



Response template for providing feedback to public consultation – draft proposed accreditation standards for paramedicine

This response template is the preferred way to provide your response to the consultation on the **Draft proposed accreditation standards for paramedicine**. Please provide your responses to all or some of the questions in the corresponding text boxes. You do not need to respond to a question if you have no comment.

Making a submission

Please complete this response template and send to accreditationstandards.review@ahpra.gov.au using the subject line '*Feedback on draft proposed accreditation standards for paramedicine.*'

Submissions are due by COB on 13 March 2020.

Stakeholder details

Please provide your details in the following table:

Name:	Dr Paul Jennings (Acting Director Operational Capability)
Organisation Name:	Ambulance Victoria

Your responses to the public consultation questions

1. Does any content need to be added?

Ambulance Victoria (AV) appreciates the opportunity to provide a response to the public consultation on the draft proposed accreditation standards and acknowledges these are only the standards and not the actual process to support the assessment and review of educational institutions.

Overall the document is appropriate for the targeted/intended outcomes. It is a simple, succinct document that outlines the proposed accreditation standards.

We would recommend mental health / well-being screening of each applicant prior to entry into a paramedicine program. Changes in the prehospital work environment and mental health workload also highlight the needs for the domains to include more explicit information of Occupational Health and Safety expectations including by not limited to occupational violence; identification and reporting of child safety concerns and domestic violence identification and reporting.

Other gaps identified:

- English proficiency for entry into the program is noted on page 11. AV would recommend this is set as a standard and not a guide. AV could not locate or identify IELTS/English proficiency in the glossary (not sure if this was an oversight)
- Students registered with the Paramedicine Board of Australia – must be completed prior to the first day of placement.
- We suggest the education provider is responsible to ensure students are aware of the education provider's responsibilities surrounding mandatory/voluntary notifications to AHPRA of both students and clinicians.

There is a very positive view of cultural identification and safety throughout the domains and the document as a whole. However, we suggest specific focus within the standards include:

- Care of the older person – including elder abuse
 - The older person and elder abuse is an area that is being reviewed by The Royal Commission into Aged Care Quality and Safety. The final report is due to be published April 2020 – this will be pertinent to curriculum and clinical care moving forward
- Mental Health – The royal commission into Mental Health has closed and the interim report findings are now available. This would be pertinent to curriculum and clinical care.

2. Does any content need to be amended?

We suggest the following areas require further amendment or clarification:

Page 10 – Examples of 'documentary and experiential evidence' is unclear and requires more information. We recommend that the standards document should explicitly state the number of hours of work-integrated learning provided by education providers. This standard should clearly state the number of hours too be provided in a paramedicine setting as well as non-paramedicine settings. Furthermore, the education providers should be required to provide information regarding expected learning outcomes for each placement in each setting.

AV is currently not accredited by the NSQHS so limiting placement to only health services who are accredited would significantly affect clinical placement in Victoria (and other states). We suggest reference to the requirement for NSQHS accreditation be removed at this time, but we would encourage reviewing this in due course as ambulance services achieve accreditation.

3. Are there any potential unintended consequences of the current wording?

We do not believe so and are comfortable with the current wording.

4. Do the proposed accreditation standards, associated criteria, expected information and explanatory notes indicate clearly what is required for education providers to demonstrate they are producing safe and competent graduates?

AV believes this has been met. We agree the intention of this document is to prepare the domains for assessment and accreditation and not the process.

5. Do you think education providers will have difficulty in providing evidence (expected information) to meet any of the criteria?

Yes, page 9 dot point 1.5:

AV notes this would require all placement providers to support a written agreement with the education provider and to produce evidence of its own accreditation and licenses. AV would be seeking further understanding as to how a jurisdictional service would be required to meet the obligations with each of the education providers it partners with.

6. What do you think should be the Accreditation Committee's minimum expectations for education providers to demonstrate adequate quality, quantity, duration and diversity of a student's experience during paramedicine work-integrated learning? (related to standard 3.11)

We suggest explicit clinical outcomes for each placement – that support the subject, year level and expectation of the placement would be required. With the number of undergraduate students undertaking placement with the jurisdictional service each year – the limited understanding of the supervisor relating to abilities, scope and clinical expectation is unfair to both parties. Formal placement learning outcomes and expectations would assist with more beneficial and targeted placement. Furthermore, we believe a validated assessment tool that supports reflection by both the student and supervisor should be provided by the educational provider

7. Do you have any other general feedback or comments on the proposed standards?

AV believes that this document is very well written.