



Australian Medical Council Limited

Specialist Education Accreditation Committee

AMC Findings - Royal Australasian College of Physicians 2023 Monitoring submission

College Name: Royal Australasian College of Physicians

Date of last AMC accreditation decision: 2020 (via accreditation extension submission)

Periodic reports since last AMC assessment: 2021, 2022

Next accreditation decision due: 31 March 2025

Explanation of findings

Under the Health Practitioner Regulation National Law, the AMC can accredit a program of study if it is reasonably satisfied that: (a) the program of study, and the education provider that provides the program of study, meet the accreditation standard; or (b) the program of study, and the education provider that provides the program of study, substantially meet the accreditation standard and the imposition of conditions will ensure the program meets the standard within a reasonable time.

The AMC uses the terminology of the National Law (meet/substantially meet) in making decisions about accreditation programs and providers.

Providers must satisfy conditions on accreditation in order to meet the relevant accreditation standard. The AMC provides feedback on the conditions using the following:

Unsatisfactory	The College may not meet the related accreditation standard and AMC should investigate further.
Not Progressing	No progress or overly slow progress given the timeframe on the condition.
Progressing	Indicates satisfactory progress against the condition, with further reporting necessary.
Satisfied	The College has satisfied all requirements and can cease reporting against the condition. Condition is marked as closed.

Please note that this response contains:

Part A	<i>Summary of the overall findings relating to the College's 2023 monitoring submission.</i>
Part B	<i>Acknowledgement, and responses to conditions that were satisfied in 2023 and have been closed</i>
Part C	<i>Detailed responses to information reported against the standards, including feedback to support further reporting on remaining conditions on accreditation.</i>
Part D	<i>Report on Quality Improvement Recommendations</i>

Part A – Summary of the overall findings relating to the College’s 2023 monitoring submission.

Overall Summary of Royal Australasian College of Physicians 2023 monitoring submission
<p>The College continues to make progress in the development and implementation of curricula. The new Basic Training program is slated for implementation next year along with the first tranche of Advanced Training Programs. The following waves also have a development and implementation plan guaranteeing resourcing and timelines. These timelines are beyond the AMC deadline and it is important that they are adhered to.</p> <p>The loss of the enabling software for the training programs is a significant setback and raises the risk that progress on delivering the new training programs will stall whilst a new product is found and developed. It is of concern that an appropriate solution is only at early stages with implementation deadlines in the next 12-18 months rapidly approaching.</p> <p>It is also concerning from a governance perspective that this situation arose late in the process with no apparent warning or sufficient contingencies in place.</p> <p>The AMC notes the success of recruiting new staff leadership, and the evidence that this is bringing renewed focus on education and training as well as resetting relationships with speciality societies.</p> <p>The College is commended on implementing the remaining quality improvement recommendations.</p> <p>The impending AMC reaccreditation visit next year will focus on ongoing areas of concern for the AMC including governance, delays in the development and implementation of the new training programs, the fallout from the loss of TRACC and the ongoing high rates of BDSH.</p>

Standard	2022 Findings	2023 Findings
Overall	Substantially Met	Substantially Met
1. The context of education and training	Met	Met
2. The outcomes of specialist training and education	Substantially Met	Met
3. The specialist medical training and education framework	Not Met	Not Met
4. Teaching and learning methods	Substantially Met	Met
5. Assessment of learning	Substantially Met	Substantially Met
6. Monitoring and evaluation	Met	Met
7. Issues relating to trainees	Met	Met
8. Implementing the training program – delivery of educational resources	Met	Met
9. Assessment of specialist international medical graduates	Met	Met

Part B – AMC feedback on conditions satisfied in 2023

Standard 2: The outcomes of specialist training and education

Areas covered by this standard: educational purpose of the educational provider; and, program and graduate outcomes

Condition 34 – new in 2019		To be met by: 2023		
Ensure the standards and strategies of the Professional Practice Framework are incorporated into the renewal of Advanced Training Curricula to enable the definition of consistent and clear graduate outcomes across all specialties aligned to community need (Standard 2.3.1)				
2023 Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
				X
AMC commentary				
<p>Work to align curricula content to the new Cultural Safety Professional Standard is progressing with the achievement of a number of goals. Further stakeholder consultation is flagged for 2023 along with further content updates and a likely submission for final approval later this year.</p> <p>The submission stated that Wave 1 ATCR was due for approval earlier this year and Waves 2+ have an approved and resourced plan for development.</p> <p>The College provided additional information to the AMC prior to consideration of the monitoring submission by the Specialist Education Accreditation Committee confirming that the College Education Committee (CEC) approved the six renewed Wave 1 Advanced Training curricula. The curricula standards and program handbooks have been published on the College website. Planning for the implementation of the new Wave 1 curricula is now underway.</p> <p>The Professional Practice Framework (PPF) has been embedded throughout the new curricula standards. Work is also being done to improve standardisation of components such as trainee research projects.</p> <p>The Board has approved an accelerated plan to allow for two further waves of the curricula renewal (Wave 2 and 3), with 16 specialties in each group across 2023 and 2024.</p> <p>As Wave 1 ATCR has now been approved, this condition is satisfied. The College is asked to continue to provide updates on the curricula renewal and implementation.</p>				

Standard 4: Teaching and learning methods

Areas covered by this standard: teaching and learning approach and methods

Condition 32 - new in 2019		To be met by: 2020		
Articulate, in partnership with the Specialty Societies, the role of College oversight in advanced training subspecialty training. (Standard 4.2.3)				
<i>Note: This condition was upgraded from a recommendation (JJ) following the 2018 follow up visit (Recommendation JJ – Clarify, in partnership with the speciality societies, the role of College oversight in post fellowship subspecialty training.)</i>				
2023 Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
				X

AMC commentary

New leadership has reinvigorated discussions with specialty societies about how to best work together. A recently commenced Governance review is expected to review the existing Advanced Training Committees. There is ongoing co-operation to develop the ATCR.

RACP has described itself as the primary body that governs physician training programs but does not recognise the common interests and benefits from working with the societies.

There is ongoing specialty society contribution into the ATCR process via formalised representation on the curriculum review groups and the advanced training committees as well as via consultation and the work of individuals.

There is no update of the progress of specialty society collaboration schedules. Brief mention has been made of refining the model of collaboration between the RACP and specialty societies in education and training. This will be further investigated in the reaccreditation assessment next year.

Part C - Detailed feedback on standards, including remaining conditions

Standard 1: The context of training and education

Areas covered by this standard: governance of the college; program management; reconsideration, review and appeals processes; educational expertise and exchange; educational resources; interaction with the health sector; continuous renewal.

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 1
<p>The College has made key staffing changes since the 2022 monitoring submission. These include the appointment of a new CEO and Executive General Manager of Education (EGM), Learning and Assessment. The College is looking to use these new appointments to lead change across the College in priority areas such as education and technology. There have also been two new board appointments.</p> <p>An operational plan has been provided for 2023 with four key strategic focus areas (Sustainable College, Member Experience and Belonging, Physician and Practice of the Future and Equitable and Healthier Communities. Maintaining AMC accreditation is listed as a core operational priority but concerns with continuing to meet Standard 3 are only listed as a single point. Further to this, education and training are nominated as a focus with four priorities (governance, technology, training enquiries and curricular renewal).</p>

Requests for additional information from the AMC response to the 2022 monitoring submission:
<p><i>The College is asked to comment on how recent governance and organisational changes impact and influence College activities such as the curriculum renewal and support for First Nations and Māori trainees. Additionally, the AMC is interested in understanding how these internal roles will engage with external communities and organisations.</i></p> <p>The College nominates the appointment of the new EGM with specific curricular expertise as likely to empower the curriculum renewal. Along with the Board's identification of education as a priority area the College feels that this should align key committees, leadership and resources. No reflection is made on how these changes improve the pre-existing situation.</p> <p>There is ongoing utilisation of Indigenous leads and committees for Aboriginal, Torres Strait Islander and Māori members and First Nations health outcomes.</p> <p>No description is given on how recent governance and organisational changes will facilitate external engagement.</p> <p><i>The College is asked to provide an update on staff turnover.</i></p> <p>The College's turnover was 17.8% for the 2022 calendar year. Comment has been made that turnover seems to be reduced this year. It is noted that the College provided external factors leading to staff turnover, no mention was made if the College looked internally for reasons for the high turnover. The College is asked to reflect on whether any internal factors may have led to staff turnover and what the college has done to mitigate turnover internally.</p>

Does the College have plans to mandate Cultural Safety modules for its staff and committee members?

The College mandates the NSW Public Service Commission's cultural capability training package for staff with 60% compliance. All trainees are mandated to complete RACP's online cultural safety training. Further plans for specific cultural safety training for staff and committee members have been proposed with a 2024 timeline.

2 Activity against conditions

Nil remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 1

Data for reconsiderations, reviews and appeals has been provided. A substantial proportion are upheld. The College comments that this was often due to the submission of further information or re-evaluation of existing information. The AMC asks if the College could please comment in its next submission whether this information has prompted any policy/procedure changes.

Information on costs have been provided. No commentary is made about making sure costs are not prohibitive. Support is offered to trainees during this process via existing channels.

An updated College Governance Chart has been provided.

Summary of College performance against Standard 1

Standard 1 continues to be met.

The College continues to have a significant volume of operational priorities. Further information about the achievement of these priorities would be worthwhile and the reflection as to whether the College has the resources to achieve such a broad range of goals on an ongoing basis.

Standard 2: The outcomes of specialist training and education

Areas covered by this standard: educational purpose of the educational provider; and, program and graduate outcomes

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 2

The College has renewed six advanced training curricula which will be implemented in 2024. This includes the renewal of associated program and graduate outcomes.

2 Activity against conditions

Nil remain.

Summary of College performance against Standard 2

Standard 2 is now met.

Standard 3: The specialist medical training and education framework

Areas covered by this standard: curriculum framework; curriculum content; continuum of training, education and practice; and curriculum structure

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 3

The new basic training program is in its third year of implementation at early adopter training settings. There has been the withdrawal of two networks from the early adopter pathway due to problems with the development of TRACC, the new program's enabling technology.

Full rollout of the new basic training program was planned for 2024. The College reports that there have been ongoing problems with the enabling technology, TRACC, resulting in the termination of the vendor's contract to provide this software. Subsequently the roll out has been delayed until 2025.

This development is of great concern to the AMC. In addition to the risk of delayed progress on delivering the new training programs while a new system is developed, it is also worrying that an appropriate solution is only at the most rudimentary stages.

Contingency planning has been provided with a focus on protecting trainees and maintaining standards. No ongoing solution has been provided but KPMG have been engaged to assist in developing the Colleges requirements. A report was to be delivered in April and a detailed business case and project plan are in development. The AMC requests that these documents are provided to the AMC as soon as they are developed.

Updates have been provided regarding the advanced training curricula renewal (ATCR). Wave 1 ATCR was approved in April with implementation planning underway. Technology solutions continue to be a limiting factor.

All of the plans for implementation of the new basic training program and the advanced training curricula are dependent upon finding an enabling technology.

2 Activity against conditions

Condition 6 (ii)		To be met by: 2023 (Previously due to be met by 2020)		
In relation to the advanced training curricula: ii. Implement the revised advanced training curricula. (Standard 3.2)				
2023 Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
AMC commentary				
<p>Wave 1 was approved in April 2023, and the College is now working towards implementation of these in 2024. Wave 2 and 3 have a staggered implementation planned across three years with all renewed programs implemented by 2026. The College is now confident it has a robust and expedient model for completion within the stated timeframe, acknowledging that this will not meet the AMC deadline. Regular reporting processes have been implemented.</p> <p>The College acknowledges that implementation is dependent upon enabling technology and with the termination of the TRACC contract there is no appropriate solution that has been proposed. This represents a significant risk that the College's timeline will not be met and the implementation of all waves delayed. Contingencies have been discussed but these seem to be for 'business as usual' rather than incorporating implementation of new curricula.</p>				

Summary of College performance against Standard 3

Standard 3 continues to be not met.

The loss of the TRACC system represents a significant challenge to the implementation of both the basic training and advance training curricula raising concern that they will not be delivered within the proposed timelines.

Standard 4: Teaching and learning methods

Areas covered by this standard: teaching and learning approach and methods

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 4
<p>Learning, teaching and assessment programs have been developed for all of the Wave 1 ATCRs. This includes the learning goals, entry, progression and completion criteria, learning programs, teaching program including supervision requirements and the assessment program.</p> <p>The College has described the expansion and increased uptake of the College learning series, which is commended.</p>

2 Activity against conditions

Nil remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 4
Comments made under other standards.

Summary of College performance against Standard 4 Standard 4 is now met.
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Standard 5: Assessment of learning

Areas covered by this standard: assessment approach; assessment methods; performance feedback; assessment quality

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 5
There has been an update to the assessment policy reflecting the learned experiences of delivering assessment throughout the COVID-19 pandemic by including an additional policy regarding responsiveness to external factors. The advanced training research requirement has been reinstated after it was waived in 2020, 2021 and 2022 as a consequence of COVID-19.

Requests for additional information from the AMC response to the 2022 monitoring submission:
<i>Comment on actions arising from KPMG's report/recommendations following their review of the failings of the February 2022 examination.</i> The KPMG report set out a number of recommendations for the College to consider prior to embarking upon future computer-based testing for examinations. The College accepted these recommendations and will consider them prior to any future computer-based examination delivery. At this stage the College will not be delivering any computer-based examinations and anticipated that this will be reviewed further during a comprehensive review of assessment.

2 Activity against conditions

Condition 12		To be met by: 2022 (Previously due to be met in 2020)		
As part of the advanced training curricula review, ensure that the summative assessments apply reliable and valid methodologies and are aligned to all advanced training curricula. (Standard 5.1 and 5.4)				
2023 Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
AMC commentary				
As per condition 6(ii). Wave 1 assessment programs have been approved and are awaiting implementation in 2024. Wave 2+ assessment programs will be revised using the same approach as that used for Wave 1 and should be ready for implementation in 2025/26.				

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 5
Data has been provided on examination delivery and pass rates, including pass rates of Aboriginal and/or Torres Strait Islander trainees. The framework for contingency planning was also provided, rather than specific contingency plans. Communication is provided through the College website.

Summary of College performance against Standard 5 Standard 5 is substantially met.
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Standard 6: Monitoring and evaluation

Areas covered by this standard: program monitoring; evaluation; feedback, reporting and action

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 6
Development of a New Fellow Survey was reported.

Requests for additional information from the AMC response to the 2022 monitoring submission:

Throughout 2022 a consultant has been undertaking a broad environmental scan to support the development of an action plan to progress the five recommendations from the 2021 summit. The Board has also sought legal advice to assist in assessing how the College can make meaningful contributions to the elimination of BDSH. Through these activities an action plan will be developed and launched later this year. In the meantime, the College continues to act on localised reports of BDSH and implement improved supervisor training.

Completion rates have been provided for the majority of survey tools mentioned in the report.

2 Activity against conditions

Nil remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 6

The results of routine survey tools have been listed and College responses given. Broad themes included College communication, burden of activities such as accreditation and ongoing high rates of BDSH.

Summary of College performance against Standard 6

Standard 6 continues to be met

Standard 7: Issues relating to trainees

Areas covered by this standard: admission policy and selection; trainee participation in education provider governance; communication with trainees; trainee wellbeing; resolution of training problems and disputes

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 7

A new Member Health and Wellbeing Strategic Plan 2023-2026 has been developed.

The College has made significant changes to the Flexible Training and Progression through Training policies. This had been planned for 2023 but was expedited in response to the 2021 Gender Equity in Medicine report. These changes include removal on the cap on interrupted training, exclusion of sick leave from the time limit for training completion, reduction of the minimum FTE for part time training to 0.2FTE and introduction of a 'return to training plan' for Trainees away for greater than 24 months. Amendments to the Progression Through Training policy have been made to accommodate these changes.

The College also reported on the usage of the Training Support Pathway, the reinstatement of advanced training research programs, streamlining of trainee enquiry response and resolution processes and the commencement of the Gender Equity in Medicine Committee.

Requests for additional information from the AMC response to the 2022 monitoring submission:

Please comment on the utility of the Situational Judgement Test and the evaluations.

Evaluation is underway and will be concluded in mid-2023.

The College is asked to clarify the reasons for First Nations and Māori trainees withdrawing from its training programs, and how the College supports these doctors throughout their training.

Clarification has been provided. Reasons for withdrawal and feedback to the College is comparable to other trainees. A number of support programs were detailed and are appropriate. These include scholarships and reimbursements, coaching programs, welcome activities and support groups.

Please provide specific data about withdrawal initiated by trainees, compared with progression and performance issues being responsible for trainees leaving the program.

No feedback provided.

2 Activity against conditions

Nil remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 7

The College outlined the principles which govern fee setting and the communication to trainees. No comment is made on the appropriateness of fees and establishing whether they are potentially prohibitive.

Summary of College performance against Standard 7

Standard 7 remains met.

Standard 8: Implementing the training program – delivery of educational resources

Areas covered by this standard: supervisory and educational roles and training sites and posts

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 8

The College has streamlined its Physician Training Survey to reduce the overlap with the MTS. Funding has been received for the development and delivery of a suite of resources targeted to support culturally safe supervision.

The accreditation renewal program continues with the implementation of network accreditation and the development of reporting and monitoring tools and processes. Site accreditation executive summaries will be published on the College website from later this year.

2 Activity against conditions

Nil remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 8

The College outlined the site accreditation standards that concern the cultural safety of training but no explicit mention is made of cultural safety.

Summary of College performance against Standard 8

Standard 8 continues to be met.

Standard 9: Assessment of specialist international medical graduates

Areas covered by this standard: assessment framework; assessment methods; assessment decision; communication with specialist international medical graduate applicants

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 9

The College did not report any significant developments against this Standard.

2 Activity against conditions

Nil remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 9

Requested data has been provided.

Summary of College performance against Standard 9

Standard 9 continues to be met

Part D – Report on Quality Improvement Recommendations

Quality Improvement Recommendation	AMC Comment
Standard 1: The context of training and education	
Nil remain.	
Standard 2: The outcomes of specialist training and education	
Nil remain.	
Standard 3: The specialist medical training and education framework	
HH Clarify in partnership with key stakeholders the linkages between the first two years of postgraduate experience and College training programs. (Standard 3.5)	RACP has been engaged with the AMC's review of the National Framework for Prevocational Medical Training to optimise alignment with Basic Physician Training. There is ongoing collaboration with postgraduate medical councils. <i>This recommendation is now closed.</i>
Standard 4: Teaching and learning approach and methods	
ZZ Demonstrate that the College articulates its learning model clearly for trainees and supervisors and demonstrate alignment of trainee experience and curricula to that model. (Standard 4.2.1, 4.2.2 and 4.2.3)	This articulation has been provided in the new learning, teaching and assessment programs in the Basic and Advanced Training programs. The curricula links to learning goals which are then linked to learning, teaching and assessment activities in the program. This is outlined in the handbooks. Remaining Advanced Training programs will be revised following this model. <i>This recommendation is now closed.</i>
Standard 5: Assessment of learning	
MM Adopt recommendations from the external review on assessment regarding: timing of the clinical examination; conducting the written examination twice a year. (Standard 5.3)	These recommendations have been implemented. <i>This recommendation is now closed.</i>
Standard 6: Monitoring and evaluation	
NN Share information about the quality of training by uploading training site accreditation reports to the College's website. (Standard 6.1)	Executive summaries from site accreditation will be published on the College website. <i>This recommendation is now closed.</i>
Standard 7: Issues relating to trainees	
Nil remain.	
Standard 8: Implementing the program – delivery of education and accreditation of training sites	
Nil remain.	
Standard 9: Assessment of specialist international medical graduates	
Nil remain.	