

Public consultation response template – draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education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Please provide any feedback on the draft guidance using this template, including your responses to all or some of the questions in the text boxes on the following pages.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 These submissions will not be published on the website or elsewhere.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

Contact [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>	<p><i>[Insert good practice statement number and/or statement here]</i></p>	<p><i>[Insert your comments and/or suggestions here]</i></p>
<p>Clinical placements <input checked="" type="checkbox"/></p> <p>Simulation-based learning <input checked="" type="checkbox"/></p> <p>Virtual care <input checked="" type="checkbox"/></p>		<p>No specific comments – see general comments and feedback below in section 4</p>

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

The current guidelines appear comprehensive – no additional statements on good practice required from our perspective.

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

The Committee could advise the National Scheme that these guidelines are generic in nature, and will need to be adapted to some degree by the Boards and educators of the different health professions, to be in alignment with their practice and placement idiosyncrasies.

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

The guidelines have been written clearly and succinctly. Consequently, they are easy to understand and follow.

Our only concern is that the language of the guidelines is medically focused, and so it seems as if the underlying assumption is that all health professionals adopt a medical model of health.

Some of the allied health professions, such as our profession – Occupational Therapy – adopt a social model of health. Accordingly, words such as consumers and services are more appropriate than patients and treatment.

We acknowledge foot note 1. on page 1. where the Committee acknowledges that clinical placement is a term used to cover a variety of terms used in various professions. And we acknowledge it may not be practical to have separate guidelines for the different health professions.

We would like to see another footnote acknowledging the various different types of settings and contexts in which placements occur for those professions that are not primarily medically focused. For example, occupational therapy students have practice education placements in settings such as homes, schools, prisons and community centres.