

VETERINARY SURGEONS BOARD of WA

DISCUSSION PAPER

REGISTRATION OF PERSONS WITH AN UNRECOGNISED PRIMARY DEGREE WHO HOLD SPECIALIST QUALIFICATIONS

PROPOSAL

The Board is seeking feedback on a proposal to register applicants with an unrecognised primary veterinary degree who hold specialist qualifications to work in private practice under certain conditions without the requirement to undertake the Australasian Veterinary Exam (**AVE**).

BACKGROUND

The Board's primary function, subject to the Minister, is to administer the *Veterinary Surgeons Act 1960* (Act) and regulate in the public interest the practice of veterinary surgery in Western Australia. The following two Board functions are germane to this paper.

- a) registers persons holding approved qualifications as veterinary surgeons or veterinary specialists; and
- b) ensures the maintenance of appropriate professional standards by registered veterinary surgeons, veterinary nurses, trainee veterinary nurses, veterinary students and authorised persons.

For a number of years the Board has registered veterinary surgeons without a recognised primary veterinary degree but who hold qualifications that would qualify them for specialist registration with the condition that they only work at Murdoch University and only in their area of specialty. They are not required to undertake the [AVE](#).

There has been recent discussion as to whether this type of registration should be extended to allow the applicants to work in their area of specialty in private practice.

ISSUES

1. If a veterinary surgeon is considered by the Board to be suitably qualified to practise veterinary medicine at a specialist level at Murdoch University it follows that they have the qualifications to practise in that specialist field at the appropriate professional standard in private practice.
2. The decision not to register these applicants may be appealable to the State Administrative Tribunal (SAT) as the reason for the refusal to grant registration appears to be based on where they are practising rather than their qualifications or competency. (see section 22(1) of the Act).
3. There is a long standing shortage of veterinary surgeons with specialist qualifications and experience in Western Australia in the private sector.

4. No veterinary surgeon with specialist qualifications has undertaken the AVE when informed that they must do so to work in private practice. Instead, they have left the state and their specialist knowledge and skills have been lost to Western Australia.
5. There may be a perception that the Board may be imposing a requirement to sit the AVE as a barrier to immigration.
6. Requiring a veterinary surgeon with the appropriate qualifications who only wishes to practise in a particular specialist field to undertake the AVE does not appear to be a justifiable use of the resources needed to conduct the AVE, as they are unlikely to utilise the knowledge gained after passing the exam as it is largely not in their area of expertise.
7. The AVE is not a suitable instrument for assessing whether highly qualified and experienced veterinary surgeons should be registered as specialists in Western Australia. The subcommittee of the AVBC, the [Advisory Committee on the Registration of Veterinary Specialists \(ACRVS\)](#) is the most appropriate body to assess these candidates.
8. The Veterinary Practitioners Board of New South Wales (**VPBNSW**) has for the last two years, without any significant issues, registered applicants with an unrecognised primary veterinary degree who hold specialist qualifications and allowed them to work in private practice under certain conditions. They currently have 173 registered specialists out of which 13 have unrecognised primary qualifications, but most of these are employed at the university.

CONCERNS

1. This issue was discussed at the 18 May 2018 meeting of the Australasian Veterinary Boards Council (AVBC). The Board has placed the issue on the Agenda for the AVBC general meeting on 28 May 2021.
2. Once registered the veterinary surgeon will use the registration as a basis for registration in other Australian jurisdictions or New Zealand.

Comment: This could be managed with a condition requiring that the veterinary surgeon only practices at a specified WA veterinary practice with a Board approved supervising specialist veterinary surgeon.

3. The veterinary surgeon, once registered, may practice outside their area of speciality or otherwise breach their conditions.

Comment: This could be managed with conditions requiring that they only work for an employer and have a supervising veterinary surgeon who ensures they adhere to their conditions of registration.

4. Only one Australian jurisdiction, New South Wales, will grant specialist registration in these circumstances so in the interests of consistency it may be desirable that the status quo should remain.

5. It may be seen as unfair and unreasonable to allow veterinary surgeons with unrecognised primary degrees who hold specialist qualifications to apply for registration as a specialist when in the past others have been refused.
6. Permitting veterinary surgeons with an unrecognised primary veterinary degree who hold specialist qualifications to work in private practice may set an undesirable precedent and may result in the Board receiving a flood of applications for this type of registration which it is obliged to approve.

DISCUSSION

The VPBNSW has a [protocol](#) for registering applicants with an unrecognised primary veterinary degree but who hold specialist qualifications to work in private practice under certain conditions.

It is proposed that the VPBNSW protocol be used as a basis for the consideration of registration as specialist veterinary surgeons who have an unrecognised primary degree who hold specialist qualifications.

Below is a summary of conditions that could be attached to the specialist registration in these circumstances.

Veterinary surgeons with unrecognised primary veterinary degree who hold specialist qualifications will be granted registration with conditions which may include the following

- a. They must submit an application to the ACRVS within 3 months of being granted registration with conditions and receive a recommendation from the ACRVS that they are suitable for registration as a specialist in a specified specialist category within 12 months of the registration.
- b. If a recommendation for registration as a specialist is not received within 12 months of registration, the Board may cancel the registration.
- c. They only work for an employer who is approved by the Board. (They cannot set up a private practice on their own)
- d. They must have a supervising veterinary surgeon who is a specialist, has no conditions and resides in Western Australia.

FEEDBACK REQUESTED

Do you have any objections to the proposal?

Do you support the proposal?

Any other general comments would be appreciated.

Please provide your feedback by email, admin@vsbwa.org.au, to the Board by Tuesday 2 June 2021.