



Australian Salaried Medical Officers' Federation

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Australian Medical Council Review of Specialist Medical College Education, Training and Professional Development Programs – Stakeholder Submission

Thank you for the opportunity to provide comment on the Royal Australasian College of Surgeons (RACS) training program. The Australian Salaried Medical Officers' Federation (ASMOF) is the Doctors' Union, representing over 14,000 medical practitioners including Staff Specialists, Clinical Academics, Career Medical Officers as well as doctors in training (interns, residents and registrars) who are employed in health services across Australia.

The health, wellbeing and safety of doctors in training at work is of paramount concern to us. The poor working conditions faced by doctors in training have been firmly in the spotlight in the past years, with media reports drawing attention to system failures which have failed to protect trainees from overwork, unpaid overtime and burnout.

As a Union our focus is on employer obligations to provide a safe working environment, and we advocate for legally enforceable provisions to protect trainees from unsafe, unpaid hours. However, we also believe that Colleges such as RACS hold a privileged position in the trainee work environment that allows them to influence and moderate these environments. RACS has a crucial role to play in monitoring and upholding trainee wellbeing, most explicitly through Standard 7.4.

In light of this, ASMOF is concerned to note that in the most recent Medical Training Survey, RACS trainees reported lower scores on work/life balance than the national average. RACS trainees were less likely to report that their workplaces supported them to achieve a good work/life balance, and concerningly, just under half (48%) reported that they had a good work/life balance, compared to 64% of respondents overall.¹ RACS training programs must consider and monitor the safety hazards in doctors' workplaces, including unsafe work hours leading to fatigue, in order to ensure that trainees are able to maintain their wellbeing and work/life balance, whilst meeting the demands of the program and their workplace.

We are also concerned with the particularly vulnerable position of unaccredited trainees. Doctors in training have reported a culture of unaccredited registrars being treated as second class citizens. They report higher workloads with 71% working 40 hours a week or more, compared to the average of 66% for doctors in training.² Whilst interns and accredited

¹ Medical Board of Australia (2020) Medical Training Survey: RACS report, accessed at <https://medicaltrainingsurvey.gov.au/Download/2020/2020%20MTS%20Report%20for%20RACS.pdf>

² Medical Board of Australia (2020) Medical Training Survey: Prevocational and unaccredited trainees report, accessed at <https://medicaltrainingsurvey.gov.au/Download/2020/2020%20MTS%20Report%20for%20RACS.pdf>

registrars have greater protection from exploitative and unsafe workplace practices due to accreditation processes, a structured curriculum framework and standardised levels of supervision, trainees working in prevocational roles are unsupported, have no mandated education requirement, no guarantee of a career despite significant personal investment, and have reported higher levels of workplace distress.

In ensuring protection for RACS trainees against excessive hours, there should also be consideration given to unaccredited trainees, to ensure they are not overburdened with the remaining workload, particularly outside work hours. In order to address this, ASMOF recommends that on accreditation visits, accreditors report on all rosters and working conditions of trainees regardless of their accreditation status.

Finally ASMOF would like to draw attention to delays in the accreditation of international medical graduates (IMGs). Our Union has been made aware of IMGs who have been known to the College for over a year and have not been assessed. We would like to have assurance that there is a reasonable timeframe for the initial application and assessment, and a fair and transparent process for accreditation of IMGs. IMGs are an essential component of our medical workforce, particularly in rural and regional areas facing workforce shortages that need to be urgently addressed.

Warm regards,

A handwritten signature in black ink, appearing to read 'Geoff Dobb'. The signature is stylized with a large 'D' and a horizontal line underneath.

Prof Geoffrey Dobb
Federal President
ASMOF