

15th July 2024

Executive Officer
Medical Council of New Zealand
Te Kaunihera Rata o Aotearoa
PO Box 10509
The Terrace
Wellington 6143
New Zealand
Via: consultation@mcnz.org.nz

Dear Executive Officer,

Re: Public Consultation on the Proposed Expedited Pathway for Specialist Registration in the Provisional Vocational Scope of Practice

The Royal Australasian College of Medical Administrators (RACMA) appreciates the opportunity to provide feedback on the consultation paper regarding the proposed expedited pathway for specialist registration in the Provisional Vocational scope of practice. The quality of specialist medical practitioners directly relates to the health system medical leadership role of our Members and their responsibilities for clinical governance, where patient safety and quality of care are paramount. We note the recent welcome statement by the Commissioner of Health NZ to place this patient-centred approach to the fore. RACMA values the opportunity to contribute to further strengthening the NZ health system through contributing to the thinking on the proposed expedited pathway for specialist registration.

About RACMA

The Royal Australasian College of Medical Administrators – RACMA – is the only specialist medical college that trains doctors to become specialist medical leaders and managers. Our education programs, including our accredited flagship Fellowship Training Program, aim to equip doctors with the leadership and management skills needed to influence and lead Australasian healthcare systems with the explicit aim of improving health outcomes for all peoples of Australia and Aotearoa New Zealand.

RACMA has over 1500 Members across Australia, Aotearoa New Zealand, and Hong Kong. The strength of RACMA is its members, who, through the skills of system leadership, clinical governance and workforce management, strive to lead for change and ensure the delivery of safe and quality healthcare for all. The RACMA membership is a highly regarded health system and medical leadership group as demonstrated by our members' roles and responsibilities across the public and private health sectors, in public sector policy, in primary health care, medical insurance, the tertiary sector, the defence forces and beyond. Some of the pivotal roles of our Members are as heads of health ministries, chief executives, chief medical officers, key leaders and decision-makers in medical research strategy and funding, medical directors, heads of departments, senior decision-makers in various regulatory and quality assurance organisations, and chairs and members of key industry committees.

RACMA Members occupy roles in the health system that consider whole-of-health-system delivery and are unique in their leadership of the health system and medical professionals, funding and financing,



systems and processes. The impact of that leadership is demonstrated in all public and private settings, primary and tertiary settings and health system reform.

Principles-Based Approach

We commend the Medical Council of New Zealand for seeking to address workforce pressures through innovative pathways while maintaining high standards of public safety. RACMA supports efforts to expedite the registration process for International Medical Graduates (IMGs) as long as there is an appropriately effective process to assure their competence and safety in the specialty, to New Zealand standards.

Issues of Consideration

1. Facilitating IMGs into NZ and Growing the Specialist Workforce

We acknowledge the need to grow the specialist workforce in New Zealand and recognise that facilitating IMGs' entry through expedited pathways is a potentially viable strategy. Paramount, however, is ensuring that this pathway does not compromise the quality of care and public safety.

2. Principle of Equivalency of Training Institutions

RACMA supports the recognition of equivalent training institutions, particularly those in the UK and Ireland, which have consistently produced competent and safe practitioners. This recognition should be based on rigorous assessments and historical data supporting the equivalency of training standards.

3. Recognition of the Colleges as Vocational Trainers

While the expedited pathway may streamline the registration process, it is crucial to acknowledge the role of the various medical specialist colleges as vocational trainers and assessors. The colleges' expertise and long experience in evaluating IMGs should be capitalised on. An escalation pathway involving the colleges should be established for cases where there are questions about an IMG's training, experience, or references.

4. Colleges' Responsibility and Role

The responsibility of specialist medical colleges in approving vocational registration is a significant consideration. While the Medical Council of New Zealand does not have to follow college recommendations, it is important to balance this with the colleges' responsibility to uphold professional standards.

5. Equity Considerations

The expedited pathway should ensure equity and fairness, avoiding any unintended bias towards applicants from traditionally recognised countries. It is crucial to consider the impact on applicants from diverse backgrounds to ensure the pathway is inclusive and fair.

6. Robust Clinical Governance

RACMA strongly emphasises the need to ensure robust clinical governance within the expedited pathway. Ensuring that IMGs adhere to stringent clinical governance frameworks will safeguard the quality and safety of healthcare services. This includes rigorous oversight, continuous professional development, and comprehensive support systems to uphold high standards of medical practice.



Response to Consultation Questions

1. Support for the Proposal

RACMA supports the proposal for an expedited pathway in principle, provided that the specified qualifications, recency of practice requirements and references are robust and ensure public safety. Streamlining the process may be beneficial, but safeguards must be in place to maintain high standards.

2. Active Clinical Practice Requirement

The requirement for a minimum of 2 years' clinical experience in the past 5 years in a comparable health system appears appropriate. This ensures that IMGs have recent and relevant practice experience.

3. Potential Adverse Consequences

Potential adverse consequences include the risk of inadequately vetted IMGs entering the workforce and impacting patient safety. Mitigating these risks involves rigorous qualification and reference assessments, ongoing supervision, and an established escalation pathway for questionable cases.

4. Additional Comments

RACMA emphasises the importance of maintaining collaboration with specialist medical colleges and ensuring that any expedited pathway remains flexible and adaptive to changing healthcare needs and workforce dynamics.

Conclusion

RACMA is committed to supporting policies that enhance the medical workforce while maintaining high standards of care and public safety. We appreciate the opportunity to contribute to this consultation and look forward to continued collaboration with the Medical Council of New Zealand.

Yours sincerely,

Dr. Helen Parsons CSC FRACMA
RACMA President

