



16 October 2024

Ms Sue Dawson  
Independent Reviewer  
NRAS Complexity Review

Via email: [NRASComplexityReview@health.gov.au](mailto:NRASComplexityReview@health.gov.au)

Dear Ms Dawson

**RE: Complexity Review – Submission in response to Consultation Paper 1**

The Royal Australian College of General Practitioners (RACGP) welcomes the opportunity to provide a submission in response to the first consultation paper released as part of the independent review of complexity in the National Registration and Accreditation Scheme (Complexity Review).

The RACGP is the voice of general practitioners (GPs) representing more than 50,000 members in our growing cities and throughout rural and remote Australia. For more than 60 years, we have supported the backbone of Australia's health system by setting the standards for education and practice and advocating for better health and wellbeing for all Australians.

Our core commitment is to support GPs from across the entirety of general practice to address the primary healthcare needs of the Australian population. With the return of college-led training in 2023, the RACGP now trains more than 90% of Australia's GPs including those in rural and remote areas.

The RACGP's submission to Consultation Paper 1 addresses a number of topic areas including evidence and issues, governance and stewardship, accreditation functions, and complaints handling. Our members are particularly keen to see improvements made to complaints processes given the mental health impacts of vexatious complaints and delays in investigating/managing complaints.

One of the prevailing themes that emerged in member feedback was the lack of trust between Ahpra and GPs. This is a significant issue when expecting GPs to accept regulatory decisions and policy changes.

The GP workforce also features heavily in our response. The challenges associated with attracting and retaining GPs have been well documented, and we need to strike the right balance between protecting public safety and ensuring regulations and red tape do not impede workforce growth.

We look forward to participating in the Complexity Review as it progresses. Please contact Samantha Smorgon, National Manager – Funding and Health System Reform, on (03) 8699 0566 or via [samantha.smorgon@racgp.org.au](mailto:samantha.smorgon@racgp.org.au) if you have any questions or comments regarding our submission.

Yours sincerely

**Dr Nicole Higgins**  
President