

Ms Bronwyn Nardi
Chair
Practitioner Regulation Sub-Committee
Health Workforce Principals Committee
NRAIP@dhs.vic.gov.au

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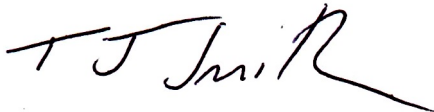
Dear Ms Nardi,

As the peak representative body for Australia's 12,800 medical students, the Australian Medical Students' Association (AMSA) is committed to ensuring that medical students receive a high quality medical education, are able to actively contribute to the provision of safe, high quality patient care.

AMSA is supportive of the concept of medical student registration, and foresee that this could occur within the framework of the proposed National Registration and Accreditation scheme.

Please find attached our submission on the proposed registration arrangements which outlines the measures we believe need to be taken to ensure that student registration is beneficial to both patients and student registrants.

Yours sincerely



Timothy Smith
Vice President (External)
Australian Medical Students' Association

Australian Medical Students' Association

Submission on the proposed registration arrangements under the National Registration and Accreditation Scheme

The Australian Medical Students' Association (AMSA) recognises the potential value or registration of medical students, and is supportive of the inclusion of student registration within the framework of the proposed National Registration and Accreditation system.

Currently medical students are only registered in New South Wales, South Australian and Victoria. With the rise in sharing of clinical training facilities between universities, and the potential for students to cross state borders to undertake clinical training placements, AMSA supports national consistency in relation to medical student registration.

AMSA considers the purpose of medical student registration to be:

- to ensure patient safety and ongoing public confidence in medical students;
- to facilitate early recognition of impairments that could compromise patient safety;
- to encourage impaired students to seek treatment and ongoing support, where appropriate;
- to facilitate and encourage alternative arrangements within medical schools that allow disabled or impaired students to complete their medical degrees;
- to develop an impartial mechanism of notification and investigation of complaints against students that is independent of Universities; and
- to allow recognition of medical students by any clinical teaching facility in Australia.

Nature of Student Registration

In Table 2 (Proposed types and subtypes of registration) under proposal 7.1 in the consultation paper on the proposed registration arrangements, student registrants are defined as:

Applicants who are enrolled in an approved course of study or undertaking approved supervised clinical training in preparation for an examination for registration.

There is considerable diversity in the curricula and assessment practices at Australia's 19 medical schools. Not all medical courses are concluded with *examinations for*

registration or barrier examinations. AMSA is strongly opposed to the introduction of national barrier examinations for registration. This definition should be amended to reflect the fact that not all students will be undertaking study or clinical training *in preparation for an examination for registration.* A definition which more appropriately describes student registrants is:

Applicants who are enrolled in an approved course of study or undertaking approved supervised clinical training in order to obtain approved qualifications (and meet any other requirements set by the responsible board) to permit registration.

Under proposal 7.4.1, it is proposed that the legislative provisions with respect to student registration would be framed to:

- require only those students who are undertaking clinical training that involves contact with patients/clients to be registered;
- empower boards to deal with students whose ability to undertake clinical training is affected by physical or mental impairment, drug or alcohol dependency; and
- give boards the discretion to include or not include a student category of registration.

As one of the core purposes of medical student registration is to ensure patient safety, AMSA is supportive of the provision requiring only those students who are undertaking clinical training that involves contact with patients/clients to be registered. As many of the medical courses in Australia provide students with early clinical exposure, it is important to take into account that many medical students will effectively be required to register from the date of enrolment in the medical course and for the duration of their course.

AMSA supports the proposal that boards be empowered to deal with students whose ability to undertake clinical training is affected by physical or mental impairment, drug or alcohol dependency. This provision should, however, be predicated on the legislative requirement that a student should only be subjected to disciplinary proceedings by the board when all other appropriate avenues have been exhausted. Further feedback on the handling of complaints and disciplinary proceedings against students will be discussed in AMSA's submission on the proposed complaints arrangements.

AMSA believes medical student registration should be mandatory under the proposed National Registration and Accreditation system, and should not be left to the discretion of the board. Currently medical students are required to register with their respective state medical board in New South Wales, South Australia and Victoria in order to undertake clinical placements during their training. Failure to mandate provisions for medical student registration within the proposed legislation will result

in significant confusion over the continuing role of medical student registration in these states.

Summary

1. Medical student registration should be mandatory.
2. The definition of student registrants should reflect the diversity of course curriculum and assessment, and should not specifically refer to examinations for registration.
3. Only those students undertaking clinical training that involves contact with patients/clients should be required to register with the board.
4. While the board should be empowered to deal with impaired students, there should be a requirement that the other appropriate avenues to address the impairment have been exhausted before the matter is escalated.

Information collected on Student Registrants

Under proposal 4.2.1, it is proposed that the boards have the power to require an extensive list of information to accompany an initial application for registration. Much of the information listed as required would not be applicable to students applying for registration.

AMSA believes that students should be required to provide only the following information to the board for the purposes of registration:

- Name;
- Address;
- University and year level, with appropriate proof of enrolment.

AMSA has reserved its decision on whether students should be required to provide workforce data required for national workforce analysis until the privacy and information-sharing paper is released for consultation.

As the majority of medical schools in Australia undertake criminal history checks on their student prior to enrolment, AMSA is supportive of proposal 4.3.1, option 2, that the legislation require criminal history checks on all new applicants and at renewal of registration, but these requirements be phased in over time from 1 July 2010. The cost of conducting a criminal history check should not be incurred by the student.

Under proposal 11.2.5, it is proposed that the boards have the power to require

registrants to provide details of each practice address. Medical students are often required to undertake clinical training at a number of clinical teaching sites, often at short notice. As such it will be impractical for student registrants to be required to report to the board their location of practice. As such AMSA is strongly supportive of the option that there be no requirement to provide a practice address.

AMSA believes that all measures must be taken to ensure the absolute confidentiality of the information provided by students to the board. In particular, the board must not publish the personal data of students in that part of the register open to the public. Further comment will be provided on privacy of information once the privacy and information sharing paper is released for consultation.

Summary

1. Only name, address, University, year level and proof of enrolment should be collected from students applying for registration.
2. Criminal history checks are an appropriate component of applications for registration, provided student registrants do not incur any expense through this.
3. Student registrants should not be required to provide practice addresses to the board.
4. Personal information provided to the board by student registrants should be confidential.

Decisions on Application for Registration

Under proposal 6.1.1, it is proposed that boards be given the discretionary power to do the following before deciding on an application for registration:

- investigate the applicant;
- require the applicant to attend before the board to answer questions about their application;
- require the applicant to provide further information or any documents considered necessary by the board to decide the application;
- require the applicant to undergo a written, oral or practical examination to assess the applicant's competence to practise; and
- require the applicant to undergo a health assessment (eg a medical examination or psychological assessment) to assess the applicant's capacity to practise.

AMSA believes that student registration should be a passive process, and that the board should only have the right to investigate a student in the event of a complaint.

Should a student applicant be required to attend the board to answer questions about their application the student should be entitled to have legal or other appropriate representation present during the questioning. The applicant should not incur any expense by being required to attend the board to answer questions about their application.

AMSA believes the board should not be empowered to require student applicants to undertake any competency assessment. It is role of the University to assess students' competency to practice while enrolled in a medical course.

AMSA strongly believes that students should not have to routinely undergo a health assessment or provide a health status report, including infective or immune status, as part of an application for registration. Student applicants have the right to privacy concerning their health status. Health assessment of applicants should only be required in exceptional circumstances where the physical or mental health of a student might reasonably be thought to impact adversely on patient safety.

Summary

1. Student applicants should only be investigated in the event that a complaint is made against them.
2. Should the board investigate a student, the student should have the right to representation at any board proceedings.
3. The board should not require student applicants to undertake an assessment of competency.
4. Health assessments should not be a routine part of the application process.

Renewal of Registration

With respect to proposal 11.1.1, that registration be granted for a period of 12 months, AMSA suggests that there be consideration given to granting student registration for the duration of the students' course. This would minimise the

administrative requirements placed on students, universities and the board, while still providing a mechanism to ensure patient safety and the early recognition of impaired students.

Should students be required to renew their registration annually, AMSA is supportive of proposal 11.2.1, that the legislation include provision for a 'grace' period of three months following expiry of registration, during which a student is deemed to be registered, but that if they fail to renew by the end of this period, then the board removes their name from the relevant register.

Under proposal 11.2.4 it is proposed that the legislation impose an obligation on registrants to notify the board of a change of contact address within 28 days, and that a penalty apply for failure to comply. Medical students are highly mobile, and a large proportion change addresses frequently. While the onus should remain with student registrants to maintain up to date contact details with the board, AMSA opposes a penalty for failure to notify the board of a change of contact address within 28 days, on the grounds that registration should not constitute a financial encumbrance on students.

Summary

1. Student registrants should be granted registration for the duration of their course.
2. A three month grace period should be included in the legislation if annual renewal is required.
3. Penalty should not apply to student registrants who fail to update their contact address within 28 days of moving.

Professional Indemnity Insurance (PII)

Under proposal 6.3.1, it is proposed that registrants be required to be covered by PII arrangements at all times during the registration period, as a condition of registration, and to require registrants demonstrate coverage to the satisfaction of the responsible board, at the time registration is granted for the first time, and annually on renewal of registration.

AMSA believes that student registrants should not be required to demonstrate PII coverage on application for registration, as the University or clinical teaching facility almost always provides PII. Student registrants should only be required to purchase

their own PII when undertaking clinical placements which are adjunct to their course requirements.

Summary

1. Student registrants should not be required to demonstrate PII coverage on application for registration.

Registration Fees and Charges

Under proposal 4.1.1 it is proposed that the legislation require applications for registration to be accompanied by the fee fixed for that profession.

Given that students derive no income from their clinical practice, and that studying is a significant financial burden on many students, AMSA believes the board should not charge a fee for student registration. Similarly students should not incur any expense for criminal history checks, or for any investigation or appeal.

Summary

1. Boards should not charge fees for student registration.
2. Criminal history checks, investigations and appeals should occur at no cost to student registrants.

Representation on the National Medical Board

If medical students are registered under the proposed National Registration and Accreditation scheme, it is appropriate that medical students should be given representation on the National Medical Board.

The reasons medical students should be represented on the board include:

- The issues facing student registrants are significantly different to those facing medical practitioners;
- As outlined by the IGA, half to two-thirds of the members of the boards will be members of the profession. The philosophy of having a

registrant judged by their peers can not be said to apply to students if they are not represented on the board; and

- The board will be responsible for recommending competency and accreditation standards to the Ministerial Council (on the advice of the Australian Medical Council [AMC] in the interim). As much of this advice will pertain to medical school accreditation standards, it is appropriate that the consumers of medical education represented in this process.

Currently, medical students are represented by a student representative on the AMC's Medical Schools' Accreditation Committee. This provides a model of how student representation has been successfully included in the accreditation process. It is reasonable to assume that medical student representation in the registration process could be equally successful.

Summary

1. There should be consideration given to including a medical student representative on the National Medical Board.

Conclusion

With consideration of the factors outlined above, and with ongoing consultation with medical students, medical educators and the medical profession, student registration can be implemented within the framework of the proposed National Registration and Accreditation system, providing benefit to patients and students alike.