



Risk-Based Accreditation Decision Making Policy

Owner: Owner

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1 Purpose

The Risk-Based Accreditation Decision Making Policy (the Policy) outlines ANMAC's process for assigning risk to new and accredited education providers and programs leading to registration or endorsement as a nurse or midwife in Australia.

ANMAC's assessment and monitoring activities are guided by the Australian Health Practitioner Regulation Agency (Ahpra) and Accreditation Committees Guidelines (the guidelines) for risk-based accreditation decision making and are underpinned by the Health Practitioner Regulation National Law Act (National Law). The guidelines advocate for ongoing identification and reprioritisation of risks. According to the guidelines effective risk-based accreditation decision making is founded on six guiding principles:

- Maintaining regulatory rigour
- Ensuring fairness and equity
- Considering only relevant information
- Making proportionate responses based on information provided by education providers
- Fostering constructive stakeholder relationships
- Regularly reviewing the framework to continually enhance the risk-based accreditation approach.

2 Scope

This Policy is applicable to:

- ANMAC accredited and Nursing and Midwifery Board of Australia (NMBA) approved nursing and midwifery education programs and education providers; and
- All education providers seeking accreditation of a program of study leading to registration or endorsement as a nurse or midwife.

3 Key definitions

Key term	Definition
Accreditation Committee	<p>These committees provide recommendations to the ANMAC Chief Executive Officer (CEO) and as necessary the ANMAC Board on the functions of accreditation and monitoring of education programs that lead to registration and endorsement. To achieve this, each committee:</p> <ul style="list-style-type: none"> • Evaluates and monitors relevant education providers and education programs, considers assessment reports and recommendations prepared by the ANMAC's Accreditation Services team against the relevant approved Accreditation Standards.

	<ul style="list-style-type: none"> • Makes recommendations to the ANMAC CEO and as necessary the ANMAC Board concerning whether an education program should be accredited, accredited with condition/s or to refuse to accredit.
Accreditation Event	<p>Any planned or unplanned accreditation assessment activity. A risk assessment and corresponding risk rating are applied with every accreditation event or complaint investigation regarding an accredited program or education provider. Accreditation events include:</p> <ul style="list-style-type: none"> • a new program submission from an education provider • a reaccreditation submission for an existing education program • an application to change an accredited/approved education program or when a change to an education provider and/or accredited/approved education program has occurred • monitoring – targeted or conditions • a complaint is received that may or may not require investigation.
Accredited program of study	A program of study accredited under section 48 of the National Law by an accreditation authority.
Risk assessment	Risk assessment utilises the ANMAC Risk Assessment Tool to assign a risk rating to all programs of study leading to registration or endorsement as a nurse or midwife.
Risk indicators	Descriptive responses that are most relevant to and guide the information and evidence collected during the accreditation event or complaint investigation. There are 15 risk indicators in the ANMAC Risk Assessment Tool.
Risk management	Risk management involves the implementation of strategies to: <ul style="list-style-type: none"> • identify risks and hazards, • assess both the likelihood of these risks occurring and the severity of their potential consequences, and • prevent or mitigate these risks or minimize their impact.
Risk profile	The collation of information in response to the risk indicators that guides accreditation committees in making decisions about education providers and education programs' overall level of risk and appropriate responses to those risks.
Risk rating	The rating assigned to the education program as the result of applying the risk rating score to the Risk Matrix found in the Risk Assessment Tool. The risk rating may be low, medium, high or critical and assists to determine the actions to be taken to mitigate or reduce risk that would impact the delivery of the education program including impacting the safety of the public.
Risk rating score	Risk rating score is calculated from the aggregated total of the 15 risk indicators scores.

A full glossary of terms used in the Risk-Based Accreditation Decision Making Policy is available on ANMAC's website (<https://www.anmac.org.au/glossary>).

4 Policy

This policy explains a process for:

- assessing the risk of education providers and education programs
- an overview of the process for communicating the identified risk, and
- escalation strategies to oversee and manage potential impacts posed by a high, critical or increasing program risk.

The key principles of the risk assessment approach include:

- Ensuring education providers and education programs assessed as having a high level of risk are assigned the highest priority and attention through appropriate monitoring and accreditation assessment.
- Accreditation and monitoring processes ensure risks are identified and re-assessed as required based on an Accreditation Event.
- Regulatory actions that are consistent, proportionate and necessary to protect the public and are consistent with the National Law.

4.1 Risk Assessment and process

A program's risk is assessed during an **Accreditation Event** and a risk rating assigned by ANMAC using the Risk Assessment Tool (RAT). The RAT addresses risk under four risk rating criteria including:

- Education provider profile and history
- ANMAC Accreditation Standards and monitoring
- Education provider and education program data and feedback
- Institutional culture.

5 Decision Making

The decision-making process for assigning risk involves assessing information gathered during an Accreditation Event according to the four risk rating criteria and 15 related risk assessment indicators (see Diagram 1).

PROVIDER PROFILE AND HISTORY	
1	ASQA, TEQSA or other VET regulator period of registration, conditions and any reports.
2	Introduction of new accreditation standards since last full submission accreditation.
3	ANMAC accreditation period for any existing programs, monitoring and/or conditions and/or complaints on existing programs & provider engagement with monitoring.
4	Program changes submitted to ANMAC for the existing program, including significance and number of changes.
ANMAC ACCREDITATION STANDARDS	
5	Number of recommended / actual conditions and/or targeted monitoring criteria for this submission or as a result of this monitoring event.
6	Recommended / actual conditions and/or targeted monitoring for governance, PEP /MPE, teaching & learning approaches, student assessment, human & physical resources, or program evaluation & quality improvement processes.
7	Recommended / actual conditions and/or targeted monitoring for program content related to cultural safety, interprofessional practice, national or global health.
PROVIDER AND PROGRAM DATA AND FEEDBACK	
8	Student completion rates.
9	Student attrition rates after 3 months of program commencement.
10	Staffing composition including number, appointment level, qualifications and status (i.e. permanent, contract or casual).
11	Feedback from staff, industry and /or students gathered during the accreditation, monitoring or complaint process.
12	External input into the program through external advisory body that is established and meets regularly.
INSTITUTIONAL CULTURE	
13	Institutional function according to values, beliefs and ideology.
14	Balance between feedback, staff profile, complaints and concerns, student attrition rate and external factors.
15	Institute incorporates staff and student support policies and processes.

Diagram 1: Risk assessment indicators used to calculate risk during an Accreditation Event

A risk rating is assigned by ANMAC. The risk rating is dependent on the Accreditation Event and assessment of risk in accordance with the above risk indicators (Diagram 1). The Accreditation Committee's recommend a risk rating to the ANMAC CEO or as relevant the ANMAC Board. The ANMAC CEO and as relevant the ANMAC Board, makes the decision whether to accept or change the risk rating. ANMAC informs the NMBA of risk ratings in the Outcome Report.

5.1 Risk Classification

The Risk Matrix (Diagram 2) serves as a fundamental component of the Risk Assessment Tool. It utilises intersections between likelihood and consequence to support proportionate decision-making and recommendations according to the identified level of risk where:

- *Likelihood* describes the probability that an education provider will fail to deliver a program meeting accreditation standard.
- *Consequence* refers to the severity of risk—should it materialise—in relation to whether the program effectively equips graduates with the knowledge, skills, and professional competencies required for safe and competent practice as nurses and/or midwives.

		Consequence				
		Negligible	Minor	Moderate	Major	Catastrophic
Likelihood	Almost Certain	MEDIUM	HIGH	CRITICAL	CRITICAL	CRITICAL
	Likely	MEDIUM	HIGH	HIGH	CRITICAL	CRITICAL
	Possible	LOW	MEDIUM	HIGH	HIGH	CRITICAL
	Unlikely	LOW	MEDIUM	MEDIUM	HIGH	HIGH
	Rare	LOW	LOW	LOW	MEDIUM	MEDIUM

Diagram 2: ANMAC risk matrix

5.2 Reporting on the Outcomes of the Risk-Based Assessment

ANMAC will formally notify the education provider in writing regarding a program's risk rating, any change in risk rating, and any corresponding changes to monitoring and reporting requirements. ANMAC aims to provide this notification within four weeks of the decision date.

Where appropriate, ANMAC will inform the Nursing and Midwifery Board of Australia (NMBA) through the monthly report if there is an escalation or change in a program's risk rating. This notification may include, but is not limited to, the following scenarios:

- An increase in a program's risk rating or lack of risk reduction despite the implementation of mitigating strategies for programs initially assessed as high risk.
- Accreditation assessments resulting in a program being rated as critical or high risk.
- Significant inadequacies in a program's governance or resources that pose a threat to public safety.
- Situations where potential public commentary about a nursing or midwifery program could create reputational risk for ANMAC, the NMBA, or the nursing and midwifery professions.
- Instances where, at the CEO's discretion, disclosure to the NMBA is deemed necessary to ensure quality nursing and midwifery education.

5.3 Risk Mitigation and Monitoring

The Risk Assessment Tool incorporates a Risk Matrix (Diagram 2) to guide decisions about monitoring strategies for education providers and education programs. This matrix assists in determining an education program and provider's overall risk rating, identifying programs at high or critical level of risk.

Each risk rating corresponds to a specific accreditation outcome and a tailored monitoring approach. These strategies are designed to be proportionate and responsive to the unique risk of each program. If an education provider or education program's circumstances change, its risk rating is reassessed, which may lead to updated monitoring requirements or conditions.

The following outlines each level of risk, including definitions and examples of possible outcomes arising from the assessment:

Low-level risk – Impacts at this level are minor and may result in limited impact to students, the program, the provider, and/or the public.

Programs assessed at low-level risk may receive full five-year accreditation with no conditions or monitoring only. Providers are expected to continue submitting Annual Program Monitoring Reports (PMR) and proactively report designated program changes.

Medium-level risk – Risks at this level may moderately impact students, the program, the provider, and/or the public, potentially necessitating remedial actions to ensure ongoing compliance with accreditation standards and prevent escalation to higher risk levels.

Outcomes for medium-level risk may include five-year accreditation with conditions and /or targeted monitoring focused on any medium, high, or critical indicators.

High-level risk – High-risk scenarios are likely to have major or significant effects on students, the program, the provider, and/or the public, requiring substantial remedial measures to maintain adherence to relevant accreditation standards.

Programs at this risk level may be granted a reduced accreditation period, accompanied by conditions and/or targeted monitoring related to any medium, high, or critical indicators.

Critical-level risk – At this level, there are critical impacts on students, the program, the provider, and/or the public, calling for immediate interventions to mitigate the identified risks.

Possible outcomes include imposing specific conditions, targeting any medium, high, or critical indicators, conducting targeted monitoring site visits, or revoking existing program accreditation/refusing new program applications.

6 Related documents, legislation and standards

External
<i>Health Practitioner Regulation National Law Act 2009</i>
<i>Privacy Act 1988 (Cth)</i>
<i>Ahpra - Guidelines for risk-based accreditation decision-making</i>
Internal
Accreditation Policy and Procedure
ANMAC Committees Policy and Terms of Reference
Delegations of Authority Policy
Board Delegations of Authority Policy
Risk Based Assessment Tool V10

4 Document management

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References

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Final Audit Report

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