

21 April 2009

The Secretary  
Senate Community Affairs Committee  
PO Box 6100  
Parliament House  
Canberra ACT 2600

Email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Secretary

Thank you for the opportunity to provide a submission in relation to the Senate Community Affairs Committee inquiry into the proposed National Registration and Accreditation Scheme (NRAS).

The Australian Society of Plastic Surgeons (ASPS) supports the Royal Australasian College of Surgeons and the Australian Medical Association's position on the proposed National Registration and Accreditation Scheme (NRAS) and is a cosignatory to its recent letter to the Senate Committee.

ASPS supports a national registration scheme which provides consistency of registration processes throughout jurisdictions and facilitates the movement of registered practitioners across Australia. However, we are concerned that the proposed NRAS will lower the standards expected of the medical profession and ultimately jeopardise quality of care and patient safety. Once the bar is lowered, standards will be difficult to raise again. In addition we believe that the proposed scheme is expensive, inefficient and administratively cumbersome.

ASPS believes the proposed changes will negatively impact the international recognition of the medical profession in Australia. This would have significant implications for Australian-trained doctors seeking work or further training overseas. The proposed NRAS means that Australian-trained doctors could lose international recognition of their primary degrees or specialist qualifications. The current scheme allows and encourages Australian-trained doctors to work or train overseas to expand their experience and skill set.

A loss of international recognition under the new NRAS system would also mean Australia is not an attractive proposition to international students as a place to study.

We also have reservations over the proposed changes, described in the IGA, to the setting of accreditation standards for medical education and training. Compared with the existing AMC model, the proposed changes see an increased Ministerial involvement in the setting of standards for accreditation of education and training.



We believe the current model has a high level of accountability and transparency and has the confidence of the profession. The AMC maintains an appropriate objectivity while allowing for Ministerial input through the approval process.

Finally, in our view, the proposed NRAS does not acknowledge, protect or retain the role of medical colleges in respect of specialist registration, assessment, training or assessment of continuing competence. NRAS as proposed will include in legislation the ability to register doctors who do not meet general registration standards. This is an issue of great concern to ASPS, to the medical community in general and to the public as it puts at risk the quality and safety of patient care.

I trust you will find this submission helpful. The Society looks forward to contributing further in the coming rounds of consultation.

Yours sincerely

A handwritten signature in black ink, appearing to read "H. Webster", with a long horizontal flourish extending to the right.

Howard Webster, MBBS (Hons) FRACS (Plast) MBA  
President

cc. Dr Rosanna Capolingua, President AMA  
Ian Dickinson Vice President RACS