

1 May 2026

Marguerite Smith  
Policy Officer (Accreditation Standards Review)  
Australian Medical Council  
PO Box 4810  
Kingston ACT 2604  
Australia

Via email: [standardsreview@amc.org.au](mailto:standardsreview@amc.org.au)

Tēnā koe Marguerite,

The Council of Medical Colleges | Te Kaunihera o Ngā Kāreti Rata o Aotearoa (CMC) is writing to endorse the submission that the Council of Presidents of Medical Colleges (CPMC) is making on the Australian Medical Council's (AMC) draft accreditation standards (standards). We also have a few comments of our own for you to consider.

### Endorsement of CPMC submission

CPMC has met with the Australian and Australasian Colleges and we agree with their general and specific feedback on the standards. In particular, we support the intent and direction of reform – but express some concern about clarity, feasibility, and readiness of colleges to implement, especially in the timeframes being considered.

CMC is particularly pleased to see the emphasis that the new standards put on both trainee wellbeing, and cultural competence and safety. We agree that these are critical areas of focus in the post-graduate training space, and that positive change is needed to both ensure trainee safety and to improve the quality of care that Māori, Pacific, Aboriginal, Torres Strait Islander and other at-risk communities receive.

### New Zealand-specific feedback

CMC would like to raise a couple of additional comments in terms of how the standards might apply in a New Zealand context. We are conscious that New Zealand branches of Australasian Colleges will be accredited against these standards, and also that the Medical Council of New Zealand (MCNZ) may in future consider applying them in a New Zealand-only context.

Our initial comment is that employment arrangements in New Zealand are very different to those in Australia. In particular, employers (usually Te Whatu Ora) carry the legal and operational responsibility for workplace wellbeing under the Health and Safety at Work Act 2015. While Colleges and College policies can make a meaningful difference for trainees, for example for ensuring that training programmes avoid harmful workloads and that pastoral support is available, it is not appropriate to make them responsible for providing AMC with assurances around trainee wellbeing. In that context, we suggest you consider how standard 6.1.1 might be reworded to recognise the important – but legally restricted - role that Colleges can play in the wellbeing space.

Australasian College for Emergency Medicine (ACEM)	College of Intensive Care Medicine of Australia and New Zealand (CICM)	New Zealand College of Sexual and Reproductive Health (NZCSRH)	Royal Australasian College of Medical Administrators (RACMA)	Royal Australian and New Zealand College of Obstetricians and Gynecologists (RANZCOG)	Royal College of Pathologists of Australasia (RCPA)
Australasian College of Sport and Exercise Physicians (ACSEP)	New Zealand College of Musculoskeletal Medicine (NZCMM)	Royal Australasian College of Physicians (RACP)	Royal Australasian College of Surgeons (RACS)	Royal Australian and New Zealand College of Psychiatrists (RANZCP)	Royal New Zealand College of General Practitioners (RNZCGP)
Australian and New Zealand College of Anesthetists (ANZCA)	New Zealand College of Public Health Medicine (NZCPHM)	Royal Australasian College of Dental Surgeons (RACDS)	Royal Australian and New Zealand College of Ophthalmologists (RANZCO)	Royal Australian and New Zealand College of Radiologists (RANZCR)	Royal New Zealand College of Urgent Care (RNZCUC)

Our second comment is to emphasise the need for AMC and MCNZ to engage with New Zealand-only Colleges, and New Zealand branches of Australasian Colleges before considering any extension of the standards into New Zealand. As the previous point highlights, New Zealand provides a very different context and standards developed for use in Australian Colleges cannot simply be introduced here without due consideration of the needs of New Zealand patients and the requirements of New Zealand law.

Thank you again for the opportunity to comment. If you have any questions or concerns, please do not hesitate to reach out to Michael Thorn at [Michael.thorn@cmc.org.nz](mailto:Michael.thorn@cmc.org.nz).

Nāku noa, nā

Dr Samantha Murton

Chair

Council of Medical Colleges

Australasian College for Emergency Medicine (ACEM)	College of Intensive Care Medicine of Australia and New Zealand (CICM)	New Zealand College of Sexual and Reproductive Health (NZCSRH)	Royal Australasian College of Medical Administrators (RACMA)	Royal Australian and New Zealand College of Obstetricians and Gynecologists (RANZCOG)	Royal College of Pathologists of Australasia (RCPA)
Australasian College of Sport and Exercise Physicians (ACSEP)	New Zealand College of Musculoskeletal Medicine (NZCMM)	Royal Australasian College of Physicians (RACP)	Royal Australasian College of Surgeons (RACS)	Royal Australian and New Zealand College of Psychiatrists (RANZCP)	Royal New Zealand College of General Practitioners (RNZCGP)
Australian and New Zealand College of Anesthetists (ANZCA)	New Zealand College of Public Health Medicine (NZCPHM)	Royal Australasian College of Dental Surgeons (RACDS)	Royal Australian and New Zealand College of Ophthalmologists (RANZCO)	Royal Australian and New Zealand College of Radiologists (RANZCR)	Royal New Zealand College of Urgent Care (RNZCUC)