



Ref: D11/1861

Standing Committee on Health and Ageing  
PO Box 6021  
Parliament House  
CANBERRA ACT 2600

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**Submission No. 17**  
(Overseas Trained Doctors)  
Date: 31/01/2011

Dear Sir/Madam

I refer to your correspondence of 15 December 2010 inviting former Area Health Services to make submissions in relation to the inquiry into the registration process and support for Overseas Trained Doctors (OTDs). I am aware that the New South Wales Health Department has also been requested to make a submission hence, matters relating to State responsibilities, where this information has been specifically sought from them, will not be addressed in this submission.

Illawarra Shoalhaven Local Health Network (ISLHN) has had significant experience in recruiting Overseas Trained Specialists and Non Specialist Medical Officers.

With respect to Overseas Trained Specialists, ISLHN is aware that the Australian Medical Council (AMC) seeks advice from the specialist Colleges on the assessment of the qualifications held by OTDs. It has been noted that the highest possible assessment level from AMC is listed as "substantial". This presents a difficulty for ISLHN in terms of employment, as it is unclear whether this assessment indicates that the Overseas Trained Specialist is the equivalent of an Australian Trained Specialist, and whether previous overseas experience should be recognised for progression within the State Staff Specialist Award.

ISLHN requires the Overseas Trained Specialist to be registered as "specialist" by the Medical Board of Australia. It is noted that the NSW Medical Board previously had a specific registration category (7 (1f)) to recognise an Overseas Trained Specialist who was registered to work at the level of a specialist, but was still under a period of College mandated "peer review and supervision". This category does not exist within the Medical Board of Australia registration categories, and it is now impossible to tell from an Overseas Specialists registration whether or not they are still under College mandated conditions.

ISLHN has also noted inconsistencies in College/AMC consideration of qualifications. For example two potentially identically trained doctors applied for recognition to the AMC; one received recognition as a specialist, whilst the other was registered to work as a "Registrar under supervision".

There have also been concerns raised with the classification by Colleges that an applicant may work as a Specialist in an Area of Need position, but is required to work at the level of Registrar in a position not approved for an Area of Need. Whilst appreciating the need to have Specialists working in Area of Need locations, it appears that there may be two standards being applied by the Colleges to Overseas Trained Specialists.

Considerable feedback has been received from OTDs on the College/AMC/Medical Board process. Firstly there is concern about the time taken for these three bodies to reach a final assessment, which can take up to six months. Where doctors have requested urgent consideration by Colleges, they have been advised that the OTD Assessment Committee (or some other similar title) meets on a regular basis and is unable to deal with matters out of session. OTDs have also complained that, whilst the fees from the Department of Immigration, the AMC and the Medical Board are "reasonable", Colleges are charging fees in the thousands of dollars, which OTDs feel does not reflect the amount of work required.

For Non Specialist Doctors, the applicable requirements are for registration with the Medical Board and for an appropriate visa to be issued by the Department of Immigration. In general, these present little difficulty, although there is an issue of timeliness over the December/January period, with the number of public holidays, the significant number of applications being submitted, and the clinical year starting in mid-January. However, the process for Non Specialist Doctors is significantly quicker and simpler than that for doctors seeking registration under the Specialist Pathway.

Yours sincerely



Susan Browbank  
**Chief Executive**

Date: 18/1/11