

Public consultation response template – draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education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Please provide any feedback on the draft guidance using this template, including your responses to all or some of the questions in the text boxes on the following pages.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 These submissions will not be published on the website or elsewhere.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: Australian Physiotherapy Council

Contact email: [REDACTED]

Myself

Name: [Click or tap here to enter text.](#)

Contact email: [Click or tap here to enter text.](#)

Question B

If you are completing this submission as an individual, are you:

A registered health practitioner?

Profession: [Click or tap here to enter text.](#)

A member of the public?

Other: [Click or tap here to enter text.](#)

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

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
<p><i>Example:</i></p> <p>Clinical placements <input checked="" type="checkbox"/></p> <p>Simulation-based learning <input type="checkbox"/></p> <p>Virtual care <input type="checkbox"/></p>	[Insert good practice statement number and/or statement here]	[Insert your comments and/or suggestions here]

2. Are there any other evidence-based good practice statements that should be included in the guidance?
<p>The Australian Physiotherapy Council (the Council) is pleased to provide comment on the Ahpra Board Accreditation Committee's (the Committee) draft <i>Guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education</i> (the draft guidance).</p> <p>The Council recommends that in relation to embedding good practice in clinical placements, an additional statement be added noting clinical supervisors should be trained in cultural safety. The Council believes that clinical supervisors should be able to demonstrate to students what culturally responsive healthcare looks like and facilitate a culturally safe and inclusive clinical environment for patients and practitioners.</p>

3. What information could the committee provide that would help National Scheme entities implement the guidance?
<p>It is proposed that the Committee provide advice on an integrated approach to clinical education. This will assist accreditation authorities and education providers to understand expectations regarding appropriate levels of different types of clinical education and encourage further innovation in types other than clinical placements, thereby helping reduce pressures on healthcare systems.</p>

4. Do you have any general comments or feedback about the guidance?
<p>The Council commends the Committee on its efforts to develop good practice guidance to further embed good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education.</p> <p>The draft guidance is considered very comprehensive, and the Council believes it will help to support continuous improvement in entry-level health practitioner education, thereby ensuring graduates continue to be equipped with the capabilities required for safe and contemporary practice.</p>

The Council is similarly committed to this vision, with our Accreditation Standard ensuring that the aspects of the draft guidance are met. This includes requirements that clinical supervisors are suitably trained and registered with Ahpra, and that students undertake clinical education in a range of environments and settings.

Under the Council's Accreditation Standard, education providers are also required to collect feedback from placement facilities and students to ensure supervisors receive any support needed and that learning environments are conducive to achieving intended outcomes. Many education providers maintain multi-year agreements with clinical placement providers, helping to ensure the ongoing supply of clinical placements and facilitate quality assurance processes.

The Council encourages innovation within entry-level physiotherapy programs including recognition of simulated learning and telehealth placements as valid clinical experience. Most providers of physiotherapy programs now include a telehealth placement as part of clinical education models, whereas prior to the COVID-19 pandemic such experiences were only offered by some universities.

As part of our upcoming review of the Accreditation Standard, the Council will consider the Committee's guidance to further leverage accreditation to achieve National Registration and Accreditation Scheme objectives.