

Register Audit Policy

To safeguard the integrity of the PACFA Register, all registrants are required to participate in an audit process to ensure compliance with the renewal of registration obligations.

Responsibility for meeting PACFA's renewal requirements for Member Association members is shared between the Member Association and PACFA. Where the Member Association oversees annual renewals, it is accountable for providing all relevant documentation to PACFA at the time of audit.

A minimum of 7% of registrants will be audited by PACFA each year.

Renewal obligations

For the renewal of PACFA Registration, all registrants are required to comply with the PACFA renewal requirements as set out in the following Standards: Criminal History, Professional Indemnity Insurance, Client Contact, Clinical Supervision, Continuing Professional Development and Ethical Conduct.

As part of the renewal process, registrants are required to submit evidence of the following quality assurance documents:

- > proof of current and adequate insurance coverage for all aspects of practice and in all locations
- > a Nationally Coordinated Criminal History Check certificate obtained within the last two years
- > a Working With Children check certificate, if applicable.

At the time of renewal, registrants are not required to provide evidence of their continuing professional development (CPD) undertaken or of their client and supervision hours. Instead, registrants are required to complete an online declaration confirming that they have fulfilled all renewal requirements.

Registrants are required to keep their renewal documents in a Professional Portfolio for three completed years, the immediate past and the previous two membership years to the past year. The PACFA membership year is twelve months from July to June each year.

The audit process

1. Registrants will be notified by email that an audit is taking place, requesting the submission of renewal documents for either the most recent year or one of the previous two years.
2. To meet the audit requirements, registrants are to supply an electronic file of their evidence demonstrating that the renewal requirements were met for the period being audited.
3. Registrants will be given 3 weeks to upload the required documents to their member portal.
4. Registrants who complete the audit successfully will be formally notified that the audit was successful.
5. Registrants who do not provide documentation by the due date, or who provide documentation that is unsatisfactory or incomplete, will be given a final notice to provide the required documentation within a further 3 weeks.
6. If the registrant fails to submit within the time frame of the final notice, their registration will be suspended, and the registrant will be advised accordingly. While on suspension, a registrant's name will continue to appear on the register, but contact details will not be displayed, and the registration status will be listed as 'Suspended'. PACFA will notify relevant health funds of the registrant's suspension.
7. Once suspended, the registrant will be given the opportunity within the next 3 months to address their deficit in meeting the renewal requirements. This may include undertaking supervision with a prescribed PACFA supervisor and/or additional CPD to address the deficit.
8. If the suspended registrant provides adequate documentation to PACFA during the 3-month suspension period, their registration status will be returned to 'Active' immediately, and the health funds will be advised.
9. If a registrant fails to demonstrate compliance with the renewal requirements within the 3-month suspension period, their registration will remain suspended for the remainder of the financial year and they will be unable to renew their membership/registration for the next year.
10. Failing to meet compliance with any of the requirements for renewal as listed in the relevant Associated Standards results in a breach that leads to the lapse of PACFA registration.

Documents you are required to keep

Professional portfolio

Registrants must keep their registration renewal documentation in their professional portfolio for three completed years, (the immediate past and the previous two membership years to the past year).

The portfolio consists of 5 sections:

1. Client and Supervision records
2. Continuing Professional Development records
3. Quality Assurance records
 - 3.1 Professional indemnity insurance records
 - 3.2 Criminal History Check
 - 3.3 Working with Children Check (if applicable)
4. Ethical Conduct records (if applicable)
5. Member Association membership records (if applicable)

1. Client and supervision records

Client Contact hours recorded must comply with the definition of client contact as described in the PACFA [Client Contact Standard](#), while clinical supervision undertaken must comply with the PACFA [Clinical Supervision Standard](#). Only eligible clinical registrants may claim peer supervision.

Evidence for audit purposes includes the registrant's client and supervision logs which have been signed by their supervisor. Registrants should use the PACFA [Annual Verification: Summary of Supervision and Client Contact](#) to record the total hours logged for a membership year.

2. Continuing professional development records

In accordance with the PACFA [Continuing Professional Development Standard](#), CPD activities must be directly relevant to clinical practice in counselling and psychotherapy and/or the research evidence base for counselling and psychotherapy.

Registrants are required to keep evidence for both the Category A and Category B CPD activities undertaken.

- › Acceptable evidence for Category A activities is attendance certificates or payment receipts which clearly state the name of the course, the attendee and the hours undertaken.
- › For each Category B activity logged, a Reflective Review of approximately 150 words is to be written and kept as evidence. Registrants should use the [PACFA Reflective Review template](#).

3. Quality Assurance Records

3.1 Professional indemnity insurance record

As outlined in the PACFA [Professional Indemnity Insurance Standard](#), Registrants are required to keep proof that they are covered by professional indemnity and public liability insurance. Evidence for audit purposes includes a Certificate of Currency, and/or a letter from the registrant's employer stating that the registrant is covered by the employer's insurance.

3.2 Criminal History Check

As outlined in the PACFA [Criminal History Standard](#), as part of the renewal process, all registrants living in Australia must provide a valid Nationally Coordinated Criminal History Check obtained within the last two years.

3.3 Working with Children Check (if applicable)

As outlined in the PACFA [Criminal History Standard](#), members who work with children and young people must upload evidence of a current and valid Working with Children Check Clearance.

4. Ethical conduct records (if applicable)

As outlined in the Ethical Conduct Standard, registrants need to provide information and documents about any ethical conduct issues that have arisen during the period being audited. This includes legal proceedings or criminal investigations relating to their practice, complaints made to PACFA or a PACFA Member Association or other professional association, AHPA or the Healthcare Complaints Entity in their state or territory.

5. Member Association membership records (if applicable)

Registrants who have joined PACFA via membership of a [PACFA member association](#) are required to provide evidence that they are current members of that Member Association. Evidence includes a Membership Certificate or receipt for payment of membership fees.

Right of appeal

Registrants who have been suspended and have subsequently had their registration lapsed due to an unsuccessful audit outcome have the right to appeal. For more information, refer to the Registration Appeals Policy.

Document version control

Version	Description	Originator	Reviewed	Approved	Date	Next review
C	Effective November 2024	Registration & Membership Manager	Professional Standards Committee	CEO	November 2024	November 2025

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