



**Te Kaunihera  
Rata o  
Aotearoa**

Medical  
Council of  
New Zealand

## **Expedited pathway for registration in the Provisional Vocational scope of practice**

### **Consultation under section 14(2) of the Health Practitioners Competence Assurance Act 2003 on a proposed new prescribed qualification**

#### **Introduction**

Te Kaunihera Rata o Aotearoa | 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. While public safety and maintaining standards of the profession is paramount, it is important that Council continually reviews and updates registration policies and pathways, to ensure they are fit for purpose and enabling, particularly in light of current workforce pressures.

Council is considering prescribing a new qualification for specialist IMGs. This new qualification will provide for an expedited pathway for specialist registration in the Provisional Vocational scope of practice.

Under the existing pathway for Provisional Vocational registration, Council relies on medical Colleges to assess and provide advice on applicants' qualifications, training and experience.

Under the proposed expedited pathway, applications for registration – in approved areas of medicine and where the applicant holds an approved postgraduate qualification – will be determined without relying on advice from the relevant medical Colleges. This will decrease the overall timeframe for processing applications for eligible IMGs to gain Provisional Vocational registration and commence practice. It will also reduce the overall workload of Colleges to allow them to focus resources on more complex applications.

Recognising Council's overarching objective of ensuring public safety, the pathway would be specifically applied to IMGs who have completed approved postgraduate medical training and in approved areas of medicine. In determining what postgraduate medical training and areas of medicine should be approved, Council will specifically focus on the postgraduate qualifications and areas of medicine that, in Council's experience, has provided a demonstrably competent and safe cohort of registrants.

This document is in two parts:

- Part A - Consultation on the proposed new pathway to registration (prescribed qualification)

- Part B - Request for views on the postgraduate qualifications and areas of medicine that Council may approve.

### **Part A - Consultation on proposed new pathway to registration (prescribed qualification)**

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 Provisional Vocational scope of practice. This scope is applied to doctors commencing practice in Aotearoa New Zealand at specialist level. Council is also responsible for formally '*prescribing*' the specific qualifications that doctors must have to be eligible to be registered in each scope of practice.

#### **Existing pathway for registration in the Provisional Vocational scope of practice**

Under the current pathway, an applicant requires a positive, individual assessment of their qualifications, training and experience. The core requirement is that Council must be satisfied that the IMG has qualifications, training and experience *equivalent to, or as satisfactory as*, that of a New Zealand vocationally-trained doctor registered in the same area of medicine.

Council requests the relevant medical College to assess the application and provide advice (either paper-based or via an interview) on whether the combination of the IMG's qualifications, training and experience is *equivalent to or as satisfactory as*. Council is the final decision maker in respect of applications for Provisional Vocational registration.

Council requires the relevant medical College to provide preliminary advice within six weeks and interview advice within four months of submitting the request for assessment of the IMG's application. Overall, the process can take up to 6 months before a final determination is made.

#### **Proposed new pathway (additional qualification) for registration in the Provisional Vocational scope of practice**

Council proposes to prescribe the following new pathway (additional qualification) for registration in the Provisional Vocational scope of practice. That is, an applicant:

1. holds a primary medical degree from a university medical school approved from time to time and published on the Council's website.
2. holds an overseas postgraduate medical qualification awarded at the end of a period of specialist training and approved by Council.
3. intends to practise in New Zealand in an area of medicine approved by Council.
4. prior to application, has a minimum of 2 years' clinical experience in the past 5 years practising in that area of medicine, in a country recognised by Council as having a health system comparable to Aotearoa New Zealand.<sup>1</sup>
5. is on the specialist register in the country where they have completed postgraduate medical training.<sup>2</sup>

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<sup>1</sup> Council currently recognises 24 [countries](#) as having health systems comparable to Aotearoa New Zealand.

<sup>2</sup> An applicant who meets the requirements of the prescribed qualification would also have to satisfy the statutory requirements under section 15(1) of the Health Practitioners Competence Assurance Act 2003 to be fit for registration and competent. For example, the applicant would need to satisfy Council's English language requirements and reference policy.

In contrast to Council's existing provisional vocational pathway, the proposed new qualification (i.e. expedited pathway) would remove the need to seek advice from the relevant medical College. Instead, the application would be considered and determined by Council without reference to the College.

In implementing the pathway, Council considers it important to retain the flexibility to approve and vary the postgraduate medical qualification and areas of medicine from time to time. As such, Council will maintain a list of approved postgraduate medical qualifications and areas of medicine, which will be subject to regular review. This is discussed in Part B.

### **Rationale for the proposed new qualification**

Noting the current health workforce pressures, particularly in the medical profession, it is important that Council continually reviews and updates registration policies and pathways to ensure they are fit for purpose and enabling. The current proposal to create an expedited pathway seeks to ensure that eligible specialist IMGs can obtain registration in the Provisional Vocational scope of practice within a shorter timeframe.

Recognising Council's overarching objective of ensuring the protection of public health and safety in any new pathway, the starting point for this proposal is a conservative one. It is based on the principle that Council will only apply this to combination of qualifications (including the jurisdictions in which the qualifications were acquired) and areas of medicine that, in Council's experience, have provided a demonstrably competent and safe cohort of registrants.

Under the existing pathway for Provisional Vocational registration, the process can take up to 6 months before a final determination is made. Conversely, applications for registration via the proposed expedited pathway will be approved without relying on advice from the relevant medical Colleges. This will decrease the overall timeframe for processing applications for eligible IMGs to gain Provisional Vocational registration and commence practice. It will also reduce the overall workload of Colleges to allow them to focus resources on more complex applications.

### **Principles guiding the prescribing of new pathways (qualifications)**

In making this proposal, Council has also considered the principles outlined in section 13 of the Health Practitioners Competence Assurance Act 2003, which guide the prescribing of qualifications. That is, the qualifications must be necessary to protect members of the public; may not unnecessarily restrict the registration of persons as health practitioners; and may not impose undue costs on health practitioners or on the public.

Council's view is that the proposed qualification will maintain the high standard required of applicants for registration and reinforce the existing focus on the protection of the public. With reference to the guidance section 13 provides, Council believes that the proposal will enable, rather than restrict, the registration of IMGs. In addition, through the creation of an expedited pathway, Council considers costs of registration will overall be reduced.

### **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 for an expedited pathway, where registration may be approved without the input of the relevant college, if the applicant has a specified qualification and recency of practice? If so, why?
2. As part of the new qualification, there is an active clinical practice requirement – an IMG must have a minimum of 2 years’ clinical experience in the past 5 years practising in that area of medicine, in a country recognised by Council as having a health system comparable to Aotearoa New Zealand, prior to application. In your view, is this set at the right level?
3. Do you see any potential adverse consequences, and if so, how can they be mitigated?
4. Do you have any other comments regarding the proposal?

## **Part B - Postgraduate qualifications and areas of medicine that Council may approve**

As indicated, Council will separately maintain a list of approved overseas postgraduate medical qualifications for the purposes of this pathway, and approved areas of medicine to which this pathway can be applied. In this Part we set out Council’s indicative list of approved postgraduate medical qualifications and areas of medicine.

### *Postgraduate qualifications*

Recognising Council’s overarching objective of ensuring public safety, the proposal is initially aimed at IMGs who have completed postgraduate medical training in the United Kingdom (UK) or Ireland, noting that both countries are recognised by Council as competent authorities.<sup>3</sup>

### *Approved areas of medicine*

There are 36 areas of medicine that an IMG can be registered in and work as a specialist in Aotearoa New Zealand. There can be significant variation between scopes of practice in terms of how specialist training undertaken in another country compares to the training provided here. The current proposal is based on a review of assessment outcomes from the previous 5 years.

IMGs who have completed a full postgraduate medical training programme in the UK or Ireland (and gained a certificate confirming completion of specialist training), applying for provisional vocational registration in the four areas of medicine listed below, are predominantly assessed as *equivalent to a* New Zealand vocationally-trained doctor registered in the same vocational scope of practice, resulting in a demonstrably competent and safe cohort of registrants.

- Anaesthesia
- Emergency Medicine
- General Practice
- Internal Medicine.

For this reason, Council is proposing to include these areas of medicine in the initial implementation of this pathway.

Further, on reviewing the assessment outcomes of applications via the current pathway from UK and Irish specialist IMGs, we have identified the following areas of medicine that require additional

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<sup>3</sup> Council currently recognises the General Medical Council and the Irish Medical Council as competent authorities in accordance with a specific set of [criteria](#).

information as part of the consultation process before they can be included in the expedited pathway:

- Obstetrics and Gynaecology
- Psychiatry
- Diagnostic and Interventional Radiology.

### **Request for views**

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

1. The current proposal is initially aimed at IMGs who have completed postgraduate medical training in the UK or Ireland. We have also identified four areas of medicine initially suitable for the expedited pathway, as well as three areas of medicine that require further exploration.
  - a. Are there any additional areas of medicine that should be considered for IMGs who have completed postgraduate medical training in the UK or Ireland?
  - b. Are there any postgraduate qualifications from other countries that should be considered?
  - c. If so, what are the relevant postgraduate qualifications?
2. 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](mailto:consultation@mcnz.org.nz). The consultation closes on **30 July 2024**.

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.