



28 February 2019

Our ref: TM19-009

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Sent via email: hbennett@mcnz.org.nz

Tēnā koe Ms Bennett

The Royal New Zealand College of General Practitioners (the College) welcomes the opportunity to provide feedback on the proposed *Standards for assessment and accreditation of vocational medical training and recertification programmes for New Zealand colleges*.

Background

General Practitioners (GPs) comprise almost 40 percent of New Zealand's specialist workforce. The College is their professional body and the largest medical college in the country. It provides training and ongoing professional development for GPs and rural hospital generalists and sets standards for general practice. The College has a commitment to embed the three principles (participation, partnership and protection) of Te Tiriti o Waitangi (Treaty of Waitangi) across its work, and to achieving health equity in New Zealand.

Submission

The College is largely supportive of the approach taken

Our view is that the content outlined in the current consultation document is clear. We see the value in aligning the accreditation standards more closely with the accreditation standards applied by the Australian Medical Council (AMC) to Australasian (and Australian) Colleges. We largely agree with the approach the Council has taken in the revision of these standards.

The College is pleased to see the progress that has been made in recognising the importance of addressing Māori health equity in these Standards, noting that there is still work required in this area.

Other key points

- We support the Council's note that sub-specialty training programmes should be grounded in 'the broader educational outcomes for the discipline/specialty as a whole' (3.1.1 note b).
- We are encouraged by the focus on training to address Māori health needs (1.6 note c and 3.2.9), specifying a focus on understanding Māori health inequities and on identifying culturally "safe" practises (3.2 note g and h). The College also looks forward to the Council providing the profession with a definition of "cultural safety" that is more reflective of the context of practising in Aotearoa New Zealand (3.2 note f).
- Regarding standard 4.2, we question the removal of the descriptive element of Te Tiriti o Waitangi and explicit mention of the health disparities affecting Māori. We also look forward to clear definition of what 'cultural competence' means to aid in the delivery of this standard (4.2.5).

- The College suggests the Council append a list of definitions to the standards, and for a definition of 'employer' to be included that would cover the range of employment scenarios in which the trainees might find themselves.
- The College welcomes the aim of increasing the recruitment, selection and retention of Māori trainees and the benefits of a regional approach to trainee selection (7.1). We look forward to the Council supporting colleges to address this standard.
- The College would welcome a requirement that those who participate in selecting trainees to the training programme, are appropriately trained to do so (7.1).
- We welcome the recognition and general emphasis across the standards on the wellbeing of health practitioners.
- At this time the College believes it is hard to make meaningful comment on standard 9.1.2 – the requirements to meet the Council's '*Vision and principles for recertification for doctors in New Zealand*' – given the Council is yet to finalise the recertification structure for the period where these accreditation standards may apply. The College believes a subsequent consultation on Standard 9 would be appropriate once the recertification requirements have been confirmed. This would ensure that Colleges have a meaningful and informed opportunity to comment on this standard.
- The College would like further clarification on the use of the word 'performance' regarding proposed standard 9.1.3. The College believes it has no direct role in defining or assessing the "performance" of vocationally registered doctors in their workplace setting.
- The College seeks further clarification regarding the term 'underperforming' as set out in proposed standard 9.3.1.
- The College would appreciate clarification of what the Council expects in relation to "counselling" those who 'fail to meet recertification requirements' (9.1.8) and, additionally, guidance from the regulator about the expectations for colleges on what is meant by 'a process for escalating those doctors not participating' in CPD (9.1, note i).

Our final request is that the Council provide support, resourcing and clear guidance around implementation of the proposed standards. The College will need time to develop, implement and embed new processes that will meet the expectations you have outlined. This is of specific concern to the College in relation to the General Practice education and recertification programmes, as these are due for reaccreditation in 2021.

We are keen to work closely with the Council to ensure that the College can meet the expectations of these proposed standards.

We hope you find our submission helpful. Should you require any further information or clarification please contact the College's learning team at Ken.Trass@rnzcgp.org.nz.

Nāku noa nā



Terina Moke
Acting Chief Executive