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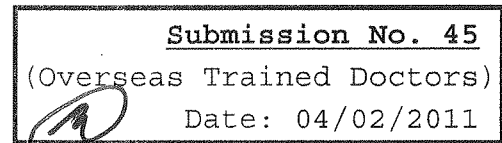
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Dear Secretary

Re: Inquiry into Registration Processes and Support for Overseas Trained Doctors
Submission from the Royal Australian and New Zealand College of
Obstetricians and Gynaecologists

Please find enclosed the submission of the Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) to the Department of Health and Ageing Inquiry into Registrations Processes and Support for Overseas Trained Doctors.

Any queries about the submission should be directed to:

Dr Rupert Sherwood, President
Royal Australian and New Zealand College of Obstetricians and Gynaecologists
College House

The College would be pleased to clarify any part of our submission if requested.

Yours sincerely

Dr Rupert Sherwood
President

encl

**RANZCOG Submission to the House of Representatives Standing Committee on
Health Ageing Inquiry into Registration Processes and Support for
Overseas Trained Doctors**

The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) is the peak body responsible for training and standards in the specialist discipline of obstetrics and gynaecology in Australia and New Zealand. In Australia the College is accredited by the Australian Medical Council (AMC) to undertake the requisite training and assessment of doctors to enable recognition as a specialist obstetrician and gynaecologist, with Fellowship of the College (FRANZCOG), the qualification recognised by the Australian Health Practitioner Regulation Agency (AHPRA) to enable inclusion on the specialist register of the Medical Board of Australia (MBA) in the field of obstetrics and gynaecology.

The College is also the body formally recognised by the MBA to conduct assessments of overseas trained doctors (OTDs) who possess overseas qualifications in obstetrics and gynaecology and who wish to be recognised as a specialist in this field in Australia. The College also undertakes such assessments in New Zealand for the Medical Council of New Zealand in the capacity of a Branch Advisory Body (BAB) to the Council. It undertakes these functions acutely aware of the associated responsibilities from a range of stakeholders, including (and most notably) the overseas trained doctors and the Australian community whom they are seeking to serve, cognisant at all times of the need to deliver high standard, safe and effective healthcare to the Australian public.

The College welcomes this opportunity to contribute to the House of Representatives Standing Committee on Health and Ageing *Inquiry into Registration Processes and Support for Overseas Trained Doctors*. As would be expected from considering the functions and activities of the College, this submission will focus primarily on matters relating to a subset of overseas trained doctors seeking to practise as specialists in Australia, although some comments will be pertinent to those also seeking to practise in the category of general registration through attainment of the AMC Certificate, and the multiple pathways available to accomplish this. Accordingly, the following is offered in regard to the three areas articulated in the inquiry's Terms of Reference.

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1. *Explore current administrative processes and accountability measures to determine if there are ways OTDs could better understand colleges' assessment processes, appeal mechanisms could be clarified, and the community better understand and accept registration decisions*

The high quality of healthcare available to the Australian community is well known and acknowledged, as are issues associated with the delivery of that care; for example, the maldistribution of services in rural and remote areas. There is also little doubt that OTDs wishing to practise in Australia face a system that is complex, even to those who would consider that they are familiar with it through a day to day involvement as a deliverer of health care or in some other capacity. The complexity associated with Australia's healthcare system is predicated on arrangements associated with levels of governance (Federal-State responsibility and associated statutory and administrative agencies), practice modalities (public-private) and, certainly until relatively recently, a registration system that was fraught with complication across jurisdictional borders. This complexity can lead potentially to difficulties navigating the system for those unfamiliar with it and who wish to become part of it at practitioner level. Despite relatively recent efforts to increase numbers of locally trained medical graduates, Australia is currently not self-sufficient in its ability to supply a medical workforce and will not be so for some time. Thus, it is important that all parties attempt to facilitate as effective, transparent and supportive a process as possible when OTDs are recruited to work in Australia.

The College is aware of a submission to this inquiry by the Committee of Presidents of Medical Colleges (CPMC) that outlines aspects of the general process by which doctors wishing to be recognised as a specialist in Australia have their qualifications assessed. Doubtless other bodies and individuals will describe similar material to the Committee. Nevertheless, for the purposes of being on record, as well as for the information of the Committee, the College will describe briefly its role in applications from OTDs wishing to practise as a specialist in obstetrics and gynaecology in Australia.

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The so-called *Specialist Pathway* for OTDs is broadly consistent across the medical specialities and has developed in recent years cognisant of matters described in the 2005 ACCC-AHWOC Review of Australian Specialist Medical Colleges, the 2006 COAG reforms and initiatives brought about by bodies such as the Joint Standing Committee on Overseas Trained Specialists (JSCOTS). The process is coordinated through the AMC and requires the specialist College in question to make a determination as to the *comparability* of the training and experience of an OTD with specialist qualifications obtained overseas to an Australian-trained specialist in that specialty.

Typically, this is accomplished through an initial (in the case of RANZCOG, paper based) assessment of materials supplied to the College through the processes of the AMC, which includes verification of the qualifications of the OTD. Where the training, qualifications and experience of the OTD are *prima facie* considered likely to be ‘comparable’, based on publicly available, published guidelines, the OTD proceeds to an assessment interview to determine whether they are considered ‘substantially comparable’, ‘partially comparable’ or ‘not comparable’ to an Australian specialist in obstetrics and gynaecology. This interview explores whether or not the doctor possesses the competencies expected of a specialist in obstetrics and gynaecology who is practising independently and unsupervised in Australia.

Applications for assessment may be received at any time, either via the AMC or direct from an OTD who has attained the AMC Certificate or who has been previously assessed by the College¹. Applicants who are assessed as able to proceed to the interview stage of the assessment process are then advised by letter of their interview date (from the next available of six dates throughout the year on which interviews are conducted; i.e. approximately every two months throughout the year). This letter also supplies information to guide applicants in regard to the nature of the interview, and details access to resources that should be accessed to aid their preparation for the interview. The College does its utmost to facilitate the overall assessment process and minimise the time required for the applicant and other interested parties (e.g. potential employers) to gain certainty in relation to the assessment outcome of the applicant and, hence, the pathway to Fellowship

¹ Applications from Australian trained doctors with a specialist qualification obtained overseas may also be made direct to the College.

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and category of medical registration that will apply. It is, however, not unknown for factors essentially outside control of the College to lengthen the process. Such factors include incomplete applications, delays in receipt of reports from nominated referees, etc.

- Following the interview process, OTDs assessed as ‘substantially’ comparable may be asked to complete a period of up to twelve (12) months supervised practice (oversight) before being eligible for Fellowship of the College and registration by the MBA on the specialist register. There are no further formal written or other format examinations for the OTD to undertake. Those who are required to undertake a period of supervised practice are, however, required to complete periodic workplace assessments at three-monthly intervals, followed by a final summative performance-based assessment (completed in the workplace by individuals from a range of groups who have worked with the OTD, including those in non-clinical roles) that attests the OTD does, in fact, possess the competencies expected of an Australian-trained specialist in obstetrics and gynaecology.
- Those assessed as ‘partially’ comparable are essentially considered to be at the level of a senior trainee in the FRANZCOG training program and will be required to complete a period of training (minimum twelve (12) months / maximum 24 months) during which they must be certified as possessing the competencies expected of an Australian-trained specialist in obstetrics and gynaecology, as well as some other assessments, including the examinations undertaken by all RANZCOG trainees before being eligible for Fellowship of the College and registration by the MBA on the specialist register.
- Those who are assessed as ‘not comparable’ to an Australian-trained specialist in obstetrics and gynaecology (whether at the initial- or interview stage of the assessment process) are advised that in order to qualify for recognition as a specialist in obstetrics and gynaecology in Australia they will be required to gain a place in and complete the FRANZCOG training program. The College does possess a clear policy in relation to Recognition of Prior Learning (RPL), by which the training time required may be able to be reduced.

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Table 1 (below) outlines data associated with the assessment outcomes for OTDs presenting for assessment by RANZCOG in Australia for the period 2006 to 2010. Of note is that, on average for this period, 88% of all applicants progressed to the interview stage of the assessment process, with 52% of those interviewed being considered substantially comparable to an Australian trained specialist in obstetrics and gynaecology following the interview component of the assessment process. This represents 114 OTDs who, during this period, were either immediately able to be recognised as specialists, or were required to spend a period of up to twelve months under oversight before qualifying for specialist recognition. A further 75 were considered ‘partially comparable’ and able to undertake a pathway to attainment of specialist status that may now be completed within a minimum period of twelve months².

	OTS AS	NEFI	EFI	SC	SC (OS)	PC	NC
2006-2007	75	5	70	34		32	4
2008 Applications	61*	12	49	17	8	12	12
2009 Applications	66*	8	58	7	20	21	10
2010 Applications	51*	5	46**	6	22	10	7

* Includes applications assessed concurrently with AoN

** One applicant deemed Eligible for Interview did not proceed with the interview component.

- OTS AS – Number of OTS Applications Assessed (including those assessed concurrently with AoN applications)
- NEFI – Not eligible for Interview (akin to ‘Not Comparable’)
- EFI – Eligible for Interview
- SC – Substantially Comparable – No Period of Oversight
- SC (OS) – Substantially Comparable – With a Period of Oversight
- PC – Partially Comparable
- NC – Not Comparable

Table 1 RANZCOG Assessments undertaken and relevant outcomes for the period April 2006 – August 2010.

² It would be inappropriate to imply that this is the time taken by many applicants to complete the requirements. In reality, the average time is longer; however, it is not unknown for the requirements to be completed within 12 months.

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Also of note from College data is that, during the same period (2006 – 2010), a total of 257 trainees across Australia and New Zealand were elevated to Fellowship of the College through the FRANZCOG training Program. In total, in Australia during the same period, a total of 152 OTDs were elevated to Fellowship through the Specialist Pathway (i.e., obtained the qualification that enables recognition as a specialist in obstetrics and gynaecology). Thus, in the period 2006 to 2010, the number of OTDs who gained Fellowship of the College was substantial, equal to more than half the number of Fellows who undertook their training in Australia and New Zealand. These data should be sufficient to allay concerns that access to qualification as a specialist obstetrician and gynaecologist by OTDs is being in any way blocked by the body that conducts the assessment.

All applicants who are assessed as substantially comparable with a period of oversight are able to access professional development during their oversight period as a College member in the category of Educational Affiliate; indeed, the College requires this to ensure the OTD is accessing appropriate Continuing Professional Development (CPD). Once they have completed the requirements for Fellowship they are enrolled in and subject to the requirements of the College CPD program. Those applicants who are assessed as partially comparable are considered by the College to be ‘in training’ and are able to access support materials available to all RANZCOG trainees, as well as additional support available in terms of specific up-skilling opportunities (refer to next section).

The assessment process associated with OTDs seeking to practise in a medical speciality is complex and represents perhaps the best possible illustration of undertaking high stakes assessment (from both the perspective of the applicant being assessed and the end stakeholders; i.e. the Australian Community), with limited opportunity for longitudinal ‘in vivo’ assessment. There are many considerations to be acknowledged and much in the way of attractive options that on face-value represent the potential to ‘fast track’ processes. The College acknowledges the potential for the holders of some overseas qualifications (e.g. specialist qualifications obtained in the United Kingdom) to be able to be assured of progress along part of the assessment process as it currently operates. Indeed, RANZCOG regulations include the capacity for allowing doctors with specialist

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qualifications from some jurisdictions to be assured of proceeding to the interview stage of the assessment process. However, the College urges caution in regard to any move to grant automatic specialist recognition to such doctors, certainly without a period of practice in an environment where the doctor in question is able to access strong system and peer support. This view is taken on the basis of a long period of significant experience in the assessment of OTDs with specialist qualifications from a wide range of jurisdictions, based on the basic premise elucidated by the Minister for Health in her statement of 25 October 2010³, of the primary importance of the maintenance of high standards of healthcare for all Australian communities.

In general, the potential vulnerability of OTDs unfamiliar with the Australian health system makes significant the need for access to clear information, transparent processes and support. Certainly, the College is able to, and does, supply information to individual OTDs in regard to the portion of the assessment process that it is responsible for, and has made great efforts over time to ensure this. In addition to the web-based information available, individual OTDs are able to contact the College directly for clarification. This availability of information extends to the College Appeals Process, the existence of which OTDs who apply for assessment via the Specialist Pathway are made aware of when an assessment decision is advised.

The RANZCOG Appeals Process may be accessed via the College website (www.ranzcog.edu.au/about/pdfs/appealsprocedures.pdf). Consisting of a majority of non-College members (one of whom is an experienced legal practitioner who Chairs the Committee), the Appeals Process is viewed by the College as absolutely transparent and meeting all requirements for appellants to be assured of receiving natural justice and procedural fairness. While it is the experience of the College that OTDs who are aggrieved by an assessment do not hesitate to access the College Appeals Process (and there is nothing to suggest in the data associated with Appeals that have been brought by OTDs via the College Appeals Process that to do so is a fruitless exercise), there are views that, in the wider sphere of matters pertaining to OTDs, there are instances where OTDs are apprehensive to access other appeal mechanisms that are available in relation to decisions of other bodies.

³ Transcript of Joint Press Conference of Prime Minister, Treasurer, Minister for Health and Ageing – Canberra; 25 October 2010. Accessed via www.pm.gov.au/press-office/transcript-joint-press-conference-3.

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The ability for OTDs to be able to access clear, easy to understand information is of considerable importance. The issue of at what stage particular information is needed may be of particular significance when different phases of the process involve the intersection of responsibilities of multiple participants, or move from one agency/body to another. For example, the matter of registration category relevant to an OTD applicant as a result of their College assessment, both initially, then following completion of any requirements for attainment of Fellowship and qualification for recognition as a specialist. As mentioned earlier, the adoption of the National Registration and Accreditation Scheme (NRAS) has simplified this matter, with designated categories of registration more clearly associated with assessment outcomes. However, the further intersection with the Health Insurance Commission (HIC) and Medicare implications are still causes of possible confusion. For example, the ability to quickly access information about and interpret the consequences of the ten year moratorium on provider numbers for OTDs (Section 19AB) and possible exemptions may not necessarily be easy to find and interpret for Australian residents seeking to access the information in question. The information may be found on the Commonwealth's Doctor Connect website (www.doctorconnect.gov.au/internet/otd/Publishing.nsf/Content/work-s19AB%20factsheet); however, the information contained therein may not be easily connected by OTDs to their individual circumstance.

All bodies involved in the assessment process and subsequent registration procedures hold detailed information relevant to the process. It may, however, be prudent for one agency that deals with all applicants (e.g. AMC, or AHPRA), or which may be able to be seen as 'neutral' in the context of any assessment or registration outcomes (e.g. Commonwealth Department of Health and Ageing) to be charged with the responsibility, and resourced appropriately, to produce clear materials that succinctly explain all steps of the process and the roles of the different agencies. This role could be expanded to ensure dissemination of information to relevant stakeholders, as well as act as a 'one stop shop' source of information for OTDs. This suggestion is not made to diminish the contribution of existing materials or sources of advice. Rather, it is a call to ensure the centralised provision and promulgation of materials that clearly and unambiguously guide an OTD through what is undoubtedly a complex process.

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An education program could then be devised with the aim of conveying the essential material to those considered most in need. This would also assist in ensuring that stakeholders, such as OTDs, recruiters, employers and the public can access sufficiently detailed information to appreciate the capacity in which the OTD is practising, and the circumstances surrounding that practise. Recent decisions involving registration categories ('Standards') of the MBA under the National Registration and Accreditation Scheme (NRAS) have done much to simplify the connection between assessment outcome and registration and there is felt to be a significant education opportunity available here that should not be underestimated or missed.

In summary, and without wishing to dismiss concerns that have been raised, the College believes that efforts to improve effectiveness and clarity of assessment processes for OTDs should centre around the effective promulgation of information that succinctly and accurately summarises the requirements and responsibilities of all stakeholders involved in the process.

2. *Report on the support programs available through the Commonwealth and State and Territory governments, professional organisations and colleges to assist OTDs to meet registration requirements, and provide suggestions for the enhancement and integration of these programs*

The essential components of the Specialist Pathway for OTDs have been in place now for some time and a great deal of material is available to support OTDs seeking to proceed down this pathway, both in terms of process and support from a range of sources (see, for example, www.amc.org.au/index.php/img#aon , www.doctorconnect.gov.au/ , www.ranzcog.edu.au/oop/index.shtml). These resources cover a range of domains, from administrative processes through to general orientation issues, and specific clinical matters. Despite the availability of the information, anecdotal feedback suggests that difficulties can arise in awareness of what information is needed at what stage of the application process. This is compounded by the fact that not all OTDs enter the process from a common situation or background.

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Web-based information is made available to all OTDs by the College. These resources attempt to clarify requirements at all stages of the assessment process, and to aid in preparation for the interview component of the assessment process (see, for example, *RANZCOG Overseas Trained Specialist Assessment – Quickguide to the OTS Assessment Process 2011*; www.ranzcog.edu.au/overseas/pdfs/ots-information.pdf, *Assessment of Overseas Trained Specialist Obstetricians and Gynaecologists – Competency Standards*; www.ranzcog.edu.au/overseas/pdfs/ots-competency-standards.pdf). Applicants who are preparing for the interview are supplied with a username and password that enables access to College educational materials that are not available to the general public.

OTDs who are assessed as partially comparable to an Australian trained specialist in obstetrics and gynaecology are advised following interview of the major areas in which it is considered that they have need of extra training / up-skilling. With assistance from the Commonwealth government the College has been able to offer educational resources for all OTDs⁴ and targeted up-skilling programs for those individual OTDs assessed as partially comparable to aid their efforts to complete the requirements needed to gain Fellowship of the College. The up-skilling accessed by OTDs during this period has spanned a range of areas (e.g. communication skills, clinical areas, such as ultrasound). Feedback has endorsed the value of such assistance in assisting the OTDs in question to gain the necessary up-skilling required to attain College Fellowship and, thus, recognition as a specialist in the field of obstetrics and gynaecology.

It is in the period following assessment that the College feels there is scope for increased support of OTDs working toward College Fellowship. The attainment of suitable employment to enable up-skilling or completion of periods of supervised practice is often difficult for the OTDs in question. In this regard, the College is not resourced to act as an employment conduit other than in a very general manner. Also, once an OTD gains employment appropriate to enable completion of any supervision or assessment requirements, the opportunity to attend professional development opportunities to assist with up-skilling is often limited, given employer human resource considerations.

⁴ The Online Orientation Program, which may be accessed at www.ranzcog.edu.au/oop/index.shtml, contains materials related to clinical and non-clinical aspects of obstetrics and gynecology practice in Australia for OTDs seeking to work in the specialty in Australia. The resources were accessed by a total of 1,203 registered users during the period 2006 to 2010.

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The College is aware of the mention by the CPMC in its submission to this inquiry of the possibility of a locum-type scheme to assist with enabling such OTDs to access professional development opportunities and we would be supportive of investigation of the practicality of such a scheme. It might be possible to use the Specialist Obstetric Locum Scheme (SOLS), the program funded by the Commonwealth to enable O&G specialists in rural and remote communities to access professional development opportunities, as a model for such an initiative.

The same would apply to investigation of a possible mentoring scheme for OTDs working toward attainment of specialist status to enable wide-scope professional advice and support. Indeed, following feedback from Fellows who have been through the RANZCOG OTD assessment process, the supervisors of OTS applicants and others, the College is currently considering the feasibility of establishing a system of mentoring for OTDs who have been assessed as either partially or substantially comparable and who are working towards Fellowship of the College. Recognising that the difficulties experienced by OTDs do not cease simply because Fellowship is attained consideration will be given to the mentoring extending beyond an OTD's attainment of Fellowship. It is felt that to be able to offer this type of support to all OTDs in these situations would be of considerable practical benefit.

The matter of support and access to appropriate professional development and mentoring is of particular significance for OTDs offering service to positions that may truly be considered 'Area of Need'. As the Committee is no doubt aware from other submissions, the assessment of OTDs for suitability for employment in positions designated Area of Need (AoN) pursuant to the process coordinated through the AMC (see www.amc.org.au/index.php/img/aon) is also undertaken by the relevant specialist College. The process requires the assessment of an individual OTD's skills and experience in relation to a specific position description supplied by the employer for each Area of Need position. For some time now OTDs presenting for interview for assessment for suitability for a defined Area of Need position are also assessed for comparability to an Australian trained specialist in obstetrics and gynaecology as per the process previously described. The support requirements for individuals occupying such positions (which

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have position descriptions that are, essentially, subsets of the full range of clinical practice in the specialty in question) are significant, and these AoN positions are often inappropriate for the purposes of genuine up-skilling and providing the opportunity for the doctor in question to progress their knowledge and skills to Fellowship level.

Table 2 below outlines the number of applications and the outcome (Suitable / Not suitable) of Area of Need assessments conducted by RANZCOG in the period 2006 to 2010. Also indicated are the outcomes of concurrent assessment for comparability conducted at the time of the AoN assessment. While the College is aware of workforce shortages in rural and regional Australia, increased capacity to enable support for OTDs occupying Area of Need positions is crucial, as is the need for all jurisdictions to ensure that employment of OTDs to deliver any ‘specialist’ services in Area of Need positions is done through the AMC process, rather than a state-based process that circumvents the assessment of such doctors for their suitability to safely offer such medical services in frequently poorly system and peer supported locations.

	AoN AS	S	NS	NC	PC	SC
2006-2007	14	13	1	No concurrent assessment		
2008 Applications	10	9	1	1	3	6
2009 Applications	9	8	1	2	1	6
2010 Applications	7	7	0	0	3	4

- AON AS – Number of AoN Applications Assessed
- S – Suitable for AoN Position
- NS – Not suitable for AoN Position
- NC – Not comparable / Not eligible for OTS
- PC – Partially comparable
- SC – Substantially comparable

Table 2 Area of Need Assessments undertaken by RANZCOG and relevant outcomes for the period April 2006 – December 2010.

In summary, there are a great many resources available to support OTDs in their efforts to attain College Fellowship and meet the requirements for specialist registration with the MBA. However, co-ordination of the robust individual supports necessary to enable OTDs to ‘connect’ all the facets of practising in the Australian Healthcare system appears

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to be lacking. This is of particular relevance to OTDs who find themselves in situations where collegial support is lacking (e.g. Area of Need), and strong mentoring programs would aid significantly for these doctors. Also, the ability to access the range of professional development opportunities required by OTDs is a source of concern, and a program that enables improved access to such opportunities would likely be of considerable benefit.

- 3. Suggest ways to remove impediments and promote pathways for OTDs to achieve full Australian qualification, particularly in regional areas, without lowering the necessary standards required by colleges and regulatory bodies*

Information contained within previous sections of this submission covers, to a significant extent, the issues relevant to the committee's Terms of Reference. We believe that the fundamental solution to such matters is effective promulgation of clear information to enable OTDs to undertake the necessary processes with confidence, coupled with the availability of well structured employment positions to enable appropriate experience to be obtained. This will allow an OTD to work with certainty toward the attainment of specialist status, with appropriate support that recognises the requirements of their transition. The specific needs of individual OTDs will undoubtedly differ, particularly when considering those doctors who are completing the requirements associated with having been assessed as partially comparable to an Australian trained specialist. Thus, mechanisms designed to assist with access to appropriate professional development, mentoring and other professional interactions should be paramount. This is particularly difficult to achieve in rural and remote regions, and the tension that develops between an expectation of ensuring delivery of services in areas of workforce shortage, and being able to facilitate the necessary professional education opportunities for OTDs is fully appreciated by the College. Nevertheless, this is clearly an area that must be explored by the Commonwealth in conjunction with jurisdictional health services; the College is most willing to assist where it can.

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Summary

There is no doubt that Australia benefits from the contribution of OTDs. The manner in which we undertake fair, transparent, and effective assessment processes for OTDs wishing to practise as specialists in Australia is recognised by our College as being of the utmost importance, not only to the OTDs themselves, but to the communities in which they will ultimately intend to offer their services. The issues associated with seamless access to medical registration that can allow independent practice (particularly at specialist level), yet at the same time ensuring maintenance of the highest standards of practice, as all Australian communities have the right to expect, are also recognised. The College is confident that the appropriate mechanisms are, for the most part, available to enable this under current processes.

It is important to ensure that the processes involved in such assessments are thoroughly understood by all stakeholders, and that the expectations of all involved are appreciated. There is undoubtedly scope for improvement in the processes by which information is promulgated. This will increase the accuracy of collective knowledge amongst stakeholders associated with the process, and will allow identification and appropriate resourcing of a central agency responsible for the provision of overarching advice that encompasses all aspects of the process.

There is a need for mechanisms to enable individual OTDs working toward attainment of specialist recognition to be provided with effective and appropriate support in the form of robust mentoring and provision of opportunities to access appropriate and relevant professional development opportunities.

The College would welcome any opportunity to elaborate upon any of the material contained within this document, or to assist in the development and implementation of any targeted initiatives that arise from the deliberations of the Committee.

January 2011