

**From:**  
**To:** [Specialist IMG Pathways Review](#)  
**Subject:** Public consultation on the revised Registration standard: specialist registration  
**Date:** Wednesday, 3 July 2024 3:25:35 PM  
**Attachments:** [REDACTED]

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To whom it may concern,

Thank you for the opportunity to provide feedback on the Medical Board of Australia's consultation - draft revised registration standard: specialist registration

Please find attached response from [REDACTED]

If you have any questions regarding this response, please do not hesitate to get in touch.

Kind regards,

Anne Tonkin  
Chair, Medical Board of Australia

Via email: [SIMGPathwaysReview@ahpra.gov.au](mailto:SIMGPathwaysReview@ahpra.gov.au)

3 July 2024

**Submission to the Medical Board of Australia Consultation – Draft  
Registration Standard: Specialist Registration**

Thank you for the opportunity to provide feedback regarding the **Medical Board of  
Australia Draft Registration Standard: Specialist Registration**

[REDACTED]

[REDACTED] This includes supporting the training, assessment and accreditation of trainees; the maintenance of quality and standards in both specialties; and workforce mapping to ensure we have the specialists available to support the sectors in the future.

[REDACTED] notes the new proposed expedited pathway bypasses the traditional Medical College assessment model. Ensuring that IMGs meet rigorous standards of practice and competency is crucial for maintaining high-quality healthcare delivery, individuals on the proposed expedited pathway will not require a College assessment and does not require an individual to hold or be eligible for Fellowship of the College. [REDACTED] will not be awarding Fellowship to individuals who gain specialist registration via the expedited pathway, essentially establishing two [REDACTED] – those who hold Fellowship of the College and those who do not. With the nature of [REDACTED] practice, it may not be apparent that an IMG has been practicing unsafely or issuing erroneous reports until several years after the report has been issued, this is of particular relevance in private practice.

[REDACTED] has identified that there may be potential risks to the expedited pathway model as described by the MBA. If the MBA are determining who is safe to provide patient care, Medical College's should not take, or be seen to take responsibility for individuals who have been granted specialist registration to practice in Australia – [REDACTED] notes the competency requirements for specialist registration as detailed in section 57 (1)(b) of the National Law details:

- six months of satisfactory supervised practice approved by the Board in the specialty within Australia, or
- an examination or assessment approved by the Board, to assess your ability to competently and safely practise the specialty.

[REDACTED] does raise concerns that IMGs may find it difficult to obtain a six-month supervised practice post within a health department, noting departments may be reluctant to take on these IMGs due to the possible risks [REDACTED] [REDACTED] would

suggest a period Level 2 supervision for 12 months, then Level 3 supervision for a further 12 months, prior to specialist registration being granted.

[REDACTED] extends thanks the Medical Board of Australia for the opportunity to contribute to the public consultation on the *Draft Registration Standard: Specialist Registration*. [REDACTED]

[REDACTED]. We look forward to an ongoing engagement through these regulatory reforms.

[REDACTED]

[REDACTED]

[REDACTED]