

133 Molesworth Street  
PO Box 5013  
Wellington 6145  
New Zealand  
T+64 4 496 2000

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Ms Sian Lewis  
Executive Officer  
Optometry Council of Australia and New Zealand  
PO Box 16179  
Collins St West  
VIC 8007  
[officemanager@ocanz.org](mailto:officemanager@ocanz.org)

Dear Ms Lewis

Thank you for your email of 22 June 2021 asking for our feedback on the review of optometry training programme accreditation standards. Dr Martin Chadwick, the Ministry of Health's Chief Allied Health Professions Officer, has contributed to this reply on behalf of the Ministry.

Firstly, we note that the review panel does not appear to include anyone from New Zealand. In the interests of ensuring equity and New Zealand's Te Tiriti o Waitangi (the Treaty of Waitangi) obligations are met and recognising the different contexts between New Zealand and Australia, representatives from both countries should be present.

Equity within the health and disability workforce and health outcomes is a key priority for New Zealand. We support the inclusion of criteria similar to the Australian Dental Council's 6.2, and adding Māori and Pasifika:

*The program provider promotes and supports the recruitment, admission, participation, retention and completion of the program by Aboriginal and Torres Strait Islander Peoples, and Māori and Pasifika.*

The Optometry Council of Australia and New Zealand could consider further emphasising workforce equity through other standards and guidance. For example, in the selection of students and the design and delivery of programmes to mitigate the impact of inequities.

Specific reference to, and recognition of, Te Tiriti o Waitangi (the Treaty of Waitangi) and associated obligations in New Zealand would also strengthen workforce equity, cultural safety and equitable health outcomes.

The COVID-19 pandemic highlights the need for all health and disability workers to be prepared for pandemics and other such events that require the workforce to respond quickly and with agility. We support the optometry training programme giving students an understanding of the potential impact of such events and how to support the whole health

system when needed. We also suggest that this aspect of training could be done in conjunction with other health professional training to support the cross-professional collaboration needed in a pandemic.

Other than these points, we have no further comments on the standards. Thank you for the opportunity to comment on the optometry training programme.

Yours sincerely



Amy Wilson  
**Acting Deputy Director-General  
Health Workforce**