

06/83

10 September 2008

Ms Bronwyn Nardi
Chair
Practitioner Regulation Subcommittee
of the Health Workforce Principal Committee

Attention: Practitioner Regulation Subcommittee
NRAIP@dhs.vic.gov.au

Dear Ms Nardi

The AMA and the co-signatories to this letter support the introduction of national registration arrangements for medical practitioners that ensure that doctors are qualified, safe and can work anywhere in Australia. In stating this, we would take the opportunity to point out that the current registration and accreditation arrangements are not responsible for the specific incidences of poor medical practice that have been highlighted recently in the media.

We are very concerned that the current proposed national registration and accreditation scheme will put at risk medical standards. Further, we believe that the scheme will be a vehicle for government to use other health providers to inappropriately undertake medical competencies in response to workforce challenges.

We can find no evidence or justification for the model for accreditation of medical education and training and clinical standards setting proposed by the Council of Australian Governments (COAG) and delivered via the Intergovernmental Agreement (the IGA). The AMA and the co-signatories do not support the current COAG proposal as outlined in the IGA and other documents. We believe the public interest would be better served by administrative reform within the existing framework. Accreditation of the medical profession already exists and is applied in a national framework.

Our submission is an attempt to highlight areas where future standards of excellence in medical practice, and therefore the safety of patients, are at risk under the current proposed arrangements.

Our intent in this submission is to constructively engage with government to provide information that, to date, we believe has not been adequately catered for within the IGA. Where we highlight potential risks, we have indicated possible alternative strategies that could be incorporated into the enabling legislation to mitigate these risks. Our joint submission makes it clear however that we consider these risks to be of such significance that approaches to deal with them, other than through specific legislative provisions, would not be sufficient to reduce our concerns.



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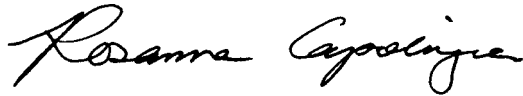
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It is important to recognise from the medical profession's perspective that this submission and our future engagement with government on the implementation of this scheme does not imply our concurrence with the final outcome. Our final view on whether the IGA delivers an acceptable model will depend on whether the protections we have suggested are included in the legislation. It will also depend on how closely the final scheme reflects the existing framework and protects the public interest. This submission exemplifies our commitment to try and reach an outcome that maintains excellence in medical practice in Australia.

Yours sincerely



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