Public consultation response template – draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education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Please provide any feedback on the draft guidance using this template, including your responses to all or some of the questions in the text boxes on the following pages.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 These submissions will not be published on the website or elsewhere.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

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

OFFICIAL

Page 2 of 4

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* ☐	*N/A*	*N/A*
Clinical placements ☐ Simulation-based learning ☐ Virtual care ☐		

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

3. What information could the committee provide that would help National Scheme entities implement the guidance?
TEQSA would like to thank AHPRA for its invitation to respond to the draft guidance on embedding good practice in clinical placements, simulation based learning and virtual care in initial student health practitioner education. Under the *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act) TEQSA is responsible for protecting and enhancing the integrity, quality and reputation of Australian higher education. TEQSA often publicly releases guidance material as part of its work to ensure compliance with the *Higher Education Standards Framework (Threshold Standards) 2021*. TEQSA's guidance notes are available on the TEQSA website. TEQSA's response to AHRPA's draft guidance is primarily focused on ensuring registered higher education providers (providers) remain cognisant of their obligations under the Threshold Standards. Particularly relevant are those obligations around: • delivery with other parties (section 5.4)

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

OFFICIAL

Page 3 of 4

- learning outcomes and assessment (section 1.4).

Delivery with other parties

Providers who collaborate with third parties to deliver clinical placements have obligations under the Threshold Standards. Providers who partner with another party to deliver any part/s of a course of study, including work-integrated learning and placements, remain accountable for the quality of the student experience and supervision. Providers also remain accountable for the continued wellbeing and safety of students in these arrangements.

Learning outcomes and assessment

Providers also have obligations under section 1.4 of the Threshold Standards regarding learning outcomes and assessment. Key considerations for TEQSA are:

- Methods of assessment, such as tele-delivery and simulated learning, are consistent with the learning outcomes being assessed and reflect the level of student attainment.

- On completion of a course of study, regardless of the mode of learning e.g. face-to-face, tele-delivery or simulated learning, students can demonstrate the learning outcomes of the course of study.

It is expected providers have controls in place to identify and manage risk, as well as mechanisms to assure ongoing compliance with the Threshold Standards.

If a provider is unable to assure itself of a partnered organisation's ability to meet the requirements of the Threshold Standards it is required to take action to protect the interest of students.

4. Do you have any general comments or feedback about the guidance?
TEQSA supports AHPRA's decision to incorporate simulation and virtual care training into its guidance and recommends highlighting for providers the requirements of the *Threshold Standards* in these delivery settings.

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

OFFICIAL

Page 4 of 4