



Policy on registration within a vocational scope of practice - Doctors who do not hold the approved New Zealand or Australasian postgraduate qualification

Policy Statement

This policy must be read with reference to the Medical Council of New Zealand (Council) *Policy on Registration in New Zealand* and the current *Memorandum of Understanding with the VEAB*.

This policy applies to international medical graduates (IMGs) who do not hold the approved Fellowship, Diploma or Certificate qualification, and have applied for vocational registration because they hold an overseas postgraduate medical qualification.

To qualify for vocational registration under this policy the doctor must:

- hold the prescribed qualification (ie a combination of qualifications, training and experience) that is assessed as being *equivalent to or as satisfactory as* the relevant approved qualification;
- be fit for registration (Health Practitioners Competence Assurance Act (HPCAA), section 16);
- be competent to practise medicine within the vocational scope applied for;
- meet Council's policy on English language requirements;
- complete a period of practice in a provisional vocational scope of practice (if applicable);
- complete any assessment requirements within a provisional vocational period; and
- be competent to practise independently and unsupervised.

Rationale

1. Council is responsible for protecting the health and safety of members of the public by providing mechanisms to ensure that doctors are competent and fit to practise medicine in New Zealand (HPCAA, section 3). Specifically, Council can only register a doctor who meets the following three requirements:
 - has a prescribed qualification. A prescribed qualification is an approved medical qualification or a combination of overseas / New Zealand qualifications, training and experience¹;
 - is fit for registration;
 - is competent to practise within the scope of practice for which he or she has applied.
2. The prescribed qualification for this pathway is qualifications, training and experience considered by Council to be "*equivalent to, or as satisfactory as*" the approved New Zealand or Australasian Fellowship, Diploma or Certificate (depending on the relevant vocational scope).
3. To be registered in a vocational scope the IMG² must demonstrate their competence in a broad vocational scope and within these domains: clinical expertise, communication, collaboration, management, scholarship and professionalism³.

¹ Council policy and the application of section 15 (2) means Council may treat any overseas qualification as a prescribed qualification.

² An IMG is a doctor who has a primary qualification awarded from an overseas (outside of New Zealand) educational institution / University.

³ The booklet *Good medical practice* and *Cole's Medical practice in New Zealand* outlines the domains of competence.

4. Council makes the decision on whether all three requirements have been met (refer para 1 above).
5. Council requests advice from the relevant Vocational Education and Advisory Body (VEAB) on:
 - whether the IMG holds the prescribed qualification; and
 - whether the proposed employment and supervision plan are appropriate.
6. The VEAB is the specialist New Zealand or Australasian college responsible for advising Council about matters related to a particular vocational scope.

Who can apply?

7. The IMG must hold an overseas postgraduate medical qualification to make an application.
8. The overseas postgraduate medical qualification must be awarded at the end of a period of specialist training and be in a recognised vocational scope (requirements for which are listed on the Council’s website).

General information

9. All IMGs are required to work in a provisional vocational scope of practice before vocational registration can be granted. Council determines the requirements the IMG needs to complete to obtain vocational registration, which includes supervised practice (with reporting) and / or types of assessments⁴.
10. Provisional vocational scope registration is granted to allow the IMG to complete set supervision and / or assessment requirements within 18 months of being registered in a provisional vocational scope.
11. The minimum period required on a provisional vocational scope is 12 months of satisfactory supervised practice. This allows an IMG’s competence to be confirmed, and for the IMG to be inducted to their new place of employment, and orientated to the New Zealand health system.
12. An exception to the 12 month supervised practice period is for an IMG that:
 - has completed the full United Kingdom (UK) training programme; and
 - holds either a:
 - Certificate of Completion of Training (CCT); or
 - Certificate of Completion of Specialist Training (CCST); or
 - Certificate of Accreditation (JCHMT/JCHTA/JCHST)⁵; or
 - Certificate of Satisfactory Completion of Specialist Training (CSCST); and
 - has VEAB advice indicating that his or her qualifications, training and experience is “equivalent to” the NZ or Australasian prescribed qualification.

This doctor will usually be required to complete 6 months of satisfactory supervised practice (refer para 15 below). Council will take particular note of any recommendation (with specific reasons) from a VEAB that an IMG should instead complete 12 months under supervision.

⁴ Section 19 (5) enables Council to have an examination or assessment undertaken for competence purposes. Clear reasons for competence concerns would need to be identified.

⁵ Council meeting December 2016.

Additionally, an exception may also be applied in the instances where

- the relevant VEAB has recommended that an IMG be placed on the provisional vocational supervision pathway, and
- the VEAB has recommended a reduction in the period of supervision required, and
- Council is in agreement⁶.

**Two
provisional
vocational
pathways**

13. If the IMG is deemed eligible for registration in a provisional vocational scope then the IMG will be registered in one of the following pathways:
- provisional vocational (**supervision pathway**); or
 - provisional vocational (**assessment pathway**).

**Supervision
pathway**

14. Eligibility for provisional vocational scope registration (**supervision pathway**) is granted if Council considers that:
- the IMG has qualifications, training and experience *equivalent to* that of the prescribed qualification, which is the New Zealand or Australasian Fellowship, Diploma or Certificate qualification;
 - the IMG is fit and competent for provisional vocational registration; and
 - the IMG appears able to achieve registration in a vocational scope of practice within 18 months of obtaining registration in a provisional vocational scope.
15. The IMG must meet the following requirements under the provisional vocational scope (**supervision pathway**):
- complete 12 months of satisfactory supervised practice or 6 months of satisfactory supervised practice if the IMG has completed the full UK training programme and holds the CCT; CCST; JCHMT/JCHTA/JCHST; or CSCST (unless specific reasons are provided by the VEAB that indicate 12 months is necessary); or where a reduction in the supervision period is recommended by the VEAB, and approved by Council staff (under delegation); and
 - enrol in the VEAB recertification programme, before making a change of scope application (refer para 50 below).
16. If an applicant for a vocational scope of general practice has the following combination of qualifications, training and experience in general practice, then the Registrar has delegated authority to depart from the standard RNZCGP recommendation:
- Membership or Fellowship of the Royal College of General Practitioners, and
 - Certificate of Completion of Specialist Training, and
 - 8 to 10 years of general practice experience in a comparable health system, and
 - Excellent references from senior medical colleagues attesting to the applicant's training, qualifications and experience to work as a specialist in general practice.

In these cases the applicant may be deemed eligible to apply for registration within a vocational scope of general practice after 12 months satisfactory supervised practice in New Zealand.⁷

⁶ Council meeting December 2016.

⁷ Council meeting October 2005.

17. The IMG must submit 3-monthly (quarterly) supervision reports to Council, until 12 months is completed or Council advises otherwise. These reports must be completed by the IMG and supervisor as they confirm the IMG's competence.
18. If unsatisfactory supervision reports are received, Council communicates concerns to the IMG and supervisor in an open and fair manner.
19. If the IMG is currently working in New Zealand under a special purpose (locum tenens) or a provisional general scope of practice, the Registrar has delegation to decide whether criteria has been met for the time spent working under supervision within this form of registration will be counted towards the period of 6 to 12 months of satisfactory supervision required for provisional vocational registration upon receipt of satisfactory supervision reports⁸. This will be approved if the Registrar is satisfied that the same supervision arrangements would have been in place for all forms of registration.

Assessment pathway

20. Eligibility for provisional vocational scope registration (**assessment pathway**) is granted if Council considers that:
 - the IMG has qualifications, training and experience **as satisfactory as** that of the prescribed qualification, which is the New Zealand or Australasian Fellowship, Diploma or Certificate qualification;
 - the IMG is fit and competent for provisional vocational registration; and
 - the IMG will be able to achieve registration in a vocational scope of practice within 18 months of obtaining registration in a provisional vocational scope.
21. The IMG must meet the following requirements under the provisional vocational scope (**assessment pathway**):
 - complete 12 to 18 months of satisfactory supervised practice under assessment;
 - enrol in the VEAB recertification programme, before making a change of scope application (refer para 51 below);
 - undertake any type(s) of *assessment* required (refer para 23 below.)
22. The IMG must submit 3-monthly (quarterly) supervision reports to Council, which must be completed by the supervisor and IMG. These reports are in addition to any assessment (refer para 23 below), as combined they are used to confirm the IMG's competence.
23. Procedural reports or a specific type of supervision relevant to the particular vocational scope may be requested. If so, the IMG must provide a copy of these reports to Council at 3-monthly intervals.
24. If unsatisfactory supervision or procedural reports are received, Council communicates the concerns raised to the IMG and supervisor in an open and fair manner.

⁸ Council meeting December 2012

Types of assessments	<p>25. The type of assessment may include any one or more of the following:</p> <ul style="list-style-type: none"> • a period of practice under assessment at a tertiary centre; • a vocational practice assessment (VPA) (refer to <i>Policy on vocational practice assessments (VPAs)</i> for further details); • specific type of reports (usually procedural assessment reports) completed whilst under supervision; • a multisource evaluation (by colleagues, patients and the IMG); • a formal audit of interventions in procedural based practice (the IMG should maintain a log book including names, numbers and outcomes of procedures performed); • sitting and passing a relevant examination⁹; • other forms of assessment, with evidence showing how an assessment is relevant to qualifications, training and experience.
Vocational Practice Assessments	<p>26. The VPA is Council’s preferred form of assessing competence for IMG’s on the assessment pathway. For information on who is required to have a VPA, the VPA process and the tools used, refer to the <i>Policy on vocational practice assessments (VPAs)</i>.</p> <p>27. The VPA is held after the completion of the full supervised period. If there is a break of 1 month or more in the IMG’s employment in NZ during this time, the IMG is required to return to work for at least 3 months of continuous supervised practice (one block of time) before the VPA is undertaken.</p>
Return to practice from overseas	<p>28. If the IMG leaves NZ to practise overseas and does not complete their period of supervised practice or any assessment (eg VPA), and then returns to NZ, then the IMG is required to meet the following requirements prior to the VPA and / or completion of other assessment requirements :</p> <ul style="list-style-type: none"> • Return to practice in NZ within 3 years – complete at least 3 months of continuous supervised practice under assessment, or complete the remaining period of their supervised practice (whichever is the longer). • Return to practice in NZ after 3 years – complete at least 6 months of continuous supervised practice under assessment, or complete the remaining period of their supervised practice (whichever is the longer). These IMGs are also required to comply with Council’s <i>Policy on doctors returning to medical practice in New Zealand after an absence of 3 or more years working overseas</i> and the <i>Policy on restoration to the medical register</i> (whichever is applicable). <p>29. The next section below provides detailed information about the process Council follows.</p>

⁹ Examinations will only be recommended in exceptional circumstances.

Vocational registration process	<p>30. The vocational registration process comprises 4 steps, which must be completed before an IMG can be granted vocational registration.</p> <ul style="list-style-type: none"> • Step 1 -Assessment of fitness, competence and qualification requirements for registration in a provisional vocational scope. • Step 2 -Decision on the IMG’s eligibility for provisional vocational registration (supervision or assessment pathway)¹⁰. • Step 3 -Approval of employment, position and supervision. • Step 4 -Decision to grant vocational registration (moving from provisional vocational to vocational).
	<p>31. The IMG is advised in writing by email and / or letter at each step in the process.</p>
STEP 1	<p><u>Assessment of fitness, competence and qualification requirements for registration in a provisional vocational scope</u></p>
	<p>32. The IMG submits a vocational application and has their application assessed by Council staff. (Job offers are not required at this step of the application process but rather at Step 3 below.</p>
Fitness and competence	<p>33. Council staff reviews the application for completeness, and determines whether the IMG meets the initial fitness and competence requirements for provisional vocational registration.</p> <p>34. If the application is incomplete, the IMG must provide the remaining information within 2 months or the application will be closed. If the IMG wishes to re-apply then he / she has to submit a new application, including fees.</p>
Advice on the prescribed qualification	<p>35. Before Council makes a decision on whether the IMG’s holds the prescribed qualification (refer para 2 above), Council sends all information related to the IMG’s “qualifications, training and experience” to the appropriate VEAB for advice on:</p> <ul style="list-style-type: none"> • the relative equivalence of the IMG’s qualifications, training and experience to the following standard: the prescribed qualification, which is the New Zealand or Australasian Fellowship, Diploma or Certificate; and • the appropriate supervision period, and if any additional assessment may be required. (Refer para 23 above).
	<p>36. This information is only sent to the VEAB when the application is complete.</p>

¹⁰ Section 15 (1) is that qualifications, fitness and competence for registration must be taken into account before a doctor is registered in New Zealand.

- Types of advice**
37. There are two types of advice that can be requested, depending on where the IMG is located.
- **If the IMG is overseas**, then preliminary advice is requested. This is in the form of a paper assessment. If preliminary advice indicates that the IMG is not suitable for provisional vocational scope registration then the IMG is given the option of coming to New Zealand to attend an interview (final advice), or withdrawing their application.
 - **If the IMG is in NZ**, then final advice is requested. This is in the form of an interview with the VEAB.
38. Council requires the advice following interview to inform the final decision. The only exception is the vocational scope of general practice where only a paper assessment is conducted.
39. The VEAB liaises directly with the IMG to organise an interview within 3 months of receiving the complete application (if doctor goes direct to interview) or from when the doctor arrives in NZ. The IMG is expected to attend the first available interview unless delays are caused by extenuating circumstances.
40. After the final advice is received, Council decides whether the IMG can proceed to provisional vocational registration.

STEP 2

Decision on the IMG's eligibility for provisional vocational scope registration¹¹

41. A decision on eligibility for provisional vocational scope registration is valid for 2 years. The IMG is required to start work in NZ by completing Step 3 below, within this timeframe.
- Preliminary decision (Doctor is overseas)**
42. Council may decide that the IMG is allowed to start work but only under the provisional vocational (**assessment pathway**) in the first instance. This decision is based on the documents submitted in the application, registration history and the preliminary advice provided by the VEAB. Provisional vocational scope registration is granted on the condition that the IMG attends an interview with the VEAB as soon as possible upon arriving in New Zealand.
43. The preliminary decision process usually takes 3 months from the date a complete application is received at Council.
- Final decision (Dr is in NZ)**
44. A final decision is usually made by Council staff (under delegation), after the interview with the VEAB, on whether:
- the IMG is ineligible or unsuitable to proceed with provisional vocational registration; or
 - the IMG is eligible for provisional vocational registration; or
 - the IMG can continue on provisional vocational registration (having been registered based on Council's preliminary decision).

¹¹ Refer to 2 above.

45. It usually takes 6 months for a final decision to be made on an IMG's eligibility for provisional vocational registration and the requirements the IMG needs to meet for vocational registration. This is from the date a complete application is received at Council.

Not suitable to proceed

46. If, after the interview, Council finds that the IMG is unsuitable for (or cannot continue on) provisional vocational registration then Council staff propose to decline the application.

47. The IMG has the legal right to make written submissions or be heard on the proposed decision at the next available full Council meeting (section 21, HPCAA).

48. At the full Council meeting, a decision is made on whether to resolve to:

- decline the application; or
- approve the IMG's eligibility to proceed down this pathway; and
- determine the requirements that the IMG must complete to gain vocational registration.

STEP 3

Approval of employment / position and supervision plan (starting work in New Zealand)

49. Before the IMG can start work in the provisional vocational scope in New Zealand, the IMG's employment / position and supervision plan must be approved by Council. The IMG is required to send a job offer / letter of appointment, job description, and comprehensive supervision, induction and orientation plan, and a current curriculum vitae (if applicable) to Council.

50. **Supervision pathway:** The employment / position and supervision plan must meet Council's guidelines outlined in the publication *Orientation, Induction and Supervision*¹².

51. **Assessment pathway:** Council staff seek advice from the VEAB on the employment, position and supervision plan which must meet Council's guidelines outlined in the publication *Orientation, Induction and Supervision*¹³.

52. Approval of employment / position and supervision plan usually takes 20 working days from the date complete documentation is received at Council.

STEP 4

Decision to grant vocational registration (moving from provisional vocational to vocational)

53. Once the supervision and / or assessment requirements have been satisfactorily met, the IMG must apply for a change of scope¹⁴ from a provisional vocational to a vocational scope of practice.

¹² The *Orientation, Induction and Supervision* booklet is on the website and outline's Council's minimum supervision requirements. The booklet includes reference to the Approved Practice Setting (APS) model of supervision. The applicability of this to doctors who are provisionally vocationally registered is still being considered by Council.

¹³ Refer to 8 above.

¹⁴ The change of scope application confirms to Council that the provisional requirements have been met with both the IMG and supervisor signing the form. It confirms the IMG is able to practise independently and unsupervised.

Satisfactory completion of requirements

54. Completion of the requirements in the provisional vocational scope, confirms to Council that the IMG is:
- practising at the level of a New Zealand-trained doctor holding the prescribed Fellowship, Diploma or Certificate qualification;
 - practising at the level of a doctor registered in the same vocational scope and; and
 - competent to practise independently and unsupervised across the broad vocational scope of practice.
55. A change of scope from a provisional vocational scope of practice to a vocational scope of practice is approved:
- on satisfactory completion of the period of supervised practice;
 - when all assessment requirements have been satisfied (if applicable);
 - the IMG has shown he / she is competent and capable of independent, unsupervised practice;
 - the IMG has met all three HPCAA requirements for eligibility for a vocational scope of practice (refer para 1 above).
56. The change of scope application takes 20 working days to process from receipt of the complete change of scope application.
57. If all is satisfactory, the vocational scope is effective from the date of receipt of the complete change of scope application.

Unsatisfactory completion of requirements

58. If the IMG fails to satisfactorily complete the requirements at the end of the supervision or assessment period (up to a maximum period of 18 months), then the IMG's registration in a provisional vocational scope and the requirements to be completed are reconsidered at a full Council meeting.
59. Council may direct the IMG to either up skill in an identified area(s) requiring development or to satisfactorily complete other types of assessments (refer to para 23 above).
60. There is no typical outcome from a full Council meeting, as each case is considered on its own merits.

Conditions for supervision / assessment requirements

61. Completing the supervision / assessment requirements may be noted as a condition on the IMG's practising certificate. Conditions may also include that the IMG has a limited scope of practice and can only deliver certain health services.

Non-compliance with conditions

62. If the IMG has conditions on their scope of practice to ensure competence within a vocational scope, and fails to satisfy those conditions within 2 years, the Registrar may refer the IMG's application for a practising certificate (PC) to a full Council meeting (section 27(1)(b) HPCAA). Council may:
- extend registration within a provisional vocational scope for a further period; or
 - propose to either place restrictions on, or propose to decline to issue, the PC (s28 HPCAA), and give the IMG an opportunity to make written submissions and be heard by Council; and
 - then make a decision on whether or not to issue a PC.

Varying the prescribed qualification

63. The Registrar has the delegation¹⁵ to vary a prescribed qualification¹⁶, and approve applications for registration within a vocational scope of practice limited to a subspecialty.
64. In varying the prescribed qualification, the Registrar proposes to limit the health services that the IMG will be permitted to perform and is assured that the varied qualification is adequate for the performance of the health services and to protect public health and safety.
65. Written agreement from the IMG is required before a variation to the prescribed qualification is confirmed.
66. If there are any concerns about the individual application or if the IMG objects to their vocational scope of practice being limited, then the matter will be referred to a full Council meeting.

Limiting the IMG's practice

67. Conditions to limit the IMG's practice may occur when an IMG has narrowed their specialist practice to a sub-specialty area, or if an application has been brought to a full Council meeting.
68. If the IMG has not been assessed for general medical competence¹⁷ in the broad vocational scope, then the IMG may be authorised to practise only within a limited vocational scope. The IMG would be subject to conditions imposed by Council under section 22 of the HPCAA. The conditions would be noted on the IMG's PC.

Notes

69. All IMGs applying for registration within a vocational scope of practice must be intending to practise in New Zealand. Registration will only be granted once the IMG has arranged suitable employment and has attended a registration interview to confirm their identity and documentation.
70. The vocational scope of practice is not a training pathway. This pathway is only for assessment of doctors who have completed their vocational training overseas. Registration will not be granted to enable a doctor to participate in a vocational training programme.
71. Training is deemed to be the full enrolment and participation in an accredited training scheme leading to conferment of the approved Fellowship, Diploma or Certificate qualification. Components of a training programme maybe used as an objective measure of the IMG's competence.

Information to the VEAB

72. Council informs the VEAB of the decision on provisional vocational registration, vocational registration and the outcome of a decision made at the full Council meeting.
73. If new information is presented on qualifications, training and experience (after the initial application is submitted), then Council requests advice from the VEAB on this information.
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¹⁵ Delegation of authority to Registrar –approved by Council on 9 and 10 June 2009

¹⁶ Section 15(3)(a) and (b) of the HPCAA

¹⁷ The Medical Council book, *Education and supervision for interns* outlines the attitudes, knowledge and skills expected to be learnt in the years immediately following graduation.

74. Council supervision reports are sent to the VEAB for their information only and not in relation to advice on vocational registration.

Document control	• Approved by Council	October 2006
	• Updated and approved by Council	July 2011
	• Changes to period of supervision for UK graduates approved by Council	October 2011
	• Updated to change 'BAB' to 'VEAB' following name change	August 2015
	• Additions to exception criteria for reduction in supervision period approved by Council	December 2016

Pathway to registration within a vocational scope for IMGs

