

2025 AMC Monitoring Submission

AMC Findings - Royal Australasian College of Surgeons

Date of last AMC accreditation decision	2023 via Accreditation Extension
Periodic reports since last AMC assessment	2024
Next accreditation decision due	31 October 2027

Explanation of findings

Under the Health Practitioner Regulation National Law, the AMC can accredit a program of study if it is reasonably satisfied that: (a) the program of study, and the education provider that provides the program of study, meet the accreditation standard; or (b) the program of study, and the education provider that provides the program of study, substantially meet the accreditation standard and the imposition of conditions will ensure the program meets the standard within a reasonable time.

The AMC uses the terminology of the National Law (meet/substantially meet) in making decisions about accreditation programs and providers.

Providers must satisfy conditions on accreditation in order to meet the relevant accreditation standard. The AMC provides feedback on the conditions using the following:

Findings against conditions	
Unsatisfactory	The College may not meet the related accreditation standard and AMC should investigate further.
Not Progressing	No progress or overly slow progress given the timeframe on the condition.
Progressing	Indicates satisfactory progress against the condition, with further reporting necessary.
Satisfied	The College has satisfied all requirements and can cease reporting against the condition. Condition is marked as satisfied

Please note that this response contains:

Part A	<i>Summary of the overall findings relating to the College's 2025 monitoring submission.</i>
Part B	<i>Acknowledgement, and responses to conditions that were satisfied in 2025 and have been closed.</i>
Part C	<i>Detailed responses to information reported against the standards, including feedback to support further reporting on remaining conditions on accreditation</i>

Part A: Summary of the overall findings relating to the College's 2025 monitoring submission.

Overall Summary of Royal Australasian College of Surgeons 2025 monitoring submission
<p>Overall, the College continues to make progress, though a number of conditions remain, at best, progressing 2-3 years post their expected completion. There continues to be a lot of unwarranted variation between training programs, though this is improving.</p> <p>The Trainee Committee submission is mainly positive, though ongoing issues such as bullying and harassment remain, as well as other issues outside of the College's control, such as portability of entitlements when trainees transfer between posts.</p> <p>The recent compliance issue with SIMG assessments is reported to have delayed improvements. Many STB/Cs express concerns about the implications of the expedited pathway for SIMGs. The AMC remains concerned about the very slow progress of conditions under Standard 9, especially given the recent compliance breach, and asks that the College and boards/councils prioritise this work.</p> <p>The College continues to substantially meet AMC standards for specialty training programs.</p>

Standard	2024 Findings	2025 Findings
Overall	Substantially Met	Substantially Met
1 The context of education and training	Substantially Met	Substantially Met
2 The outcomes of specialist training and education	Substantially Met	Substantially Met
3 The specialist medical training and education framework	Substantially Met	Substantially Met
4 Teaching and learning methods	Met	Met
5 Assessment of learning	Substantially Met	Substantially Met
6 Monitoring and evaluation	Substantially Met	Substantially Met
7 Issues relating to trainees	Met	Met
8 Implementing the training program – delivery of educational resources	Substantially Met	Substantially Met
9 Assessment of specialist international medical graduates	Substantially Met	Substantially Met

Part B – Acknowledgement, and responses to conditions that were satisfied in 2025 and have been closed

Standard 2: The outcomes of specialist training and education

Areas covered by this standard: educational purpose of the educational provider; and, program and graduate outcomes

Condition 4			To be met by: 2022	
Clearly and uniformly articulate program and graduate outcomes (for all specialties) which are publicly available, reflecting community needs and mapped to the ten RACS competencies. (Standard 2.2 and 2.3)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
				X
2025 AMC commentary				
Current competencies have been reviewed, revised and made more uniform. All are now publicly available.				

Part C – Detailed responses to information reported against the standards, including feedback to support further reporting on remaining conditions on accreditation.

Standard 1: The context of training and education

Areas covered by this standard: governance of the college; program management; reconsideration, review and appeals processes; educational expertise and exchange; educational resources; interaction with the health sector; continuous renewal.

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 1

The College do not note any significant developments, though their responses indicate what should be considered as significant developments. These include a revised Constitution, improvements in governance structures for training and improvements in the College’s financial position.

2 Activity against conditions

Condition 1		To be met by: 2022		
Demonstrate within the College governance structure that accountability is shared by RACS Council, the Education Board, Board of Surgical Education and Training, and Specialty Training Boards to enable each of the 13 training programs meet AMC standards and conditions. Evidence of alignment and robust reporting mechanisms, between the College and specialty training boards in developing education and training policies consistently, is needed. (Standard 1.2)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
There have been a number of workshops run by Committee of Surgical Education and Training (CSET) working across Specialty Training Boards and Committees (STB/Cs), including working towards ‘global’ consistency in terminology, principles and specific shared interventions. The status and progress of each SLA has been provided, noting that they are not all at the same progress point, and also noting that Australian Orthopaedic Association (AOA) and Neurosurgical Society of Australasia (NSA) have different shared governance arrangements. Whilst there continues to be a lot of activity, this condition is now three years overdue and evidence of sustainability is yet to come. There needs to be at least evidence of SLA agreements established and working as intended with ongoing visibility of all programs.				

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 1

Comprehensive statistics are provided in relation to reconsideration, review and appeals as well as a well-designed policy in relation to these. The number of decisions that are varied continue to be small and are mainly with respect to SIMGs.

Summary of College performance against Standard 1

The Standard continues to be Substantially Met. Condition 21 should be reported under Standard 6 in future reports. The College is to be commended on the substantial work they have done in relation to this Standard.

Standard 2: The outcomes of specialist training and education

Areas covered by this standard: educational purpose of the educational provider; and, program and graduate outcomes

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 2

No significant developments reported against this Standard.

2 Activity against conditions

Condition 3		To be met by: 2023		
Broaden consultation with consumer, community, surgical and non-surgical medical, nursing and allied health stakeholders about the goals and objectives of surgical training, including a broad approach to external representation across the College. (Standard 2.1)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
<p>The College provides a useful framework for its consultation with other health service providers and provide examples of how these interactions have occurred. Engagement with health consumers and the community in general is still lagging, with engagement with the Community Reference Group still awaiting approval, and a lack of response from consumer groups when they consulted on their monitoring and evaluation framework. An excellent example of engagement is provided from Australian Orthopaedic Association (AOA) and has highlighted some issues. It is still largely focussed on performance in training or clinical settings rather than the focus of this Condition on the “goals and objectives of surgical training”.</p> <p>A large number of STB/Cs now have a community or consumer member on them, with them demonstrating their benefit to those training bodies. Full implementation of the Community Reference Group should allow this Condition to be rated as Satisfied.</p>				

Summary of College performance against Standard 2

Condition 3 is close to being satisfied, and Condition 4 now is satisfied. The Standard continues to be Substantially Met.

Standard 3: The specialist medical training and education framework

Areas covered by this standard: curriculum framework; curriculum content; continuum of training, education and practice; and curriculum structure.

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 3

No significant developments reported against this Standard.

Requests for additional information from the AMC response to the 2024 monitoring submission:

Regarding Condition 9, satisfied in 2024. The College is asked to comment on how it's being mindful there are no unnecessary "time based" or "procedure number" hold ups for trainees otherwise deemed competent.

Examples from a number of programs are provided with both increased movement to competency-based outcomes and removing assessments that have not appeared to be effective.

2 Activity against conditions

Condition 8		To be met by: 2023		
Include the specific health needs of Aboriginal and Torres Strait Islanders and/or Māori, along with cultural competence training, in the curricula of all specialty training programs. (Standard 3.2.10)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
		X		
2025 AMC commentary				
There continues to be inconsistent approaches between different training programs, with a high-level (but not specific) statement around how all the professional competencies (including cultural safety) are assessed. The course that is a compulsory part of the Continuing Professional Development (CPD) program is impressive, with some Specialty Training Boards and Committees (STB/Cs) making it mandatory for trainees. Apart from the fact that cultural competence/safety has been added to the Professional Skills Curriculum, there is limited detail on how this is being assessed. A more consistent approach across training programs is needed, given that this is largely a generic competence across all branches of Surgery.				

Work on the curriculum outcomes was reported in 2024 and, despite the request for an update on how outcomes are being achieved across all specialities, limited evidence for this is provided.

For the College to satisfy this condition, there is a need for greater consistency across all training boards. The update provided is considered as not progressing as this work has already been reported in the last monitoring submission.

Condition 10 To be met by: 2023

For all specialty training programs develop curriculum maps to show the alignment of learning activities and compulsory requirements with the outcomes at each stage of training and with the graduate outcomes. This could be undertaken in conjunction with the curricular reviews that are currently planned or underway (Standard 3.4.1)

Previously Standard 4.1.1 – moved to Standard 3.4.1 in 2024

Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	

2025 AMC commentary

The commentary from the College shows some progress, with the review of mapping graduate outcomes to competencies cited. Whilst this goes some way towards addressing the Condition, this work appears incomplete.

Summary of College performance against Standard 3

A clearer response is needed that explicitly addresses the previous commentary for Condition 8. Although still marked as substantially met, the lack of progress and clear outcomes places this standard at risk of being rated as not met.

Standard 4: Teaching and learning methods
Areas covered by this standard: teaching and learning approach and methods

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 4

No significant developments reported against this Standard.

Requests for additional information from the AMC response to the 2024 monitoring submission:

The College is asked to please provide updates on the robot-assisted surgery (RAS) implementation?

An advisory group has been created, and a partnership to deliver basic skills training engaged. The more limited exposure of trainees to RAS in Australia compared to similar countries is noted.

Could the College please comment on the low third attempt pass rates for the FEX.

There has been some discussion and speculation with respect to this, noting particularly issues with SIMGs. There is variability in the level of support provided to failing candidates. It is also noted that the small number of candidates who need to undertake a third attempt is small, making analysis difficult. The AMC suggest emphasising the need to appropriately support failing candidates.

2 Activity against conditions

Nil Conditions Remain.

Summary of College performance against Standard 4

This standard continues to be met.

Standard 5: Assessment of learning

Areas covered by this standard: assessment approach; assessment methods; performance feedback; assessment quality

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 5

No significant developments reported against this Standard.

2 Activity against conditions

Condition 22				To be met by: 2026 (New Condition added 2024)
Document how assessments are blueprinted to curriculum outcomes, by stage of training, for all RACS training programs (standard 5.1.1 and 5.2.2)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				

The College has shared this condition with all STB/Cs. Some of these have already undertaken the exercise (General Surgery AUS, AOA, Plastics AUS, Urology). Vascular Surgery expects to complete this in 2027-28 which is well beyond the timeframe of the condition.

Further detail will be provided in 2026. Visibility of progress across all programs is required to close this condition, noting it due to be met by 2026.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 5

The statistics provided are noted. For most programs, the pass rate declines with subsequent attempts. Pass rates for First Nations candidates appear to be similar to overall rates. SIMGs continue to have lower pass rates in general.

Summary of College performance against Standard 5

This standard continues to be substantially met.

Standard 6: Monitoring and evaluation

Areas covered by this standard: program monitoring; evaluation; feedback, reporting and action

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 6

No significant developments reported against this Standard.

2 Activity against conditions

Condition 12				To be met by: 2022
Establish methods to seek confidential feedback from individual supervisors of training, across the surgical specialties, to contribute to the monitoring and development of the training program. (Standard 6.1.2)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
A confidential survey has been sent to all supervisors, with the Australian Orthopaedic Association (AOA) and Neurosurgical Society of Australasia (NSA) conducting separate surveys. The reports of the College and NSA				

surveys were provided as attachments. Both surveys provide useful and interesting information from supervisors, though the College and NSA surveys asked different questions (with some overlap). Ideally, the surveys should be the same (there are useful elements in both surveys). The report of the AOA survey should also be provided in the next submission. Once that has been seen and there is evidence that the surveys are being administered on a regular basis, this condition can be rated as satisfied.

The College is asked to give details on how it intends to maintain this monitoring in the future for ongoing quality assurance of the program.

Administering a common survey across all supervisors is a quality improvement recommendation.

Condition 13				To be met by: 2022
Develop and implement completely confidential and safe processes for obtaining and acting on regular, systematic feedback from trainees on the quality of supervision, training and clinical experience. (Standard 6.1.3 and 8.1.3)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
<p>The response to Condition 21 comments that all STB/Cs conduct trainee surveys (see Attachment 1.15 – not every STB/C reported here) as well as a survey by Royal Australasian College of Surgeons Trainees' Association (RACSTA). They also report on post FEX surveys conducted. The report of the RACSTA survey (Attachment 1.12) has some useful information. Mechanisms are different for each training program. NSA have established a trainee representative committee which includes this as part of its role.</p> <p>The results of the College's trainee survey on supervision are in Attachment 8.1.</p> <p>To close this condition, the College must provide evidence that survey results are being acted on to improve program quality.</p>				

Condition 14				To be met by: 2022
Develop formal consultation methods and regularly collect feedback on the surgical training program from non-surgical health professionals, healthcare administrators and consumer and community representatives. (Standard 6.2.3)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
<p>The response to this condition has been included in the response to Condition 3. This includes an evaluation of Surgical Education and Training (SET) by an external provider, and consideration of a Community Reference Group. These are promising but need to confirm establishment of regular and formal consultation methods to satisfy this Condition. Establishment of the Consumer Reference Group and evidence of regular consultation with them on the surgical training programs should satisfy this condition.</p>				

Condition 15				To be met by: 2023
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Report the results of monitoring and evaluation through governance and administrative structures, and to external stakeholders. It will be important to ensure that results are made available to all those who provided feedback. (Standard 6.3)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
		X		
2025 AMC commentary				
The commentary suggests a lack of implementation as yet, though with some intention to use the training management platform to provide information to Specialty Training Board and Committees (STB/Cs). Some progress appears to be made, but major elements are not implemented yet. There doesn't yet appear to be a consolidated approach to results with systematic reporting mechanisms across all programs to internal and external stakeholders. Evidence of same is required to satisfy the condition.				

Condition 21				To be met by: 2025 (New Condition added 2024)
Demonstrate systematic processes for monitoring and evaluation across all specialties of the Reconciliation action Plan, the Building Respect, Improving Patient Safety (BRIPS) action plan, the diversity and inclusion plan, and the Rural Health Equity Strategic Action Plan (Standard 6.1 and 6.2).				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
This is better placed in Standard 6 but given that the College has reported it under Standard 1 it has been kept here (recommend report under standard 6 in future reports).				
The College has done a lot of work trying to match Medical Training Survey (MTS) results and work done through their own trainee surveys and projects funded by the Commonwealth through Specialist Training Program (STP) and Flexible Approach to Training in Expanded Settings (FATES) with their current Reconciliation Action Plan (RAP) and policy design. They have identified numerous barriers regarding both expanding rural training and growing the number of First Nations trainees. For rural there is a concern (but no surprise) at the limited engagement of STB/Cs where rural service provision is very limited currently. In relation to Building Respect, Improving Patient Safety initiative (BRIPS) there are ongoing issues of perceived sexism and a lack of attention to cultural safety applying to trainees which is limiting recruitment. It is clear from some of the feedback they have received from trainees that there continue to be cultural issues which are not always picked up through the training site accreditation process. They have demonstrated systematic processes, though it is not clear how to translate the FATES projects into sustainable monitoring. If the College is able to demonstrate how these projects will be progressed outside of FATES funding into the future, this condition may be able to be closed. The NT training pathway is example of where the College has done this well.				

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 6
Responses to MTS are included under Standard 1.

Summary of College performance against Standard 6

Some progress is being made, though not enough in volume or speed. As previously stated, Condition 21 should be reported under this Standard in the future. The Standard remains Substantially Met.

Standard 7: Issues relating to trainees

Areas covered by this standard: admission policy and selection; trainee participation in education provider governance; communication with trainees; trainee wellbeing; resolution of training problems and disputes

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 7

No significant developments reported against this Standard.

2 Activity against conditions

Nil Conditions Remain.

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 7

The current training fees are provided. The statistics on new and current trainees and Fellows are noted.

Summary of College performance against Standard 7

The Standard remains Met.

Standard 8: Implementing the training program – delivery of educational resources

Areas covered by this standard: supervisory and educational roles and training sites and posts

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 8
No significant developments reported against this Standard.

2 Activity against conditions

Condition 19		To be met by: 2023		
In conjunction with the Specialty Training Boards, finalise the supervision standards and the process for reviewing supervisor performance and implement across all specialty training programs. (Standard 8.1)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
<p>In light of the implementation of the process with AMC and Miller Blue, it is difficult to assess this condition. The College show how they have mapped the model site accreditation standards to draft RACS Model standards, and a draft timeline for implementation is also attached.</p> <p>There has also been a supervisor MSF project done. There are supervisor and trainer policies provided, though it is not clear if all Specialty Training Boards and Committees (STB/Cs) have agreed to them. The review process includes the supervisor survey reported under Standard 6.</p> <p>As per the commentary in 2024, to be satisfied, this condition requires a process for regular review of <i>individual</i> supervisor performance (with regular feedback) across <i>all</i> training programs. Evidence of how this will be achieved is not provided.</p>				

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 8
Data for Standard 8 will be collected separately as part of NHPO reporting.

Summary of College performance against Standard 8
It is unclear how much Condition 19 is independent of the site accreditation standards project. The Standard remains substantially met.

Standard 9: Assessment of specialist international medical graduates

Areas covered by this standard: assessment framework; assessment methods; assessment decision; communication with specialist international medical graduate applicants

1 Significant developments underway or planned that relate to the accreditation standards

AMC commentary – significant developments against Standard 9
No significant developments reported against this Standard.

2 Activity against conditions

Condition 20				To be met by: 2023
Develop and implement alternative external assessment processes such as workplace-based assessments to replace the Fellowship Examination for selected specialist international medical graduates. (Standard 9.2.1)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
	X			
2025 AMC commentary				
<p>The implementation of External Validation of Professional Performance (EVOPP) has been delayed as the College has been dealing with an identified compliance breach with respect to SIMG assessments (reported to AMC recently). Work towards implementation of EVOPP will commence after July 2025. Other initiatives (not relevant to this condition) are also cited.</p> <p>The AMC views progress on this condition as unsatisfactory because very little has occurred to address it over a number of years (it was not progressing in 2024). The College is asked to prioritise its response to this condition, particularly as it was due in 2023. Again, the College should look to the work of other Colleges in this area.</p>				

Condition 23				To be met by: 2025 (New Condition added in 2024)
In relation to RACS specialist international medical graduate assessment processes develop and implement quality assurance processes within the RACS monitoring and evaluation framework to ensure ongoing all-specialty compliance with Medical Board of Australia and Medical Council of New Zealand standards. (Standards 9.1.1 and 6.1.1)				
Finding	Unsatisfactory	Not progressing	Progressing	Satisfied
			X	
2025 AMC commentary				
Work is underway to develop a QA framework and process for SIMG assessment, including analysis of variation between STB/Cs. In light of the recent compliance breach, the AMC remains concerned about progress on this condition, and the College and boards/councils are asked to prioritize this work.				

3 Statistics and annual updates

AMC commentary – statistics and annual updates against Standard 9

Statistics have been noted. It appears that the data on gender may be incorrect.

Summary of College performance against Standard 9

The Standard remains Substantially Met.
