Head Medical is an International Medical Recruitment company that recruit doctors from all over the world, to positions throughout Australia.

As manager of a team of people that are responsible for providing assistance and guidance to the company's doctors in the collation of their applications for medical registration in Australia, I have a very good appreciation of the impact that the changes that you propose are likely to make on this invaluable source of labour.

At present, the only state that enforces the provision of Police Certificates with a doctors application is South Australia and we have experienced on numerous occasions the difficulties, excessive costs and subsequent delays that this requirement has caused to our doctors, not to mention the knock on effect to the medical service providers on the ground in Australia.

For those doctors coming from the likes of the UK, this requirement does not prove too arduous, as there is a set and very straight forward process to request these documents for the purposes of emigration. However, in many other countries the task of obtaining such a certificate is far more onerous and on some occasions near impossible, even when attempting to follow recommended procedures as detailed by the DIAC. For instance, we worked with one doctor who was required to obtain a police certificate from South Africa. After submitting the original application, we were advised that the process would take 2 weeks to complete, but in actual fact the certificate was not issued until 4 weeks later, after which we were faced with the impossible task of trying to arrange for its return to the UK. Unfortunately the postal system in South Africa leaves something to be desired, and only after an additional month of endless calls and emails to the Police Service in SA and various courier companies here in the UK, not to mention an additional £100 fee, did the doctor finally have his certificate in hand. As you can imagine this process caused a great deal of stress to the doctor, not only as a result of the additional monetary costs, having already spent many thousands on getting through the process to this stage, but also in the endless stress and calls/ emails he was having to handle daily for a number of weeks, alongside a very busy consultants post and the family's preparations for making the move to Australia.

In some cases, where a doctor has tried to obtain the certificate over a prolonged period of time without success, or where obtaining the certificate would mean travelling to the country in person, we have ended up requesting an exemption to the requirement and providing a statutory declaration in place of the police certificate, detailing the efforts of the doctor and avenues exhausted, or reasons why travelling to the country are unfeasible, which the board have been happy to accept.

My fear in the adoption of Option 2, is that essentially the status quo would continue, i.e. the provision of a certificate with an application would become mandatory, but the task of obtaining one in many countries would remain unduly difficult, so an exemption to the requirement would have to be requested after a prolonged period of the doctor having attempted unsuccessfully to obtain one, providing instead a statutory declaration attesting to their character and efforts to obtain the certificate. In essence, the end result would be the acceptance of a declaration from the doctor, but with the addition of the added costs, hassle and stress to the doctor beforehand in having to attempt to obtain the police certificate, not to mention the knock on delays for all involved.

I would thus argue that Option 4 is by far the better solution, avoiding the above described situation with increased hassle and cost to both the board and the applicants; whilst adding an additional deterrent for those who have a criminal history. A solution that I believe is much easier to justify given the very small numbers that are likely to have an international criminal history.

By the time most International Medical Graduates get to the stage of an application to AHPRA, they have already gone through an extremely expensive and arduous journey with both the AMC and a specialty college, having spent a lot of money, and a lot of time in the sourcing and collation of all the required paperwork (often required by all three bodies) and from my personal experience I believe that having to face such difficulties in sourcing Police Certificates (in many cases more than one) at this stage in the process, would be enough to see some doctors walk away from the process altogether, and quite realistically run out of available funds to complete the process, which would seem contrary to the aims of the board and a great detriment to the service providers and patients that you are there to assist.

I very much believe that in the consideration of such a proposal, great thought has to be given to balancing the need to ensure patient safety, with the needs of the patients and service providers in Australia to have qualified and able doctors in post and practising as quickly as possible and to me, Option 4 best achieves this.

G Evans