



# Risk Escalation Policy

## Accreditation Services

Owner: Accreditation Services

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**Australian  
Nursing & Midwifery  
Accreditation Council**

## 1 Purpose

This policy sets out how the Australian Nursing and Midwifery Accreditation Council (Anmac) assesses and communicates a program's risk of not meeting or not continuing to meet accreditation standards (a program's risk), and how Anmac will manage the regulatory risks posed by a program that is assessed as having a high or critical risk.

## 2 Scope

This policy applies to all Anmac accredited and Nursing and Midwifery Board of Australia (NMBA) approved nursing and midwifery education programs and education providers. An assessment of risk is undertaken for each accreditation event. The risk rating is determined using a program's circumstances according to the following indicators:

- Provider profile and history
- Anmac Accreditation Standards
- Provider and program data and feedback
- Institutional culture.

## 3 Key Definitions

A full glossary of terms used in the Risk Escalation policy is available on the Anmac website (<https://www.Anmac.org.au/glossary>).

## 4 Policy statement

A structured and reliable process for assessing a program's risk, a clear process for communicating a program's risk, and escalating mitigation strategies to ameliorate potential impacts posed a high, critical or increasing program risk. The key principles of the risk assessment approach are that:

- Education providers and programs that pose a high level of risk are given the highest priority and attention through stringent monitoring and accreditation assessment.
- Accreditation and monitoring processes allow risks to be identified and re-assessed over time based on recent data relevant to the risk indicators.
- Regulatory actions are proportionate, consistent and necessary to protect the public consistent with the National Law.

### 4.1 Risk Identification

A program's risk rating is determined using the evidence gathered during accreditation assessments (full submissions, monitoring and program change submissions) and through complaint investigations.

The risk assessment tool (the tool) uses four (4) indicators that have been identified as most relevant for nursing and midwifery programs. The indicators are made up of 15 items in total. A risk is determined against each indicator which is devised from descriptive responses that are most relevant to the information and evidence collected during the accreditation event or complaint investigation. The overall risk rating results from an aggregated total of all items.

## 4.2 Risk Classification

The overarching risk matrix uses intersections of likelihood and consequence to assist with the final risk rating for a program.

- Likelihood: probability of the provider being unable to deliver a program that meets the accreditation standards
- Consequence: severity of the effect of the risk (if it is realised) on the program providing the required competencies and professional capabilities to equip graduates of the program to practice as health practitioners.

		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

## 4.3 Risk Mitigation and Monitoring

The tool determines the risk rating of each program of study to enable effective monitoring based on a program’s unique circumstances. A program’s risk rating and circumstance both inform monitoring activities which are designed to identify programs of study that are no longer meeting the accreditation standards and therefore may place the public at risk.

Each risk rating has corresponding accreditation outcomes and monitoring approaches. Monitoring approaches are specific to each program of study and are designed to ensure regulatory actions are proportionate and sensitive to the identified risks of a program. Changes to a program’s circumstances may change the risk rating, allowing regulatory actions to respond to decreasing or increasing urgency and severity of remedial actions to ensure accreditation standards are met.

- **Low level risk** – The impacts of this risk will have relatively minor impacts to students, the program, the provider and/or the public.

Outcome – Full 5-year accreditation with no conditions or Targeted Monitoring. Continue with Annual Program Monitoring Report (PMR) and Prospective Reporting of designated program changes.

- **Medium level risk** – The impacts arising from this risk that may moderately affect students, the program, the provider and/or the public and may require remedial actions to ensure the program continues to meet the accreditation standards and that the risk does not escalate to a higher level of severity.

Outcome – Full 5-year accreditation with Targeted monitoring specific to any Medium, High or Critical indicators.

- **High level risk** – The impacts from this risk may have major, significant impact on students, the program, the provider and/or the public and will require remedial actions to ensure the program continues to meet the accreditation standards.

Outcome – Reduced accreditation period with Targeted monitoring specific to any Medium, High or Critical indicators.

- **Critical level risk** – The impacts from this risk have a critical impact on students, the program, the provider and/or the public. Immediate interventions are needed to mitigate this risk.

Outcome – Conditions specific to any Medium, High or Critical indicators, Targeted Monitoring site visit, OR revocation of existing program/refusal of new program.

## 4.4 Communication of Risks

Anmac will notify the education provider in writing of a program's risk rating or a change in risk rating and any change to monitoring requirements. As far as possible, Anmac will seek to notify the education provider of the decision within four weeks of the date of the decision.

Anmac may notify the Nursing and Midwifery Board of Australia (NMBA) of a program's risk rating and specific monitoring requirements. Notifications to the NMBA would usually be made in the following circumstances.

- When a program's risk rating has rapidly increased or when mitigating strategies have not resulted in a decrease in risk for a program initially rated as high.
- When an accreditation assessment results in a program's risk rating reaching critical status.
- When a program's governance or resources are significantly inadequate and pose a risk to public safety.
- When there is a potential for public exposure of public comment about a nursing and midwifery program that may create reputational risk to Anmac, the NMBA or the professions of nursing and midwifery.
- When the CEO considers at their discretion that disclosure to the NMBA is warranted to effectively manage quality education for nursing and midwifery.

When an education provider is assessed to be critical risk or a change to risk rating occurs with concerns for the subsequent monitoring or conditions applied, the Director of Accreditation Services will formally notify the CEO who will then escalate the risk to the Anmac Board.

## 5 Roles and Responsibilities

The Anmac CEO, on behalf of the Anmac Board, has overall responsibility for ensuring that Anmac accredited and NMBA approved programs of study are being delivered against the approved accreditation standards.

## 6 Related documents, legislation and standards

<b>External</b>
<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>
<b>Internal</b>
Accreditation Policy and Procedure
Anmac Committees Terms of Reference
Operational Anmac Delegations of Authority Policy
Board Delegations of Authority Policy
Risk Based Assessment Tool V11

## 7 Document management

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