



Healthy Profession.  
Healthy Australia.

5 February 2013

Richard Willis  
Secretary  
Legal and Social Issues Committee  
Victorian Legislative Council  
Parliament House  
East Melbourne VIC 3002

email: [lsic@parliament.vic.gov.au](mailto:lsic@parliament.vic.gov.au)

Dear Mr Willis

**Re: Inquiry into the Performance of the Australian Health Practitioner Regulation Agency**

The Royal Australian College of General Practitioners (RACGP) thanks the Victorian Legislative Council for the opportunity to comment on the performance of the Australian Health Practitioner Regulation Agency (AHPRA) including:

- its cost effectiveness
- its regulatory efficiency
- the ability of the National Scheme to protect the Victorian public.

The RACGP is the specialty medical college for general practice in Australia, responsible for defining the nature of the discipline, setting and maintaining the curriculum and standards for education, training, quality general practice and for supporting general practitioners in their pursuit of clinical excellence and community service.

This submission is made specifically in relation to the performance of the new national Medical Board under the auspices of AHPRA. In principle the RACGP supports the national system of medical registration with the potential to achieve:

- nationally consistent registration requirements and processes
- increased medical workforce portability and flexibility
- streamlined investigation and disciplinary proceedings
- operational efficiencies typically derived from economies of scale
- greater transparency/public accountability.

Notwithstanding the above, the College has ongoing concerns regarding the:

1. cost of medical registration
2. AHPRA complaints process.

### Cost of medical registration

The transition to the national registration scheme has been accompanied by a significant increase in registration fees, despite the expectation that the amalgamation of the state and territory medical boards would lead to operational efficiency gains and cost reductions.

The RACGP believes that the national medical board should be able to perform the pre-existing state and territory medical boards' duties, and any new activities, within the new budgetary allocation. Further, clear reporting of the costs associated with administering the national legislation and regulation of the profession would improve transparency, accountability and possibly acceptability of current and any future pricing structures.

### AHPRA complaints process

The College continues to receive concerning feedback from general practitioner members regarding the AHPRA complaints process, including:

- unnecessarily lengthy complaint processes
- poor/delayed communication of investigation and hearing outcomes, including the outcomes of panel and tribunal hearings.

Investigations into the professional conduct of a health practitioner can often be a stressful period for the health practitioner involved. Feedback from RACGP members indicates that it is not uncommon for investigations into the professional conduct of general practitioner to exceed 6 months, even when there is little substance to the allegations.

It is therefore important that all investigations, and outcomes of hearings, are completed in a swift and timely manner to reduce stress and uncertainty for those health practitioners involved, and to ensure that the investigation itself, rather than any alleged notified behaviour, does not become a safety concern for the health practitioners and the communities they serve.

The RACGP would greatly appreciate your consideration of the issues canvassed herein. If you have any questions regarding these matters please contact myself or Mr Roald Versteeg, Manager – Policy & Practice Support on (03) 8699 0408 or at [roald.versteeg@racgp.org.au](mailto:roald.versteeg@racgp.org.au)

Yours sincerely,



**Dr Liz Marles**  
President