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21 June 2024

AHPRA Board  
Accreditation Committee  
GPO Box 9958  
Melbourne  
VIC 3001

By email: AC\_consultation@ahpra.gov.au

Dear Committee Members,

***'Feedback – public consultation on good practice guidance for clinical placements, simulation-based learning and virtual care'***

Thank you for the opportunity to provide feedback to the AHPRA Accreditation Committee's *public consultation on good practice guidance for clinical placements, simulation-based learning, and virtual care*.

The Australasian Sonographers Association (ASA) is the professional organisation for Australasian sonographers, who are the experts in ultrasound. With over 7,000 members, and representing more than 70% of Australasia's sonographers, the ASA's purpose is to foster a sonography profession that delivers high quality ultrasound with a vision to create a healthier world through sonographer expertise.

We understand that the draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education is primarily for National Scheme entities. However, we agree that the document can provide useful guidance for professions that currently sit outside the national scheme. While the sonography profession is not currently regulated under AHPRA, approximately 25% of sonographers are dual qualified as medical radiation practitioners and are regulated under the Medical Radiation Practice Board of Australia (MRPBA).

In addition, there are many common issues and challenges relating to clinical placements across health professions regardless of their regulatory framework. Many of these are well articulated in the supporting paper prepared by the AHPRA Board Accreditation Committee, *Information paper: good practice approaches to embedding clinical placements, pedagogical innovations and evidence-based technological advances in health practitioner education*.

We acknowledge the work AHPRA is doing in this area. Clinical placements are an essential component to the education and training of health care students, providing the opportunity to integrate theory into practice; become familiar with a variety of practice environments; and build the knowledge, skills, and attributes essential for professional practice<sup>1</sup>.

In response to the draft guidance document, we agree that *all health practitioners have an important role to play in supporting the development of the health workforce*<sup>2</sup>; and that *clinical placement*

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<sup>1</sup> Australasian Sonographers Association, ASA Guideline: A Sonographer's Guide to Clinical Supervision (2015). Available from: [https://www.sonographers.org/publicassets/62af4f20-2a85-ea11-90fb-0050568796d8/Clinical\\_Supervision\\_Guidelines.pdf](https://www.sonographers.org/publicassets/62af4f20-2a85-ea11-90fb-0050568796d8/Clinical_Supervision_Guidelines.pdf)

<sup>2</sup> AHPRA and National Boards Code of Conduct. June 2022



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*supervisors are critical in this regard, and need the knowledge, skills and professional attributes to support good clinical practice as well as the ability to provide teaching, supervising and mentoring to students<sup>3</sup>.*

The ASA is currently reviewing its own guideline to clinical supervision<sup>4</sup>, and is undertaking work towards establishing standards and expected accreditation of sonography clinical supervisors. We welcome the opportunity to share this work with you as it progresses. While the practice environment within which the student undertakes their placement may vary, it is important that supervision appropriately reflects their level of education and needs, and provides a quality learning environment. In addition, we believe the profession – including educators, employers, and health professionals – need to work together with governments to overcome the challenges associated with the current shortage of clinical placements. It is important that any clinical training positions offered centers on students' educational needs, while also providing the appropriate acknowledgement and support for the role of supervisors and employers.

In addition, while simulation-based learning should not replace clinical placements, we agree it can add significant value to learning, particularly in the early stages of student education. The ASA also agrees that all health practitioners need to understand the role and application of virtual care which is now considered mainstream in today's health care sector. While sonographers have limited involvement in providing virtual care direct to patients, many work with practitioners who are offsite.

We acknowledge the definition of clinical placements in the guidance draft to incorporate the wide range of possible arrangements in place. We recommend considering transitioning to the increasingly common umbrella term of *work-integrated learning*, as used by MRPBA<sup>5</sup>, TEQSA<sup>6</sup> and referenced in the University Accord final report<sup>7</sup>. The term 'placement' can suggest this learning component is organised by the education provider or a central administrator. However, it is often the student's responsibility to find and secure, and can encompass a variety of arrangements (paid or unpaid).

We look forward to hearing the outcome of the Committee's work. If you wish to discuss any aspect of our submission, please contact Elissa Campbell, General Manager Policy and Advocacy, at [elissa.campbell@sonographers.org](mailto:elissa.campbell@sonographers.org).

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Tony Coles', is written over a light blue horizontal line.

**Tony Coles**  
**Chief Executive Officer**

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<sup>3</sup> AHPRA Accreditation Committee - Public consultation - draft guidance on embedding good practice in clinical placements, simulation-based learning and virtual care in initial student health practitioner education.

<sup>4</sup> Australasian Sonographers Association. ASA Guideline: A Sonographer's Guide to Clinical Supervision (2015). Available from: [https://www.sonographers.org/publicassets/62af4f20-2a85-ea11-90fb-0050568796d8/Clinical\\_Supervision\\_Guidelines.pdf](https://www.sonographers.org/publicassets/62af4f20-2a85-ea11-90fb-0050568796d8/Clinical_Supervision_Guidelines.pdf)

<sup>5</sup> Medical Radiation Practice Board, AHPRA. Fact sheet for clinical supervisors - Professional capabilities for medical radiation practice (2019). Available from: <https://www.medicalradiationpracticeboard.gov.au/Registration-Standards/Professional-Capabilities.aspx>

<sup>6</sup> Tertiary Education Quality and Standards Australia. Guidance Note: Work-integrated learning. Available from: <https://www.teqsa.gov.au/guides-resources/resources/guidance-notes/guidance-note-work-integrated-learning>

<sup>7</sup> Australian Government. Australian Universities Accord – Final Report (2024). Available from: <https://www.education.gov.au/australian-universities-accord/resources/final-report>