

## **The Royal Australian and New Zealand College of Radiologists**

### **Submission on the Proposed Arrangements for Specialists within the National Registration and Accreditation Scheme for the Health Professions**

The Royal Australian and New Zealand College of Radiologists (RANZCR) supports the establishment of a national registration scheme for medical practitioners, recognising that the current mutual recognition arrangements across eight jurisdictions perpetuates differences and obvious anomalies in registration categories, does not adequately support common standards for patient safety and quality nor facilitate the movement of practitioners across the jurisdictions.

RANZCR is concerned, however, with several important aspects of the arrangements for specialists as described in the “Further Consultation Paper”. RANZCR endorses the submission from the Committee of Presidents of Medical Colleges (CPMC) but wishes to highlight the following matters.

#### **Specialist Endorsement**

The current proposal fails to provide for a specialist register and opts for some form of endorsement on the general register. This does not reflect the trend over the past ten or more years for jurisdictions to establish separate specialist registers as now occurs with strong support in several states and in New Zealand.

RANZCR believes that independent specialist medical practice should only be undertaken by persons who hold specialist qualifications awarded or recognised by bodies accredited by the Australian Medical Council (AMC) as competent to train and assess practitioners in the recognised specialties – a role currently undertaken by the specialist medical Colleges.

#### **Continuing Competence Requirements**

The CPMC has made previous submissions on behalf of the Colleges pointing out that the term “continuing competence” cannot be regarded as a synonym for “continuing professional development”. Participation in CPD is strongly supported by all Colleges and an appropriate CPD program is part of AMC accreditation requirements. However, it is not a measure of a practitioner’s competence and this should be corrected in the proposed arrangements.

#### **Registration of Specialists**

RANZCR is very concerned that the proposed arrangements provide for specific registration of practitioners who have not met the standards for recognition as specialists and who are not approved for general registration, to practise independently without conditions or supervision. To do so is entirely counter to community expectations that those who are granted registration are suitably trained and qualified to provide safe and quality care, and especially for those claiming to be specialists.

Similarly, it is inappropriate and misleading for practitioners who are not qualified as specialists nor entitled to practise independently, to claim the title of “Specialist”.

## **Scope of Practice**

The proposed arrangements now provide for the national boards of the various professions to consult with other boards when considering proposal to amend scopes of practice. However, the consultation paper provides that boards “should” consult other relevant boards in this regard. RANZCR strongly believes that this should be requirement and that “must’ should be substituted for “should”.

## **Accreditation**

The CPMC very sensibly argues that the accreditation functions in the proposed arrangements should be deferred until the registration component of the new scheme has been successfully implemented. The enormous work involved in establishing national registration across the nine professions and eight jurisdictions should not be underestimated, noting that the functions of the existing jurisdictional boards need to continue during the period of transition. The need for and the timing of the inclusion of the accreditation function should be delayed until the new registration arrangements have been successfully implemented. RANZCR strongly supports this recommendation.

A handwritten signature in black ink, appearing to read 'Mark Khangure', with a stylized flourish at the end.

Mark Khangure, FRANZCR  
**President**

12 February 2009