

26 June 2014

Dr Joanne Katsoris
Executive Officer – Medical
Australian Health Practitioner Regulation Agency
GPO Box 9958
MELBOURNE VIC 3001

By email: medboardconsultation@ahpra.gov.au

Dear Dr Katsoris

Re: Consultation – Core Registration Standards

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to provide feedback into the *Review of the registration standards for Professional indemnity insurance, Continuing professional development and Recency of practice*.

The Professional Indemnity Insurance standard uses clear, relevant and easy to understand language. However the College has a number of concerns and recommends the inclusion of the following:

1. A public reassurance of medical practitioner work standards.
2. Details of the competencies required when working with Aboriginal and Torres Strait Islander peoples.
3. An assurance that doctors who have experienced a period of mental illness will not be discriminated against when returning to work.
4. The RANZCP scope of psychiatric practice is widely defined to encompass a variety of clinical, research and administrative practice and also include a variety of treatment approaches and therapies, which would be considered as part of an everyday consultant practice. There is concern that the narrowed scope of practice requirements may impact adversely on psychiatrists in occasional practices, for example, those nearing retirement, and those with different styles of practice.
5. That the Medical Board undertakes a review of the outcomes of CPD audits prior to making any changes to determine whether in practice they are being understood and administered appropriately.
6. Consideration of the implications for the requirement of one month FTE per year. Some psychiatrists are concerned that this requirement will adversely affect psychiatrists who have occasional and/or high administrative and research practices and those who are required to undertake remedial training when returning to work after extended leave

7. An explanation of the relationship between recency of practice and scope of practice requirements and how the new minimum hours requirement will impact the existing requirements for return to practice, which will remain.

The RANZCP welcomes the proposed changes and recommends that the Medical Board and AHPRA continue working with the medical colleges to gain a better understanding of individual requirements for specialists and college CPD programmes.

If you would like to discuss any of the issues raised in the submission, please contact Dr Anne Ellison, General Manager, Practice, Policy and Projects, via email to anne.ellison@ranzcp.org or by phone on (03) 9601 4918.

Yours sincerely



Dr Murray Patton
President

Ref: 3631