



**Te Kaunihera
Rata o
Aotearoa**

Medical
Council of
New Zealand

Consultation

Recognition of UK PLAB licentiate examination for registration of IMGs in provisional general scope of practice

Executive summary

This consultation sets out two proposals for registration of International Medical Graduates (IMGs) in the Provisional General scope of practice in Aotearoa New Zealand based on an applicant having passed Part 1 and Part 2 of the United Kingdom (UK) Professional and Linguistic Assessments Board (PLAB) test.

The PLAB test is a pre-registration examination administered by the General Medical Council (GMC) with a view to ensuring IMGs have the right knowledge and skills to practise medicine in the UK.

We welcome your feedback on the proposals. It will be considered carefully before we make any decisions.

Introduction

Te Kaunihera Rata o Aotearoa Medical Council of New Zealand (Council) is the professional regulator of doctors in Aotearoa New Zealand. Our primary purpose is to protect the public by providing mechanisms to ensure that doctors are competent and fit to practise.

One of our key regulatory functions under the Health Practitioners Competence Assurance Act 2003 (HPCAA) is the registration of doctors, both Aotearoa New Zealand-trained and from overseas.

Under the HPCAA, the Council is required to define the separate areas of medicine and specialties that make up the practice of medicine in New Zealand. One of these areas (described as “scopes of practice” or “scopes”) is the Provisional General scope of practice. This scope is applied to doctors commencing practice in New Zealand at an early career, non-specialist level. Doctors registered in this scope must generally work for six to 12 months in Council-approved positions and under approved supervision.

The 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. In some cases, the “prescribed” qualification will be an identified medical degree, or fellowship of a medical college, but in some cases the Council will require a combination of a medical degree and additional training, or approved experience.

Council is considering prescribing new qualifications that will be accepted for registration of International Medical Graduates (IMGs) in the Provisional General scope of practice. Council acknowledges the importance of ensuring its pathways for registration are fit for purpose and enabling. We must be assured that the introduction of a new registration pathway consisting of new prescribed qualifications, or any proposed changes to the existing examinations pathway do not pose risks to public health and safety.

This consultation sets out two proposals. Council is considering implementing both proposals and seeks your feedback, including on potential benefits and risks.

Proposals

Proposal 1 – New Registration Pathway (PLAB/Foundation Year 1)

1. Prescribing a new qualification for the registration of IMGs in the **Provisional General** scope of practice in Aotearoa New Zealand, consisting of:
 - a. Passing Part 1 and Part 2 of the PLAB test;
 - b. Successfully completing Foundation Year 1 (FY1) of the UK Foundation Programme; and
 - c. Holding full general registration with the GMC.
2. In connection with this, prescribing a new qualification for registration in the **General** scope of practice for IMGs who meet all the requirements at (1) above, by requiring* that they:
 - complete one year (full-time equivalent) of satisfactory supervised practice working within the Provisional General scope in a position to be determined by the Council (based on work experience in the UK), under supervision approved by the Council;
 - achieve advanced cardiac life support (ACLS) certification in the last 12 months at the level of New Zealand Resuscitation Council CORE Advanced for doctors working in hospital-based practice; or CORE Immediate for doctors working in general practice or non-clinical based practice; and
 - are recommended for registration within the General scope by their supervisor, who has been the applicant's supervisor for at least 3 months immediately prior to the application.

Proposal 2 – Amended Examinations Pathway (PLAB as alternative to NZREX)

3. Recognising passing Part 2 of the PLAB test as an alternative to IMGs passing the New Zealand Registration Examination (NZREX Clinical), to gain registration in the **Provisional General** scope of practice via the existing examinations pathway.
4. Registrants would be required to complete the same structured two-year internship as NZREX graduates, within an accredited pre-vocational medical training programme.
5. To be eligible to apply for provisional general registration via this pathway, Council will require IMGs to have passed Part 2 of the PLAB test within the previous 5 years.¹

* These are the same requirements as those currently in place for doctors registered under the Council's pathway (Pathway 5) for Australian General Registrants.

Background

Registration – scopes of practice and pathways

Doctors apply for registration in a specific scope of practice. The Council offers several scopes of practice and different ‘pathways’ to registration within these scopes.

Broadly, there are three categories of scopes of practice, including general, vocational, and special purpose scopes. Both the general and vocational scopes of practice have associated provisional scopes, which require a registrant to work under approved supervision and in approved positions, before applying for full registration in that scope.

There are different pathways that set out the prescribed qualifications (or eligibility criteria) for registration in a particular scope of practice. Currently, the pathways for registration in the provisional general scope of practice are:

[Pathway 1](#) – New Zealand and Australian graduates

[Pathway 2](#) – Examinations (NZREX Clinical)

[Pathway 3](#) – Competent Authority (UK & Irish graduates)

[Pathway 4](#) – Comparable Health System

[Pathway 5](#) – Australian general registrant.

Under Pathways 1 and 2, an applicant must hold a prescribed primary medical qualification, while under Pathways 3 to 5, the applicant must provide evidence of prescribed medical experience, in addition to a prescribed primary medical qualification. Further, all applicants must be considered fit for registration, including meeting the Council’s English language requirements, and be competent to practise in the scope of practice.

These scopes of practice and prescribed qualifications are published in the New Zealand Gazette, and we are required to consult on any changes we are proposing to make. The [current notice](#) of scopes of practice and prescribed qualifications for the practice of medicine came into effect in 2022.

The Provisional General and the General scopes of practice

In the provisional general scope, doctors must practise in a Council-approved position, under Council-approved supervision. We check that doctors have suitable experience for the level of position they wish to practise in. All IMGs applying for the general scope of practice will initially be granted a provisional scope.

By comparison, doctors registered in the general scope of practice can practise in any area of medicine, clinically and non-clinically, at any level. They must practise in line with Council’s professional standards, which require doctors to practise within their level of competence.

While doctors can practise at specialist (including general practitioner) level within these scopes, they are not defined as specialist scopes of practice, and we do not recognise such doctors as specialists.

Examinations pathway

The examinations pathway to registration in the provisional general scope requires the applicant to have sat and passed the NZREX Clinical. Passes are valid for five years. This pathway is used by

doctors who are not eligible for any other pathway to registration as a medical practitioner in Aotearoa New Zealand. The examination is an objective, structured clinical examination (OSCE), pitched at the level of a recent Aotearoa New Zealand medical graduate.

To be eligible to sit NZREX, an applicant must:

- hold an [acceptable primary qualification](#)
- satisfy our [English language requirements](#)
- have passed one of the following examinations within five years of the examination date they are allocated to:
 - PLAB test – Part 1
 - Medical Council of Canada Qualifying Examination (MCCQE) Part I
 - Australian Medical Council MCQ
 - United States Medical Licensing Examination (USMLE) Steps 1 and 2 (Clinical Knowledge).

Rationale for proposal 1 - New Registration Pathway (PLAB/Foundation Year 1)

The PLAB test is a robust form of pre-registration assessment. Part 1 of the PLAB test consists of a written examination in the form of multiple-choice questions and is already recognised by Council in relation to the examinations pathway (NZREX Clinical). Part 2 of the PLAB test takes the form of an OSCE (the same format as the NZREX Clinical). This allows for an in-person assessment of an IMG's competency in communication, history taking, physical examination, clinical reasoning, medical knowledge, and integration of said skills.

Council is proposing that in addition to passing PLAB, this pathway will require an IMG to have completed FY1 of the UK Foundation Programme. The overall approach of the programme is detailed in the [UK Foundation Programme Curriculum 2021](#). On applying to the UK Foundation Programme, all applicants must pass a Situational Judgment Test, which assesses knowledge of ethics and good medical practice.

During FY1, the IMG will undertake three 4-month supervised placements in different medical or surgical specialties. There is also a programme of assessment throughout FY1, culminating in an Annual Review of Competence Progression (ARCP). A satisfactory ARCP grants IMGs eligibility to apply for full general registration with the GMC.

Council identified similarities between FY1 of the UK Foundation Programme and the internship framework established in Aotearoa New Zealand, which ensures junior doctors continue to develop the broad-based core competencies and experience obtained during medical school. Combined with passing the PLAB test and ultimately, gaining full general registration with the GMC, Council considers this a strong framework for a new registration pathway.

Rationale for proposal 2 – Amended Examinations Pathway (PLAB as alternative to NZREX)

The PLAB test has international recognition and standing. One of the current pre-requisites to sit the NZREX Clinical is for an applicant to have passed Part 1 of the PLAB test. Part 2 of the PLAB test consists of an objective structured clinical examination, equivalent to the NZREX Clinical. It is logical

to amend the existing examinations pathway to recognise passing both parts of the PLAB test as an alternative to passing the NZREX Clinical to obtain provisional general registration.

Notes

The GMC has announced that the PLAB will be replaced by the Medical Licensing Assessment (MLA) from 2024. Like the PLAB, the MLA will be a two-part assessment made up of an applied knowledge test and a clinical and professional skills assessment. For the purposes of this consultation document, references to the PLAB should be taken as including references to the MLA as the scheduled successor to the PLAB.

Council acknowledges the challenges posed by having IMGs make up over 40% of our workforce. In particular, it is important that all doctors working in Aotearoa New Zealand are familiar with our cultural context, including the significance of Te Tiriti and our focus on cultural safety and health equity. Council has recently conducted trial workshops for newly registered IMGs to raise their awareness and understanding of these aspects, and is actively considering ways to develop this further in 2023.

Submissions

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

We will be holding consultation webinars early in the New Year to discuss the proposed changes and to answer any questions you might have.

The webinars will be on:

- **19 January 2023** at 11am and
- **25 January 2023** at 2.30pm

To register in advance for the webinar on 19 January 2023, click [here](#):

To register in advance for the webinar on 25 January 2023, click [here](#):

Please provide written submissions by completing the [survey questions online](#) by close of business on **1 February 2023**.

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.

Consultation Questions

1. Do you support the proposal for a new registration pathway based on an IMG passing the PLAB 1 and 2 tests, completing FY1 and obtaining full general registration with the GMC (proposal 1)?
2. What do you see as the main issues/benefits/risks with proposal 1?
3. Do you support the proposal for an amended examinations pathway recognising passing Part 2 of the PLAB test as an alternative to IMGs passing the NZREX Clinical (proposal 2)?
4. What do you see as the main issues/benefits/risks with proposal 2?
5. Do you have any other comments about these proposals?