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Dr Joanne Katsoris  
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Dear Dr Katsoris,

**RE: Consultation on draft revised registration standard for specialist registration**

Thank you for the opportunity to comment on the revised draft of the Specialist Registration Standard. The Royal Australasian College of Surgeons (RACS) welcomes the efforts by the Medical Board of Australia (MBA) and the Australian Health Practitioner Regulation Agency (AHPRA) to make its publications more accessible through the use of clear English and structure.

RACS notes that the current standard makes a distinction between Fellowship as a qualification of specialist competence, and Fellowship as the ongoing membership of a medical college for the maintenance and promotion of standards. You have indicated that the main change in the proposed new draft removes the dual reference to Fellowship, limiting it to recognition of Fellowship as a qualification of competence.

The Fellowship qualification is not regarded by RACS as being static, with the standard fixed in time as it is for a university qualification. Instead Fellowship is about achieving and maintaining a standard as well as participating in the ongoing activities of the awarding college, such as continuing education and other professional development initiatives.

Participation in a Continuing Professional Development (CPD) program is mandated by the MBA for registered specialists who do not maintain membership of their college. This does help to ensure that specialist practitioners engage in continuing development, but it does have its limitations. You would be aware of RACS' experience with allegations of discrimination, bullying and sexual harassment in the profession of surgery which have resulted in the Building Respect, Improving Patient Safety Action Plan. This is the result of a conversation with the entire RACS Fellowship, and demonstrates that standards are not static.

While the current standard discounts Fellowship as membership of a specialist medical college in preference to recognition of a qualification, RACS believes there are benefits from that dual reference and asks the MBA and AHPRA to retain it within the standard.

RACS is of the opinion that the current standard is achieving its aims, and do not believe that there are any other substantial changes required to the new draft, or additions made.

Yours sincerely,



**Mr Philip Truskett AM**  
President