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Active Management Process

For Accreditation Committees

Version 0.15

Effective September 2024

Pursuing Training Excellence



Active Management Process

Purpose

This document outlines the College's process for managing non-compliance with RACP Training Provider Accreditation Standards, Accreditation Criteria and/or Training Program Accreditation Requirements.

The Active Management Process enables evidence-based decision making and provides transparency for all relevant parties throughout the process.

It is intended to be a supportive and collaborative mechanism that maintains focus on progress and provides touch points to discuss and resolve challenges.

Increased monitoring for non-compliance, is driven by the College's need to provide assurance to the Australian Medical Council (AMC) and the Medical Council of New Zealand (MCNZ) that Training Providers and their Training Programs continue to meet or substantially meet RACP Accreditation Standards, and Criteria and/or Requirements.

Applicability

The Active Management Process applies to Settings accredited to deliver RACP Basic and/or Advanced Training Programs, and is used by RACP staff, RACP bodies and delegates in managing accreditation decisions and the stages of Active Management.

The process applies to concerns with **major or severe impacts** that have been escalated to Active Management following the [Monitoring of a Training Provider Process](#).

Examples of concerns with major or severe impacts include:-

- heavy workload
- unsafe working conditions and/or unsafe rostering
- lack of supervision
- reports of bullying, harassment, discrimination and/or racism
- media articles or survey results that indicate major impact or high risks
- poor trainee and supervisor health and wellbeing
- risks to patient safety.

Stages of Active Management

Under this process, concerns are actively managed through the following stages:-

Stage 1 – Develop an Action Plan

Stage 2 - Active Updates

Stage 3 - Withdrawal Process

The College and Accreditation Committee actively manage the concerns and conditions of a Training Provider and/or Training Program throughout each stage with a series of actions to be conducted within set timeframes.

Relevant Abbreviations

The Active Management Process document contains acronyms throughout:-

- AMAF – Active Management Assessment Form
- AML – Active Management Lead
- TAS – RACP Training Accreditation Services team

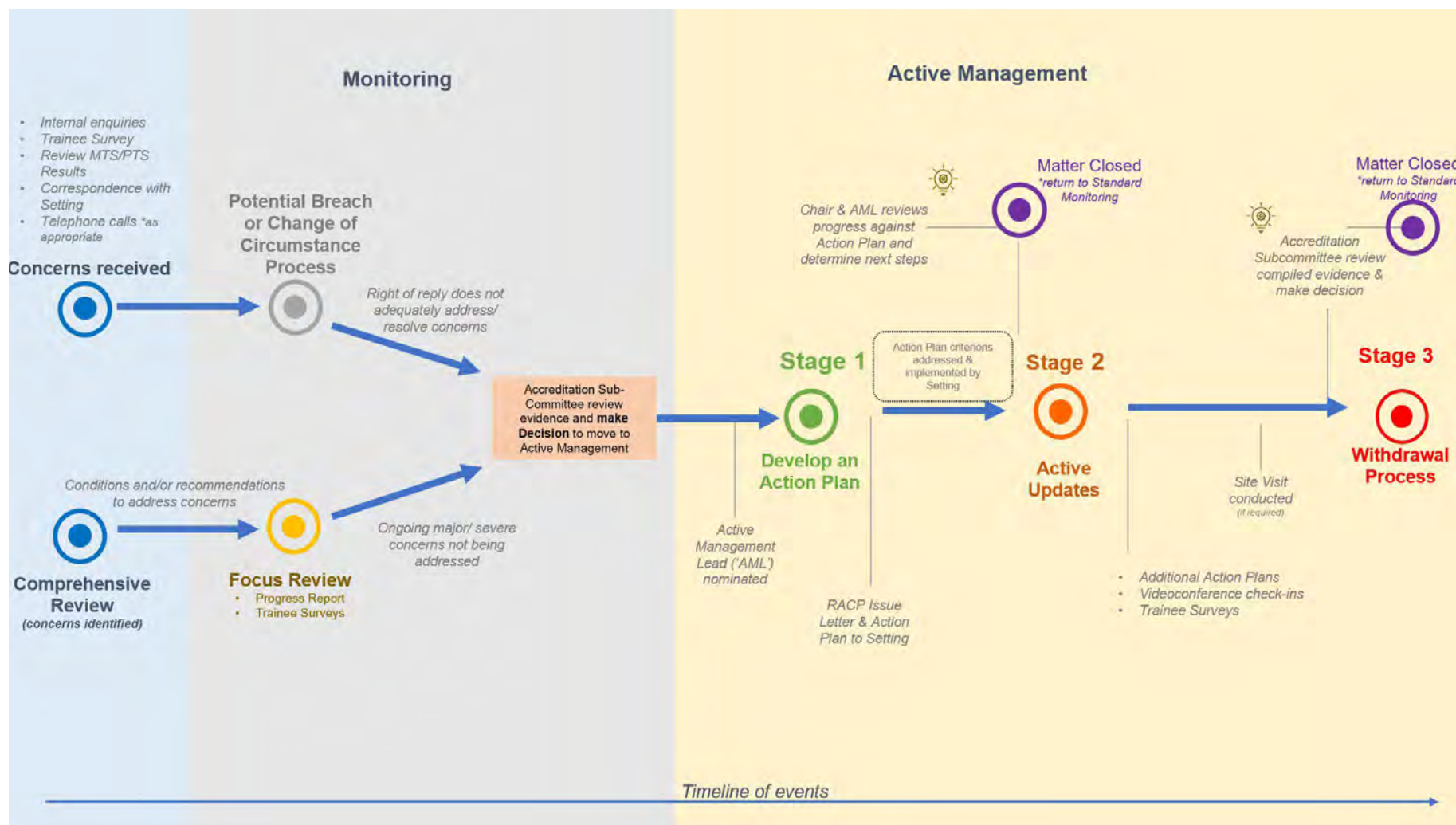
Other Resources

The process correlates to the following additional resources:-

- [Training Provider Standards](#)
- [Basic Training Program Accreditation Requirements](#)
- [Advanced Training Standards/Criteria](#) – *refer to individual program*
- [Monitoring for a Training Provider](#)
- [Potential Breach Form](#)
- [RACP Complaints Management Policy](#)
- [Complaint Management Procedure](#)
- [Reconsiderations, Reviews & Appeals Process](#)

For any queries in relation to this document, please contact Training Accreditation Services at accreditation@racp.edu.au (AUS) or accreditation@racp.org.nz (Aotearoa NZ).

Summary - Stages of Active Management



Stages of Active Management

Escalation to Active Management is undertaken when other reasonable possibilities to resolve concerns have been exhausted. This can occur when Settings have ongoing issues that have not been addressed and/or when concerns have a major/severe impact. All Settings must be provided with an opportunity to review and respond to concerns before being placed on Active Management.

Findings of the below monitoring mechanisms, may result in a decision by the Accreditation Committee to escalate a Setting to the Active Management:

- Following Potential Breach process
- Following Change of Circumstance process
- Following Focus Review (Routine Monitoring)
 - o Progress Report
 - o Trainee Survey
 - o Videoconferences with Trainees, Setting Executive team and/or Training Program Leadership
 - o Site visit
 - o MTS Letter

Throughout the Active Management Process, Training Accreditation Services (TAS) complete the Active Management Assessment Form (AMAF) for internal record keeping and sharing with internal RACP decision making bodies.

The Accreditation Committee may determine the impact is reduced and can be returned to standard monitoring in accordance with the [Monitoring of a Training Provider](#) process at any stage throughout the Active Management Process.

Stage 1: Develop an Action Plan

1. The Accreditation Committee determines that the Setting is placed on Stage 1 Active Management and nominates an Active Management Lead ('AML') to assist with the Active Management Process. The Accreditation Committee determines the current accreditation status of the Setting and/or Training Program(s) based on any conditions and/or recommendations in place. If concerns have already been established based on evidence, the accreditation status is changed (i.e., from 'Accredited' to 'Accredited with Conditions').
2. Training Accreditation Services (TAS) draft [Letter Template A – Stage 1](#) and [Action Plan Template](#) to be sent to the Chair for review and approval.
3. Prior to issuing the letter to the Setting, TAS contact the Director of Physician/Paediatric Education or Head of Department by phone to provide advanced notice of the Accreditation Committee's decision and inform them that correspondence will be issued to place the Setting on Active Management.
4. Once approved, the Setting receive a letter to notify them of their Active Management status. It is issued to the Training Provider for completion and submission by email to TAS within 28-days from the date of the letter.
 - **The Action Plan** requests written responses, and any available supporting documentation, in relation to the conditions and/or recommendations specified against areas of non-compliance to the relevant Accreditation Standards/Criteria.
 - The Training Provider is asked to propose how and by what timeframe they will achieve compliance with the conditions and/or recommendations.
5. The letter is issued to the Training Provider by email.
 - 5.1 The Training Provider has 28 days to lodge a request to reconsider the decision using the [RACP Reconsideration, Review and Appeals](#) Process.
 - 5.2 Following the 28-day period, TAS issues [Email Template A – Stage 1](#) to any relevant internal and external stakeholders ([as per Appendix 1](#)) with the high-level status update. This includes notifying and working collaboratively with relevant jurisdictions to address concerns.
 - 5.3 TAS updates the AMAF and Active Management register with due dates.
 - 5.4 If the accreditation status has been changed following the Committee's decision then following issue of the letter, TAS update any relevant record keeping systems and the [College 'Accredited Settings' web list](#).
6. Once received, TAS review the Action Plan to ensure all conditions and/or recommendations are addressed and any supporting documentation is provided. If incomplete, TAS send the Action Plan back to the Setting for further information.
7. TAS complete the relevant sections of the AMAF.
8. TAS provide copies of the Action Plan, AMAF and any other documentation to the Chair and/or Active Management Lead (AML) by email for their review and to seek a **recommendation** from one of the following options:

Type	Action
Decision Deferred	Decision deferred pending further information, supporting documentation or evidence regarding the Action Plan. This may also include requests for further engagement with relevant stakeholders (e.g., conduct trainee surveys, videoconferences, phone call check-ins with Setting Executive team or Training Program Leadership).
Return to Monitoring	The concerns and/or conditions are assessed to have a minor or moderate impact. Return to standard monitoring (as per Monitoring of a Training Provider process) with a Progress Report and/or other supporting documentation to be submitted within a set timeframe.
Proceed to Stage 2	The concerns are assessed to have a major impact. Remain on Active Management and proceed to Stage 2 – Active Updates.
Proceed to Stage 3	The concerns are assessed to have a severe impact. Remain on Active Management and proceed to Stage 3 – Withdrawal Process.

9. **Committee Decision:** All documentation, including AMAF with the recommendations made by the Chair and/or AML, are placed on the agenda of the Accreditation Committee's next scheduled meeting 'for decision', or an extraordinary videoconference is arranged, as directed by the Chair and/or AML.

In the meeting, the Accreditation Committee review the documentation to make an one evidence-based **decision** from one of the following options:-

Type	Action
Decision Deferred	Decision deferred pending further information, supporting documentation or evidence regarding the Action Plan. This may also include requests for further engagement with relevant stakeholders (e.g., conduct trainee surveys, videoconferences, phone call check-ins with Setting Executive team or Training Program Leadership).
Return to Monitoring	The concerns and/or conditions are assessed to have a minor or moderate impact. Return to standard monitoring (as per Monitoring of a Training Provider process) with a Progress Report and/or other supporting documentation to be submitted within a set timeframe.
Proceed to Stage 2	The concerns are assessed to have a major impact. Remain on Active Management and proceed to Stage 2 – Active Updates.
Proceed to Stage 3	The concerns are assessed to have a severe impact. Remain on Active Management and proceed to Stage 3 – Withdrawal Process.

- 9.1 TAS may provide recommendations to the Committee for consideration with additional information in accordance with procedural fairness, realistic review timelines and available resourcing.
- 9.2 Within 28 days from the Accreditation Committee meeting, TAS staff finalise the minutes extract regarding any Active Management items and circulate this extract to the Chair for approval.
10. The [Letter Template B – Stage 1](#) is drafted by TAS and approved by the Chair. The letter outlines the agreed Active Management decision, any next steps. If proceeding to Stage 2, the letter will outline Active Updates (i.e. the agreed action plan) to be

conducted (*refer to point 12 below*).

11. The letter is issued to the Training Provider by email.
 - 11.1 The Training Provider has 28 days to lodge a request to reconsider the decision using the [RACP Reconsideration, Review and Appeals](#) Process.
 - 11.2 Following the 28-day period, TAS issues [Email Template A – Stage 2](#) to any relevant internal and external stakeholders ([as per Appendix 1](#)) with the high-level status update. This includes notifying and working collaboratively with relevant jurisdictions to address concerns.
 - 11.3 TAS updates the AMAF and Active Management register with due dates.
 - 11.4 If the accreditation status has been changed following the Committee's decision then following issue of the letter, TAS update any relevant record keeping systems and the [College 'Accredited Settings' web list](#).

Stage 2: Active Updates

12. The Accreditation Committee have assessed the concerns through Stage 1 of the Active Management Process and decided to proceed to Stage 2. The Setting is continuing to implement the agreed Action Plan, including providing requested updates to the Accreditation Committee.
13. The Accreditation Committee select the Active Updates to be conducted under Stage 2 within set timeframes and this is outlined to the Training Provider in the [Letter Template B – Stage 1](#) (refer to step 10 above). Agreed Active Updates may include:-

Type	Action
Additional Action Plans	Further updates to the Stage 1 Action Plan to be provided on specific conditions and/or recommendations within either 6, 8 or 12 months from the date of the letter.
Conduct Site Visit	An Active Management Site Visit to be conducted, either physically or virtually under standard operating procedures. The Committee may agree to conduct the site visit following receipt of additional Action Plans. This visit will be attended by an Accreditation Panel comprising of: 1 x Active Management Lead, 1 x Accreditor, 1 x Trainee Representative (if required) and 1 x TAS staff member. Following the visit, the Accreditation Panel completes the Active Management Findings Form (AMFF) with recommendations to the Accreditation Committee.
Active Management Videoconferences	An Active Management Videoconference(s) with the stakeholders nominated by the Accreditation Committee (e.g., Basic or Advanced Trainees, Setting Executive team, Network Director of Physician/Paediatric Education, Director of Physician/Paediatric Education, Head of Department or similar) will be organised and facilitated by TAS on an agreed date. The Panel use the Active Management Question Guide in preparation and throughout the meeting(s). Any notes taken by the Chair and AML during the videoconferences are provided to TAS for internal record keeping purposes. If requested and agreed by all parties, TAS may circulate notes from the meetings to attendees for factual verification purposes.
Trainee Surveys	TAS will conduct and issue trainee surveys either by way of a standard RACP trainee survey or specific questions to trainees to gain additional feedback and check on progress.

14. At least one week prior to each Active Update due date, TAS issue an email reminder using [Email Template A – Stage 2](#) to the Training Provider.
15. On receipt of any Active Update documentation (e.g., Action Plans, Active Management Findings Forms, or similar), TAS review to ensure it is adequately completed and acknowledge receipt. Copies are then issued by email to the Chair and/or AML for noting.

16. **Committee Decision:** As any Active Update documentation received, TAS places copies on the agenda of the Accreditation Committee's next scheduled meeting 'for decision', or an extraordinary videoconference is arranged, as directed by the Chair and/or AML. In the meeting, the Accreditation Committee review the documentation to make an one evidence-based **decision** from one of the following options:-

Type	Action
Met	Sufficient action has been taken by the Training Provider to satisfy the Active Updates within the review timeline and achieve compliance of the conditions and recommendations. Determine if the matter can be closed and the Setting returned to standard monitoring.
Partially Met	Some progress has been made however further action by the Training Provider is required. Determine if the matter can be closed and the Setting returned to standard monitoring or request additional Action Updates under Stage 2 – Active Updates.
Not Met	Insufficient or no action has been taken. Determine whether progression to Stage 3 – Withdrawal Process, is required.

- 16.1 Training Accreditation Services may provide alternative recommendations to the Committee for consideration with additional information in accordance with procedural fairness, realistic review timelines and available resourcing.
- 16.2 Within 28 business days from the Accreditation Committee meeting, Training Accreditation Services Staff finalise the minutes extract regarding any Active Management item/s and circulate this extract to the Chair/s for approval.
17. Following the Committee meeting, TAS drafts [Letter Template A – Stage 2](#) for approval by the Chair. The letter outlines the Committee's agreed Active Management decision.
18. The letter is issued to the Training Provider by email.
- 18.1 The Training Provider has 28 days to lodge a request to reconsider the decision using the [RACP Reconsideration, Review and Appeals](#) Process.
- 18.2 Following the 28-day period, TAS issues [Email Template B – Stage 2](#) to any relevant internal and external stakeholders ([as per Appendix 1](#)) to provide a high-level status update. This includes notifying and working collaboratively with relevant jurisdictions to address concerns.
- 18.3 TAS updates the AMAF and Active Management Trackers with due dates.
- 18.4 If the accreditation status has been changed following the Committee's decision then following issue of the letter, Training Accreditation Services update any relevant record keeping systems and the [College 'Accredited Settings' web list](#).
19. Once the 28-day period concludes, TAS issue a brief with the Active Management outcome and a copy of the approved Accreditation Committee meeting minutes to the parent College Committee and the College Education Committee for noting.

Stage 3: Withdrawal Process

20. If determined by the Accreditation Committee in the stages above, that the impact is severe or insufficient/no progress has been made to address the conditions, then the matter may be escalated to Stage 3 - Withdrawal Process. The parent College Committee (Basic or Advanced Training) is informed of the Accreditation Committee's recommendation to withdraw accreditation.
21. A brief, including a copy of the minutes extract from the Accreditation Committee meeting regarding the Active Management withdrawal decision and any other relevant documentation is issued to the Secretariat for voting at the next scheduled meeting of the parent committee **OR** if the next scheduled meeting is more than four weeks away then it is requested to be circulated as Out of Session.
22. Once the meeting by the parent body has taken place, a copy of the minutes extract is received by TAS and issued to the Chair and/or AML for noting.
23. If the parent body agrees to ratify the Accreditation Committee's decision to withdraw accreditation, then TAS issues a brief to the RACP Board for noting:-
 - The brief includes a copy of minutes extract from the parent body Committee meeting for noting at the Board's next scheduled meeting **OR** if the next scheduled meeting is more than four weeks away then is requested to be circulated out of session.
 - The brief outlines to the RACP Board the Accreditation Committee's recommendation to withdraw accreditation from the Training Setting and ratification received by the parent body.
24. Following ratification by the parent body and confirmed noting by the RACP Board, TAS draft [Letter Template A – Stage 3](#) which is sent to the Chair for review and approval.
25. Prior to issuing the letter to the Setting, TAS contact the Setting Executive or Director of Physician/Paediatric Education or Head of Department by phone to provide advanced notice of the Accreditation Committee's decision to withdraw accreditation and inform them that correspondence will be issued.
26. Once approved, the letter is issued by email to the Training Setting advising of the withdrawal decision.
27. Immediately following the issue of this letter, TAS also:
 - Update the 'Accredited Settings' web list on the RACP website to remove the Setting from the list .
 - Update CAS to archive the record and add notes outlining the reason(s) for withdrawal.
 - Issue [Email Template A – Stage 3](#) to current trainees at the Setting to notify them of the withdrawal.
 - Issue [Email Template B – Stage 3](#) to internal and external stakeholders to notify them of the decision.

Appendix 1: Internal and External Stakeholder Involvement

Stakeholders	Stage 1	Stage 2	Withdrawal
 RACP Training Accreditation Services <i>plans, coordinates and manages accreditation cycles, liaises with fellows, accreditors, setting contacts, Committee Members and implements accreditation programs.</i>	• Letter Template A: draft and issue notifying of active management status with an Action Plan Template. • Contact DPE by phone advising decision and next steps. • Issue Email Template A: Informing of Stage 1 status. • Update accreditation status records, if required. • Review Action Plan and update AMAF. • Provide brief and action plan to Accreditation Committee for decision and draft minutes. • Letter Template B: draft and issue with agreed outcome and review timelines.	• Letter Template A: draft and issue following each milestone review and decision. • If applicable, facilitate further engagement including videoconferences, trainee surveys and take notes. • If applicable, facilitate and organise site visit • Issue Email Template A: within 1 week prior to each milestone. • Review & issue milestone documentation to Chair & AML. • Issue Email Template B: Informing of status following each milestone. • Provide Brief to Accreditation Committee for final decision and draft minutes. • Issue brief to RACP Committees identified in the table below.	• If necessary, organise an urgent Out of Session video meeting with Accreditation Committee meeting for withdrawal decision. • Issue brief with minutes to parent body Committee for voting. • If accepted by parent body, then issue brief to RACP Board. • If confirmed by RACP Board, then draft and issue Letter Template A. • Update accreditation status records, if required. • Issue Email Templates A and B advising of withdrawal decision.
 RACP Training Support <i>provides advice to trainees experiencing difficulty, facilitates and administers the trainee support pathway.</i>	• Email Template A: Informing of Stage 1 status. • Liaise with TAS in supporting trainees where necessary.	• Email Template B: Informing of status following each milestone. • Liaise with TAS in supporting trainees where necessary.	• Email Template B: Informing of withdrawal • Liaise with TAS in supporting trainees where necessary.
 RACP Training Services <i>coordinates and manages annual cycles of trainee registration, training time and compliance with training requirements.</i>	• Email Template A: Informing of Stage 1 status. • Liaise with TAS in supporting trainees where necessary.	• Email Template B: Informing of status following each milestone. • Liaise with TAS in supporting trainees where necessary.	• Email Template B: Informing of withdrawal • Liaise with TAS in supporting trainees where necessary.
 Chair of Accreditation Committee or equivalent <i>responsible for leadership of the College Body, facilitating accreditation reviews and communications with Parent Body and/or Board.</i>	• Letter Template A & B: Review & approve • Review Action Plan, liaise with AML and provide recommendation to Accreditation Committee • Lead discussion at Accreditation Committee meeting • Review & approve minutes following meeting	• Letter Template A: review and approve following each milestone. • Attend and conduct with AML, any further engagement meetings or site visits. • Review documentation received upon each milestone, liaise with AML and make recommendation for next steps. • Provide update on status to Accreditation Committee. • Review & approve minutes following meeting	• Review minutes and correspondence in relation to withdrawal decision. • Letter Template A: review and approve.
 Accreditation Committee or equivalent <i>oversees the accreditation for Training Program/s. Monitor, review and interpret accreditation criteria.</i>	• Review Brief and documents provided by TAS and determine next steps. • Nominate AML and Member/s to fulfill the duties associated with that role upon nomination.	• Review Brief and documents provided by TAS following each milestone and determine next steps.	• Attend meetings to discuss and determine referral for Withdrawal decision.
 Parent Committee (BT Committee or AMDEC/PDEC) <i>Ensures oversight in the implementation of</i>			• Review Brief from Accreditation Committee and ratify decision to proceed with withdrawal process (where applicable) • Vote on referral for withdrawal

College Education Policy in the Training program/s including accreditation, supervision and examinations.			
 President of Division Councils Represents and connects Fellows and trainees in Australia and Aotearoa New Zealand through its Council, committees, and associated committees.		Email Template B: Informing of status.	Email Template B: Informing of withdrawal
 State Committee Chair Australian state and territory committees represent their trainees and Fellow residents across educational, professional development and advocacy issues.		Email Template B: Informing of status.	Email Template B: Informing of withdrawal
 College Education Committee Peak body responsible for developing and overseeing College-wide education policy and improving both new and amended training and education programs.	Email Template A: Informing of Stage 1 status.	Email Template B: Informing of status	Email Template B: Informing of withdrawal
 RACP Board Governs and supports the RACP Governance by representing College members and guiding decision-making.			Notified of decision to withdraw, as ratified by the Basic Training Committee.
 Training Network/s & Network Governing Bodies Supports high quality training and education to physicians.	Email Template A: Informing of Stage 1 status.	Email Template B: Informing of status Network Director of Physician/Paediatric Education are also invited to attend site visit review if scheduled.	Email Template B: Informing of withdrawal
 Local Health District/Jurisdiction or Health New Zealand/Te Whatu Ora Management of public hospitals, healthcare clinics and institutions. Promote, protect and maintain the community's health.	Email Template A: Informing of Stage 1 status and working in partnership with RACP to address concerns.	Email Template B: Informing of status and working in partnership with RACP to address concerns.	Email Template B: Informing of withdrawal

 Relevant Australian State Health Minister or NZ Minister of Health <i>Supports the promotion, management, development and maintenance of health and wellbeing systems and legislation.</i>			Email Template B: Informing of withdrawal
 Australian Medical Council (AMC)/ Medical Council of New Zealand (MCNZ) <i>Independent national standards body for medical education and assessment.</i>			Email Template B: Informing of withdrawal