

The Secretary  
Senate Community Affairs Committee  
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Parliament House  
Canberra ACT 2600



**The Royal Australian  
and New Zealand  
College of  
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By email: [community.affairs.sen@aph.gov.au](mailto:community.affairs.sen@aph.gov.au)

Dear Secretary,

**Re: Submission to the Senate Community Affairs Committee into National Registration and Accreditation Scheme for Doctors and Other Health Workers**

Thank you for the opportunity to respond to the Senate inquiry into the proposed National Registration and Accreditation Scheme for Doctors and Other Health Workers.

The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) is supportive of the concept of a national registration scheme for medical practitioners. However, the RANZCOG is of the view that accreditation should remain independent of registration arrangements, as per the Productivity Commission recommendations.

It is the position of the RANZCOG that any new system of registration and accreditation should ensure that the primary consideration and focus be patient safety. The RANZCOG is concerned that some aspects of the proposed system may inadvertently jeopardise this fundamental philosophy.

The primary consideration of the RANZCOG is to deliver 'excellence in women's health'. The training program has been developed and accredited by the Australian Medical Council (AMC) to provide the highest possible standard of training for specialist Obstetricians and Gynaecologists in Australia and New Zealand. In addition to the highly regarded specialist training program, the RANZCOG has for many years mandated the participation of all practising Fellows in a Continuing Professional Development (CPD) program. This compulsory CPD program is focused at ensuring that the knowledge and practice of Fellows remains current and relevant in a rapidly changing and developing professional environment. Thus, the College through its actions over a long period has demonstrated its commitment to ongoing professional development of its Fellows. Any proposed 'continuing competence' standards must be tailored to ensure that they meet the intended purpose for all specialties and are valid to measure the complex higher order professional capabilities associated with specialist practice, rather than simple tests of cognitive recall or reductionist methods.

In its current form, the registration scheme will use an endorsement on the general register to denote a medical specialist, rather than the establishment of a separate register of specialists. Under this proposal of a single register that includes specialists, the very real potential exists for doctors to practice outside of their experience, through personally deciding on their scope of practice. The RANZCOG is thus opposed to this method of public identification of fully recognised specialists, which has the potential to undermine patient safety and confidence; only through a separate specialist register can this be avoided.

It is essential that the new registration arrangements facilitate the movement of registered medical practitioners across jurisdictions, supported by nationally uniform policies and regulatory guidelines, whilst ensuring that independent specialist medical practice is undertaken only by practitioners who have

recognised specialist qualifications. A mechanism must be incorporated to protect the national registration scheme from unilateral actions by individual jurisdictions. In addition, further layers of bureaucracy are proposed, which will not necessarily contribute in any worthwhile way to transparency or to the objective of improving the safety and quality of healthcare services.

It is the position of the RANZCOG that any accreditation process should include the legal recognition of the role of the Medical Colleges in:

- determination of accreditation criteria and standards specific to the appropriate speciality;
- development of the appropriate curricula and training programs for accreditation;
- responsibility for the CPD program and related requirements for Fellows;
- responsibility for the assessment of International Medical Graduates wishing to have their training and experience recognised for independent practice as a specialist in Australia.

The RANZCOG is committed to an independent accreditation body that is comprised of members with appropriate professional expertise; credible and outside of any undue external influence. This body should be separate and sit outside of the registration process. The RANZCOG is opposed to any accreditation process that would lead to a reduction in the independence, autonomy and effectiveness of the AMC – an independent body with recognised expertise and knowledge relevant to the required accreditation function.

The College is also concerned that an unintended outcome of the proposal presented in regard to accreditation may be a diminution of standards already in place for the medical profession. This outcome would be the result of the attempt to derive a common approach to accreditation for all professions including those currently not subject to accreditation requirements. Any new accreditation arrangements should not result in a reduction of the current standards that govern medical professions.

### Summary

The RANZCOG supports a national registration scheme and the introduction of an appropriate accreditation arrangement for the wider health professions. However, it is in the detail and conduct of these two processes where important and key differences remain. Specifically, it is the position of the RANZCOG that:

- National Registration of doctors should be published on a clearly distinct and separate register for fully recognised medical specialists that would allow the public to clearly recognise fully qualified medical specialists;
- the Registration and Accreditation processes should not be linked and should remain separate;
- both the Registration and Accreditation processes should be absolutely free from any outside influence and totally independent;
- the AMC should remain the lead authority for accreditation of specialist colleges, without any diminution of the AMC's autonomy, independence or effectiveness.

The RANZCOG is firmly of the belief that transparency in medicine, quality in health services, and patient safety can only be assured if these issues are resolved.

Yours sincerely,



Dr Edward Weaver  
President