



INTRODUCTION

Thank you for the opportunity to provide a submission to the House of Representatives Standing Committee on Health and Ageing's Inquiry into the 'Registration Processes and Support for Overseas Trained Doctors'.

The Royal College of Pathologists of Australasia is very actively involved in the current registration processes for International Medical Graduates (IMGs) and considers it plays a vital role in ensuring that appropriately qualified IMGs are able to be registered to practice medicine in Australia while ensuring safe and appropriate quality medical services are provided to the people of Australia. It is acknowledged that there are sometimes tensions between the need for speed and simplicity in assessing IMGs and ensuring that they are safe and competent to practice in Australia, however after such incidences as Dr Patel in Queensland, the College hopes that the need for thorough processes is recognised as the results of inappropriate registration of IMGs can have far reaching consequences. There are definite differences in how medical graduates and specialists are trained and practice medicine in various countries throughout the world and it is vital that practicing Australian doctors and specialists who understand the expected standards of medicine in this country are able to advise on this.

There has been an international shortage of pathologists for many years and workplaces in Australia have had to rely on IMGs to help address these shortages though as the problem is worldwide it has not always been easy to attract appropriately qualified specialists to Australia. The College welcomes IMGs into the College in a number of ways (as Fellows, Affiliates or Trainees) after the appropriate assessment of their qualifications and experience.

BACKGROUND

There is often confusion with terminology used for International Medical Graduates and the processes associated with their registration. The below summarises the College's interpretation of this which will be used when addressing the Terms of Reference of this Inquiry.

Essentially there are three principle bodies involved with the actual "registration processes" of IMGs those being the Australian Medical Council (AMC), the Colleges and the Medical Board. Obviously employer organisations, the Immigration Department and recruitment agents all also have a role to play, however the College is not going to comment on these in great detail.

The AMC plays a vital role in ensuring the IMGs are indeed qualified as they report in their application and undertake primary source verification which is vital to ensure this. There have been instances where qualifications have been falsified.

The Colleges ensure the discipline specific qualifications and experience are comparable (or not) to an Australian based specialist. This is based on a review of their qualifications, training and experience on paper and at an interview, and additional assessment, training and examinations as required.

The Medical Board takes advice from these two bodies in assessing the category of Medical registration the IMG is able to be granted.

There are currently 4 pathways for assessment that the RCPA recognises via the Australian Medical Council (AMC) processes.

Competent Authority Pathway

Standard Pathway (AMC Examination)

Standard Pathway (workplace-based assessment)

Specialist Assessment Pathway (full comparability/Area of Need)

The first three processes are for IMGs who have not already obtained specialist qualifications in their original country of domicile (these are usually referred to as Overseas Trained Doctors) while the last one relates to those IMGs who are deemed to be specialists and have been working as a specialist in their own or another country outside Australia. The College is mainly involved in the fourth category of IMG, (Overseas Trained Specialists) though we do accept IMGs from the first three categories once they have attained their AMC certification.

In relation to the Specialist Assessment Pathway there are two pathways the, the General OTS pathway which assesses the IMGs for suitability to work as a specialist in Australia and the Area of Need pathway that provides assessment for an IMG for a specific job.

There are three outcomes of these Assessments, Substantially Comparable, Partially Comparable and Not Comparable (thus not deemed to be a specialist and will need to follow one of the first three AMC pathways).

Please note that while the College charges a fee of \$ 2,500 plus applicable GST for this assessment to cover administration fees and interview related expenses, all services (time) provided by the Fellows of the College are on a voluntary basis.

For Overseas Trained Specialists the Medical Board of Australia then register the IMG in an appropriate category which could include:

- Specialist registration
- Provisional registration
 - Postgraduate training or supervised practice
 - Area of Need
 - Public interest
 - Teaching or research

The College is generally supportive of the current processes but like anything there are always opportunities to refine the processes as issues arise.

Our submission addresses the terms of reference for the enquiry, and is structured around the three areas to be addressed.

- 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 College continually reviews how it assesses IMGs and over the years has tried to streamline and simplify the process as much as possible, whilst at the same time as not compromising safety and quality. We have also worked very constructively with the Australian Medical Council and the Medical Boards (and now the Medical Board of Australia) to enhance opportunities, facilitate processes and provide greater support for IMGs.

The College recently developed detailed Step Guides to assist the IMGs in navigating the system and these are available on the website www.rcpa.edu.au/Overseas.htm. These do demonstrate the steps involved in the process, the various outcomes that could occur, the pathways to get registered and the approximate timelines for processing each step. The Step Guides include a summary flowchart that provides an overall summary of the process to complement the detail in the Guide. I attached the Summary process for standard OTS pathway and Area of Need pathways.

The College is considering developing further shorter more concise versions of the Step Guides for some IMGs who find difficulty in comprehending complex document when English is not their first language.

Other areas that have been introduced to assist in streamlining the processing include the introduction of video conferencing for interviews for IMGs, the better use of electronic technology both at the College level internally and also between the College AMC and Medical Board has also helped streamline processes, increasing the number of interviews held each year, and undertaking various steps in the process simultaneously rather than sequentially.

Cultural orientation and language difficulty are significant problems for many OTDs from non-English speaking countries. This is exacerbated in the case of OTDs being assigned to rural and remote posts where access to language classes is scarce and cultural challenges may be more acute.

Assisted by Commonwealth Government funding, the College has commissioned independent research into the needs of IMGs and is developing educational resources to address their needs.

The major difficulties the College encounters with the processes is when IMGs, employing bodies and Medical Boards ignore the well established processes. The College in these circumstances is sometimes contacted half way through the IMG trying to be registered in Australia seeking urgent advice for assistance. Better education of all Human Resources Departments in organisations in particular is required on this issue.

Another issue relates to employment of IMGs who have been assessed through the College often expecting the College to be able to find a suitable job for them. While the College provides access to our employment section of the website both to see job vacancies and also to place advertisements and also lists of laboratories in Australia the College does not have the capacity to act as an employment broker, and this is not well understood by IMGs

Another problem area which the College often hears about relates Immigration and Visas. This is not something the College is directly involved in but it does cause considerable problems for IMGs.

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

IMGs applying for registration via the specialist pathway do not indicate any awareness of relevant government programs, and the College is only aware of some advice on the Doctor Connect website <http://www.doctorconnect.gov.au/>, however this is limited in its value.

However some have indicated that such programs could be helpful. For example, a one-day workshop addressing issues relating to cultural orientation would be helpful. This would also provide opportunities to meet others face-to-face and develop mutually supportive relationships and networking opportunities. Alternatively access to a blog/forum for IMGs. Similarly, OTDs express a need for programs to support English language development, particularly with respect to medical terminology and Australian idiom.

Supervisors of IMGs seem to be generally unfamiliar with programs available particularly in relation to cultural awareness. The College is making an effort to develop its own pathology-specific resources. For example we have produced videos depicting interactions between IMGs and their supervisors. These are used as stimulus material in workshops to facilitate discussion about cultural awareness and assisting OTDs with their questions and difficulties.

Whilst our pathology-specific videos have been employed successfully, we recognise a need for more resources to be used both online and in face-to-face contexts. Many of these could be generic and suitable for a many disciplines. Smaller Colleges have limited means to produce high quality resources, and it would be helpful if a shareable repository of items was available to us.

There is also a great need to provide training and networking opportunities for staff members in Colleges who are involved in processing applications and acting as a point of contact to provide advice to IMGs. The AMC has provided sessions for College staff involved in this area that have been very useful. An ongoing series of workshops and online materials could be very helpful in ensuring that advice offered is timely and accurate, and to promote communication channels between various institutions and individuals involved. This training may also include representatives from the Medical Board of Australia.

IMGs responding to our research project have expressed great appreciation of the opportunity to express their views, and to feel that their voices are being heard and their needs addressed. For this reason it is important that their views are continuously sought, and we recommend that both qualitative and quantitative data be sought and analysed both at local institutional and government levels. Some consideration could be given to developing generic instruments for all IMGs for needs assessment and program monitoring. This could be coupled with suggested questions for Colleges and other institutions to tailor and use in local contexts.

- 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.**

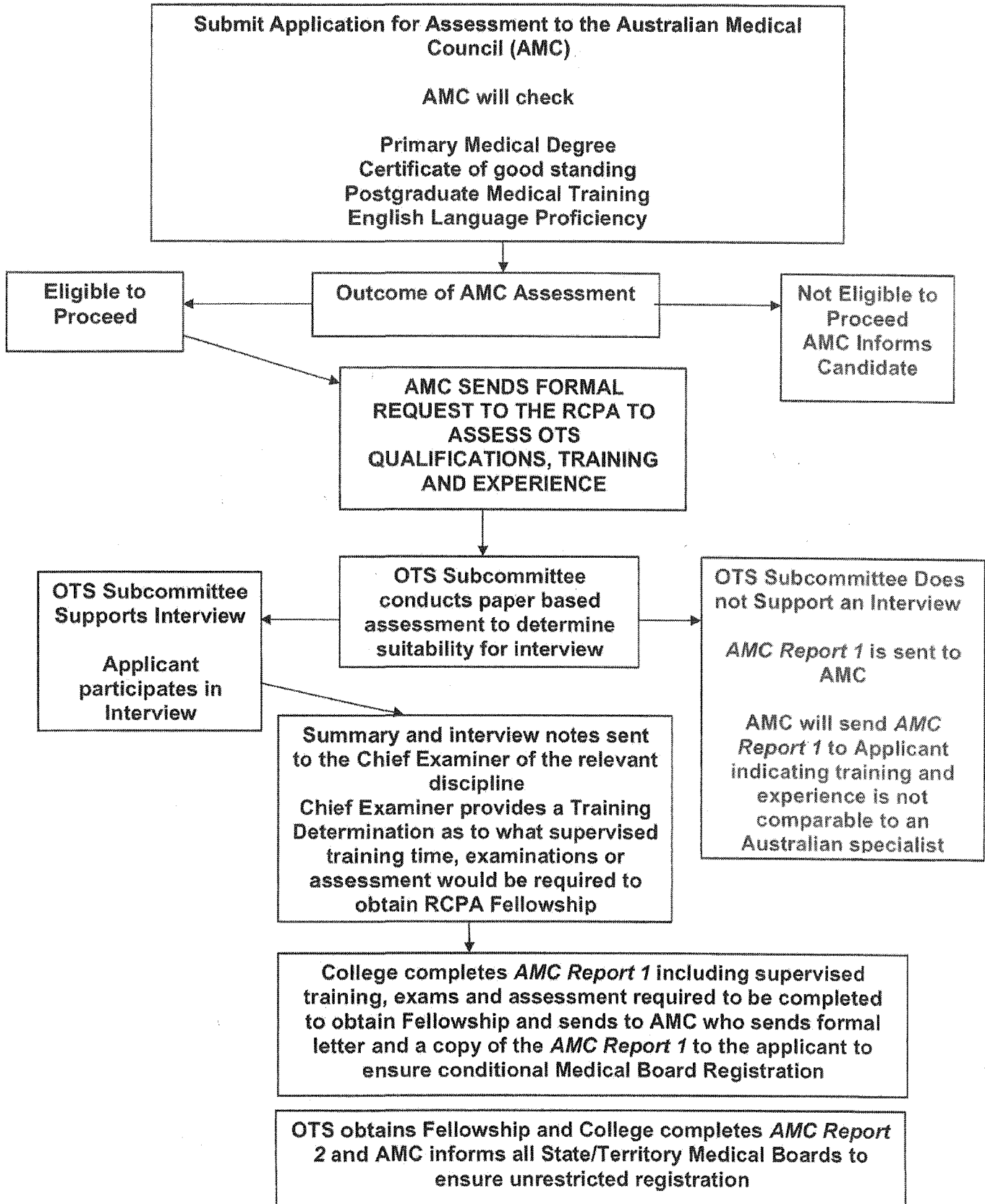
The RCPA has developed Peer Review Assessment pathway to Fellowship as an alternative to examinations for selected overseas trained pathologists deemed to be substantially comparable to Australian trained pathologists. This program is operating successfully and the model may be extended to a broader range of applicants in future.

We are very mindful of the difficulties in providing adequate supervision in remote areas. Current workforce constraints mean that proper supervision for peer-review pathways to FRCPA in remote areas is not feasible at this stage. Support networks for doctors in remote situations, provision of adequate educational resources and policies to ensure quality supervision are necessary to address this, but will be primarily applicable to other specialities that are less dependent on centralised services.

CONCLUSION

The College is generally supportive of the current processes in ensuring that appropriately qualified IMGs are able to be registered to practice medicine in Australia while ensuring safe and appropriate quality medical services are provided to the people of Australia. It is acknowledged that there are sometimes tensions between the need for speed and simplicity in assessing IMGs and ensuring that they are safe and competent to practice in Australia, however after such incidences as Dr Patel, the Colleges hopes that the need for thorough processes is recognised as the results of inappropriate registration of IMGs can have far reaching consequences. Like any system there are always opportunities to refine the processes as issues arise however the College does not consider any major changes are required.

Flowchart of RCPA OTS Interview Process



Flowchart of RCPA AON Interview and Fellowship Process

