

Public consultation response template – draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education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Please provide any feedback on the draft guidance using this template, including your responses to all or some of the questions in the text boxes on the following pages.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 These submissions will not be published on the website or elsewhere.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 Pharmacy 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>	9. learning outcomes and clinical placement performance measured and assessed using clear, fair and equitable assessment criteria, rigorous and consistent assessment methods, and validated assessment instruments, where these are available for the relevant health profession	The Australian Pharmacy Council (APC) requires accredited programs to include placements that incorporate appropriate and measurable assessments against our performance outcomes. This has been captured well in this good practice statement.
<p>Clinical placements <input checked="" type="checkbox"/></p> <p>Simulation-based learning <input type="checkbox"/></p> <p>Virtual care <input type="checkbox"/></p>	12. attend placements where the training facilities, clinical assessor training programs and clinical assessors are quality assured, where relevant.	<p>APC suggests rewording this statement to emphasise the value of ensuring quality assurance of placements.</p> <p>For example, to meet APC accreditation standards¹, pharmacy degree programs must have defined standards and criteria in place for work integrated learning (WIL) placement sites, allowing for effective monitoring and evaluation. A wide range of health professions and education providers often publish standards for clinical placement sites to ensure high-quality learning experiences for learners.</p> <p>APC suggests rewording the statement to, “attend placements where the training facilities, clinical assessor training programs and clinical assessors are quality assured using relevant mechanisms”.</p>
<p>Clinical placements <input type="checkbox"/></p> <p>Simulation-based learning <input checked="" type="checkbox"/></p> <p>Virtual care <input type="checkbox"/></p>	1.4. they are used to complement traditional teaching methods, such as clinical placements.	Providers are employing innovative methods and new pedagogy to deliver learner-centred training. As a result of enhanced technology and growing demands of students, providers have become more

¹ Australian Pharmacy Council (APC). 2022. Accreditation Standards for Pharmacy Programs. Updated October 2022. Accessed 13-Jun-24 at <https://www.pharmacycouncil.org.au/resources/pharmacy-program-standards/>

		<p>adaptive and are employing a wide variety of teaching methods.</p> <p>It is noted that the good practice statement refers to simulation being a 'complement' to clinical placements. We would encourage the guidance to include (if possible) an explicit discussion around the use of simulation alone based on the available evidence. i.e. is it appropriate for an education program to replace all clinical placements with simulation-based learning?</p>
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2. Are there any other evidence-based good practice statements that should be included in the guidance?

APC has no further feedback.

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

Encouraging National Scheme entities to reference this guidance in profession-specific standards, can help align language and facilitate the dissemination of instructions.

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

APC commends the work of the committee and thanks the committee for this opportunity to comment on the draft guidance on embedding good practice in clinical placements.

APC acknowledges the effort invested in creating a thorough and extensive guide for learners and supervisors. The draft guidance is greatly enhanced by the inclusion of the clinical supervisor guide and cultural safety notes. Overall, the guidance is well-structured and presents a wealth of evidence supporting the good practice statements.

For health professionals, experiential learning is an essential part of their learning journey and complements traditional teaching methods. Learners benefit from experiential placements by applying knowledge and concepts to real-world situations. Placements will help with professional development, equip students with critical thinking skills, provide opportunities to interact with consumers and to work collaboratively in an interprofessional health team.

APC looks forward to the progress of this work and the opportunity to align our accreditation standards with the Guidance.