

April 1, 2019

Deborah Frew  
Chair, Workforce Regulation Project Reference Group  
COAG Health Council

Email: [MOH-ASR@health.nsw.gov.au](mailto:MOH-ASR@health.nsw.gov.au)

Dear Ms Frew

**Consultation on Australia's Health Workforce: strengthening the education foundation**

Thank you for the invitation to provide a view on the costs, benefits and risks, of implementing the recommendations reflected in the final report of the Independent Review of Accreditation Systems (ASR) within the National Registration and Accreditation Scheme (NRAS) for health professions: *Australia's Health Workforce: strengthening the education foundation*.

The Australian and New Zealand College of Anaesthetists, which includes the Faculty of Pain Medicine is responsible for the training, examination and specialist accreditation of anaesthetists and specialist pain medicine physicians and for the standards of clinical practice in Australia and New Zealand. ANZCA's mission is to serve the community by fostering safety and high quality patient care in anaesthesia, perioperative medicine and pain medicine.

The college provided extensive, considered feedback on the draft final report and recommendations. In particular, the college strongly stated that it did not support the recommendation to reform the governance of the system by establishing a single national cross profession accreditation framework for health workforce education and training and an overarching Health Education Accreditation Board.

The college remains of the view that the Australian Medical Council (AMC) through the Medical Board of Australia already provides an actively regulated and effective accreditation system that delivers on the objectives set out in the National Law, and ensures a safe, high quality health education and qualifications system for the Australian public.

The college would like to reiterate that it considers there is significant risk with the concept of a single accreditation authority and single cross profession accreditation framework.

The medical profession is a highly specialised profession, involving a significant amount of rigour, discipline, quality, standard setting and which places high demands on education providers and individual clinicians to ensure a safe, high quality health system for patients. Expert, specialty-specific knowledge and input into standard setting is a critical component of Australia's safe, high quality medical system.

Creating a common template to apply across all health professional groups' risks diluting existing standards and creating generic standards that may dilute the quality assurance currently being achieved in specialist medicine.

The current model is working well for the medical colleges and it has been noted that the AMC strengthened and improved their dialogue with colleges over recent years.

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The AMC now have more structure, transparency and consistency in their accreditation process. The AMC accreditation processes provide positive value to the college's educational quality assurance activities. The AMC includes community and consumer input and ensures the requirements of patients are at the centre of decisions.

The college is concerned about the possibility that costs associated with accreditation processes could escalate with any changed model. Within the current framework, colleges are regularly discussing ways to carry out accreditation activities more efficiently and to produce less resource intensive accreditation processes and by reviewing principles of accreditation and effective ways of working with the AMC.

ANZCA considers that the AMC provides an actively regulated and effective accreditation system within the medical profession that delivers on the objectives set out in the National Law. Furthermore, the current scheme is reasonably efficient in that a common set of rigorous standards are applied across different vocational scopes of medicine, and across training at medical schools. Australia is one of the safest countries in the world in which to have surgery, in part reflecting the effectiveness and high quality of the accreditation system. In this context, the benefits of reforming an accreditation system that is meeting many of the desired outcomes for accreditation are unclear.

Once again, thank you for the opportunity to provide feedback. If you have any questions about the matters raised in this letter, please contact Clea Hincks, Director, Safety and Advocacy by email to [policy@anzca.edu.au](mailto:policy@anzca.edu.au).

Yours sincerely



**JOHN ILOTT**  
Chief Executive Officer