



Review of regulatory settings for overseas health practitioners

The Australian Society of Medical Imaging and Radiation Therapy (ASMIRT) is the peak body representing medical radiation practitioners in Australia. Our aims are to promote, encourage, cultivate and maintain the highest principles of practice and proficiency of medical radiation science, always mindful that the welfare of the patient should be at the centre of everything we do.

DISCUSSION QUESTIONS

1. The Review is considering recommendations to ease skills shortages in registered health professions including medicine, nursing, midwifery, psychology, pharmacy, occupational therapy and paramedicine on the basis of current and projected labour market shortages.

a. Do you agree there are current and/or projected skills shortages in these professions?

ASMIRT believes that there is an awareness of shortages in the occupational therapy profession, and an awareness that the demand for medical radiation professions varies across States and Territories. For this reason, having a “one rule fits all” approach may be very restrictive for employers.

b. If yes, is there any data or evidence you can provide to demonstrate these shortages?

The shortages are supported by data shared within industry and the plethora of positions advertised across private and public health settings. Feedback from medical radiation Directors indicates that there are issues with backfilling radiographer positions to cover the reduced ability (within the past 3 ‘COVID’ years) for staff to take their accumulated Long Service Leave, annual leave and professional development leave. This, in addition to sick leave taken by staff dealing with personal and carer’s leave for family members, has put a continued strain on departments and practices that are usually supplemented by working holiday visa holders.

With NDIS contracts being outsourced there are numerous companies seeking occupational therapy practitioners in Qld alone.

2. What, in your view, are the key strengths and weaknesses of the current regulatory settings relating to health practitioner registration and qualification recognition for overseas-trained health practitioners?

Strengths:

ASMIRT believes that the following are the key strengths of the current regulatory settings relating to health practitioners.

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- There are established and implemented professional standards and capabilities that all health practitioners must meet and comply with, to achieve registration or remain registered within their professions.
- There are reporting structures that allow notifications to be made when practitioners are perceived as not meeting these professional standards.
- Practitioners are registered nationally and can move easily between states to practice their profession.
- Established professional assessing authorities, that stand independent of and from the regulatory body Australian Health Practitioners Regulatory Agency (Ahpra), perform recognised and respected assessments of the various overseas medical radiation practitioner applications.

Weaknesses:

There are a number of weaknesses that ASMIRT have identified:

- Unclear timelines for processing registration (Ahpra) applications (both domestic and international)
- Limited notification/ communication to both applicant and employer relating to processing delays when they occur.
- Lack of communication, consistency and standardisation of assessing outcomes, lack of communication between Ahpra and assessing authorities
- There is a requirement by the registration body for overseas applicants to be in the country to receive their allocated 'registration number'. This is only issued when all paperwork provided by the applicant has been deemed to be satisfactory to meet minimum standards. However, ASMIRT have been advised of situations where paperwork submitted by the applicant is insufficient and the individual is not informed, or the case worker has been replaced, and paperwork is misplaced.
- Ahpra caseworkers, in the past, have been transitory workers and have been known to leave suddenly prior to busy times i.e., Christmas-January period.
- As an employer, it is extremely difficult to contact Ahpra, with many – unanswered phone calls and email messages.

- Working holiday visa holders are not assessed on their skills by the gazetted body (assessing authorities), in the same manner as the migrant visa applicants.
- ASMIRT recommends that Ahpra must respect the assessing authorities for the various professions and their expertise when decisions have been made regarding applicants' qualifications. ASMIRT recommends that the regulatory authority not attempt to absorb this role into one entity.

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3. During the pandemic, a range of regulatory settings and processes relating to registration and qualification recognition of overseas-trained health practitioners were temporarily waived, relaxed or had greater flexibility.

a. Are there settings or processes that were particularly beneficial or challenging from a professional or employer perspective?

In response to workforce shortages, the Australian Government developed an incentive pilot program for onshore migrants, to support stronger economic growth and to increase workforce participation for skilled migrants with the hope of addressing critical skills shortages in Australia. This was targeted at specific professions where there was a significant shortage.

The pilot consisted of:

- 1) Faster Skills migration
- 2) Skills Assessment opportunities for migrants
- 3) Employability Assessments

Whilst the notion of this pilot was beneficial, the rapid timelines and other constraints did not assist onshore migrants in the medical radiation science profession.

Assessing authorities complete in-depth, and sometimes lengthy assessments to ensure applicants meet Australian standards within the professions they are applying to work in.

Introducing a one-stop-shop that simply ticks boxes, potentially opens the door to approving MRP's that do not necessarily meet these exacting standards required. ASMIRT does not believe that a short-term solution simply to meet job vacancies is sustainable.

As an assessing authority, ASMIRT have recognised and responded to real-life demands in developing streamlined in-house processes. This has enabled the maintenance of quality and detailed levels of assessment, whilst facilitating faster turn-around times. ASMIRT has embraced the new 'virtual' world and ensured that they are less reliant upon the unreliable and frequently delayed postal service.

From an employers' perspective, it was very challenging to employ staff rapidly. The turnaround times for international or domestic applications to be processed did not increase. Subsequently, employers extended their time frames for commencing a new employee to compensate for the delays in registration. This was disappointing, however a reality.

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b. Do you believe any of these temporary changes were beneficial or potentially detrimental to patient safety?

The process of fast-tracking medical radiation professionals by simplifying or removing particular processes or requirements could potentially pose a threat to patient safety. For this reason, independent skills assessing authorities must continue to be supported so that regulatory authorities do not become a 'one-stop-shop' simply to satisfy faster processing times.

c. What opportunities/challenges may arise if these settings and/or processes are retained permanently?

ASMIRT have not been able to measure this, as our profession has received limited benefit from the government pilot program.

4. The end-to-end process for overseas health practitioners seeking to work in Australia can be complex, time-consuming and costly. Current regulatory requirements may set unduly restrictive barriers, which in turn may deter potential practitioners from seeking to work in Australia?

a. Do you agree with this premise? If so, why?

ASMIRT acknowledges that the process for migrating or seeking work in Australia can be complex, time-consuming and costly in the differing professions. Overseas health care practitioners need to be aware of all the requirements to make an informed decision prior to following this pathway.

The Australian Qualifications Framework details the standard of Australian Education. The standard of health care provision in Australia is high, and to ensure the continued delivery of world-class, high-level services, ALL health practitioners MUST be able to comply with the regulatory requirements. For this reason, ASMIRT do not feel that these regulatory requirements are unduly restrictive barriers.

ASMIRT would like to see an improvement of Ahpra application processing times along with improved communication pathways, to ensure applicants are able to track the progress of their applications and speak with a knowledgeable employee if they have questions.

Whilst the cost may be seen as prohibitive for overseas applicants, this presumably funds the processing of applications.

To protect employers, ASMIRT suggests that all visa holders, both working holiday or migrant, should have a comprehensive skills assessment and qualification check. This will ensure that the employers have confidence that the person that they are employing meet the Australian academic and clinical standards to fulfill their employment contract.

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Under the current system whereby assessing authorities and the regulatory body both undertake this assessment with different/independent criteria, there can be delays and additional cost for the applicant. Inconsistent rules and outcomes, loopholes, poor communication, and collaboration between assessing authorities and the regulatory body has the potential for confusion and problems for the individual and subsequently the employers.

b. What practical changes could be made to current regulatory settings to most significantly improve the end-to-end process:

i. over the next 12 months

ASMIRT recommends that Ahpra invest in employing more permanent/longer term staff and providing better training to staff who process applications. It is clear that whilst seasonal temporary staff may assist in application process during peak demand periods, the quality of communication with applicants and employers is not present.

ASMIRT suggests the establishment of better communication pathways to enable applicants or employers to track application processing times.

ASMIRT recognises that servicing the rural and regional healthcare services is important. However, this should not be used as an argument to allow a less than rigorous application process, given that many of these practitioners may be expected to work as solo practitioners.

ii. in the medium- to longer-term?

Ahpra has recently updated their website, however there are marginal improvements to the website navigation to simplify how to access relevant information.

ASMIRT recommend clear communication, information and service provision regarding Ahpra's assessment process to be made readily available to individuals who apply for registration and regular communications with the assessing authority.

5. If you are an overseas health practitioner or employer – are there any thoughts you would like to share in terms of your experience of the end-to-end process for working in Australia or employing an overseas-trained health practitioner?

There is an onus on the individual to provide ALL evidence to support their qualifications, skills, experience, employment and CPD details initially. Time delays are mostly due to lack of the above.

Employees need to be open and honest with the employer regarding their visas and work intentions, especially when seeking employer sponsorship.

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