Public consultation response template – draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education

April 2024

Please provide any feedback on the draft guidance using this template, including your responses to all or some of the questions in the text boxes on the following pages. The boxes will expand to accommodate your response. You do not need to respond to a question if you have no comment.

Making a submission

Send the completed response template to AC_consultation@ahpra.gov.au using the subject line '*Feedback – public consultation on good practice guidance for clinical placements, simulation-based learning and virtual care*'.

Submissions are due by close of business (AEST) 21 June 2024.

Publication of submissions

At the end of the consultation period, submissions (other than those made in confidence) will be published on the Accreditation Committee's website to encourage discussion and inform the community and stakeholders about consultation responses.

We can accept submissions made in confidence. These submissions will not be published on the website or elsewhere. Submissions may be confidential because they include personal experiences or other sensitive information. Any request for access to a confidential submission will be determined in accordance with the *Freedom of Information Act 1982 (Cth)*, which has provisions designed to protect personal information and information given in confidence. **Please let us know if you do not want us to publish your submission or want us to treat all or part of it as confidential.**

We will not place on the website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation. Before publication, we may remove identifying information from submissions, including contact details.

The views expressed in the submissions are those of the individuals or organisations who submit them, and their publication does not imply any acceptance of, or agreement with, these views by the review.

Published submissions will include the names of the individuals and/or the organisations that made the submission, unless confidentiality is requested. If you do not wish for your name and/or organisation's name to be published, please use the words **'Confidential submission'** in the subject title when emailing your submission.

Initial questions
To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.
Question A
Are you completing this submission on behalf of an organisation or as an individual?
Your answer: ☒ Organisation Name of organisation: Australasian Council of Podiatry Deans Contact email: ██████████████ ☐ Myself Name: <u>Click or tap here to enter text.</u> Contact email: <u>Click or tap here to enter text.</u>
Question B If you are completing this submission as an individual, are you: ☐ A registered health practitioner? Profession: <u>Click or tap here to enter text.</u> ☐ A member of the public? ☐ Other: <u>Click or tap here to enter text.</u>
Question C Would you like your submission to be published? ☒ Yes, publish my submission **with** my name/organisation name ☐ Yes, publish my submission **without** my name/ organisation name ☐ No – **do not** publish my submission

Public consultation on guidance for embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education
– April 2024

Page 2 of 6

Your responses to the consultation questions

1. Do you have any comments on the good practice statements in the guidance?
Please add your comments to the following table and add a new row for each good practice statement you have a comment for.

Guidance	Good practice statement	Comments or suggestions
Example: *Clinical placements* ☒ *Simulation-based learning* ☐ *Virtual care* ☐	Overall, the good practice statements are well-aligned with current educational needs and technological advancements that we are seeing developing. They will help to ensure that graduates are well-prepared for practice. The statement *'Student learning from clinical placements is likely to be maximised when students:…* *1. experience a variety in their placements, including…* *In diverse geographic locations (rural, regional, and metropolitan)* – consider including international *6.* *Resemble activities they would perform in the workplace as registered practitioner consider including* with an appreciation of career progression and opportunities for growth within the profession. *address their personal needs'* should be more balanced and include 'where feasible' Consider adding • Encourage them to be lifelong learners The statement *'clinical placement supervisors should:…be trained…'*: where does the responsibility for training clinical supervisors lie - this should be clarified between education providers and	All seems reasonable. There is an inevitable tension between expectations of supervisors and their workload.

Public consultation on guidance for embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education – April 2024

Page 3 of 6

	placement providers. And further:… *'demonstrate a willingness and ability to support students by*'..please consider adding '<mark>actively participating in training to develop capabilities related to clinical supervision</mark>'.	
Clinical placements ☐ Simulation-based learning ☒ Virtual care ☐	Overall, the good practice statements are well-aligned with current educational needs and technological advancements that we are seeing developing. They will help to ensure that graduates are well-prepared for practice. 1. They have a degree of realism that… consider including • <mark>Allows student competency to be demonstrated and assessed in an equitable manner</mark> 6.they promote active learning experience. That is…consider including • <mark>Reflect on their performance and set measurable goals for improvement</mark> 7. Should there be consideration to using culturally safe resources <mark>(e.g. using manikin models with a range of skin tones)?</mark>	
Clinical placements ☐ Simulation-based learning ☐ Virtual care ☒	Overall, the good practice statements are well-aligned with current educational needs and technological advancements that we are seeing developing. They will help to ensure that graduates are well-prepared for practice. However: <mark>Should acknowledge that that the proportion of virtual care that can be effectively delivered by different disciplines is likely to be variable (e.g. virtual care for podiatry very small as a hands-on profession).</mark>	

Public consultation on guidance for embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education
– April 2024

Page 4 of 6

2. Are there any other evidence-based good practice statements that should be included in the guidance?

Something specific related to physical and emotional safety as well as cultural safety. These are very different but equally important.

Acknowledgement of the benefits of clinical placements to the placement providers themselves. Eg: quality improvement processes that underpin the BPCLE serve to enhance the operations and service delivery of the organisation as well.

Integration of research is lacking. Although 'good practice' is defined as 'evidence-based', there doesn't appear to be an explicit criterion which includes research integration as a skill that supervisors should have.

3. What information could the committee provide that would help National Scheme entities implement the guidance?

4. Do you have any general comments or feedback about the guidance?

We don't have any issues with any of the statements themselves, **however we do have concerns with how these will be interpreted by accreditation committees and how compliance/attainment with these will be evaluated. They also need to be more specific about who is responsible for some of these good practice statements being implemented, monitored, funded etc.**

We have concerns with the guidance statements being solely based on evidence from studies which are likely to have been conducted in highly controlled and contrived environments and then being applied to environments that are highly variable, often chaotic, fast paced, rapidly changing etc.

Achievement of some of the guidance statements relies on a stable, fully staffed workforce providing supervision which cannot always be guaranteed. **In terms of placement supervisors being adequately trained, highly skilled etc, who is responsible for ensuring this is the case? Universities cannot insist all supervisors meet this requirement without potentially compromising placement partner relationships/availability of placement spots for students. Who is to provide the time,**

Public consultation on guidance for embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education
– April 2024

Page 5 of 6

resources and funding required for supervisors to take on this training? From our accreditation assessment experience, it is implied that the university was responsible for ensuring this when we have no way of making that happen as external supervisors are not paid/employed by the university.

The incorporation of simulation based learning and virtual care learning also involves additional training of educators, who in many cases, are learning these new technologies alongside students.

These points do need to be acknowledged i.e. whilst these are good practice, these practices may not always be feasible, or implementable.

Public consultation on guidance for embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education
– April 2024

Page 6 of 6