MAINTENANCE OF EXEMPTION STATUS

THIS LINK APPLIES TO CANDIDATES WHO HAVE COMMENCED ON THE RANZCP SPECIALIST ASSESSMENT PATHWAY PRIOR TO 1 SEPTEMBER 2014

If you commenced on the pathway after 1 September 2014, please see Link 19B, Maintenance of Exemption Status

1. PREAMBLE

The goal of the RANZCP Training and Assessment program is

“To ensure that the FRANZCP is a statement to the community and the profession that its holder has successfully completed high quality training and assessment in psychiatry and is committed to practising psychiatry ethically, as well as maintaining high standards of clinical competence through continuing education and professional development.”

In accordance with this goal, the College recognises its responsibility to the public as well as to Fellows and RANZCP Exemptions Candidates to set limits so as to maintain standards. This may take several forms:

- The maintenance of high standards of clinical competence and professional development may at times require the College to withdraw Exemption Status from a candidate.
- The College may at times need to withdraw Exemption Status from a candidate who has been de-registered or who has committed a serious breach in ethics or conduct.

The RANZCP is diligent in ensuring successful applicants hold appropriate qualifications and medical registrations (as per RANZCP Training and Assessment Regulations). Where an existing Exemptions Candidate has conditions placed upon his/her medical registration, the Committee for Specialist International Medical Graduate Education (CSIMGE) must be formally advised of these within fourteen days. Failure to do so may be cause for disciplinary action that may include suspension or removal of Exemption Status.

Provisions for exclusions are included in the RANZCP Training and Assessment Regulations. Regulation 14.2 of the RANZCP Training and Assessment Regulations (2003) states: “The Board/Education Committee, on advice from its committees, may exclude you from the training and/or assessment program at any stage.”

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1 RANZCP Report to General Council 00/2 From the Project team for the Review of Training, Examination and Continuing Education.
Withdrawal of Exemption Status across the RANZCP as a whole, even for a limited time period, is a serious step and requires a careful process which is fair, contains extensive room for remedial interventions wherever possible, and which can be reviewed and revisited. This policy thus addresses both the grounds and procedure for exclusion and also the remedial and review process associated with the need to set limits so as to maintain standards regarding College Exemptions Candidates.

All specialist international medical graduates (SIMG) assessed for the Specialist Pathway are required to register with the relevant Australian or New Zealand Medical Board (Australian Health Practitioner Regulation Agency – AHPRA or Medical Council of New Zealand – MCNZ) within 12 months of receiving their final outcome letter or upon commencement of practice within Australia or New Zealand.

It is the responsibility of the candidate to inform the College of their medical registration start date as soon as they have presented to AHPRA or the Medical Council of New Zealand and are registered. For medical registrations obtained within the 12 months of the date on the Final outcome letter, the Exemption status will be adjusted to start from the date medical registration in Australia/New Zealand is granted.

If candidates are unable to obtain medical registration within the 12 months of the final outcome letter, they should write to the CSIMGE explaining their case and their planned intentions for obtaining medical registration and start working in Australia/New Zealand. A clear intention of obtaining registration and starting work in Australia/New Zealand in the near future, as well as an intended plan for progression to Fellowship, is required from the candidate. Medical registration obtained after the initial 12 months from the date of the Final outcome letter will not be adjusted. If a clear intention of obtaining registration and starting work and progressing in Australia/New Zealand is not evident in the submission from the candidate then the Committee may start the proceedings of withdrawal of the candidate.

2. GROUNDS FOR EXCLUSION FROM ALL RANZCP TRAINING PROGRAMS

2.1. Serious breaches in ethics or conduct
- Withdrawal of Exemption Status can occur if a candidate has been de-registered by the Medical Board or has had conditions imposed on their registration.
- Withdrawal of Exemption Status can occur if a candidate breaches the College Code of Ethics.
- Withdrawal of Exemption Status can occur if a candidate has had their employment contract terminated due to serious problems regarding ethics, competence or conduct.

2.2. Serious concerns regarding failure to progress towards Fellowship
- Withdrawal of Exemption Status can occur if the CSIMG has serious concerns regarding an Exemptions Candidate’s overall competence and their ability to progress to Fellowship.

3. PROCEDURE FOR WITHDRAWAL OF EXEMPTION STATUS

The RANZCP will implement the following procedure when withdrawal of a candidate’s Exemption Status with the RANZCP is being considered:

3.1. Medical Board de-registration or conditional registration
- Upon receiving advice that the candidate has been de-registered, College staff will forward this advice to the CSIMGE.
- The CSIMGE will consider the matter and formally advise the Education Committee and the Board of any recommendation to withdraw the candidate’s Exemption Status.

2 "Medical Board” refers to the Medical Board of Australia or to the Medical Council of New Zealand
The Education Committee and the Board, upon receiving advice from the CSIMGE, will consider the matter and advise the Exemptions Candidate in writing of their decision, by registered mail.

Where conditions are placed on an Exemptions Candidate’s Medical Board registration, the CSIMGE will review the conditions to determine:

- whether any additional supports or remedial assistance are required; and
- whether Exemption Status can be maintained.

If the decision is taken that Exemption Status cannot be maintained, the process as for de-registration is followed.

3.2. Breach of the College Code of Ethics

Where the College is notified of an alleged breach of the College Code of Ethics, the General Manager, Education and Training and College Legal Officer will notify the Chair, Education Committee and the Chief Executive Officer (CEO) prior to any consideration of the matter.

An alleged ethical breach will be referred to the Membership Conduct Committee (MCC) for their review, consideration and determination. Should a matter regarding a candidate be referred to the MCC, the relevant authorities may be informed at the discretion of the MCC.

3.3. Termination of employment

Exemptions Candidates are required to report termination of their employment contract to the College. On becoming aware of this, College staff will notify the CSIMGE, providing information regarding the circumstances, where available. College staff will inform the Exemptions Candidate involved that they are entitled to write to the CSIMGE on their own behalf to explain the circumstances.

The CSIMGE will consider the matter and, in complex local situations, may arrange for an independent member of the Committee to investigate the situation and advise the Committee.

After consideration, the CSIMGE may decide:

- that there are special local circumstances such that exemption status can be maintained.
- that the Exemptions Candidate should have their status formally withdrawn. In this case they will formally advise the Education Committee and the Board of their recommendation.

The Education Committee and the Board, upon receiving advice from the CSIMGE, will consider the matter and advise the candidate in writing of their decision.

3.4. Failure to progress towards Fellowship

It is expected that candidates will be able to successfully complete the mandated training and assessment requirements to proceed to admission to Fellowship within three years of gaining Exemption Status. However, the College acknowledges that circumstances may arise which prolong a candidate’s progression and therefore, candidates are required to apply for Extensions of their Exemption Status every three years (to a maximum of nine years) if they wish to maintain their Exemption Status.

Extensions

Exemptions Candidates are required to apply to the CSIMGE for an Extension of their Exemption Status if it is due to expire (or a Renewal if their Exemption Status has
expired) and they have not yet completed all the mandated training and assessment requirements to achieve Fellowship. In their application for an Extension/Renewal of Exemption Status, a candidate is required to outline the reasons for the delay in their progress and their plan for progression to Fellowship.

Candidates who commenced on the RANZCP Specialist Assessment Pathway prior to 1 September 2014, may be granted a maximum of nine years Exemption Status time to complete all mandated training and assessment requirements and attain Fellowship. If circumstances arise which prolong a candidate’s progression, candidates are required to apply for Extensions of their Exemption Status every three years (to a maximum of nine years) if they wish to maintain their Exemption Status.

Applications for further Extensions of Exemption Status beyond nine years of candidacy must include supporting documentation proving truly exceptional circumstances which have prevented the attainment of Fellowship within the nine years Exemption Status time already had, and will be assessed on a case-by-case basis by the CSIMGE at its monthly meeting. The CSIMGE will then make a recommendation to the Education Committee and the Board regarding withdrawal of the candidate’s Exemption Status with the RANZCP.

**Extensions of Exemption Status beyond nine years of candidacy**

For candidates who commenced on the RANZCP Specialist Assessment Pathway prior to 1 September 2014, nine years is the maximum period of time that Exemption Status will be granted to complete the process of attaining Fellowship. Two types of exceptional circumstances may provide for an additional Extension of Exemption Status beyond nine years:

1. **Exceptional circumstances**

Exceptional circumstances are interpreted as pertaining to a personal / family issue which has prevented progression to Fellowship (e.g. severe ill health). Extensions are granted on an individual basis by the CSIMGE. In general, workload, employment, supervision or educational matters are not considered to be relevant as it expected that the candidate has had nine years to address these issues.

2. **Exceptional circumstances relating to educational grounds**

Approval of this extension is by the CSIMGE and is based on educational grounds and subject to the candidate providing a realistic educational plan that is focussed upon attaining Fellowship within the extension period.

The CSIMGE will consider granting the one year extension on educational grounds provided the candidate can demonstrate:

- All requirements for Fellowship except the clinical examination have been achieved
- Progression towards Fellowship, including previous attempts of the clinical examination.
- An achievable educational plan that is supported by the candidate’s employer and supervisor.

**Educational plan**

It is expected that the candidate will already have had a number of attempts at the clinical examination, at least one remediation period, assistance from mentors or supervisors, and has attended the ECE Preparation Workshop.

The plan must contain all of the following elements:

1. Specific examination preparation work individually supported by at least one experienced College Fellow. (e.g. weekly - fortnightly clinical examination trial sessions for at least three months; weekly supervision sessions; attendance at specific preparation workshops where the candidate receives individualised feedback).
2. Engagement in psychiatric practice for a significant period of time where the duties relate directly to components of the clinical examination (e.g. working in an acute adult ward for three months; working in an adult community or rehabilitation team with sufficient opportunities for this to relate to examination preparation; working part time with access to appropriate preparation opportunities).

3. Address specific deficits identified by previous examination feedback and by supervisors or Directors of Training (e.g. language/cultural coaching; additional education; or further consideration of previous remediation plans).

4. Address geographic or professional isolation if this has been identified as an issue affecting progression to Fellowship.

5. Attendance at an ECE Preparation Workshop during the life of the plan.

6. Additional educational experiences (e.g. conference attendance) may be considered but all elements must be relevant to examination preparation.

7. A statement of support from the candidate’s employer supporting the plan and guaranteeing access to the additional supports/ placements required.

8. A statement of support from the candidate’s supervisor/Director of Training/Fellowship Attainment Coordinator that:
   a. it is an achievable plan;
   b. the support required is available; and
   c. it addresses the candidate’s requirements.

The plan must be presented to the CSIMGE before the candidate’s Exemption Status expires.

The extension will be for a maximum of 12 months, dated from the expiration of the last extension, regardless of the date of approval.

Important points to note:

1. There will be no further extensions based on education matters notwithstanding examination results, workload, employment, supervision or educational circumstances.

2. This extension is not guaranteed: current Exemptions Candidates who are approaching the expiry date of their final extension (i.e. nine years of candidacy) should consider all their options.

3. If the CSIMGE concludes that the plan is unrealistic or unable to be supported, it will not be approved.

4. During the extension period any formal remediation process will be suspended as it is assumed the educational plan is addressing the remediation needs of the candidate.

5. The timing will always allow for one further ECE attempt. A second attempt may be possible in individual cases, but the 12 month extension will not be extended.

6. Clinical examinations scheduling and results will have no influence on the process or duration of the extension. The Committee for Examinations is responsible for timing and standards of examinations.

7. The CSIMGE takes no responsibility for organising any additional training, placements or preparation for applicants.

4. SPECIAL CONSIDERATION

At all stages of these processes it is expected that the candidate will be counselled and that discussions will occur - initially informally - with the supervising Fellow (or delegate), in order to clarify and hopefully rectify any problems.
Where a candidate believes there to be particular exceptional circumstances that significantly contributed to their failure to:

- maintain an employment contract with local service providers, or;
- progress towards achieving Fellowship,

This must be brought to the immediate attention of their supervising Fellow and the CSIMGE.

The CSIMGE will consider any exceptional circumstances and formally advise the Education Committee and the Board of its recommendations regarding withdrawal of the candidate’s Exemption Status.

The Education Committee and the Board, upon receiving advice from the CSIMGE, will advise the candidate in writing of their decision, by registered mail.

5. BREAKS IN EXEMPTION STATUS

Candidates may apply to the CSIMGE for a break in Exemption Status for a maximum of twelve months. Candidates must be able to provide proof of exceptional circumstances to support the temporary suspension of their Exemption Status. A Break in Exemption Status Notification form, completed and signed by the candidate’s Supervising Fellow, and supporting evidence will need to be submitted to the CSIMGE at least one month before the proposed break in Exemption Status. Please refer to the Guidelines for Breaks in Exemption Status for further information, also available at Link 19a.

6. REVIEWS OF WITHDRAWAL DECISIONS

6.1. Process for Reviews and Appeals:

In accordance with Regulation 14.3 (RANZCP Training and Assessment Regulations), any candidate may request a review of a decision affecting them in relation to training and assessment. The relevant committee and the Education Committee will consider such requests.

Please refer to the Complaints Resolution page of the RANZCP website for further information: [https://www.ranzcp.org/Pre-Fellowship/2003-Fellowship-Program/Complaints-Resolution.aspx](https://www.ranzcp.org/Pre-Fellowship/2003-Fellowship-Program/Complaints-Resolution.aspx).

6.2. Time period of withdrawal of Exemption Status:

Following withdrawal of RANZCP Exemption Status, a candidate can apply to the CSIMGE for a further review if they can provide evidence that the conditions which led to their withdrawal no longer apply. The CSIMGE will consider the matter then notify the Education Committee and the Board of its decision, providing documentation. The Education Committee and the Board may, after consideration:

- decide to cancel the withdrawal decision. The candidate could then undergo the usual application process for RANZCP Exemption Status.
- decide to maintain withdrawal of Exemption Status. In this case, the candidate could re-apply for a further review at a later date if appropriate (i.e. if they were at that later date more able to provide evidence that the conditions which led to withdrawal no longer applied.)

Approved: Education Committee 08/2014
Approved: Fellowship Attainment Committee 04/2010
Approved: Fellowship Attainment Committee 02/2009
Amended: Fellowship Attainment Committee 10/2004
RELEVANT FORM

The following form can be assessed at http://www.ranzcp.org/fellowship/links-and-forms.html, underneath **Link 19a**, **POLICY: Maintenance of Exemption Status**

- Break in Exemption Status Notification form