

12 December 2023

Dr David Gruen AO
Australian statistician
Australian Bureau of Statistics

Via email: updating.anzsco@abs.gov.au

Dear Dr Gruen

The Royal Australian College of General Practitioners (RACGP) wishes to provide a submission to the Australian and New Zealand Standard Classification of Occupations (ANZSCO) Review. The RACGP wishes to make this submission after it was made aware that the current ANZSCO listing for a General Practitioner (GP) does not account for the post-hospital vocational training required to be a GP or sufficiently recognised GPs as medical specialists.

The RACGP is seeking to have the occupation of general practitioner moved from unit group 2531 to 2533 under a new unique code. The RACGP believes this accounts for the state of the modern primary health medical workforce. In the current workforce, a significant majority of general practitioners have additional years of post-hospital training and have passed exams to achieve vocational training with the RACGP. Doctors practising general medicine without vocational training account for a very small portion of the workforce and consist mostly of those who have not sought completion of RACGP exams and RACGP membership after the introduction of vocational registration in 1996.

The RACGP has sought to complete this submission as close as possible to the format of the ANZSCO Comprehensive Review Consultation Round Two.

1. What is your first name?

Nicole

2. What is your last name?

Higgins

3. What is your organisation?

Royal Australian College of General Practitioners (RACGP).

4. What is your position/title?

RACGP President

5. Which state are you located in?

Queensland

6. What is your email address

Healthreform@RACGP.org.au



7. What is your phone number?

+61 3 8699 0566

8. How did you find out about the Comprehensive review and update of ANZSCO

Found on the ABS website.

9. Please select a focus area

Medical, nursing and other healthcare services.

10. Are there any occupations in your industry, business or workplace that are not accurately described?

Yes, 253111 General Practitioner

For each inaccurately described occupation:

10.1 Provide your proposed new title, alternative title, definition, specialisations, licensing and/or registration requirement (whichever apply).

253111 should be changed to Prescribed Medical Practitioner and the occupation of general practitioner should be moved to unit group 2533 under a new unique code. 253111 should also have the alternative titles of Other Medical Practitioner (OMP), Non-Vocationally Registered General Practitioner.

The occupation of General practitioner description should read "Diagnoses, treats and prevents human physical and mental disorders and injuries predominantly in a primary care setting. Registration or licensing is required.". This description will make it distinct from 253311 Specialist Physician (General Medicine).

10.2 Provide a list of any unique tasks that distinguish this occupation from others included in ANZSCO.

General practitioners are some of the only medical specialists that provide care with post-hospital training across all ages, all genders, and all bodily systems, and treat both mental and physical health. General Practitioners are specialists in working with undifferentiated diagnosis caring for patients holistically throughout their healthcare journey and treating multiple conditions simultaneously. General practitioners are the most common physicians in primary health and are the physicians most people see for their health needs. General practitioners have the unique task of keeping people well, focusing on preventive health to reduce the burden of disease both individually as well as across the population. GPs also have a unique role in leading intersectoral collaboration to support the longitudinal care of patients.

10.3 Include any evidence to support your proposed changes, such as industry workforce surveys, workplace awards, job vacancy data, industry workforce planning documents, or job descriptions.

The current definition of 253111 does not reflect the introduction of vocational registration for GPs in 1996. Since 1996 doctors seeking to practice generalist medicine and bill MBS item numbers for general practitioners need to pass RACGP exams to be considered a General Practitioner. Junior Medical Officers who are in training after 1996 cannot practice medicine in a general practice unless they are a general practice registrar or are a fellow of the RACGP. OMPs can also pursue a similar path to vocational registration through the Australian College of Rural and Remote Medicine (ACRRM) which also requires membership and passing of exams.

General Practitioner is also [recognised as a specialty](#) by the Australian Health Practitioner Regulation Agency (AHPRA). The title of Specialist General Practitioner is a [protected title](#) under the National law and is distinct from the title of Specialist General Physician (which is currently recognised under the ANZSCO with the unique code 253311).

In November 2023 Services Australia made [administrative changes to the Medicare Benefits Schedule](#) to change references of OMPs to Prescribed Medical Practitioners. For this reason, the RACGP is recommending 253111 be changed to Prescribed Medical Practitioner.

10.4 Describe how the inaccurate description affects your industry, business or workplace.

The inaccurate descriptions within the ANZSCO contribute to the incorrect belief by medical and non-medical healthcare worker peers and the general public that General Practitioners are not medical specialists and have a lower level of training and clinical competence than other hospital-based specialties. These incorrect beliefs are demoralising to the profession, discourage junior medical officers from pursuing general practice and lead to the devaluing of the work of general practitioners. As a result of this misperception, there has been a significant drop in medical graduates taking up general practice. In [2016](#) general practice was being pursued by close to 50% of trainees but today only [11%](#) are expressing an interest in general practice

11. Are there any occupations in your industry, business or workplace for which ANZSCO does not accurately reflect the skill level (1 to 5)?

The RACGP agrees that the occupations of Prescribed Medical Practitioner and General Practitioner be classified at skill level 1.

12. Are there any occupations in your industry, business or workplace which we should consider classifying under a different ANZSCO category (e.g. sub-major, minor or unit group)?

Yes, General Practitioners must be clearly recognised as Medical Specialists by inclusion in unit group 2533 (Specialist Physicians) rather than 2531 (General Practitioners and Resident Medical Officers). The RACGP believes this will be achieved by creating a new unique code for General Practitioners in unit group 2533 and renaming the existing code 253111 as Prescribed Medical Practitioner. The RACGP acknowledges this change will require renaming Unit Group 2531 to account for the removal of General Practitioners. The RACGP would also recommend renaming unit group 2531 to Resident Medical Officers and Prescribed Medical Practitioners.

12.1 Include any evidence to support the change (such as skill transferability with minimal retraining required).

Since 1996 Junior Medical Officers seeking to work in a general practice have needed to complete an additional year of hospital-based training, two to three years of training within general practices including a 6-month extended skills term in a hospital, general practice or community-based non-general practice setting. Those seeking to pursue rural generalism will also complete a fourth year of training to attain additional rural skills. Once this training is complete, GP registrars need to pass RACGP exams to be recognised as a General Practitioner. These four years of additional training are not recognised by classification in unit group 2531. There are also a range of other programs under the General Practice Experience Pathway that lead to RACGP fellowship which require a similar level of skill and training to attain fellowship. The RACGP believes the most appropriate unit group would be 2533 which acknowledges the additional training and skills possessed by medical specialists.

12.2 Describe how the current placement affects your industry, business or workplace.



Please see our response to question 10.4

13. Are there any occupations in your industry, business or workplace that should be separately identified with a unique code?

Yes. Moving the occupation of General Practitioner from the unit group 2531 to 2533 will require a new unique code for the occupation of General Practitioner.

14. Are there occupations that are emerging, or that you anticipate will emerge, in the next 5 to 10 years in your industry, business or workplace?

No.

15. Is there any other information to help support your submission?

15.1 Any impacts if the proposed changes are not made to the ANZSCO.

If these changes are not made to the ANZSCO then statistical attempts to measure the GP workforce will be incorrectly grouping them with Registrars who have a significantly lower level of training and clinical autonomy than GPs. Continued use of the current ANZSCO occupations will contribute to biases within the health sector against GPs and contribute to the discouragement of junior medical officers from pursuing general practice during an ongoing GP workforce shortage which is becoming critical.

15.2 Alignment of your proposed changes to policy, program or statistical/data needs.

Without amendment, the ANZSCO will inaccurately account for Australia's Medical Specialist workforce. This will have flow-on effects for other services and organisations that use ANZSCO as a guide to classify occupations and will fail to recognise the specialist status of general practitioners in Australia.

Please list any other organisations that are represented in this submission:

No other organisations are represented in this submission.

16. Please provide information on any other issues in relation to ANZSCO that have not already been covered in this survey.

The RACGP has no further information to add regarding this submission.

The RACGP looks forward to contributing to further discussions with the Australian Bureau of Statistics regarding the ANZSCO's classification of GPs. Please contact Ms Samantha Smorgon, National Manager – Funding and Health System Reform on (03) 8699 0566 or at samantha.smorgon@racgp.org.au if you have any questions regarding this submission.

Yours sincerely

Dr Nicole Higgins
RACGP President