



**Te Kaunihera
Rata o
Aotearoa**

Medical
Council of
New Zealand

Special purpose teleradiology scope of practice – change to location of supervisors

Executive summary

Te Kaunihera Rata o Aotearoa | the Medical Council of New Zealand (Council) determines the requirements for International Medical Graduates (IMGs) to obtain registration in Aotearoa New Zealand before they commence practising medicine.

Council acknowledges the importance of reviewing and updating its registration policies and pathways to ensure they are fit for purpose and enabling.

Proposal

Council is proposing to change the current requirement that IMGs registered in the special purpose teleradiology scope of practice must be supervised by doctors based in Aotearoa New Zealand. Introducing a degree of flexibility to the location of supervisors could potentially enhance the effectiveness of supervision arrangements, noting that supervisors would still have to be vocationally registered, hold a current practising certificate, and maintain a link to a New Zealand healthcare provider.

Introduction

Council is required to define the separate areas of medicine and specialties that make up the practice of medicine in Aotearoa New Zealand. One of these areas (or '*scopes of practice*') is the special purpose teleradiology scope of practice.

Special purpose registration is a temporary form of registration, enabling a doctor to work in New Zealand for a specific purpose and fixed time period. The special purpose teleradiology scope of practice enables IMGs without the approved New Zealand or Australasian postgraduate qualification to provide diagnostic teleradiology services to patients in Aotearoa New Zealand at specialist level for up to 12 months. Doctors registered in this scope must work in Council-approved employment and under approved supervision.

This document constitutes Council's consultation under section 14(2) of the Health Practitioners Competence Assurance Act 2003 on one such update - a variation to the location of supervisors for IMGs registered in the special purpose teleradiology scope of practice.

Requirements for registration

There are a number of requirements an IMG must meet to be eligible to apply for registration in the special purpose scope of teleradiology, if they do not hold an approved New Zealand or Australasian postgraduate qualification. The detailed requirements are set out in Council's [Notice of scope of practice and prescribed qualifications](#). They are also set out at Appendix 1 of this paper.

Providing teleradiology services (special purpose teleradiology scope)

A doctor registered in the special purpose scope of teleradiology is required to practise under supervision. Supervision reports must be completed on a 3-monthly basis by the supervisor and submitted to us. Currently, the doctor's supervisor must be the **relevant clinical director** of the New Zealand-based health provider (*emphasis added*). That is, the supervisor must be based in Aotearoa New Zealand.

The supervision arrangements should include:

- a. Details of the level of responsibility to be delegated to the doctor.
- b. An induction/orientation and supervision plan which contains details of how supervision will occur, including the frequency of meetings, and availability by video conference, telephone, and email of the supervisor.
- c. An audit carried out by the supervisor of 30 consecutive cases for each reporting radiologist to coincide with the first 3-month supervision report.

Registration in the special purpose teleradiology scope of practice is for a maximum period of 12 months. If the registrant wants to continue practising in this scope of practice after that time, they will need to re-apply for registration.

Proposal – amendment to the requirement that a supervisor is based in Aotearoa New Zealand

Council is proposing to change the current requirement that IMGs registered in the special purpose teleradiology scope of practice must be supervised by a vocationally registered doctor based in Aotearoa New Zealand. Instead, the approved supervisor could be located offshore, provided they maintain vocational registration in Aotearoa New Zealand, hold a current practising certificate, and are linked to a New Zealand healthcare provider.

Rationale for the proposal

Introducing a degree of flexibility to the location of supervisors could potentially enhance the effectiveness of supervision arrangements (noting that supervisors would still have to be vocationally registered, hold a current practising certificate and maintain a link to a New Zealand healthcare provider). For example, if a supervisor is in the same country (or nearby country) as an IMG practising in the special purpose scope of teleradiology, this increases the opportunity to conduct face-to-face supervision meetings or training sessions in a similar time zone.

Council acknowledges the importance of continually reviewing and updating its registration policies and pathways to ensure they are fit for purpose and enabling.

Your views are important

To inform Council's decision-making you are invited to respond to the following questions.

1. Do you support the proposal to introduce a degree of flexibility around the location of supervisors for doctors registered in the special purpose teleradiology scope of practice?
2. Do you see any potential adverse consequences or risks, and if so, how can they be mitigated?
3. Do you have any other comments regarding the proposal?

Submissions

We invite you to provide feedback. This will be considered carefully before we make any decisions.

Please provide written submissions by completing the survey questions [online](#). Alternatively, you can email your submission to consultation@mcnz.org.nz. The consultation closes on **18 August 2025**.

Any decision made as a result of this consultation will be shared with stakeholders and all consultation respondents.

Publication of submissions

We publish submissions at our discretion on our website. Published submissions will include the names of the individuals and/or the organisations that made the submission unless confidentiality is requested.

Please advise us if you do not want all or part of your submission published.

We will not place on our website, or make available to the public, submissions that contain offensive or defamatory comments or which are outside the scope of the subject of the consultation.

Appendix 1

Requirements for registration in a special purpose teleradiology scope of practice

The applicant must:

- a. have a postgraduate qualification in diagnostic radiology, approved by Council;
- b. be registered in a jurisdiction where they are able to gain a postgraduate qualification approved by the Council;
- c. have been in active clinical practice (at least 20 hours per week) in the vocational scope of diagnostic radiology for at least 22 out of the last 36 months;
- d. be providing radiology services under contract to a health provider located in New Zealand and be fully credentialed by the health provider (this process having been undertaken prior to applying for registration); and
- e. work for an overseas facility that is accredited by an appropriate accreditation body.

The credentialing process must meet the following requirements:

- a. The health provider must be assured that the doctor has the qualifications, training and experience to carry out the specific procedures that the health provider requires within their specific clinical setting.
- b. The health provider must credential CPD throughout the period of registration.

The New Zealand based health provider must:

- a. have appropriate systems in place to provide supervision and induction, and to deal with complaints. This must include an agreement to fund the doctor to come to New Zealand if an investigation is necessary; and
- b. have a dispute resolution process to facilitate the fair, simple, speedy and efficient resolution of complaints. This process must include automatic notification of the relevant authorities in New Zealand and the doctor's home country should a complaint be received and must also permit and facilitate external review and investigation by those authorities.

An appropriate accreditation body would be a suitable national or international accreditation body. International Accreditation New Zealand (IANZ) accreditation is required where available.