

Submission

Australian Government Department of Finance | Review of regulatory settings for overseas health practitioners

Thank you for inviting the Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) to make a submission to the Australian Government Department of Finance on the Review of regulatory settings for overseas health practitioners.

RANZCOG is the lead standards body in women's health in Australia and New Zealand, with responsibility for postgraduate education, accreditation, recertification, and the continuing professional development of practitioners in women's health, including both specialist obstetricians and gynaecologists, and GP obstetricians.

Overview

In line with the letter received from the Department of Finance, RANZCOG invited members closely involved in the Specialist International Medical Graduate (SIMG) assessment processes to provide feedback. As identified in the report, Obstetricians are a significant priority in most states and territories. RANZCOG's data indicates that there is a maldistribution within the O&G workforce, with over 90% of the domestic O&G workforce located in MMM1 and MMM2. While the pipeline is relatively stable, there are ongoing limitations imposed by distribution, reduction in working hours, and an ageing workforce. The same issues apply to General Practitioners (GPs), and as an extension, to GP Obstetricians who provide care in areas where O&G specialists are not located. The SIMG workforce provides valuable support in meeting workforce demands. RANZCOG believes that improvements within the regulatory system for overseas health practitioners is a critical part of ongoing workforce planning, as well as in reducing barriers for skilled and experienced overseas health practitioners to work in Australia.

RANZCOG's processes

RANZCOG's current processes for SIMG assessments are aligned with the AHPRA Standards. Applicants are invited to submit a paper-based application, and upon receipt of all documentation, referee reports are also requested. A high-level overview of the steps involved is listed below:

- Assessors complete a Summary of Preliminary review, with outcomes determined to be Eligible for Interview, Not Comparable / Not Eligible for Interview. Assessors can request a second opinion from the SIMG Clinical Advisor, who then provides the outcome.
- Eligible candidates are added to an interview list.
- Ineligible candidates are provided with an outcome letter from the Chair of the SIMG Committee, which is also added along with a report to the AMC portal. Candidates can apply for reconsideration and have an opportunity to provide further documentation that can be assessed before an outcome is finalised.
- Candidates attending interviews receive the following outcomes: Substantially Comparable, Partially Comparable or Not Comparable.
- Substantially Comparable and Partially Comparable Candidates receive an outcome letter outlining the requirements to be completed towards their Fellowship.

- Candidates with a Not Comparable outcome are provided with a letter, which is also uploaded along with a report onto the AMC portal. Candidates can apply for reconsideration and submit additional documentation. Candidates can appeal reconsideration decisions.

Key Reform Priorities

Based on the interim report, RANZCOG has identified key areas below which are a priority. RANZCOG believes that the reform should adopt a broad perspective with patient safety, equity and fairness and a high-quality applicant experience as key elements.

Process efficiencies and Applicant Experience

- Removal of process duplication and sharing of information across regulators and agencies, with a view of moving to a single portal over time.
- Automation and streamlining of application steps, and provision of more support to applicants, with clear information on the end-to-end process and timeframes.
- Fair and robust review and appeal processes for applicants, with clarity around decision making framework and timeframes.
- Expanded testing options to allow for more flexibility and cost efficiencies for applicants.
- Reasonable changes to English language standards and requirements.
- Continuous improvement and feedback loops.

Skills / scope assessment and patient safety

- Better recognition of skills and experience of overseas health practitioners with establishment of a competent authority pathway for SIMGs who have trained in health systems that are comparable to the Australian health system.
- Workplace-based assessment of surgical skills for all SIMGs to ensure patient safety.
- Targeted supervision of surgical procedures to maintain standards and ensure patient safety.
- Establishment of key performance indicators to monitor progress.
- Retain recency of practice as a critical component of assessments, particularly in surgical specialties.
- Transparency in performance standards.
- Cultural safety training to educate in the cultural differences and their impact on access to healthcare.
- Introduction of assessment of minimum level of prior experience, and recommendation of restricted scope of practice for SIMGs, where applicable.

Workforce

- Quantifying and reporting of workforce, skills, and distribution issues.
- Ensure that rural and remote work is viable and attractive to overseas health professionals, through development of infrastructure and support systems.
- Collect feedback from workplaces and community.
- Develop / sustain innovative, multidisciplinary models of care to address workforce shortages.
- Support SIMGs (and their families) to transition to life in Australia and protect SIMGs from bullying, harassment and discrimination in the workplace.

RANZCOG's work

RANZCOG has undertaken a significant amount of work to refine and streamline internal processes, and to provide ongoing support to our SIMG candidates. An overview of the different areas covered in our work is outlined below.

- RANZCOG works closely with the government and other stakeholders to provide input into the development of national workforce strategies.

- RANZCOG is involved in a range of initiatives that support workforce needs, including the development of a women's health workforce map, multidisciplinary training opportunities and mentoring and networking opportunities amongst others.
- RANZCOG has MoUs with key stakeholders including the Australian College of Midwives to support collaboration and development of multi-disciplinary care pathways.
- RANZCOG is undertaking a cultural safety project with a view of enabling our members including SIMGs to provide culturally appropriate care and reduce the risk of poor outcomes in First Nations communities and culturally and linguistically diverse communities.
- RANZCOG has embedded strong governance processes in place to support SIMG candidates through their application process, and to enable them to seek reconsideration and review of any decisions.
- RANZCOG currently seeks feedback from all SIMGs who attend assessment interviews in an attempt to continuously improve our processes and maintain good practice standards.

Closing statement

RANZCOG welcomes the overall efforts to streamline processes and improve the application and selection experience for overseas healthcare professionals. We believe that ongoing measurement of performance, provision of upskilling and training opportunities, and collection of feedback is essential in ensuring workforce sustainability and continuity of service provision.

RANZCOG believes that SIMG assessments require a high level of expertise in Obstetrics and Gynaecology as well as an understanding of the Australian health system. Bearing in mind the already established processes and standards, and RANZCOG's expertise, understanding of the training and skill requirements, and ongoing work in this space, we firmly believe that the assessment of SIMGs for Obstetrics and Gynaecology must remain the responsibility of RANZCOG.

RANZCOG acknowledges with thanks, the contribution of Dr Nisha Khot and Dr Eman Al Naggar for this submission.

Yours sincerely,



Dr Benjamin Bopp
President