Professor Michael Woods  
Independent Reviewer  

Via email only: admin@asreview.org.au

Dear Professor Woods,

**Review of Accreditation Systems in Australia**

The Medical Council of New Zealand (Council) appreciates the opportunity to provide feedback to the consultation being undertaken by the Australian Health Minister’s Advisory Council on Accreditation Systems within the National Registration and Accreditation Scheme.

Council’s statutory purpose is to protect the health and safety of the public by ensuring doctors are competent and fit to practise. Our functions include ‘to prescribe the qualifications required for scopes of practice within the profession, and, for that purpose, to accredit and monitor educational institutions and degrees, courses of studies, or programmes’.

Prescribing the qualifications for practice and accrediting the education and training organisations that grant those qualifications is critical to ensuring doctors are competent and fit to practise at the time they are registered in their particular scope of practice. This includes graduates of Australian and New Zealand medical schools and colleges as well as overseas graduates coming to our countries. Any significant change to the standards and processes for accreditation would need to ensure that there is no unintended consequence that could negatively impact the high quality of Australian and New Zealand medical graduates and consequently the health and safety of the public.

Council has a wide regulatory brief in New Zealand. It independently carries out the equivalent functions of the Australian Health Practitioner Regulation Agency (AHPRA), the Medical Board of Australia (MBA) as well as the Australian Medical Council (AMC). However there is a high level of collaboration between Council and these three Australian organisations.

At a strategic and policy level, there is a very close working relationship between Australia and New Zealand. Recent examples include improvements to the generalist training doctors receive in their first two years of practice (ensuring work ready doctors), strengthening recertification (revalidation in Australia) requirements for vocationally registered doctors, and an increasing emphasis on improving cultural competence and reducing health inequity.

At an operational level, information about individual doctors working in either country is shared regularly. This often relates to the doctor’s qualifications for practice, including assessment of overseas graduates, and any issues about competence and fitness to practise.

Underpinning the quality of Australian and New Zealand graduates, at an undergraduate and at postgraduate level, is a shared / co-regulatory model. It is of the highest importance to the Australian and New Zealand public that educational and training institutions (medical schools and colleges) produce high quality graduates. Robust and fair accreditation standards and processes are necessary to ensure this level of quality is maintained and enhanced.
Currently the AMC and Council work together closely to ensure accreditation standards and processes deliver doctors who are fit for purpose. I would emphasise that not only do the standards and processes provide quality assurance in medical programmes, they also focus on quality improvement within the profession, such as improving cultural competence.

An aim of the review is to improve efficiency. Whilst important, an essential element of the current accreditation process is its cost-effectiveness and this is of greater importance than efficiency per se. Value is added to the education and training of medical undergraduates and postgraduates through accreditation and this must be given priority when considering any changes based solely on improving efficiency. However, Council would support reducing duplication and increasing the use of technology. The level of change required to make these changes is relatively minor. The AMC’s costs are consistent with comparable international medical regulators and this benchmark does indicate that there is no significant problem that requires a radical overhaul of the current processes.

Accreditation standards are core to ensuring a quality process. Council works closely with the AMC, an independent national standards organisation for medical education and training, to establish standards that are appropriate for both Australia and New Zealand. The current process of developing and consulting on the standards is transparent, fair and engages all key stakeholders.

The joint Australian and New Zealand accreditation also enables Australian and New Zealand doctors to be fully recognised in each country. Council is unable to perform accreditation functions independently of the AMC (except for New Zealand-only colleges), and any significant change to the standards or the accreditation process would require our joint policy of mutual recognition to be reviewed by Council.

Accreditation of medical education and training organisations has an important international component. The World Federation for Medical Education, which has a strategic partnership with the World Health Organisation, publishes global standards for quality improvement in undergraduate and postgraduate medical education and in continuing professional development. As the number of medical schools and graduates continues to rise worldwide, and with doctors being the most mobile health profession, there is a need to ensure quality assurance and quality improvement across different jurisdictions and medical regulators. The AMC, supported by Council, is seeking recognition of our accreditation standards and processes. It would be disappointing if changes were made that undermine these important international developments.

Finally, the key purpose of accreditation is to ensure that training providers produce graduates that provide safe and good quality care to the public. Any changes to the accreditation standards or processes should not compromise the outcome being sought, i.e., high quality medical graduates who will continue to provide outstanding care to the Australian and New Zealand public.

Council would be happy to meet with you to discuss our submission if that would be of value.

Yours sincerely,

Philip Pigou
Chief Executive Officer