

## Stakeholder details

Initial questions
<p><i>To help us better understand your situation and the context of your feedback please provide us with some details about you. These details will not be published in any summary of the collated feedback from this consultation.</i></p>
<p><b>Question A</b></p> <p>Are you completing this submission on behalf of an organisation or as an individual?</p> <p><b>Your answer:</b></p> <p><input checked="" type="checkbox"/> Organisation</p> <p>Name of organisation: Victorian Hospitals' Industrial Association (VHIA)</p> <p>Contact email: ██████████</p> <p><input type="checkbox"/> Myself</p> <p>Name:</p> <p>Contact email:</p>
<p><b>Question B</b></p> <p>If you are completing this submission as an individual, are you:</p> <p><input type="checkbox"/> A registered health practitioner?</p> <p>Profession: <a href="#">Click or tap here to enter text.</a></p> <p><input type="checkbox"/> A member of the public?</p> <p><input type="checkbox"/> Other: <a href="#">Click or tap here to enter text.</a></p>
<p><b>Question C</b></p> <p>Would you like your submission to be published?</p> <p><input checked="" type="checkbox"/> Yes, publish my submission <b>with</b> my organisation name</p> <p><input type="checkbox"/> Yes, publish my submission <b>without</b> my name/ organisation name</p> <p><input type="checkbox"/> No – <b>do not</b> publish my submission</p>

## Your responses to the consultation questions

### 1. Is the content and structure of the draft revised specialist registration standard helpful, clear, relevant and workable?

Yes, with the exception of the item in question 2 below.

### 2. Is there any content that needs to be changed, added or deleted in the draft revised specialist registration standard?

1. VHIA suggests reference to 'holding another qualification the Board considers to be substantially equivalent, or based on similar competencies to an approved qualification for the specialty' is accompanied by wording that alerts applicants to who would be eligible to meet this requirement i.e. specialist international medical graduates (SMIGs)

VHIA suggests the additional wording would provide clarity in the standard without having to review other materials or seek advice from Ahpra.

2. VHIA notes point 9 in the standard under 'What must I do?' that states 'evidence that you have undertaken a Board approved orientation to the Australian healthcare system.'

VHIA suggests that point 9 also include the words 'and cultural safety training'

### 2. Are there any impacts for patients and consumers, particularly vulnerable members of the community that have not been considered in the draft revised specialist registration standard?

VHIA supports the Medical Board of Australia's 'Patient and Consumer Health and Safety Impact Statement' and desired outcome of the revised standard which will see vulnerable members of the community having more timely access to specialist services.

**3. Are there any impacts for Aboriginal and Torres Strait Islander Peoples that have not been considered in the draft revised specialist registration standard?**

VHIA notes the standard states 'Applicants will be required to undertake a period of supervised practice in the specialty and a comprehensive orientation to the Australian healthcare system, which includes cultural safety training'.

VHIA supports the Medical Board of Australia's 'Patient and Consumer Health and Safety Impact Statement'

**4. Are there any other regulatory impacts or costs that have not been identified that the Board needs to consider?**

VHIA supports the Medical Board of Australia's 'statement of assessment against Ahpra's Procedures for the development of registration standards, codes and guidelines.'

**5. Do you have any other comments on the draft revised specialist registration standard?**

VHIA represents the industrial interests of over 100 Victorian public health services and stand-alone community health services.

The timely registration and employment of both locally and overseas trained health professionals is critical to ensuring our member organisations can continue to provide services to the community.

As such, VHIA supports amendments to the revised specialist registration standard that:

- articulate existing additional registration pathways for SMIGs that are available under section 58(b) of the National Law
- will expediate the registration process for SMIGs that seek employment in our member organisations, and;
- ensures SMIGs possess the necessary qualifications and skills to provide safe and quality care within their area of speciality practice.

VHIA notes that under an expediated pathway SMIGs will not require assessment by a medical college as part of the registration process. The consultation paper also states that 'The Board, with input from the Australian Medical Council and specialist medical colleges, will develop and publish a list of qualifications that it considers are substantially equivalent or based on similar competencies to an approved specialist qualification for the specialty.'

Australian medical colleges provide, and will continue to provide, an important function in the training and assessment of specialist medical practitioners. VHIA is of the view the engagement and input of medical colleges in establishing a list of qualifications for the expediated pathway will be integral to:

- sector acceptance of the amended standard
- ensuring applicants have undertaken the appropriate specialist training, and;
- the applicant's successful transition to the Australian healthcare workforce.