



11 August 2014

Dr Richard Chadwick
General Manager
Adjudication Branch
Australian Competition and Consumer Commission
CANBERRA ACT 2601

Dear Dr Chadwick

Submission on application for re-authorisation A91441 - A91443

Thank you for the opportunity to make a submission on this application for re-authorisation of policies governing the application for admission and the interviewing of applicants for admission to study medicine at graduate-entry consortium medical schools.

The Australian Medical Council (AMC) is an independent national standards and assessment body for medical education and training. The purpose of the AMC is to ensure that standards of education, training and assessment of the medical profession promote and protect the health of the Australian community.

Since its inception, the AMC has been responsible for setting standards for medical education and training, assessing medical programs against these standards, and accrediting programs that meet AMC standards.

The AMC provided feedback to the ACCC in July 2009 regarding the initial application by the graduate-entry consortium medical schools. Since this time, the *Health Practitioner Regulation National Law Act 2009* has come into force and the AMC is the appointed accreditation body for the medical profession.

The AMC completed a review of its accreditation standards for primary medical programs in December 2012. The review proposed no changes to the overall purpose of accreditation. The standard related to admission student selection and admission is largely unchanged.

The approved *Standards for assessment and accreditation of primary medical programs by the Australian Medical Council 2012* at Standard 7.2 'Admission policy and selection' require that:

7.2.1 The medical education provider has clear selection policy and processes that can be implemented and sustained in practice, that are consistently applied and that prevent discrimination and bias, other than explicit affirmative action.

7.2.2 The medical education provider has policies on the admission of students with disabilities and students with infectious diseases, including blood-borne viruses.

7.2.3 The medical education provider has specific admission, recruitment and retention policies for Aboriginal and Torres Strait Islander peoples and/or Maori.

7.2.4 Information about the selection process, including the mechanism for appeals is publicly available.

The AMC conducts assessment and monitoring of medical programs against the approved standards in accordance with the *Procedures for assessment and accreditation of medical schools by the Australian Medical Council 2011*. All AMC accreditations are based on the education provider demonstrating that it meets or substantially meets the approved accreditation standards.

When it is considering a new medical education provider for accreditation or the reaccreditation of an established medical education provider, the AMC receives a detailed submission describing its curriculum, and its policies and processes related to delivery of the medical program. The AMC also requests a submission from the program's student society. The AMC assessment team meets a wide range of staff, students and other stakeholders.

The accreditation standards permit diverse selection approaches by medical education providers that include both academic and vocational considerations. In assessing whether the education provider's admissions process satisfies the AMC accreditation standards, the AMC team would meet the admissions committee, representative groups of students and the student organisation, and may meet other contributors such as a sample group of interviewers, and the University's admissions staff.

Once a medical program has been accredited by the AMC, the AMC monitors the program by way of progress reports on an annual or biennial basis. The student society is also invited to report to the AMC when the provider reports.

In commenting on this application for re-authorisation, the AMC has reviewed its accreditation reports and decisions, from 2010 to 2014, regarding the ten medical education providers that comprise the graduate-entry consortium in 2014, being: Monash University, University of Wollongong, Deakin University, The University of Western Australia, Griffith University, The University of Notre Dame Australia School of Medicine Sydney, The University of Notre Dame Australia School of Medicine Fremantle, Flinders University, The University of Queensland and The University of Melbourne.

From the AMC's perspective, the graduate-entry consortium has not restricted diversity and the selection requirements of the graduate-entry consortium schools remain varied. The AMC has not observed any detriment to applicants as a result of the policies governing the application for admission and the interviewing of applicants for admission to study medicine at graduate-entry consortium medical schools.

I hope these comments are of assistance.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Ian Frank', with a stylized flourish at the end.

Ian Frank AM
Chief Executive Officer