# Codes and principles for training sites and supervisors



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# 1. Introduction

The Royal Australian College of General Practitioners (RACGP) partners with accredited community general practices and supervisors to deliver high-quality training to the next generation of general practitioners (GPs).

It is a core feature of general practice training that registrars work under supervision in general practice, and we acknowledge that general practices and supervisors share a commitment to providing registrars with a high-quality learning experience in a safe training environment, and supporting them in their journey towards Fellowship.

The RACGP is recognised by the Australian Medical Council (AMC) and the general practice profession as the body responsible for developing and maintaining the **standards of training** for general practice in Australia. This document supports our **Accreditation standards for training sites and supervisors: Guide to implementation** by clearly communicating requirements for RACGP-accredited training sites and supervisors. It also details the responsibilities that a practice has to ensure a safe training environment for both the registrar and patients that meets the registrar's training needs.

#### 1.1 Purpose

The aim of these codes and principles is to clearly articulate requirements for accredited training sites and supervisors to remain compliant with the following policies and standards at all times:

- the RACGP Standards for general practice training as they apply to training sites and supervisors,
- · Accreditation standards for training sites and supervisors: Guide to implementation,
- the Accreditation Policy, and
- the GP in Training Safety and Wellbeing Policy.

## 1.2 Scope

These codes and principles apply to training sites and supervisors:

- · applying for accreditation with the RACGP, and
- who are accredited with the RACGP.

## 1.3 General principles

- Training sites and supervisors have a responsibility to ensure their training environment meets registrars' training needs and clinical safety.
- The RACGP encourages training sites to continuously improve their training environment through feedback, reflection and ongoing learning.
- The RACGP will support training sites and supervisors to develop a holistic teaching environment that benefits the practice, the registrar and patients.

## 1.4 Implementation of the codes and principles

• Agreement to comply with these codes and principles is confirmed through signing the RACGP Accredited training site and supervisor agreement at accreditation and reaccreditation.

- Throughout transition from RTO delivery of the Australian General Practice Training (AGPT) program to
  the RACGP delivery of AGPT, accreditation, training practice and placement agreement terms between
  practices and their respective RTOs will be upheld until the documented end date of the agreement or
  until replaced by an alternative RACGP agreement.
- Training sites without signed agreements in place with their RTO at the time of transfer to RACGP-led training on 1 February 2023 will be required to follow these codes and principles.
- Training sites and supervisors during transition from their accrediting RTO in 2022 and the RACGP in February 2023 will be required to adhere to terms no more onerous than the terms established with their RTO in 2022.
- Compliance against the Standards, Codes and Principles is monitored throughout the accreditation cycle.
   If a training site or supervisor fails to meet the requirements their accreditation status may be adversely affected.

# 2. Employment of the registrar

The training site must ensure that registrars are employed by the practice under a written employment agreement. The employment agreement and salary must meet requirements set out in the **National Terms and Conditions for the Employment of Registrars** (NTCER). General practice registrars (including those awaiting Fellowship) must not be engaged sessionally as contractors or considered self-employed.

Please note that some specific exceptions may apply for registrars completing Visiting Medical Officer (VMO) roles within rural hospitals. The RACGP must be advised of these arrangements and will assess and approve them prospectively.

# 2.1 Registration, indemnity and insurance

As registrars are employees of the training site, the practice is vicariously liable for their actions. Training sites must ensure appropriate business insurances are in place, including public liability, workers compensation and medical indemnity.

The training site will, as part of its recruitment and onboarding procedures:

- · check that the registrar's medical registration is and remains current for the duration of the placement
- check that the registrar's status with the Australian Health Practitioner Regulation Agency (AHPRA) is clear of notifications and restrictions
- check that the registrar has an active Medicare provider number applicable to the location before commencement and covering the duration of the placement
- · check the registrar's medical indemnity cover is and remains current for the duration of the placement
- comply with legislation relevant to the jurisdiction regarding health workforce screening checks (eg working with children certification)
- ask the registrar to disclose any pre-existing conditions that may impact upon their ability to perform
  the role and for which reasonable modification of work may be required to ensure such a pre-existing
  condition is not exacerbated
- meet all statutory obligations under the National Employment Standards and relevant national and/or state legislation relating to work health and safety.

# 2.2 Registrar wellbeing, and work health and safety

As the employer, the training site and/or supervisor has the primary duty of care to ensure, so far as is reasonably practicable, the registrar's health and safety during the placement.

Training sites must comply with work health and safety legislation applicable to their location and the RACGP **GP in Training Safety and Wellbeing Policy**. They must advise the RACGP of any safety concerns, risks, hazards or incidents that may affect registrars.

The rostering of registrars must consider fatigue management and ensure safe hours are addressed.

All training sites agree to:

- · actively engage in conversation with registrars and supervisors about fatigue management
- · manage rostering with regard to:
  - fatigue management
  - contracted employment hours
  - registrar training requirements
  - travel times to workshops
  - study requirements for RACGP examinations.
- implement measures designed to enhance the wellbeing of the registrar by reducing excess fatigue. The
  implementation and effectiveness of these measures should be regularly reviewed by the training site.
  This should include review of the registrar's in-clinic consulting hours, on-call and after-hours shifts, travel
  time, and work undertaken external to the clinic, such as local hospital cover and nursing home visits.
   Refer to the RACGP Policy position statement on stress and fatigue in general practice.
- consider facilitating flexible working arrangements for registrars (eg those with family responsibilities) to allow them to participate actively and fully without placing their health and wellbeing at risk.
- Practice managers and supervisors who have concerns about a registrar's wellbeing or performance must communicate this to the registrar's training coordinator and local medical educator.

# 2.3 Medicare provider numbers

As part of the recruitment placement process, the RACGP will coordinate applications for Medicare provider numbers for the duration of the registrar's placement. Training sites are expected to engage with the RACGP and their registrar to ensure all related applications are signed and Medicare provider numbers are active for their site before the registrar commences billing patients.

## 2.4 Bullying and harassment

Training sites must comply with relevant work health and safety and fair work legislation. Practices are encouraged to review and implement policies and practices that establish a zero-tolerance approach to bullying, harassment and discrimination in the workplace.

## 2.5 Registrar orientation to the practice

Registrars must receive a structured orientation to the practice and its clinical and organisational environment. Orientation to the training site should include direction on safe use of equipment as appropriate and should incorporate all points listed within Criterion 2.2.2.1 of the Accreditation standards for training sites and supervisors.

# 2.6 Employment environment

Rostering registrars for both ordinary and on-call hours must be fair and promote shift equity across all doctors in the practice. The supervisor, in consultation with the training site, will ensure that the range of patients seen by the registrar is appropriate to that registrar's level of experience and, as far as possible, representative of the patient case mix of the site. Rostering and case mix should support the breadth and depth of the registrar's clinical experience.

The training site agrees to provide the registrar with access to appropriate information technology, including internet access in the consulting room for consulting and educational purposes.

The training site will provide an appropriate working environment for the registrar, including adequate consulting space and clinical and office equipment to enable them to consult on a one-on-one basis with the patient in a private, confidential setting.

# 3. Relationships

It is recognised that sometimes the registrar—supervisor relationship may break down. The practice and supervisor are expected to maintain a safe training environment regardless of the circumstances of such a relationship breakdown. Bullying and harassment (eg threatening or unprofessional behaviour) will not be tolerated, whether towards the registrar, the supervisor, or other members of the practice team.

# 3.1 Pre-existing personal relationships and the employment and training of registrars: Conflict of interest

The employment and training of a registrar with a pre-existing relationship with a person(s) working in the training site (particularly if that person acts as a supervisor) has the potential to lead to conflict and poor training practice. If there is any type of close personal relationship between a registrar and a practice at which they wish to train, the registrar and the practice must disclose this to the RACGP as a potential conflict of interest at the commencement of the placement process.

As a general rule:

- The RACGP does not allow the placement of registrars in a practice where a significant pre-existing relationship (whether familial, romantic or sexual) exists between the registrar and an educational supervisor, practice owner or practice manager.
- The RACGP strongly discourages the placement of registrars in a practice where a significant pre-existing relationship exists with other staff at the practice.
- Extended skills placements where there is a pre-existing relationship are discouraged but may be considered.

To be considered for approval, a placement where there is a significant pre-existing relationship must provide:

- an independent accredited supervisor available to the registrar
- a written employment agreement that incorporates additional agreement on how a conflict of interest will be addressed if an issue arises
- assurance that the registrar is not part or full owner of the practice.

# 3.2 Therapeutic relationships between registrars, supervisors and practice staff

Supervisors and registrars should not enter into formal therapeutic relationships with each other while the registrar is undertaking a training term within the training practice of the supervisor.

Supervisors and registrars should not prescribe or put pressure on each other to provide prescriptions for themselves, their families or friends.

The RACGP recommends that registrars should not be permitted to treat other practice staff (including other GPs). Training staff should not seek medical care or prescriptions for themselves (or their families) from the registrar when reasonable alternatives are available. In rural areas where there may be limited options, the practice may consider a practice policy of allowing the registrar to treat staff with appropriate supervisory oversight after consideration of the risks, benefits and alternatives. The practice policy should also consider the training stage of the registrar and the situation should be discussed with the registrar.

In the rare event of an emergency requiring the registrar or supervisor to provide emergency treatment to the other, the incident will be disclosed to the local medical educator (if consent is given). The registrar must formally debrief the emergency with other supervisors or the local medical educator.

#### 3.3 Communication

The training site and supervisors are expected to communicate with the RACGP, other stakeholders and registrars in a professional manner. Where training site or supervisor communication is found to be manifestly illegible, disorganised or inappropriate (eg threatening), the RACGP will escalate the matter to the relevant regional accreditation panel.

# 4. Risk management: Critical incidents and adverse event management and reporting

Training sites must have a demonstrated risk management and safety system covering clinical incidents and near misses.

It is imperative that the RACGP has an overview of all issues impacting registrar training within Australia. Therefore, practices and/or their supervisors and practice managers must promptly notify the RACGP of any event that is likely to adversely affect the standing of the practice, its supervisor(s), practice manager, the training program or the RACGP in any way.

Training sites and supervisors must review and comply with the RACGP Critical incident and adverse event management and reporting for training programs guidance document and follow the documented guidance.

# 5. Placements

In order to provide the best possible opportunity for accredited training sites to have registrars placed, the RACGP balances the number of training sites accredited with the number of registrars. Placement is subject to the availability of registrars and funding, equity of distribution and suitability of the training site. Therefore, while every effort will be made to ensure priority areas of workforce shortage will be met, the RACGP does not guarantee that a registrar will be placed in a training site in each or any calendar year.

Training sites must be willing and have the capability to accept and appropriately train registrars at all stages of training, particularly the first general practice training term (GPT1). It is expected that all training sites will participate in registrar training during each accreditation cycle and demonstrate a willingness to train the full range of registrars, including registrars in their first two training terms (GPT1 and GPT2), unless the RACGP has applied conditions to the contrary.

# 5.1 Profile and changes

It is important for training sites to ensure that their practice profile is kept up to date.

The training site must advise the RACGP if there are any significant changes to the training site's management. This may include, but is not limited to, a change:

- · in ownership
- of premises or address
- in the supervisor's hours or if the supervisor is no longer employed at the training site
- · in practice manager
- in a supervisor's medical registration.

# 6. Supervision

Supervisors are required to have current full and unrestricted medical registration with AHPRA. As above, any conditions, notations, reprimands or other changes must be reported to the RACGP immediately. The RACGP also receives automatic updates from AHPRA regarding changes in supervisor registration status.

Should the supervisory team, for whatever reason, not be available to supervise/teach a placed registrar for a period of time, the practice must:

- immediately notify the local medical educator or training coordinator of the situation
- negotiate with and have approved by the RACGP an alternative arrangement for the supervision/teaching of the registrar in the absence of an accredited supervisor.

## 6.1 Clinical supervision plans

Training sites are required to have enough accredited supervisors to ensure that there is always a supervisor (primary or secondary) available for escalation of issues requiring supervisor advice or support. The level of supervision must be matched to the competence of the registrar.

Each training site must have a clinical supervision plan that details the supervisory expectations and structures for each registrar. The clinical supervision plan must be developed, reviewed and revised by the supervisory team in consultation with the registrar.

The clinical supervision plan should include the following information:

- when the registrar needs to seek supervision
- · who is providing supervision and when
- · how supervision is accessed
- a plan for escalating issues to an accredited supervisor if required
- a risk management plan to address difficulty in accessing supervision
- a statement of commitment by each supervisory team member to their contribution to supervision.

At all times, arrangements for offsite supervision need to be clear and known to the registrar, practice staff and other doctors in the practice.

Should the training site provide VMO support and include the registrar in this roster, the clinical supervision plan must include provision for supervision of the registrar as VMO. When a registrar is engaged in VMO activity arranged by the practice, the training site remains responsible to ensure the appropriate level of supervision is provided to them.

#### 6.2 Supervisor professional development

Supervisors are required to complete designated professional development as per RACGP requirements. The primary supervisor together with the supervisory team should develop and maintain a professional development plan for the training site supervisory team that reflects the development needs of the team and the needs of the supervisors within the team.

# 7. In-practice teaching, education and assessment

Throughout training, supervisors are required to assist registrars to plan their learning and regularly review these plans with them. Training site education and supervision activities will be matched to the registrar's level of competence and training level and reflect their learning needs.

Supervisors are required to complete all RACGP assessments and provide reports to the RACGP as required, including direct observation of registrar consultations and completion of formative assessments each semester on the progress of the registrar. The timely and accurate completion of assessment is important for the registrar's progression and hence is a required performance standard; failure to complete assessments may impact accreditation status.

Training sites are required to develop and maintain an in-practice teaching plan that outlines when teaching will occur and who will provide the teaching. The plan should also consider how to measure the effectiveness of the learning activities undertaken. Learning activities should be learner-centred, guided by the supervisory team and based on the RACGP curriculum and syllabus.

RACGP representatives will visit the practice to deliver assessments and support registrars at various times throughout each semester. As far as is practicable, the RACGP will schedule visits at times that suit the training site. Training sites are required to facilitate these external clinical teaching visits and enable access to medical educators for registrar and supervisor support.

# 8. Payments

Training sites and supervisors will be paid by the Australian Government Department of Health under the National Consistent Payments framework. Services Australia will administer payments on behalf of the Department.

The release of payments as outlined in the framework will be validated through training data provided by the RACGP.

In-practice teaching payments for supervisors will be made monthly in arrears, either to the training practice or directly to supervisors, based on the individual practice's model and in consultation with the individual practice. These monthly payments to supervisors will be validated by the RACGP to ensure quality teaching activity.

Practice subsidy payments will be made to the training practice quarterly at the beginning of the training term. These payments will be made to training practices hosting registrars in training terms GPT1 and GPT2 only.

Failure to meet the requirements set out in these codes and principles may delay payment to practices.

# 9. Privacy

The training site will ensure that it and its staff, supervisors and registrars comply with privacy laws.

The RACGP will ensure its staff comply with privacy laws. The RACGP maintains a **Privacy Policy** on its website. The policy has detailed information that explains how the RACGP:

- protects the personal information of individuals (including staff, supervisors and registrars) it works with
- · collects, uses and discloses personal information provided to the RACGP or collected from others
- allows persons to access/correct their personal information
- manages complaints.

The training site acknowledges and accepts that the RACGP collects and holds personal information (such as names and contact details) about accredited training practices and accredited supervisors and that this information will be used to communicate with the practice and its personnel to enable the RACGP to carry out general practice training. This may necessitate the disclosure of personal information to third parties to support related training communications with relevant personnel by phone, email or post.

The training site acknowledges and accepts these uses and disclosures of personal information as detailed within the RACGP Privacy Policy.

