

Foreword

I am pleased to present this report on my review's findings regarding specialist medical training site accreditation processes in the National Registration and Accreditation Scheme (the National Scheme). The review was commissioned by Health Ministers to consider the fairness and transparency of accreditation processes, including complaint and appeal processes. Health Ministers requested that the review give particular attention to the processes of specialist medical colleges (colleges) in accrediting training sites.

Effective accreditation of Australia's specialist medical training sites supports quality and safe patient care. Australia is fortunate in being highly regarded for the quality of its specialist medical practitioners and training.

However, increased pressure on Australia's health system due to COVID-19 appears to have exacerbated known issues with processes related to specialist medical training site accreditation.

The complex arrangements underpinning accreditation in the National Scheme have created an environment where gaps have emerged in the accountability mechanisms for processes related to the accreditation of specialist medical training sites. For example, the accreditation of specialist medical training sites is not a recognised accreditation function under the Health Practitioner Regulation National Law (the National Law).

Concerns also continue to be raised regarding specialist medical training site accreditation standards and requirements, and their ability to respond appropriately to immediate workforce needs and broader workforce planning undertaken by jurisdictional health departments across Australia.

These circumstances give impetus to ensuring specialist medical training site accreditation processes are people-centred, transparent, fair, responsive and accountable.

This report outlines my review's findings on key processes related to specialist medical training site accreditation. My review has outlined five priority areas for improvement:

1. Enhancing accountability and transparency in accreditation standards
2. Ensuring fairness and transparency in accreditation processes and assessments
3. Clarifying and strengthening monitoring processes for accredited training sites
4. Developing an appropriate framework for:
 - assessing and managing concerns about accredited training sites
 - managing non-compliance with the accreditation standards, including processes for making adverse changes to a training site's accreditation status (such as placing conditions on, suspending or withdrawing accreditation).
5. Ensuring grievances about accreditation processes and decisions are managed fairly and transparently.

My review has focussed on delivering practical, outcome-focussed recommendations to provide a roadmap for progress. In recognition of capacity and time constraints, recommendations have been graded by priority.

On 1 September 2023, Health Ministers issued a policy direction to clarify expectations regarding the accreditation of specialist medical training sites. The policy direction included that the Australian Health Practitioner Regulation Agency (Ahpra) and the Medical Board of Australia (the Medical Board) require the Australian Medical Council (the AMC) to work with jurisdictions and colleges on an implementation plan for the review's suggestions for reform. This recognises that a collaborative and coordinated approach is necessary to successfully implement the review's recommendations. I have also welcomed recognition by colleges and health jurisdictions of the importance of working together to achieve positive change.

I thank those who have engaged with the review to ensure its findings are accurate and the recommendations tailored to support practical and meaningful improvements. I look forward to continuing to work together to achieve fair and positive change in specialist medical training site accreditation processes.

Yours sincerely



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National Health Practitioner Ombudsman
National Health Practitioner Privacy Commissioner

Summary of recommendations

A roadmap for greater accountability and transparency in specialist medical training site accreditation standards

1. The AMC should work with colleges to establish a procedure for the development of specialist medical training site accreditation standards.
2. The AMC should work with colleges to ensure specialist medical training site accreditation standards are outcome-centric and evidence-informed with measurable and achievable attributes.
3. The AMC should work with colleges to map specialist medical training site accreditation standards against other key existing standards and relevant legislative requirements in the health system to align and streamline assessments.
4. The purpose and format of specialist medical training site accreditation reports should be reviewed, and these reports should be made available to relevant health jurisdictions.
5. Comparative data about the accreditation of specialist medical training sites should be made publicly available annually.
6. Where responsibility for the accreditation of specialist medical training sites has been assigned to an entity other than a college, the same obligations should exist and must be followed.

Enhancing fairness and transparency in specialist medical training site accreditation processes and assessments

7. The AMC should work with colleges and health jurisdictions to set procedural requirements for assessments undertaken against the specialist medical training site accreditation standards.
8. Policies and processes operationalising the specialist medical training site accreditation standards should be accurately and appropriately documented. Colleges should ensure these documents are accessible, made publicly available, and supported by appropriate staff training.
9. Accreditation frameworks, standards and policies should clarify obligations to ensure procedural fairness in the accreditation of specialist medical training sites.
10. Colleges should ensure training sites are provided with notice of a proposed accreditation decision and given a reasonable opportunity to respond before a final decision is made that is adverse to a training site.

Strengthening monitoring of accredited specialist medical training sites

11. The AMC should work with colleges to clarify obligations regarding monitoring of accredited specialist medical training sites.

12. Colleges should clarify how specialist medical training sites are monitored during the accreditation cycle in relevant standards and policies with reference to how concerns about a training site will be managed.

A framework for identifying and managing non-compliance with the specialist medical training site accreditation standards

13. The AMC should work with colleges and other relevant stakeholders to develop a framework for managing concerns about accredited specialist medical training sites.
 - (a) The framework should clarify how concerns related to bullying, harassment, racism and discrimination at an accredited specialist medical training site should be assessed and managed based on agreed and articulated roles and responsibilities.
 - (b) The framework should also clarify how concerns about health practitioner performance or misconduct at an accredited specialist medical training site should be assessed and managed, including relevant referral and escalation pathways.
 - (c) Once developed, the framework should be made publicly available and implemented with appropriate staff training.
14. All concerns regarding accredited specialist medical training sites should be recorded, and cyclically reviewed for patterns or systemic issues which may indicate non-compliance with the specialist medical training site accreditation standards.
15. Colleges should support individuals to raise concerns about accredited specialist medical training sites, including anonymously or confidentially.
16. The AMC should work with colleges and other relevant stakeholders to develop guiding principles and a risk-based framework to ensure a fair and proportionate response to non-compliance with the specialist medical training site accreditation standards.
17. Accreditation documentation should clarify the process for placing conditions on, suspending or withdrawing accreditation from an accredited specialist medical training site.

Managing grievances relating to specialist medical training site decisions and processes fairly and transparently

18. The AMC should work with colleges to ensure merits review processes for decisions relating to specialist medical training site accreditation align with the best practice principles in this report.
19. Colleges should ideally provide the reconsideration and review stages of the merits review process free of charge.
20. Merits review fees related to specialist medical training site accreditation decisions should be charged on a cost recovery basis, articulated publicly, and application fees refunded if the merits review application is successful.

21. The AMC and colleges should work together to ensure administrative complaint handling processes and associated policies are developed, implemented and made publicly available, and supported by appropriate staff training.
22. Colleges should ensure administrative complaint processes are accessible, and all complaints should be appropriately recorded and monitored.

Progressing the implementation plan for the review's recommendations

23. The implementation plan for the review's recommendations should clearly articulate milestones to evaluate progress.
 - (a) If insufficient progress has been made, Health Ministers should consider progressing with legislative reform to formally recognise the colleges' function in accrediting specialist medical training sites.
 - (b) Consideration of legislative reform should also include whether relevant specialist medical training site accreditation decisions should be subject to review by the responsible tribunal.