

Register Audit Policy

To safeguard the integrity of the PACFA Register, all registrants are required to participate in an audit process to ensure that their membership and registration renewal is completed correctly.

Registrants are not required to provide evidence that they meet PACFA's renewal requirements when renewing their annual membership/registration. Instead, registrants sign an online declaration stating that they have met the renewal requirements.

Registrants are, however, required to retain records of their renewal documents in a professional portfolio for two completed years: the immediate past year and the previous membership year to the past year. The PACFA membership year is the 12-month period from July to June each year.

It is essential that the required documents be kept by registrants until their audit takes place. All registrants will be audited once every 3 years.

The audit process

1. Registrants will be notified by email that an audit is taking place, and requested to submit renewal documents for a specific year, being either the immediate past year or for the previous membership year to the past year.
2. To meet the audit requirements, registrants must 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 send the required documents to the PACFA office.
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. Should a registrant fail to demonstrate that the renewal requirements were met after the 3-month suspension period, they will remain on suspension and will be unable to renew their membership/registration for the next year.

Documents you are required to keep

For renewal of PACFA registration, 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.

Professional portfolio

Registrants must keep their registration renewal documentation in their professional portfolio for 2 completed years (the immediate past year and the previous membership year to the past year) until they are audited.

The portfolio consists of 5 sections:

1. Professional indemnity insurance records
2. Client and supervision records
3. Continuing professional development (CPD) records
4. Member Association membership records (if applicable)
5. Ethical conduct records (if applicable).

1. Professional indemnity insurance records

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.

2. 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 Supervision and Client Contact Verification Form* to record total hours logged for a membership year.

3. 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*.

4. 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 a current member of that Member Association. Evidence includes a Membership Certificate or receipt for payment of membership fees.

5. 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.

Right of appeal

Registrants who are suspended from the register due to an unsuccessful audit outcome have the right of appeal. For more information, refer to the Registration Appeals Policy.

Review

This policy will be reviewed at least every 3 years.

Next review date: March 2026

This policy is effective from March 2023 and replaces the previously published policy, dated 2019.