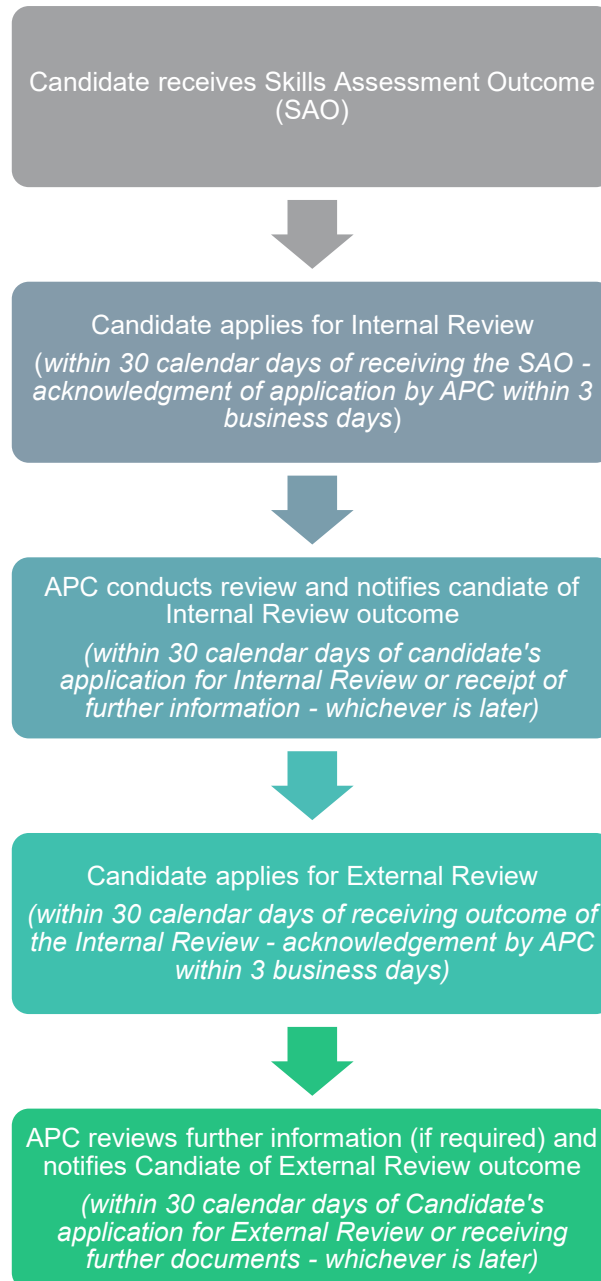
Abbreviation	Term
APC	Australian Pharmacy Council

Abbreviation	Term
DEWR	Department of Employment and Workplace Relations
DHA	Department of Home Affairs
PharmBA	Pharmacy Board of Australia

Appendix 1 – Complete Review and Appeal process steps and timelines – Eligibility Check Outcome



Appendix 2 – Complete Review and Appeal process steps and timelines – Skills Assessment Outcome



Appendix 3 – Information collected

Candidates wishing to appeal under this policy will be required to provide the APC with the following information:

- a) Their name,
- b) Their APC CRN number or application number,
- c) The name, email and phone number of anyone they wish to authorise to correspond with the APC on their behalf (optional),
- d) Any support requirements they (or their authorised representative) may need to proceed with the appeal or correspond with the APC,
- e) The eligible grounds upon which they are appealing,
- f) The outcome sought, and
- g) All other information they deem relevant to the eligible grounds for appeal.

The APC will correspond about the appeal with either the candidate or their authorised representative (if appointed), not both.

All information provided to the APC by the candidate will be managed confidentially and in accordance with its Privacy and Archive and Retention Policies.

A record of the appeal application, all correspondence and any supporting information provided by the candidate will be stored on APC systems for record and quality assurance purposes.



T1 Level 2, 6 Brindabella Circuit South, Brindabella
Business Park, Canberra Airport ACT 2609

PO Box 1227 Fyshwick ACT 2609

p +61 2 6188 4288 | www.pharmacycouncil.org.au