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Australia Health Practitioner Regulation Agency GPO Box 9958 MELBOURNE VIC 3001

By email: <u>medboardconsultation@ahpra.gov.au</u>



Avant Mutual Group Limited ABN 58 123 154 898

Registered Office Level 28 HSBC Centre

580 George Street Sydney NSW 2000

PO Box 746 Queen Victoria Building Sydney NSW 1230

DX 11583 Sydney Downtown

www.avant.org.au

 Telephone
 02
 9260
 9000
 Fax
 02
 9261
 2921

 Freecall
 1800
 128
 268
 Freefax
 1800
 228
 268

Consultation – revised guidelines for the supervised practice of international medical graduates (IMGs)

Avant welcomes the opportunity to provide comment on the consultation.

General Comment

Avant is supportive of the proposed changes to the current guidelines and makes the following suggestions.

Supervisors could be required to attach a copy of their CV when their supervision plan is submitted to the Board. This would allow the Board to see if a candidate meets the minimum 3 year practice requirement, and may assist with verifying that a supervisor is qualified in the same field as the IMG.

Educational support for supervisors and IMGs could be considered by the Board. Ideally, this support could extend beyond clinical matters to learning areas, such as patient communication with an emphasis on cultural nuisances, and patient boundaries.

The proposed online education and assessment module for supervisors, referred to in the guidelines, could be a logical platform to initiate this type of support.

Creation of a concise user guide for IMGs focused on their individual obligations may also foster broad compliance with the guidelines.

Overall, adoption of the revised guidelines could benefit from being implemented in a manner that allows employers sufficient time to adjust their existing arrangements to comply with the new criteria.

Comments on Consultation Questions

1. Are the proposed restrictions on the number of IMGs a supervisor can supervise reasonable?

Avant considers the restrictions to be reasonable.

2. It is proposed that the guidelines specify when an IMG on level one or two supervision must consult their supervisor about the management of all



patients – for level one at the time of the consultation before the patient leaves and for level two on a daily basis. Is this reasonable? If not, when should they consult their supervisor?

Under the level two supervision requirements it is unclear if an IMG and their supervisor can select specific patients to review on a daily basis, or if they are to review the treatment of each patient without exception. It may be overly burdensome in some circumstances for supervisors and IMGs to review all patients on a daily basis.

We suggest that a degree of flexibility should be permitted, to allow a supervisor and IMG to focus on review of those patients deemed most beneficial to the IMG's learning outcomes. It may further allow for efficient time management of the review process.

3. Is it reasonable to require that if the position is in general practice, the practice (not the position) must be accredited to the RACGP Standards for General Practice (4th edition)?

Avant agrees that this proposal is reasonable.

Please contact me on the details below if you require any further information or clarification of the matters raised in this letter.

Yours sincerely

Georgie Haysom Head of Advocacy

Direct: georgie.haysom@avant.org.au

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