



Responsible Committee(s):	Accreditation Committee
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Contents

Background.....	1
Acknowledgment.....	1
Purpose	1
The decision-making principles	2
Accreditation assessment terminology	2
Accreditation risk matrix and rating outcomes	3
Linking the overall risk rating to accreditation outcomes and conditions.....	4
Guidance on developing conditions and recommendations.....	6
Management of accreditation outcomes.....	7
Appendix A – Accreditation decision making flowchart.....	8

Background

Risk-based decision making is a structured methodology used to evaluate and prioritise decisions by considering the potential risks involved. This approach focuses on identifying, assessing, and mitigating risks to ensure optimal outcomes. It is particularly relevant to college accreditation activities where the potential for adverse outcomes has significant cascading impacts on the college.

This framework underpins the accreditation decision making in the Accreditation Policy and Procedure, providing robust justifications for unfavourable accreditation outcomes leading to the Removal of Accreditation Policy and Procedure. These documents are located on the college’s [Accrediting posts, programs and courses](#) webpage.

An overarching accreditation decision-making flowchart for both new and existing settings is located in Appendix A of this document.

Acknowledgment

This framework has been based on the [Model Procedures for specialist medical colleges accreditation or training settings](#) document developed by the Australian Medical Council (AMC) and has been contextualised for the RANZCP.

Purpose

This framework is to be used when undertaking accreditation activities to appropriately classify and categorise how well a training setting meets the standards, and when to conduct a risk assessment where there is doubt.

Guidance is provided in conducting the risk assessment, and the recommended approach that is to be used for each risk rating (taking into consideration if the training setting is new or existing) and the accreditation outcome that is recommended for each risk rating. Furthermore, the framework provides guidance on how the accreditation outcome is to be managed.

If the decision is to revoke accreditation for an existing training setting, the Removal of Accreditation Policy and Procedure is activated.

The decision-making principles

Decision making is driven by the following principles:

1. Accreditation is focused on the training setting's ability to deliver the training program and to provide a safe learning environment for trainees.
2. Accreditation findings and decisions relate to the accreditation standards and do not extend to areas outside of this scope.
3. Accreditation decisions will be risk-based and proportionate.
4. A consistent approach is used for assessing risk and determining the accreditation outcome and any subsequent actions, using the risk assessment framework for accreditation (see Accreditation Risk Matrix and Risk Rating Outcomes below).
5. Where an urgent response to an issue is required to protect a trainee's health and safety, the college will communicate the matter appropriately to the accredited training setting/provider to allow for all parties to meet their workplace health and safety obligations. If this includes removal of the trainee from the training setting (for example, providing immediate leave, moving the trainee to another setting), the parties will cooperate and coordinate actions to allow this to occur.

Accreditation assessment terminology

In line with the Australian Medical Council (AMC) definitions, a **Training Setting** is described as the place or position accredited, or applying for accreditation, by the college. This includes sites, posts, practices, networks (which are composed of multiple settings) and programs.

During the accreditation process, the following terminology is used. These terms will be explained for each stage of the process.

Figure 1: Accreditation Assessment Terminology

Standards/Criteria Assessment Outcome	Overall Risk Rating (of all standards)	Accreditation Outcome		Accreditation Decision
		New Settings	Existing Settings	
Options: <ul style="list-style-type: none"> • Met • Substantially Met • Not Met 	Options: <ul style="list-style-type: none"> • Low • Medium • High • Extreme 	<ul style="list-style-type: none"> • Provisionally Accredited • Not Accredited (refused) 	<ul style="list-style-type: none"> • Accredited • Conditionally Accredited • Not Accredited (revoked) 	Accreditation Outcome + Duration + Conditions (if any)

During the accreditation assessment of a training setting (as per the Accreditation Policy and Procedure and the college Accreditation Standards), the classification of how completely a training setting meets each accreditation standard/criteria can only use the following three terms:

Figure 2: Standards/Criteria Assessment Outcome Terminology

Terminology	Definition
Met	There is evidence that the criterion has been fully met.
Substantially met	Some but not all aspects of the criterion have been met. For example, there is alignment of policy/intent but evidence of delivery is not yet available, or there is some misalignment of policy/intent that needs to be addressed.
Not met	The criterion has not been met i.e. there is a gap or significant misalignment of outcome or policy with the criterion.

It is noted that *new* settings may not be able to meet all accreditation criteria because they do not yet have trainees at the setting, or for other relevant reasons.

For networks or programs, these criteria will apply, recognising that various settings may contribute to meeting the criteria overall.

The Accreditation Panel will record the rationale for its decision and any other comments in the draft report. The accreditation report allows for the inclusion of conditions and recommendations.

- **Conditions** are a qualification attached to the granting of accreditation at a training setting which requires action within a defined timeframe.
- **Recommendations** are intended to support continuous improvement. Unlike conditions, training settings are not required to act on a recommendation, however acting on the recommendation demonstrates a commitment to quality improvement.

The Accreditation Panel may also make **commendations** in the report where it has found the training setting is significantly exceeding the minimum requirements for accreditation. The college may share the commendations with other training settings to promote best practice.

Accreditation risk matrix and rating outcomes

Where a training setting has a finding of ‘met’ for all criteria within the standards, accreditation will be granted.

Where a training setting has any findings of ‘substantially met’ or ‘not met’ for any criteria within the standards, a risk assessment will be conducted (using the Accreditation Risk Matrix at Figure 3 below). The outcome of this assessment will guide the college’s response and accreditation decision.

The risk assessment is run on the **totality of the risk**, not applied against each individual criterion i.e. the accreditation team needs to look at all of the criterion that have been recorded as ‘substantially met’ or ‘not met’ and determine what the overall impact on training is and the likelihood of the setting being able to implement actions to meet the criterion/criteria within a reasonable period. Accreditation teams should NOT be creating an individual risk assessment score against each individual criterion and then determining the overall rating based on the highest rated score.

The level of risk is based on the following dimensions:

- the **impact** on training at the training setting, noting that this has consequences for patient safety. This includes considering the impact on current and future trainees and includes impacts on:
 - the ability of trainees to achieve the training program outcomes
 - the ability of trainees to complete the training program within reasonable timeframes
 - the ability of supervisors to be able to deliver effective education and training
- the **likelihood** that actions will be implemented to meet the criteria within a reasonable period. This goes to matters relating to the conditions history and behaviour of the training setting/training provider, whether they understand the issues and what is required to meet the criteria, and whether they have demonstrated that they have the capability, commitment and resources to take the actions needed.

Matters the accreditation team may wish to consider when determining this risk rating (from “rare” to “almost certain”) include:

- How the setting has responded to any previous conditions regarding the same subject matter. For example, if the same issue has been raised in previous accreditations but the setting has made little or no progress in addressing the issue, then confidence in the ability of the training setting to take action may be lower, thus potentially moving the risk rating more towards ‘unlikely’ or ‘rare’. However, this would depend on the circumstances of each case.
- The feedback from the setting during the accreditation assessment process (noting the model procedures encourage discussion between the accreditation team and the training setting to try and resolve issues prior to a final accreditation decision being made). For example, this feedback may: evidence steps the setting is willing to put in place immediately or in the near future; demonstrate a commitment to address the issues; indicate that resources are available to address the issue. This kind of positive engagement may raise the accreditation team’s confidence in the ability of the training setting to take action, thus potentially moving the risk rating more towards “likely” or “almost certain”.

The timeline of 'reasonable period' will depend on:

- the nature of the range of criteria that have not been met e.g. some areas will require a more rapid response than others because they pose an imminent or immediate risk
- the steps the training setting reasonably needs to implement change (e.g. if the action required to meet the standards is to ensure trainees have oversight and supervision appropriate for their stage of training, the training setting would need time to recruit staff or make remote supervision arrangements and this time might differ between rural and metro settings).

For these reasons, a 'reasonable period' cannot be further defined within this guidance document and is at the discretion of the accreditation team to determine.

Figure 3: Accreditation Risk Matrix

		The IMPACT on training at the training setting, noting that this has consequences for patient safety. This includes considering the impact on current and future trainees.				
		Insignificant	Minor	Moderate	Major	Severe
The LIKELIHOOD of the training setting/training provider being ABLE to implement actions to meet the criterion/criteria within a <i>reasonable</i> period.	Rare	Low	Medium	High	Extreme	Extreme
	Unlikely	Low	Medium	High	High	Extreme
	Possible	Low	Low	Medium	High	High
	Likely	Low	Low	Low	Medium	Medium
	Almost certain	Low	Low	Low	Low	Medium

Linking the overall risk rating to accreditation outcomes and conditions

Undertaking a risk assessment will assist the accreditation team to contextualise the reasons for its decision (in the accreditation report) in terms of risk.

Once an overall risk rating for the training setting has been decided, the accreditation outcome, conditions and monitoring approach can be established (see figure 4).

In response to the level of risk identified, the accreditation team will determine:

- the accreditation outcome/decision
- whether conditions are required
- monitoring requirements.

Revocation of accreditation should not be an outcome where the risk can be sufficiently mitigated through the imposition of conditions.

It is expected that when the risk rating is higher:

- any timeframes for demonstrating progress towards addressing accreditation conditions may need to be shorter
- the conditions themselves may need to be more rigorous
- the monitoring requirements will be greater

Conditions may be provided at the individual criterion level or address multiple criteria. The college will determine what monitoring activities and contact is required based on the risk assessment outcomes (refer to the Accreditation Policy and Procedure for information on monitoring).

Figure 4: Risk Rating Outcomes

OVERALL Risk rating	Approach	Accreditation Outcome	
		New settings	Existing settings
Low risk	<ul style="list-style-type: none"> Determine if conditions are required. Where they are required: <ul style="list-style-type: none"> impose conditions against the criteria outline what the conditions are, the timeframes for showing progress and how they will be monitored, including any reports that need to be provided. Will likely require some 'light touch' monitoring and there might be more flexibility on timelines for the condition to be met (e.g. within 6-12 months). There will likely be limited need for ongoing review or intervention. 	Provisionally Accredited	Accredited OR Conditionally accredited
Medium risk	<ul style="list-style-type: none"> Impose conditions against the criteria. Outline what the conditions are, the timeframes for showing progress and how they will be monitored, including any reports that need to be provided. May require a more formal monitoring approach with specific timelines for completion (e.g. within 6 months). This might include more than one review point to check in on progress towards meeting the conditions. 	Provisionally Accredited	Conditionally accredited
High risk	<p>New setting: Do not grant accreditation (accreditation is refused).</p> <p>Existing setting:</p> <ul style="list-style-type: none"> Impose conditions against the criteria. Outline what the conditions are, the timeframes for showing progress and how they will be monitored, including any reports that need to be provided. Due to the high-risk nature of the criteria that have not been met, the timeframes for demonstrating progress may need to be shorter and more rigorous than for medium risk (e.g. within 3 months). 	Not accredited (refused)	Conditionally accredited
Extreme risk	<p>New setting: Do not grant accreditation (accreditation is refused).</p> <p>Existing setting: Move to revoke accreditation.</p> <ul style="list-style-type: none"> Outline what requirements must be met in the future to be considered for accreditation/reaccreditation, including timeframes for showing progress. Note: For existing settings, the college may take an active management approach with the training setting to help it take immediate steps to lower the risk which in turn moves the setting back to a conditionally accredited pathway rather than revocation. The situation should be carefully deliberated between the college, training setting and training provider, noting that each case will be different. 	Not accredited (refused)	Not accredited (revoked)

Using this risk-based approach, revocation of accreditation is only likely to be a potential outcome in training settings that have continually shown a lack of progress in addressing conditions to meet the standards (e.g. over a number of years), rather than in settings where a key issue is identified for the first time and the setting has indicated that it will address the issue in a timely manner.

It is noted that accreditation teams may sometimes uncover an issue which poses an immediate risk at the training setting, such as an imminent risk of harm to a trainee. Accreditation teams should work with the setting to eliminate or minimise this risk to an acceptable level, and this can occur immediately while the accreditation process continues. For example, a trainee could be removed from the setting immediately while the setting and the accreditation team continue to work through the accreditation process and determine the steps that can be taken to address the matter. This can then be weighed up as part of the accreditation decision.

Guidance on developing conditions and recommendations

A **condition** is a qualification attached to the granting of accreditation at a training setting which requires action within a defined timeframe. A condition is mandatory.

A **recommendation** is a non-mandatory action to improve trainee experience and/or outcomes at the training setting.

Four guiding principles for the use of conditions have been developed by the Health Professions Accreditation Collaborative Forum and further developed in the Australian Dental Council's 'Writing accreditation conditions – Guiding principles for assessors'. Building on this and other reviews of the risk literature, guidance for colleges is provided below.

The following is a list of four guiding principles for the use of conditions:

1. The purpose of a condition is to address a shortfall against an approved Accreditation Standard.

The college will impose a condition or conditions on a training setting if it determines that one or more criterion within the model standards is 'substantially met' or 'not met'.

Conditions may be applied at the individual criterion level or address multiple criteria.

Conditions should not be added for process areas that sit outside the standards (such as applying a condition on all settings that ongoing monitoring requirements must be met). This is covered by the college's accreditation procedures.

2. The timeframe by which a condition must be met is to be fair and reasonable.

Conditions should always have timelines attached to them. The Health Practitioner Regulation National Law Act 2009 (the National Law) allows an accreditation authority to impose conditions on an accredited program if the condition will ensure the program meets an approved Accreditation Standard within a 'reasonable time'. The National Law does not specify what is considered a reasonable time. However, Australian law generally states that 'a reasonable time' depends on a number of factors including the context, the facts of the specific situation, and what a reasonable person would consider fair and appropriate under those circumstances. A reasonable time should allow the training setting enough time to implement the condition properly. If the condition relates to an urgent matter, then the amount of time that is reasonable may be less than in a non-urgent situation.

3. The condition should relate to the desired outcome.

The accreditation standards are outcomes focused. A training setting can demonstrate that it meets a criterion in a variety of ways. Similarly, conditions should not be overly prescriptive and should allow the training setting flexibility as to how the desired outcome can be met.

4. A condition must be clear.

When imposing a condition on an accredited program, it must be clear to the training setting what action it is required to take to demonstrate to the college that it will meet the relevant criterion in full. This should not involve implementing unknowns, that is, actions where the resources required or actions to be taken are yet to be determined.

Key elements of writing effective conditions include:

- **Clarity:** Conditions should be easily understood by the training setting to avoid confusion and ensure compliance.
- **Measurability:** Specify the outcome that needs to be achieved to meet the criterion, whilst still allowing flexibility for the setting to determine the best way of achieving the outcome.
- **Conciseness:** Conditions should be brief and to the point, avoiding unnecessary complexity.
- **Enforceability:** Conditions should be worded in a way that allows for clear assessment of whether the standards have been met or not met.
- **Avoid ambiguity:** Avoid phrases like "generally in accordance with" or "as necessary" which can lead to varied interpretations and hinder enforcement.

Management of accreditation outcomes

The period for which accreditation will be granted is outlined below. A flow chart of the decision-making process for new and existing training settings is available in Appendix A.

Figure 5: Accreditation Outcomes and Decisions

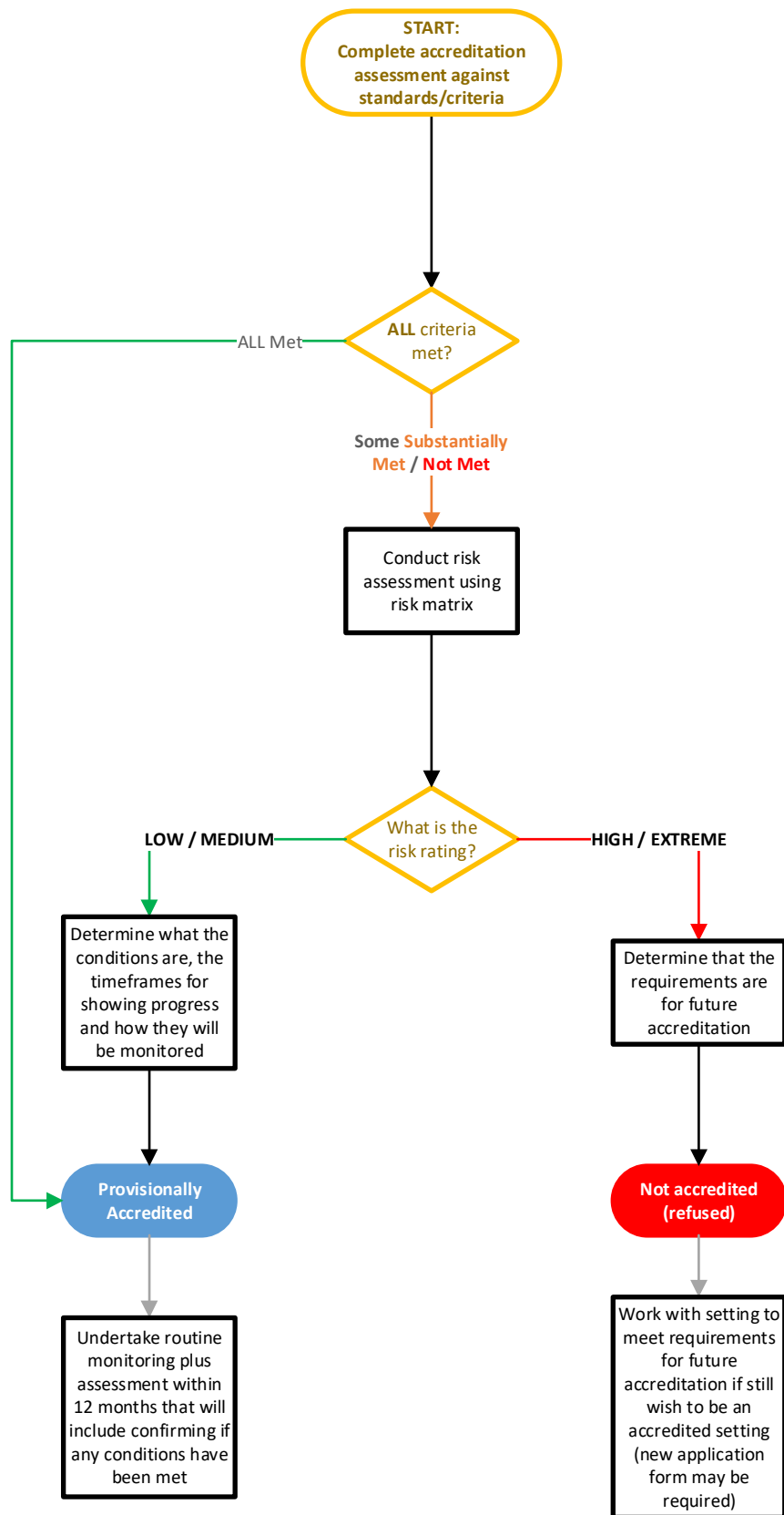
Accreditation Outcome	Alignment to risk framework	Accreditation Decision: Duration and conditions
New training settings		
Provisionally accredited	<p>A new training setting that:</p> <ul style="list-style-type: none"> meets all of the accreditation criteria OR does not meet all of the accreditation criteria but has the potential to meet them once trainees are in place. The overall risk assessment is rated as low or medium with conditions required. 	<p>Provisionally accredited for up to 12 months, subject to satisfactory routine monitoring submissions.</p> <p>The setting can appoint trainees but will be subject to an assessment within 12 months that will include confirming if any conditions have been met. At this point, training settings will be considered an 'existing training setting' for accreditation purposes.</p> <p>If no trainees are appointed within 12 months, the college will decide if provisional accreditation status should lapse or remain in place for a further period of time. If lapsed, the college will determine if the setting is required to submit a new accreditation application before trainees can be appointed.</p>
Not accredited (refused)	<p>A new training setting that does not meet all of the accreditation criteria. The overall risk assessment is rated as high or extreme.</p>	<p>Accreditation not granted.</p> <p>Any requirements that must be met in the future will be outlined. Once requirements have been met, the setting may be required to submit a new accreditation application providing assurance that it continues to meet all other accreditation criteria at the time of reapplication.</p>
Existing training settings		
Accredited	<p>An existing training setting that:</p> <ul style="list-style-type: none"> meets all of the accreditation criteria OR does not meet all of the accreditation criteria but the overall risk assessment is rated as low and it has been determined conditions are not required. 	<p>Accredited to a maximum of 5 years, subject to satisfactory routine monitoring submissions.</p>
Conditionally accredited	<p>An existing training setting that:</p> <ul style="list-style-type: none"> does not meet all of the accreditation criteria and the overall risk assessment is rated as low, medium or high with conditions required. 	<p>Accredited for 3 months to 5 years depending on the severity of the risk and:</p> <ul style="list-style-type: none"> conditions being addressed within the defined timeframe satisfactory routine monitoring submissions meeting any other specific monitoring requirements.
Not accredited (revoked)	<p>An existing training setting that:</p> <ul style="list-style-type: none"> does not meet all of the accreditation criteria and the overall risk assessment is rated as extreme with conditions required. <p><i>Note: this accreditation outcome should only be applied in the final accreditation report if, since the initial accreditation assessment was undertaken, steps to actively manage the training setting to a conditionally accredited pathway have been unsuccessful.</i></p>	<p>Accreditation not granted.</p> <p>Feedback and timeframes for reconsidering reaccreditation will be provided, including what criteria the training setting needs to address.</p> <p>The date the accreditation will be revoked will be set. Prior to this, trainees may continue to complete their training term at the setting unless their safety is at immediate risk. From the revocation date:</p> <ul style="list-style-type: none"> trainees at the setting will not be able to count training towards their training program unless specific arrangements are made no new trainees can be appointed. <p>A new application for accreditation must be submitted once requirements have been met (the setting must also be continuing to meet all other accreditation criteria at the time of submitting the application).</p>

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Appendix A – Accreditation decision making flowchart

New settings



Existing Settings

