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Mr Roger Arwas  
Executive Director  
Small Business Victoria  
GPO Box 4509  
**MELBOURNE VIC 3010**

By email: [roger.arwas@dbi.vic.gov.au](mailto:roger.arwas@dbi.vic.gov.au)

Dear Mr Arwas

**RE: Small Business Victoria Discussion Paper**

The Australian Medical Association (Victoria) welcomes the opportunity to provide feedback to Small Business Victoria on its discussion paper.

**'SmartForms'**

The volume and complexity of paperwork that doctors are required to complete has been problematic for medical practices over many years. Accordingly AMA Victoria welcomes the introduction of the pilot project to commence use of online 'SmartForms' for a set of commonly used forms by medical practitioners and pharmacists. We look forward to the details of this trial.

Online forms will ease the administrative burden imposed on medical practices and AMA Victoria looks forward to the pilot being extended to a wider range of forms in the future.

**Hiring and firing staff**

Hiring and firing of staff is still a key area of concern to medical practitioners and this was emphasised in the KPMG report 'Strategic Options for Business Victoria Online' published in September 2010. General Practitioners (GPs) find the process of hiring and putting off staff both difficult and time consuming. There is a significant amount of paperwork associated with these processes as well as complex legislative requirements.

### **Car parking requirements**

When expanding or building a new practice, Victorian planning regulations stipulate that GPs must provide five car parks per medical practitioner at a clinic. AMA Victoria has raised this concern with the Victorian Government on a number of occasions. It is difficult for GPs to obtain the necessary parking permits from local councils particularly when extending practices or opening new clinics (particularly in residential areas). This situation is currently impeding patient access to medical care.

### **Major taxation, regulatory and compliance burdens for medical practitioners**

Doctors, as small business owners, have reported that the processes associated with engaging a new doctor leads to a significant amount of complex paperwork including payroll tax requirements and lodging Business Activity Statements.

### **Finding information or advice**

It is difficult for GPs to know which authority is the appropriate body who can deal with a particular business concern or enquiry. When establishing a new clinic, doctors require a substantial amount of information specific to their needs – for instance, applying for council permits, advertising guidelines, accounting practices, and registering for GST.

### **Information as to Government grants and assistance programs**

It is time consuming for doctors, especially GPs, to apply for infrastructure grants. Commonly GPs must employ practice managers to satisfy the administrative requirements as they do not have the time to do so themselves.

Difficulties for practice staff include being able to judge what programs their practice is eligible for, which incentives are available to them, and which programs would be most suitable for their business. More information as to the progress of an application, and the likelihood of it being approved, would also be useful.

It is a matter of concern that GPs and other medical practitioners may be missing out on opportunities for financial assistance that they are entitled to because they are unaware of the invitation to apply or the process for application.

There is anecdotal evidence to suggest that doctors are tending towards becoming members of corporate clinics to avoid having to deal with the various red tape and administrative burdens associated with running their own practice.

### **Improving access to information and advice for small businesses**

As small businesses, medical practitioners are time poor and do not have the time to regularly seek out the information applicable to their business.

AMA Victoria recommends that a website be established to contain a consolidated list of state and federal programs and initiatives. Email alerts would be useful to make practitioners aware of any updates.

## **business.vic.gov.au**

Doctors report that the *business.vic.gov.au* website is useful and easy to use, particularly when registering a business name. There is evidence to suggest however that a lot of practices are neither aware of the site nor the information it contains. This needs to be more widely publicised.

## **Effect of the Global Financial Crisis**

There is anecdotal evidence to suggest that it is increasingly difficult for small business owners, including medical practitioners, to raise finance and this is deterring doctors from applying for a loan to start a new business. The requirement for greater security may act as an impediment for some looking to finance a new enterprise.

## **Workforce skills**

Doctors report that it is hard to retain practice managers and receptionists as well as practice nurses. Doctors place significant emphasis on hiring practice staff with good communication skills however these are increasingly difficult to find.

Other barriers to retaining the right staff include the administrative requirements and complexity of hiring casual employees as opposed to part time staff.

## **Occupational Health and Safety issues and risks**

Practices must deal with a wide array of patients from different backgrounds and medical histories, and accordingly, practice staff are likely to experience stress from dealing with difficult patients. In addition, injuries can occur as a result of patient contact such as injuries arising from syringes.

## **Ageing workforce**

Medical practices are currently feeling the effect of an ageing workforce with a large number of doctors in, or making the transition to, retirement. This is resulting in doctors reducing their hours of practice.

Among practice staff more generally, an issue associated with the ageing of the workforce is that older workers are not as highly skilled in IT.

## **Selling a business**

Doctors are increasingly looking to sell their business for the goodwill attached to the enterprise as well as the buildings, land and any other assets associated with the practice.

In providing information and services to doctors owning medical practices, Small Business Victoria should have regard to this development.

### **Information and advice in the event of natural disaster**

Medical practices would welcome more information being made available to them regarding their local emergency response plan. There is a need for staff to have a clear idea of who to call for information in the event of a natural disaster and what role is to be played by doctors.

In this regard AMA Victoria acknowledges the development of the State Health Emergency Response Plan and supports this information being sent to medical practices across Victoria.

We also suggest that the government provide advice specific to businesses in metropolitan and rural and regional areas.

### **Use of the internet**

The internet is used within medical practices to a large extent, although this varies between individual practices. Commonly it is used for emails, internally and externally, hospital discharge summaries, referrals, and to receive updates from GP divisions.

Doctors report that the use of the internet has greatly enhanced their efficiency however the major barriers to its use are the costs charged by internet providers.

If you would like to discuss this, or any of the other matters contained within the submission, please contact Elizabeth Muhlebach, Policy Officer, on (03) 9280 8754 or [elizabethm@amavic.com.au](mailto:elizabethm@amavic.com.au) .

Yours sincerely



Bryce Prosser

**DIRECTOR, POLICY AND PUBLIC AFFAIRS**