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The Royal
Australian &
New Zealand
College of
Psychiatrists

Supp. Submission No. 112.1

(Overseas Trained Doctors)

Date: 6/05/2011

21 April 2011

Mr Steve Georganas
Chair
Standing Committee on Health and Ageing
House of Representatives
Parliament of Australia

By email to: haa.reps@aph.gov.au

Dear Mr Georganas,

Re: Supplementary submission - Inquiry into Registration, Accreditation and Support Process for Overseas Trained Doctors

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) thanks the House of Representative Standing Committee for the opportunity to attend and present at the hearing held in Sydney on Thursday 31 March 2011. In response to your invitation at that hearing, I am writing to provide additional information and to clarify the key issues for the Royal Australian and New Zealand College of Psychiatrists ("the College") in relation to the registration and support processes for overseas trained doctors as these apply to the specialisation of psychiatry.

1. The proposal to reduce the time for OTDs to achieve Specialist status

Many Overseas Trained Psychiatrists (OTPs) require support and time and to achieve the cultural acclimatisation essential to the effective practice of psychiatry in Australia and to successfully complete the College's required assessments.

The College regards the Medical Board of Australia proposal for a time limit for Overseas Trained Doctors (OTDs), of 2 years with a maximum extension of a further 2 years for the attainment of specialist registration, as being unsuitable and problematic for the specialisation of psychiatry.

Many OTPs who are currently on the pathway to Fellowship would be adversely affected by the implementation of this requirement and unable to fulfil their current commitments within Area of Need (AON) positions or to proceed to Fellowship of the College and ongoing practice as specialist psychiatrists within Australia. This would in turn reduce the provision of psychiatric services particularly in areas currently experiencing shortages of skilled medical practitioners.

2. The need for early intervention and enhanced support strategies for OTPs

The College underscores the importance of early intervention and enhanced support strategies to be implemented to support OTPs as outlined in its submission to the Standing Committee of February 2011. The suggestions made by the College in that submission included:



- Provide establishment and recurrent funding for positions of OTP Directors of Training in each state and territory, in each medical specialty, so as to facilitate support of OTPs as required, and to monitor progress.
- Include in contractual agreements with employers for AON positions an obligation to provide support and/or supervision for OTPs, and for salaried time / leave allowances for study and professional assessments.
- Provide funding for videoconferencing facilities in remote and regional areas and in the medical colleges, for the support, mentoring and training of OTPs in remote locations.
- Provide ongoing funding for projects which support OTPs working to complete assessments on their pathway to Fellowship and full registration as medical specialists.
- Establish a service of locum specialists to enable the release of OTPs from duties to attend education, training and exam preparation programs.
- Further support provided by government for the development and implementation of the substantial comparability pathway for OTPs.

3. Recognition of funding received to implement support strategies for OTPs

The College notes with appreciation the previous support and funding provided by government, and the opportunity it has had to work with government agencies, in the support of OTPs on their pathway to Fellowship. The following projects and achievements have been enabled in the past 12 months:

- The Specialist IMG (OTP) Support Project
- The Exemption Candidate Examination Preparation Workshops
- The Redevelopment of Online Modules
- The OTP Upskilling Projects
- The RANZCP NSW Branch Rural Psychiatry Project - International Medical Graduate Fellowship Support Workshops

Details of the achievements are provided in the College's submission to the Standing Committee. The RANZCP looks forward to continuing collaboration with Government in this area to provide support for this cohort.

4. Practice in Area of Need positions that is beyond the defined 'scope of practice'

Within AON positions, OTPs frequently report that they undertake duties well above the defined 'scope of practice' for a position. At the same time as fulfilling roles of higher responsibility many OTPs are also attempting College assessments, often finding it difficult to effectively proceed toward Fellowship of the College and hence Specialist status, without adequate support and time allowances.

While the RANZCP assesses components of training and competencies achieved by these doctors and credits their associated progress toward Fellowship, it is currently unable to assess, and hence recognise, the time served by these doctors undertaking positions of responsibility in AON positions toward the requirements of Fellowship. This appears a contradiction, where the service of OTPs is accepted in practical terms within AON positions

and yet the same OTPs are unable to achieve Fellowship and hence Specialist status unless they successfully complete required College assessments. If the time for OTPs to achieve Specialist status is reduced, as is proposed, OTPs in this position will be further disadvantaged.

The College proposes tighter regulation of the AON processes, the inclusion of clearly defined Scope of Practice documentation and as outlined in the submission, the mandatory provision by employers of supervision and support for OTPs undertaking College assessments toward Specialist recognition in Australia.

5. Streamlining the application and assessment processes for OTPs

The RANZCP in its submission to the Standing Committee has outlined the complexity of the current processes for OTPs making application to practice in Australia and the difficulties many OTPs experience because of the multi-faceted, multi-agency systems currently in place.

The College recommends the establishment of a regular forum for administrators from all organisations involved in the application and assessment processes for OTPs (including the AMC, AHPRA, and the Colleges) to promote information sharing and the provision of consistent up-to-date information to OTPs.

To further streamline existing processes, the College recommends that a 'clearing house' approach be implemented so that OTPs apply to one central agency which manages the requirements of all associated regulatory bodies and all communications to and from the OTPs in the course of the application and assessment period.

6. The participation and contribution of OTPs within the RANZCP

The RANZCP acknowledges and commends to the Standing Committee the significant contribution of its OTP members to the life of the College. This contribution is seen in the willingness of the OTPs to participate as Officers of the College and to contribute within Committees of the College, such as the Overseas Trained Psychiatrists Committee and Committees of the Board of Education in particular. The contribution and active support of OTP members in the preparation of the submission to the Standing Committee and subsequent hearing is noted.

7. Statistics on placements of OTPs in rural areas

The RANZCP noted the Standing Committee's request to provide statistics on placement of OTPs in rural area. However, without a comparison of current Exemption Candidates postcodes with the Australian Standard Geographical Classification (ASGC) Remoteness Ratings it is difficult to supply data about OTPs in rural regions. Using best available data from within College systems, the following information has been extracted:

- Number of College IMGs on the pathway to Fellowship: 285
- Number of College IMGs on the pathway within Australia: 209



- Number of College IMGs on the pathway in Area of Need positions: 61
- Number of College IMGs on the pathway in non metropolitan posts (including regional, rural and remote): 86 (estimate)

8. The regulation of recruitment agents

In its submission to the Standing Committee, the College raised concerns about the role of specialised medical recruitment firms, in the recruitment of OTPs to the Australian psychiatry workforce. Misinformation and omission of information from recruitment agents and associated issues have been identified by many OTPs. The actions of these recruiters in providing (or not providing) information on processes and requirements can detrimentally affect the pathway to Fellowship of the RANZCP and hence the ability to practice within Australia, for these specialist psychiatrists. The College encourages the mandatory registration of these agents, regulations pertaining to their actions, and/or the establishment of enforceable guidelines for organisations and individuals operating as agents of recruitment for OTDs. The role of recruiters might also be examined further in relation to our recommendation for greater streamlining of application and assessment processes for OTPs (Point 5).

I hope that these further points are helpful to the committee in development of its report on this important matter. The College looks forward to working with the Australian Government in the development and implementation of improved systems to support the work of overseas trained doctors in Australia in future.



Yours sincerely

A handwritten signature in black ink, appearing to read 'M Tomasic'.

Dr Maria Tomasic
President

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