

30 August 2013

Medical Council of New Zealand  
PO Box 11649  
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## **Consultation on standards and processes for recognition of vocational scopes of practice and accreditation of New Zealand vocational colleges**

Thank you for inviting me to comment on the Medical Council of New Zealand's (Council's) consultation on the standards and processes for recognition of vocational scopes of practice and accreditation of New Zealand vocational colleges.

Overall, I support the Medical Council's proposals. I trust the following comments are helpful in developing the new standards and processes.

### **Recognition of Vocational Scopes of Practice: Stage 1**

I share Council's concern, as set out in the consultation document, of the risks associated with over-specialisation, including that it can result in the fragmented delivery of services. I refer to the following paragraph from my letter to you of 21 May 2013:<sup>1</sup>

*"In my view, MCNZ should exercise caution in adding additional layers of sub-specialities to the practice of medicine, to avoid over-specialisation. Over-specialisation is not in the best interests of consumers, and can result in the fragmented delivery of services. In general, I consider that it would be helpful if MCNZ generated criteria for when sub-specialisation may be justified, taking into account considerations such as service sustainability and the need for holistic and seamless service for consumers."*

As such, I am supportive of the criteria for assessing applications for the recognition of vocational scopes of practice as outlined in Stage 1, which include the above suggested considerations. I am particularly supportive of the inclusion of points 2.1 and 4.2, which emphasised quality and safety and addresses the need for holistic and seamless services for consumers.

This Office occasionally receives complaints from consumers which demonstrate confusion about the different roles and responsibilities of doctors within different specialities or sub-specialities. To enable patients to better understand a practitioner's expertise, qualifications and the limits of scope of practice, I also consider that scope of practice definitions should be clear and unambiguous.

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<sup>1</sup> My submission on vocational recognition of addiction medicine.

### **Recognition of Vocational Scopes of Practice: Stage 2**

I consider that there is significant benefit in direct observation in medical education, training and continuing professional development programmes, and I recommend that Council require vocational colleges to consider the benefit of direct observational audit of their members.

I also note the importance of collegial support within the medical profession and between health professionals generally, and of encouraging communication between providers. This Office sometimes receives complaints involving reluctance by junior staff to discuss matters of concern with senior staff. Cultures that allow such reluctance are not consistent with a patient-centred approach and may compromise quality and safety of care provided. I am therefore encouraged by the thoroughness of these standards in addressing the importance of supervision and support amongst peers.

### **Reaccreditation of Vocational Colleges**

I am supportive of Council maintaining a reaccreditation process for vocational colleges, to ensure that medical specialists maintain high standards of practice. I consider that during the reaccreditation process Council should ensure that vocational colleges have a system of regular assessment of member doctors' practice that is effective and sustainable and will ensure those high standards remain. It is pleasing to see that MCNZ is taking steps to ensure that there are robust and evidence based processes for the training, maintaining and reaccreditation of medical specialists.

The consultation document states that Accreditation can be granted for a maximum period of 6 years plus a further four years if the fifth year report is approved. I consider that there is benefit in reaccrediting newer vocational colleges more regularly, while well established vocational colleges may have a longer reaccreditation period.

I commend the MCNZ on the thoroughness of the proposed standards, given the importance of maintaining a high standard of care for consumers.

I trust these comments are helpful.