

15 November 2013

Marie Dalins
Director / Adjudication Branch
Australian Competition and Consumer Commission
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Canberra ACT 2601

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Dear Ms Dalins

Re: Application for revocation of authorisation A91100 and substitution of new authorisation A91392 – interested party consultation

The Royal Australian College of General Practitioners (RACGP) thanks the Australian Competition and Consumer Commission (ACCC) for the opportunity to comment on the Australian Medical Association's (AMA) application for revocation of authorisation A91100 and substitution of new authorisation A91392.

The RACGP is the specialty medical college for general practice in Australia, responsible for defining the nature of the discipline, setting and maintaining the curriculum and standards for education, training and quality general practice and for supporting GPs in their pursuit of clinical excellence and community service.

It's understood that the application is for renewal of AMA's Authority to collectively negotiate with state and territory health departments, the terms of contracts (including fees) for rural GPs providing services as visiting medical officers (VMO's) in public hospitals and health facilities, in rural and remote areas of Australia (except in New South Wales) for a period of five years.

This relates to the provision of medical services including, but not limited to, surgery, obstetrics, anaesthetics, emergency services, and medical consultations provided by rural GPs.

The application does not seek authorisation beyond the scope of the AMA's existing Authorisation, nor does it seek to alter the existing limitations and exclusions.

Having considered the application in detail, the RACGP supports renewal of the existing Authorisation as it provides the following wide range of benefits to government health departments, rural health services, GPs and the rural communities they serve, including:

1. Benefits for state/territory health departments

- Streamlines process for contracting rural GPs as VMO's
- Reduces transaction time and costs associated with contracting GPs as VMO's
- Ensures broader policy issues (education/ training, workforce, service model reform) are taken into consideration when negotiating employment contracts
- Maintains flexibility by allowing service agreements to be tailored to local needs
- Ensures mutual benefit by allowing for voluntary participation
- Improves rural GP-VMO workforce stability.



2. Benefits for GPs

- Ensures effective and proactive representation of rural GPs who may be inexperienced in contract negotiation resulting in more balanced negotiation with fairer outcomes
- Makes the process of VMO engagement easier for many GPs – especially IMG's
- Removes the burden of contract negotiations for individual GPs – saving them time, effort and costs associated with obtaining information to make informed choice, professional advice, and individual legal representation
- Allows GPs to have greater input into terms and conditions of their employment, including
 - remuneration
 - arrangements for rostering and on-call services
 - theatre access
 - after-hours requirements
 - quality and safety factors.
- Retains flexibility – allowing for customisation of service agreement to suit individual practitioner and community needs
- Ensures mutual benefit by allowing for voluntary participation
- Reduces GP stress by improving employment certainty, morale, relationship with employer and collegiality.

3. Benefits for rural and remote communities

- Makes engagement of GPs as VMOs in rural and remote areas more attractive and accessible
- Has a positive effect on recruitment and retention of GPs in rural and remote communities
- Increases the number of GPs providing advanced clinical services in rural and remote locations.

Finally, the limitations and exclusions that apply to the Authorisation seem adequate to mitigate risks of any anti-competitive effects or other public detriments arising.

If you have any questions regarding the content of this submission, please contact myself or Mr Roald Versteeg, Manager – Policy & Practice Support on (03) 8699 0408 or at roald.versteeg@racgp.org.au

Yours sincerely

Dr Liz Marles
President