



Executive Officer, Medical  
AHPRA  
GPO BOX 9958  
Melbourne VIC 3001

14 February 2020

**RE: Public Consultation: Draft revised Registration standard: Continuing professional development**

Founded in 1992 the Australasian Integrative Medicine Association (AIMA) is the peak medical body representing the doctors and other health care professionals who practice integrative medicine. We work to build a vibrant integrative medicine community which is united, recognised, supported, informed and connected.

Integrative medicine has a focus on individualised patient care. It combines the best of current western medical practice with evidence-based complementary medicine and therapies.

AIMA is currently defining the competencies a doctor needs to safely practice integrative medicine. Demonstrating these competencies through education and practice will be the basis for doctors being an 'AIMA Endorsed Integrative Doctor'. This program will bring clarity to the public, other medical professionals and medical regulators about the skills and training of integrative doctors. Being an AIMA Endorsed Integrative Doctor will include an obligation to complete appropriate continuing professional development.

We believe the CPD process outlined in this public consultation would be advantageous to our members and to integrative doctors as a whole. We believe the proposed system will bring clarity around the CPD expectations for all doctors and will help to ensure that CPD better reflects contemporary learning practices and should lead to a high quality of CPD. For this reason

**AIMA supports Option 2 – to revise the Board’s Registration standard: Continuing professional development, with the following amendment.**

**Question 3** of the Public Consultation asks 'Is there anything missing that needs to be added to the draft revised standard. We answer YES to this question.

We propose that the revised standard include a mandatory requirement for doctors to undertake selfcare/wellbeing activities as part of their CPD. This could fit as a mandatory subset of the 25% requirement 'activities focussed on reviewing performance'.

**Rationale**

Section 9.1 of the Good Medical Practice: a code of conduct for doctors in Australia states:

As a doctor, it is important for you to maintain your own good health and wellbeing. This includes seeking appropriate work-life balance.

Over recent years there has been a spotlight on doctor health and wellbeing, particularly on mental ill health. The Beyond Blue 'National Mental Health Survey of Doctors and Medical Students' 2013/2019 found:

Approximately a quarter of doctors reported having thoughts of suicide prior to the last 12 months (24.8%), and 10.4% reported having thoughts of suicide in the previous 12 months. The data also indicated that thoughts of suicide are significantly higher in doctors compared to the general population and other professionals (24.8% vs. 13.3% vs 12.8%). These differences may be, in part, due to differences in the survey question wording. Approximately 2% of doctors reported that they had attempted suicide. (page3)

The vital importance of focussing on doctor wellbeing is further highlighted by the by the development of 'Draft National Standard for Tackling Mental Ill Health in Doctors and Medical Students' which was presented by Ms Jaelea Skehan, Director Everymind on 6 March 2019 at the AMA Colleges, Associations and Societies Meeting in Canberra.

Doctor health and wellbeing is clearly a priority. It is essential not just for doctors but also for patient safety. For these reasons we believe that there should be a mandatory health and wellbeing component to the revised CPD program.

If you have any queries about this submission you can contact me on the email below.

Yours sincerely

A handwritten signature in black ink that reads "Cressida Hall". The signature is written in a cursive, slightly slanted style.

Cressida Hall  
AIMA CEO