

30 April 2009

The Secretary
Senate Community Affairs Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Community.affairs.sen@aph.gov.au

**THE ROYAL COLLEGE OF PATHOLOGISTS OF AUSTRALASIA'S SUBMISSION TO
THE NATIONAL REGISTRATION AND ACCREDITATION SCHEME FOR DOCTORS
AND OTHER HEALTHCARE WORKERS**

The College welcomes the opportunity to provide this submission to the inquiry. The College is fully supportive of the proposed national registration component of the arrangements but has serious reservations over the accreditation component of the scheme. This submission will thus only address the accreditation component of the scheme.

A) The Impact of the Scheme on the State and Territory Health Services

The scheme will greatly affect State and Territory Health Services as it is core to the maintenance of high quality healthcare delivery. As will be detailed under other terms of reference below it is this magnitude that causes the College concern as under the proposed accreditation arrangements there is a possibility of a decreasing of the standards required for healthcare delivery.

B) The Impact of the Scheme on Patient Care and Safety

C) The Effect of the Scheme on the Standards of Training and Qualifications of Relevant Health Professionals

The College considers that the proposed arrangements in relation to the Accreditation Scheme could have a major effect on patient's quality of care and also safety by directly impacting on the standards for training and approval of relevant qualifications for the medical profession.

Currently for the medical profession the Australian Medical Council (an organisation independent of government, made up of representatives of all Medical Boards, and medical colleges and some government representation) sets the standards and accredits medical college training programs for specialists, their continuing professional development and for the assessment of overseas trained doctors for comparability to Australian qualifications and their suitability to work in particular jobs. This system has been in existence since 2000 and has contributed greatly to ensuring high standards for training and continuing practice for doctors.

The standards and the accreditation is a peer based process allowing standards to be able to be developed by consensus using best practice principles and where available evidence. Medicine is a complicated profession and it is only those with an in depth knowledge of each specialty area who can enunciate what are the appropriate standards

for the community. Obviously it is up to government to decide what they are willing to pay for, but the standards of what is best practice must be determined by the profession. Under the new proposed scheme the setting of the accreditation standards for these areas will fall to a Ministerial Council. This is contrary to international standards set by the WHO (the World Health Organisation/World Federation for Medical Education *Guidelines for Accreditation of Basic Medical Education* (Geneva/Copenhagen 2005) which stipulate such standard setting should be peer based and independent of government. The College has serious concerns over the new proposal and considers the existing arrangements with the AMC should be retained.

The concerns mainly relate to potential problems. For example, in the future political pressures could be brought to bear to provide coverage of services by reducing the standards a practitioner was required to meet to be registered. We believe this is not in the best interests of the community.

D) How the Scheme on the Standards will affect Complaints Management and Disciplinary Processes within the Particular Professional Streams

No comment

E) The Appropriate Role, if any, in the Scheme for State and Territory Registration Boards

No comment

F) Alternative Models for Implementation of the Scheme

The College considers the existing AMC Accreditation Scheme should continue for medicine and that similar schemes be developed in other healthcare disciplines.



Dr Debra Graves
Chief Executive Officer