

**SUBMISSION TO THE HOUSE OF REPRESENTATIVES STANDING  
COMMITTEE ON HEALTH AND AGEING INQUIRY INTO THE  
REGISTRATION PROCESSES AND SUPPORT AVAILABLE TO  
OVERSEAS TRAINED DOCTORS IN AUSTRALIA**

The Committee of Presidents of Medical Colleges (CPMC) is the unifying organisation of and support structure for the specialist Medical Colleges of Australia. The CPMC seeks to ensure that individual medical specialties have a broad base of intercollegiate knowledge so as to enable them to provide for the Australian community the highest quality of medical care delivered in accordance with accepted clinical principles and to improve, protect and promote the health of the Australian public.

Member Colleges are responsible for the determination and maintenance of standards for their respective disciplines and for the training and education of medical specialists in that discipline.

The CPMC is also involved in policy development and, as the peak specialist medical body in Australia, provides objective advice on health issues to Government and the wider community.

The CPMC is pleased to assist the Committee in its inquiry into the registration processes and support available to overseas trained doctors (OTDs) in Australia. Accordingly, the following advice is provided -

**The Administrative Processes Currently in Place**

Committee members would be aware that a national system of registration was introduced for the regulated health professions, including medicine, with effect from 1 July 2010 under the Health Practitioner Regulation National Law Act. That legislation established national Boards for each of the 'regulated professions' and the **Australian Health Practitioner Regulation Agency (AHPRA)**, which supports the national Boards in their operation. The **Medical Board of Australia (MBA)** is responsible for the registration and regulation of medical practitioners and the accreditation of their education and training. It is not proposed to canvass the roles and processes of AHPRA or the MBA, as both organisations undoubtedly will make detailed submissions to the Inquiry in their own right.

The **Australian Medical Council (AMC)** is responsible, inter alia, for assessing the qualifications of OTDs who wish to practise medicine in Australia. The Specialist Medical Colleges liaise closely with the AMC in assessing the qualifications of OTDs whose primary medical qualification is verified and who claim to have specialist qualifications issued by overseas institutions. The established processes and procedures provide for the outcome of every assessment to be a declaration that the applicant is -

- ‘substantially comparable’ with an Australian-trained practitioner, in which case the applicant is considered suitable for recognition as a specialist and eligible to apply for admission to Fellowship of the relevant Specialist Medical College, subject to up to 12 months work under oversight to confirm the initial assessment and to ensure the practitioner’s satisfactory integration into the Australian health system;
- ‘partially comparable’, where the applicant requires up to two years’ further ‘up-skilling’ in aspects of the discipline to reach the standard of an Australian-trained practitioner; or
- ‘not comparable’. In this case, it is necessary for the applicant to enter the relevant Specialist College training program, possibly with some recognition of previous specialist training undertaken overseas.

Whilst all CPMC member Colleges undertake the assessment of OTDs who claim to possess specialist qualifications, the number of applicants dealt with by each College varies significantly. General practitioners constitute approximately one half of the total number of such applicants. In the 2010 calendar year, the other Colleges involved significantly in this activity were -

- The Royal Australasian College of Physicians, including its constituent Divisions, Chapters and Faculties (163 new Applications)
- Royal Australasian College of Surgeons (109)
- Australian and New Zealand College of Anaesthetists (72)
- The Royal Australian and New Zealand College of Psychiatrists (59)
- The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (49)
- The Royal Australian and New Zealand College of Radiologists (49) and
- The Royal College of Pathologists of Australasia (37).

It is expected that most CPMC member Colleges will be making individual submissions to the Inquiry in regard to their particular activities.

Specialist Medical Colleges have established appeal processes available to any OTD who wishes to challenge the outcome of any such assessment. Details of the appeal process are available generally on College websites and are provided also upon request by any OTD.

#### **Area of Need Practitioners**

Separate from the above processes for doctors seeking to practise independently in Australia, are the arrangements for assessment of OTD applicants who are recruited to work in positions in locations that have been declared to be ‘Areas of Need’(AoN) by State or Territory jurisdictions. In these cases, the Specialist Medical Colleges assess the applicant against the detailed position description provided by the jurisdiction, rather than the standards required of an Australian-trained specialist in that discipline. Again, general practice is the predominant discipline. Other Specialist Medical Colleges with a significant involvement in 2010 were -

- The Royal Australasian College of Physicians (46 applications)
- The Royal Australian and New Zealand College of Radiologists (37)
- The Royal Australian and New Zealand College of Psychiatrists (31)
- Royal Australasian College of Surgeons (22) and
- Australian and New Zealand College of Anaesthetists (17).

The Inquiry has been asked to address the issue of how the wider community can be assisted to better understand the requirements for OTDs who wish to practise in Australia. There is much comprehensive information available, with the principal sources being the DoctorConnect website (<http://www.doctorconnect.gov.au/> ) established by the Department of Health and Ageing, the AMC website (<http://www.amc.org.au/> ) as well as State and Territory Health

administration websites. These internationally-available resources provide a vast amount of information to prospective OTDs and to any other person who is sufficiently motivated to access them. In addition, most Specialist Medical Colleges provide on-line information to OTDs via a specific link on the College webpage, detailing the requirements and how they may be met.

An information campaign directed to the wider community, which would outline the care and efforts taken to encourage OTDs to come to Australia whilst ensuring that the current standards of quality and safety are maintained, would be valuable in educating the community generally. Any such campaign would need to be of extended duration and repeated routinely if public consciousness of this issue was to be maintained.

### **The Support Programs Available Through Commonwealth, State and Territory Governments and Other Professional Organisations to Assist OTDs to Meet Registration Requirements**

The Specialist Medical Colleges provide assistance and support to OTDs seeking to become registered to practise in Australia routinely, in the course of their dealing with OTD applicants. However, this is more appropriately an issue for the MBA, AHPRA, AMC and State and Territory administrations.

### **Assisting OTDs to Achieve Full Australian Qualifications**

The CPMC member Colleges are active in encouraging OTDs to achieve full Australian qualifications and to be admitted to Fellowship of the relevant College. It is usual when an applicant for an AoN position is being assessed, for the applicant to be assessed concurrently for comparability with an Australian-trained specialist and advised of any further training or experience required before the applicant could be recognised as a specialist and invited to apply for admission to College Fellowship.

Specialist Medical Colleges and their Fellows play a major role in the supervision of AoN practitioners, where that is a condition of a practitioner's limited medical registration and in the training and support of OTDs assessed to be 'partially comparable'. This involves prescribing the areas of further training and experience required to qualify as a specialist, assisting with locating a suitable training placement and the direct provision of training and mentoring support. In addition, OTDs and AoN practitioners are encouraged to participate in College Continuing Professional Development programs and other educational activities and meetings.

The constraints which confront OTDs and AoN practitioners in rural areas are very real. The constant tension which exists generally throughout the health system between the provision of services to patients and training imperatives is magnified in rural locations by workforce shortages and remoteness from specialist colleagues. A major contribution to promoting the achievement of full Australian qualifications by both OTDs and AoN practitioners would be the establishment of a significant resource of locum specialists. This would enable the release from routine duty of OTDs and AoN practitioners to attend education and training activities and assessment preparation programs provided by the Colleges. This would be no small operation and the salary, travel, accommodation and other costs involved would be significant. However, it would be the most effective initiative to give these doctors the professional development support they very much need and deserve.

The CPMC and its member Colleges are very supportive of the objectives of this Inquiry. They would be pleased to cooperate fully in the implementation of any initiatives the Inquiry recommends which have the potential to provide additional or more effective support to OTDs and AoN practitioners, which are a vital component of the current medical workforce in

Australia. The CPMC applauds the criterion in the Minister's reference which requires that the Inquiry develop its recommendations 'without lowering the current standards as set by the professional and regulation bodies'. The CPMC would be pleased to provide any additional information or assistance the Inquiry may require.

In particular, the CPMC would seek the opportunity for its representatives to participate in the final public hearings in order to provide advice to the Committee in regard to the feasibility, potential benefit and likely quality and safety implications of proposals the Committee may be considering for inclusion in its recommendations.



Leslie Apolony  
Chief Executive Officer

1 February 2011