

Australasian College for  
Emergency Medicine

Australian and New Zealand  
College of Anaesthetists

College of Intensive Care  
Medicine of Australia and New  
Zealand

New Zealand College of Public  
Health Medicine

Royal Australasian College of  
Medical Administrators

Royal Australasian College of  
Surgeons

Royal Australian and New  
Zealand College of Obstetricians  
and Gynaecologists

The Royal Australian and New  
Zealand College of  
Ophthalmologists

The Royal Australasian College  
of Physicians

The Royal Australian and New  
Zealand College of Psychiatrists

The Royal Australian and New  
Zealand College of Radiologists

The Royal College of  
Pathologists of Australasia

The Royal New Zealand College  
of General Practitioners

Royal New Zealand College of  
Urgent Care

Australasian College of Sport  
and Exercise Physicians

# Council of Medical Colleges in New Zealand

## Te Kaunihera o Ngā Kāreti Rata o Aotearoa

PO Box 10375  
The Terrace  
WELLINGTON 6143  
Telephone +64-4-471 2334

26 June 2020

Steve Osborne  
Principal Advisor  
Workforce Strategy and Policy  
Ministry of Health  
PO Box 5013  
Wellington 6140

By email: [Steve.Osborne@health.govt.nz](mailto:Steve.Osborne@health.govt.nz)

Tēnā koe Mr Osborne,

### **Re: Core performance standards for Responsible Authorities**

Thank you for the opportunity to provide feedback on the above consultation. The Council of Medical Colleges (CMC) is the collective voice for the medical colleges in New Zealand, and through its members aims to improve, protect and promote public health via a well-trained medical workforce and high-quality medical care. This consultation is of interest to the medical colleges, as the Medical Council of New Zealand sets standards and accredits medical colleges for vocational training and recertification programmes. It is also of interest to CMC as the medical colleges advocate for safe, appropriate quality health services in New Zealand.

The Council of Medical Colleges supports the introduction of performance reviews to ensure responsible authorities are performing their functions to a high standard, with a focus on protecting the health and safety of members of the public. Overall, the CMC agrees that performance reviews are an important mechanism for public confidence in the regulatory system.

The CMC provides more specific comment below on several elements of the Ministry's consultation document.

### **Guiding principles**

The guiding principles are sound. The CMC commends elements included in the guiding principles, such as reference to Right Touch regulation; emphasis on protecting the health and safety of the public with particular emphasis on the

health and safety of Māori; and being a mechanism for supporting responsible authorities to continually improve.

For the guiding principles to have impact, they will need to be reflected in the performance review standards in appendix one of the document.

### **Cost of reviews**

The CMC notes that the cost of reviews will be met by responsible authorities. Although the consultation document includes the principle of being cost-effective and affordable for every responsible authority, in reality performance reviews are likely to be costly. As well as the direct cost of the review, there will also be indirect use of staff time and resources in preparing for and responding to any review. Meeting these costs may include increasing the practicing certificate fees of health practitioners, a cost that tends to be met by employers. As such, the cost of performance reviews will essentially be passed onto the already underfunded health budget.

This means it is even more important that reviews are managed carefully to be as cost-effective as possible, while maximising positive outcomes for the health and safety of the public.

### **Consistency of review process across responsible authorities**

CMC notes that the consultation includes 'general terms of reference' and states that "more detailed requirements for each review will be set by the Ministry in consultation with the responsible authority being reviewed". This suggests that each responsible authority will be working to a different terms of reference.

The CMC encourages the Ministry to consider having consistent terms of reference, review processes, and reporting requirements across the responsible authorities. When one of the aims of performance reviews is to build competence and foster continued performance improvement of responsible authorities, being able to learn from each others' performance reviews will be essential. The Ministry's consultation document acknowledges this and notes that reports "should highlight any areas of learning that may benefit all responsible authorities." A consistent terms of reference and review methodology will facilitate information sharing and learning between responsible authorities. Consistency of process will also be important for ensuring responsible authorities are approached in a fair and consistent manner. It may be difficult and complex to justify having different approaches for each responsible authority, to both health practitioners and the public.

### **Review and appeal processes**

The CMC notes that the nature of the reviews will be formal and evaluative, but will be carried out in a collegial manner with both formative and evaluative feedback. The CMC supports the proposed nature of the reviews. It also supports the proposal that responsible authorities will be provided with a draft report and given the opportunity to correct factual errors, before the report is finalised.

Although the mechanisms above support a fair process, the CMC notes, however, that no review or appeal processes are outlined should the responsible authority dispute the final report.

Thank you once again for the opportunity to provide feedback.

Ngā mihi,

A handwritten signature in purple ink, appearing to read 'John Bonning', with a vertical line extending downwards from the end of the signature.

Dr John Bonning, Chair