



# Phase 2 Consultation

## AVBC Accreditation Standards and Methodology

Submission of the  
Australian Veterinary Association Ltd

9 September 2022

## Summary

The Australian Veterinary Association (AVA) appreciates the ability to contribute to the review of the Australian Veterinary Board's Council Accreditation Standards, Phase 2 consultation.

Maintaining the standards of veterinary practice protects the welfare of animals, supports public safety and preserves the integrity of veterinary practice itself.

## The Australian Veterinary Association (AVA)

The Australian Veterinary Association (AVA) is the national organisation representing veterinarians in Australia. The AVA consists of over 8500 members who come from all fields within the veterinary profession. Clinical practitioners work with companion animals, horses, farm animals, such as cattle and sheep, and wildlife. Government veterinarians work with our animal health, public health and quarantine systems while other members work in industry for pharmaceutical and other commercial enterprises. We have members who work in research and teaching in a range of scientific disciplines. Veterinary students are also members of the Association.



## AVBC Phase 2 Consultation: Feedback template

### Your information

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PART 1: AVBC ACCREDITATION STANDARDS		
Governance and Quality Enhancement		
<b>1. Governance</b>	1.4	Finances are assured for the current cohorts of students – is this sufficient duration?
		Finances should be assured also for at least the next year to allow students who are preparing for application to be warned if the course will not go ahead.
	1.6	Should student representation on relevant VEE committees, other than the curriculum and admissions committee, be prescribed further?
		The AVA believes this is sufficient.
	1.9	What level of responsibility should a VEE have for ensuring extramural sites provide safe and supportive learning experiences? What outcomes should the VEE demonstrate?
		The VEE should have a responsibility for ensuring the extramural sites are safe and supportive learning experiences. They are mandatory for student education. There is administration and insurance required to ensure student safety and support and it is acknowledged that this will be a substantial cost of providing this education. An outcome that could be considered is that the VEE has demonstrated it provides regular training to extramural sites, so they are aware of the principles of safe and supportive learning environments, and how to implement these. Ideally this training would contribute to CPD requirements of veterinarians.



3. Quality assurance and enhancement	3.2	Consumers of veterinary services are one group of stakeholders that are not often consulted on veterinary programs, other than livestock industry organisations. Should veterinary service consumers be part of external stakeholder input, and are there other stakeholders that should be consulted? How should a VEE communicate the outcomes of program review to stakeholders?
		There is a requirement for the state veterinary registration boards to involve non-veterinarians as part of the process of reviewing complaints in line with community expectation. Involving consumers for the purpose of understanding the expectations of consumers of veterinary graduates may assist in achieving these expectations and the resources that are required for the universities to achieve it.
4. Professional environment	4.1	Veterinary educators, students and the veterinary profession highlighted the importance of a positive learning and workplace culture, particularly during clinical placements, for graduate outcomes and professional sustainability. What methods should a VEE be using to demonstrate a positive culture? What evidence could be relevant here?
		The VEE should be demonstrating, surveying and assessing positive learning and workplace culture at all stages of learning to ensure the rigorous requirements of education are not impacting well-being and the future careers of veterinary graduates. This will also enable accountability of clinical placements and extramural requirements. This expectation should be a requirement of VEE teaching hospitals. Evidence that could be useful includes VEE professional and academic staff, as well as student perceptions of workplace culture using recognized methodology.
	4.4	What measures and outcomes should a VEE provide to demonstrate sustainable use of resources?
		Please find AVA policies relating to sustainability in the veterinary profession below.
	4.4	Specifically, how could a VEE demonstrate a commitment to environmental sustainability?
		It would be ideal for the profession to have a consistent approach to environmental sustainability. The AVA welcomes the use of AVA policies ratified by AVA policy council that are available for use and may assist with uniformity.  Climate change and animal health, welfare, and production <a href="https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/climate-change-and-animal-health-welfare-and-production/">https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/climate-change-and-animal-health-welfare-and-production/</a>  Drought and drought management <a href="https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/drought-and-drought-management/">https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/drought-and-drought-management/</a>



		<p>Sustainable use of pastoral land</p> <p><a href="https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/sustainable-use-of-pastoral-land/">https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/sustainable-use-of-pastoral-land/</a></p> <p>Use of waste products on agricultural land</p> <p><a href="https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/use-of-waste-products-on-agricultural-land/">https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/use-of-waste-products-on-agricultural-land/</a></p> <p>Native Animal Welfare (Habitat Clearing)</p> <p><a href="https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/native-animal-welfare2/">https://www.ava.com.au/policy-advocacy/policies/environment-and-conservation/native-animal-welfare2/</a></p> <p>Additionally, the AVA has many resources that are available for use on the website to support, educate, represent, and provide community for all veterinarians and particular resources for AVA members.</p>
	4.5 4.6 4.7	<p>These standards address concerns that were raised. They require the VEE to provide pathways for students to report concerns, give feedback, convey their needs, and wants, anonymously if they wish, including regarding compliance with the standards, and require that the VEE considers and takes actions. Any comments?</p>
		<p>This is essential. Having already invested highly to gain entry to the VEE, students are vulnerable as they try to obtain their qualification. They may be additionally vulnerable as they are often young and not financially secure. Having VEE provide and respond to student feedback with the protection of being anonymous will reduce the risk to students and potential risk for the VEE.</p>
Other comments		<p>Any other comments on this Domain?</p>
		<p>'Safety' could be included. "Governance, quality and SAFETY enhancement ". We know that there is a significant physical injury (71%) (Jeyaretnam et al, 2000) and mental ill-health (AVA Veterinary Wellness Summary Report 2021) within the veterinary community.</p>
<b>Learning Environment</b>		
5. Facilities, resources and equipment	5	<p>These standards accommodate the variety of ways that VEEs provide facilities and resources for student learning. These standards recognize the greater use of shared learning spaces, online learning resources, simulations and models and contracted external clinical learning sites, to name a few examples. Is the requirement that these facilities and resources meet high standards for student support and experience sufficiently clear?</p>
		<p>Yes, it is an excellent summary.</p>
	6	<p>The ratios for animal numbers, species and cadavers have been removed, however student access to animals (normal and diseased of the major</p>



6. Animal resources		species) and cadavers for learning and assessment will be reported annually. Any comments?
		This is acceptable as long as the VEE can demonstrate achievement of course learning outcomes with the range of animal species they have available.
Other comments		Any other comments on this Domain?
		There is a variety of subjective terminology used for the standards of facilities and outcomes required and more direction may help both the VEE and assessor of the VEE facilities. (5.8 “of sufficient standard”, 5.5 “high practice standards”, 5.6 “contemporary standards”, 5.11 “high quality research”.)
Curriculum and Assessment		
7. Governance, management	7.3	A committee or other organisational structure within the VEE has responsibility for oversight of all aspects of assessment in the program and ensuring its quality. Any comments?
		AVA agrees.
8. Educational design	8.1	Stakeholder feedback noted the importance of ongoing curriculum innovation and development to adapt to societal, professional, and educational advances. What evidence of process or outcome should a VEE provide for this?
		Societal, professional, and educational advances which are significant enough to warrant changes in expectations of veterinarians should be communicated from the state statutory bodies and AVBC to VEE. Documentation of changes in requirements should be clearly communicated to the VEE to request adaptation of the curriculum and learning outcomes required. The appropriate evidence that this has occurred in both process and outcome of learning could be assessed at the next curriculum review (as appropriate and every 7 years).
	8.4	There were many comments confirming the importance of the VEE providing a learning environment enriched by scholarship and research, including active research and clinical postgraduate training programs. What outcomes should VEEs provide to demonstrate that these activities complement the veterinary program?
		Outcomes that VEEs could provide to demonstrate active research and clinical post graduate training programs which complement the veterinary program include those that relate to research and inquiry. The future of clinical postgraduate training programs may involve hybrid models that bring VEE’s together with private enterprise, as each had its strengths.  If such a model was adopted, outcomes of complementary engagement may be through demonstration of greater external stakeholder





		engagement in both the veterinary program and the postgraduate clinical training.
<b>9. Duration and content</b>	9.2	The AVBC D1Cs have been developed and released for comment (see <a href="#">AVBC website</a> ) in response to feedback. Do these competencies, along with the subject descriptions (Appendix 1), provide sufficient guidance for design of veterinary programs?
		The Day 1 competencies provide excellent guidance. The AVA suggested that the wording in the Day 1 Competencies could be softened in parts to include “be aware of” rather than, for example, “advise on” as at Day 1, veterinarians are unlikely to meet this requirement.
	9.3	The requirement that students complete sufficient training and experience with handling the main domestic species prior to undertaking WIL placements was included in feedback regarding safety and preparedness of some students for extramural learning experiences. Any comments?
		The private veterinary profession is an essential resource for undergraduate education, and contribution to the education of future veterinarians and is a public good that the profession delivers to the wider community. The private sector also has obligations to their teams, clients and animals and they must have confidence that students undertaking WIL have a sufficient training and experience with handling the main domestic species prior to undertaking WIL placements to ensure a safe workplace.
9.5	Feedback supported the requirement that all students have opportunities to observe and participate in research in their curriculum. How should VEEs evaluate these outcomes?	
	VEEs should be able to demonstrate that every student has the appropriate level of understanding of research process (this may be achieved through several mechanisms such as participating in research, evaluation of research, demonstrating how research is applied to a clinical setting) Mandatory participation in research for every student may be onerous for VEE to deliver.	
<b>10. Clinical education</b>	10.1	The requirements for students to achieve clinical competence across a range of settings provide for flexibility in VEE-controlled and contracted clinical training. Should the requirements for disciplinary and species clinical training be more specific?
		No, they should not, many of skills that that demonstrate clinical competence can be applied across a range of species. Such a requirement may limit a VEE’s ability to deliver their curriculum. The caveat on this statement is that the VEE must demonstrate that a range of disciplines and species are included in clinical training.



	10.3	There was broad and strong support for this standard which requires the majority of clinical teaching to focus on common, entry level practice with the main domestic species. Do you support this?
		Yes, students should be supported to achieve what is required of Day 1 competencies in line with the requirements upon registration.
	10.6	Students demonstrate relevant competency before providing patient care. What evidence should VEEs provide for this standard?
		VEEs should provide evidence that students can demonstrate a certain standard of both technical and non-technical skills of patient care, this may be evidenced through assessments such as DOPS or OSCE's.
	10.7	This standard is intended to ensure students demonstrate skills in reflective practice and self-directed learning. What processes should VEEs have in place to ensure this?
		Although students should be encouraged to self-evaluate and fill their knowledge gaps, the requirements and standards need to be clearly directed and assisted by the VEE. VEE's must provide education to students on how to undertake reflective practice and monitor progress towards development of this skill.
10.8	Students are directly supervised during patient care. This standard makes the supervision requirements explicit. Any comments?	
	Direct supervision of students is important for the safety of patients, students, the EMS, and VEE. As requirements increase for both VEE and private practitioners to contribute to EMS, resources may need addressing.	
10.10	Students demonstrate proficiency in implementation of biosecurity procedures. This standard makes the requirements that students demonstrate practical competency explicit. Any comments?	
	AVA agrees.	
<b>11. Assessment</b>	11.1	The requirements for training in assessment, staff expertise in assessment, and VEE implementation of an adequate assessment strategy have been clarified. Any comments?
		AVA agrees.
	11.5 11.6	Additional requirements include management of appropriate student and staff assessment workload (11.5) and that moderation processes are in place (11.6). Do you support these?
		AVA agrees.
12	See Appendix 2. The VEE responsibilities for academic oversight, placement management, staff training and quality enhancement during	





12. WIL placements		WIL have been clarified to address concerns raised by students and external stakeholders. Any comments?
		Achievability of these accreditation standards relies heavily on the good will of the private veterinary sector to deliver EMS with no financial support to provide human resources and infrastructure for the training of undergraduates. Professions Australia compared best practice methodology of healthcare (where infrastructure, staffing and structured pathways for clinical rotations is provided) and veterinary sectors. There are similarities of professional competency but wide variations in how they are supported, leaving the private veterinary profession under supported to provide education, over stretched and accreditation standards vulnerable. If it is a requirement that WIL providers must provide feedback on student performance, education needs to be provided as to how this can be effective.
Other comments		Any other comments on this Domain?
		The requirements of veterinarians must be clear for veterinarians, registering authorities and the community. We have noted that some professional behaviour requirements of the current AVBC attributes of veterinary graduates (Annex 5, AVBC Accreditation Standards) do not align with some State Veterinary Surgeons Board Guidelines. For example, the AVBC attributes suggest 'a desire to promote animal welfare' however veterinary registration in Victoria states a requirement for professional and financial commitment to animal welfare as veterinarians 'must provide first aid and necessary analgesia'.
<b>Student and Staff Support</b>		
13. Student admission and progression	13.4	Further clarity was provided for the following:  <b>13.4</b> Training is provided for those involved in the selection process.  <b>13.6.</b> Admissions strategies support diversity and widening participation.  <b>13.10</b> Admissions and progression criteria are reviewed.  Any comments?  AVA agrees.
	13.6	
13.10		
14. Student welfare	14.3	Considerable feedback was received on student wellbeing, mental health, pressures experienced during their training, and their transition and longevity in practice after graduation. One concern related to students' experiences of learning in adverse, even hostile clinical settings, and the negative impacts of this "hidden" or unintended curriculum regarding professional behaviour. It was agreed that VEEs are responsible for ensuring students are learning in supportive settings.



		<p>Stakeholders (veterinarians and students) sought this inclusion:</p> <p><i>Students are not subject to behaviour which unnecessarily undermines their professional confidence, performance, or self-esteem.</i> How would VEEs demonstrate achievement of this outcome?</p>
		<p>Request anonymous feedback on all aspects of training, including EMS so that students have the opportunity to assist in change. Additional mechanisms for recording adverse events when considering student performance (special consideration). Framework for management and mental health supports be in place.</p>
<p><b>Staff – academic, clinical, professional and support staff</b></p>	<p>15.2</p>	<p>On the basis of VSAAC experience, the teaching staff: student ratio was retained to ensure the VEE has sufficient staff to provide for continuity of program delivery and quality. Any comments?</p>
		<p>AVA agrees.</p>
	<p>15.3 15.4</p>	<p>These standards recognise the vital role of teaching staff in program delivery and address their needs for stability and opportunity in employment. What measures should VEEs use to demonstrate they provide a supportive environment for staff?</p>
	<p>15.5 15.6</p>	<p>Requirements for feedback from staff and measurements of staff turnover as an indicator of sustainability. Consideration of the requirement of the use of an anonymous, longitudinal standardized scale to assess morale, culture etc.</p>
	<p>15.9</p>	<p>All educators (not only academic staff, but all staff with a role in teaching and assessment) are required to receive training, ongoing professional development, and to demonstrate competence and effectiveness. Do you support these requirements?</p>
<p><b>Other comments?</b></p>		<p>Any other comments on this Domain?</p>
<p><b>Appendix 1: Core subjects</b></p>	<p>A1</p>	<p>This list is intended to provide guidance, not prescription, for design of the curriculum and program learning outcomes. Veterinary knowledge is rapidly expanding, and curriculum design requires realistic choices, and selection of topics to explore in more or less depth, so that the curriculum breadth and depth do not overwhelm students. The consultation feedback suggested inclusion of more teaching and learning on; animal welfare, resilience, business understanding, financial decision making, animal handling competency, farm systems and management, biosecurity, and communication skills (to name specific areas), and all these are included in the core subjects/D1Cs. Are there areas where emphasis could be reduced or should be changed?</p>
		<p>Professional jurisprudence and ethics: additionally, the requirement of laws that govern animal welfare (public and paraprofessional adherence overseen by veterinarians) and workplace health and safety</p>



		<p>understanding and law. Given the nature of veterinary practice in Australia being largely private practice, business skills are imperative. Communication with clients is important and commonly raised in VSB complaints.</p>
<b>Appendix 2: WIL</b>	A2	<p>These AVBC draft standards define the VEE-controlled or contracted WIL requirements. They intentionally provide VEE with flexibility in the mix of VEE-controlled or contracted and extramural clinical WIL. The minimum number of weeks of EMS required is less than the RCVS requirements. Both reflect differences in conditions and veterinary programs in Australia and New Zealand. Do the definitions and requirements for clinical WIL provide sufficient flexibility to encompass the diversity of models and educational partnerships which would serve the needs of VEEs and the veterinary profession in Australia and New Zealand?</p>
<b>Appendix 3: Glossary</b>	A3	<p>Are there other terms which require clarification?</p> <p>VSB, AVBC</p>
<b>General questions</b>		
	G1	<p>One significant concern to emerge through this review has been how to achieve a balance between promoting flexibility in veterinary program design and delivery, while maintaining the quality and sufficiency of veterinary clinical education. Stakeholders recognised that some input measures were still required, to set minimums, for the components that are most essential, but also the costliest, in veterinary education. These were considered to be: teaching staff to student ratios, supervised student access to animals and clinical learning resources, and the time spent in work-integrated clinical learning in veterinary practice. These elements have been incorporated. Any comments?</p> <p>AVA agrees. The elements above are essential. Whilst it is acknowledged that financial support is a challenge within veterinary profession, reducing the ability to achieve required standards will create risk for the veterinary profession.</p>
	G2	<p>The requirement for graduates to achieve entry-level competence in common clinical conditions, procedures and common domestic species received very strong, broad support from educators, veterinarians, students and other stakeholders. Many stakeholders sought a review of the Day One Competencies, and feedback is now being sought (see <a href="#">AVBC website</a>).</p> <p>While some veterinary interest groups proposed that VEEs should provide program options that allow students to focus on clinical training with limited species (e.g., equine, or livestock or small animals) in order that graduates would achieve higher level outcomes and be better prepared for immediate transition to practice with limited supervision, this proposal was not broadly supported.</p>



		Graduates need to fulfil requirements for which they will be credited and registered.
	G3	For which standards might there be an opportunity to focus further on outcomes over inputs or process?
	G4	Where standards relate to policy and process, how might the effectiveness of their implementation and outcomes be measured?
	G5	Do you support the suggestion that AVBC access, collect and analyse national survey data from graduates and employers to provide for better outcomes data (as per RCVS)?
		It would be ideal to determine from graduates and employers of new graduates where the gaps in education, training and confidence are.

PART 2: AVBC ACCREDITATION METHODOLOGY		
Accreditation process and accreditation visit	2.1	The stakeholder feedback was strongly supportive of: outcomes focus, risk-based assessment, a tailored focus for Accreditation Visits, and for management of evidence in a “living rubric” managed in an AVBC repository. VEEs encouraged the AVBC to align with the recent RCVS changes to standards and methodology, where possible and with the AVMA. Any comments?
		AVA agrees
Accreditation Team expertise	2.2.1	Do you support the participation by a current veterinary student or recent graduate as a member of the Accreditation Team (voting or non-voting)?
		AVA encourages a breadth of opinions and would encourage a voting position. A recent graduate, rather than a current student would be more suitable as understanding the application of education is required.
	2.2.1	Are the team membership requirements to include at least one veterinarian who is working outside academia and one senior veterinary academic leader sufficient?
		More than one veterinarian working outside academia would be preferred to gain a better understanding of the application of veterinarian education.
Observers and trainees	2.2.3	The existing and proposed AVBC processes do not require an Observer to be present at every visit. Should an AVBC Observer be present for AVBC quality assurance, with costs paid by the VEE, on all visits?
		N/A for AVA to comment.
Evidence - repository, uploading, guidance	2.3	Do the requirements and process for the submission of evidence against the standards to the AVBC repository, by the VEE, and the forms of evidence acceptable require further clarification? If so, please describe guidance desired.



		N/A for AVA to comment.
Review of all evidence by the Accreditation Team	2.3.5	Is it sufficiently clear that if the VEE is found to not yet be in full compliance with any standards during the pre-visit review of evidence, these standards will be evaluated during the Accreditation Visit?
		Yes, this is clear.
Accreditation visit – scope, priority standards	2.4	The Accreditation Visit schedules will be developed to focus on those standards requiring review and adjusted based on findings, in consultation with the VEE. Are there any concerns about this process?
		No concerns identified.
Published findings	2.6.4	The Executive Summary of the final report and accreditation decision on each VEE will be published on the AVBC website once finalised. Do you support this transparency regarding the outcomes of the accreditation process?
		AVA supports transparency
Other comments		Any other comments on the accreditation process and visit??
Annual and interim monitoring	3	This section clarifies that program developments, including plans for increased student numbers, or substantial staff losses, or major curriculum change, are to be notified to VSAAC in advance, in annual or interim reports. Any comments?
Annual and interim reporting and monitoring processes	3.1	This clarifies that as a result of review of annual or interim data, VSAAC may recommend to the AVBC that the accreditation status for a VEE may change, including triggering an Accreditation Visit. Any comments?
	3.1	The veterinary profession has indicated they want to be able to monitor annual veterinary student numbers. Do you support reporting these as part of the AVBC Annual Report?
		Yes. Information of veterinary student numbers is essential for forecasting the sustainability of the profession.
Other comments		Any other comments on annual and interim monitoring?
		To determine the sustainability of the veterinary profession information of veterinary student numbers, FTE registered veterinarians and registered veterinary businesses are required. This needs a national approach.
Appendix 2: Annual monitoring data required	A2	Templates for data collection will be provided. Are there other VEE data that VSAAC should monitor annually?



<b>Other comments</b>	Any other comments on the appendices? N/A
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Thank you for the opportunity to contribute to the review.

You are most welcome to request more information or clarification.

Please find contact details below:

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