

Professor Michael Permezel

President

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Dr Joanna Flynn AM
Chair
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Australian Health Practitioner Regulation Agency
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Dear Dr Flynn

Re: Medical Board of Australia - Draft Revised Registration Standard for Specialist Registration

Thank you for the opportunity to provide comment in relation to the review of the draft revised *registration standard for specialist registration*.

The Royal Australian and New Zealand College of Obstetricians and Gynaecologists (RANZCOG) is pleased to provide the following comments to the Medical Board of Australia

Consultation Questions

1. *From your perspective, how is the current registration standard working?*

The current registration standard is working fine and provides the information needed in a comprehensive way. RANZCOG agrees there was a need for updating.

2. *Is the content and structure of the draft revised registration standard helpful, clear, relevant and more workable than the current standard?*

Unfortunately the draft revised registration standard does not seem as comprehensive as the current registration standard. The structure in headings and subheadings is not as clear as currently and it's hard to find the information needed. RANZCOG provides some alternative headings for the MBA's consideration in the following page of this submission.

3. *Is there any content that needs to be changed or deleted in the draft revised registration standard?*

The content is mainly fine, but some minor wording changes are suggested. For example the phrase 'This applies to specialist IMGs' is misleading, as the previous section also may apply in some cases.

4. *Is there anything missing that needs to be added to the draft revised registration standard?*

No

5. *Do you have any other comments on the draft revised registration standard?*

The language is directed to the IMG rather than being expressed in the traditional third person and is therefore harder to read and does not recognise that other personnel will also read the document. It may be seen as patronising. A heading 'What must I do?' is not as helpful as one that reads 'Applying for specialist registration'



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Draft Revised Registration Standard for Specialist Registration

RANZCOG offers the following comments in relation to specific sections of the *Draft Revised Registration Standards for Specialist Registration*:

Summary

RANZCOG recommends the title of this section be changed to "Purpose of the Standard"

Does this standard apply to me?

RANZCOG recommends the title of this section be changed to "Scope of the Standard".

What must I do?

RANZCOG recommends the title of this section be changed to "Applying for Specialist Registration".

When you apply for specialist registration (page 2)

Applicants who are not qualified for general registration

This applies to specialist IMGs.

RANZCOG recommends the addition of the words "who do not hold general registration"" after the words "This applies to specialist IMGs".

At Renewal of specialist registration

RANZCOG recommends removal of the word "At" from this title so it reads "Renewal of specialist registration".

Relationship between specialist registration and specialist medical colleges

RANZCOG recommends the addition of the sub-heading "Continuing Professional Development" before the first paragraph under this title.

RANZCOG also recommends the addition of a further sub-heading before the second paragraph "Revoking of fellowship or membership by colleges".

What happens if I don't meet the standard?

RANZCOG recommends the title of this section be changed to "Non-compliance with the Standard".

Concluding Comments

RANZCOG thanks the MBA for the opportunity to provide comment on the Draft Revised Registration Standard for Specialist Registration.

Yours sincerely



Michael Permezel

President