27 May 2016

Sidonie
The Medical Council of New Zealand
PO Box 10509
WELLINGTON 6143

By email consultation@mcnz.org.nz

Dear Sidonie

Re: The Medical Council of New Zealand’s Proposed Changes to Registration Policies

The Royal Australian and New Zealand College of Psychiatrists (RANZCP) welcomes the opportunity to respond to the Medical Council of New Zealand’s proposed changes to registration policies.

1. Proposal to Introduce Primary-source Verification

The RANZCP is pleased to note that the Medical Council of New Zealand (the Council) is reviewing the registration process in regards to primary-source verification.

The Council is proposing that verification will be undertaken by the Educational Commission for Foreign Medical Graduates using an Electronic Portfolio of International Credentials (EPIC) process.

Under the Health Practitioners Competence Assurance Act 2003 the Council is a responsible authority with a role in protecting patients from harm by assuring the public that medical practitioners are fit and safe to practice. If individuals are able to obtain medical registration based on inaccurate documentation, then potentially there is an issue of patient safety.

For these reasons, the RANZCP supports the Council’s proposal requiring doctors seeking registration in New Zealand to have their primary documents verified by a third party. The only exception we would make is when the doctor possesses a New Zealand or Australian graduate or postgraduate qualification that could be verified with their relevant medical college or medical school.

Below, the RANZCP has provided feedback on your questions relating to the Council’s proposals on primary-source verification.

1. Should primary-source verification of this nature be implemented for applicants for registration?

The RANZCP can see no reason why the EPIC process cannot be a standard requirement for all doctors seeking registration in New Zealand. To ensure every doctor is treated in the same way, we strongly advocate that doctors from competent authorities are not excluded from the process as they are capable of presenting fraudulent materials in
the same way any other doctor could. There have been examples in the United Kingdom where individuals have used other people’s documents to gain registration (Kelly, 2011).

The RANZCP does not believe it is necessary to make it a requirement that New Zealand or Australian graduates must seek verification of their documents through EPIC. The credentials relating to a New Zealand graduate (primary and/or postgraduate) could be verified with the university or relevant medical college. We would support a similar process for Australian graduates or postgraduates.

2. **If yes, should it be made to apply to international graduates (IMGs) only or should New Zealand graduates (primary and post-graduates) also be included?**

   We have answered this question above.

3. **If it is to apply to IMGs only, should this include Australian graduates?**

   We have answered this question above.

4. **If it is apply to IMGs only, should this include graduates of competent authorities (UK and Ireland)?**

   We have answered this question above.

5. **Should it apply to first-time graduates only or should it include those who already hold another form of registration**

   Primary source verification should be required on first application and for subsequent applications for registration only if they involve a different level of qualification. For instance, if the first registration was provisional general but the subsequent registration is for provisional vocational based on additional qualifications, then this subsequent registration needs to be verified as well.

6. **Should it apply to applications for permanent registration only (i.e. provisional general/general and provisional vocational/vocational) or should special purpose applications be included?**

   As noted in our response to question one, the RANZCP supports verification of credentials for doctors seeking registration within the general and vocational scopes, including provisional registration.

   We note that registration with special purpose scope of practice covers a range of roles including visiting experts coming to teach in New Zealand, doctors undertaking postgraduate training to gain experience and skills in New Zealand, doctors undertaking research and locum tenens.

   The locum tenens are granted registration to work in a specialist post in New Zealand up to 12 months. New Zealand is highly dependent on locums to deliver healthcare. Subsequently, doctors practising as locums may hold fairly responsible positions and have high levels of patient contact (Atmore, 2015). Many locums are highly mobile, both within New Zealand and internationally and anecdotally they do not remain long in one position so they can be difficult to track if something does go wrong. The RANZCP
believes that specialists working in locum positions could potentially pose a greater risk to patient safety than other groups, therefore we argue that locums must be included in the EPIC process.

While it may not be necessary to vet the credentials of a doctor undertaking research, it is probably more efficient to require all doctors seeking registration with special purpose scope of practice to have their documents verified through EPIC.

7. **Do you have any thoughts on the impact of this change in terms of timeframes for submitting applications and the cost of undergoing EPIC verification?**

The EPIC process may impact on timeframes as we understand that some time is required to verify a doctor’s documents. We understand that once a doctor has an application with the EPIC process, it can be easily accessed and presumably used again with greater ease.

The process will increase the costs associated with seeking registration as a doctor in New Zealand. However, the fees relating to the verification process appear reasonable. In comparison, the New Zealand Qualifications Authority who verifies educational documents may charge up to $NZ 746.

8. **If EPIC verification is required, what validity period should the verification have?**

The RANZCP understands that the Police Clearance Certificate for entry into New Zealand must be less than six months old at the time the application for immigration is lodged (Immigration New Zealand, 2016). We suggest that it would be appropriate to align EPIC validity with the same time period.

9. **Do you have any other comments?**

The RANZCP would assume that the Council has contacted other responsible authorities and relevant organisations e.g. the Education Council of New Zealand, to understand how other regulatory bodies manage issues relating to verification of documents.

2. **Proposal To Change of Scope Requirements**

The RANZCP does not have strong views on this proposal to recognise international medical graduates (IMG) general registration in Australia on the Medical Board of Australia (MBA) standard pathway as a prescribed qualification for the purposes of registration in New Zealand. However, we do note that – in order for this proposal to be successful – it will require effective communication between the MBA and the Council.

We support both proposals you have put forward on page six of the consultation document with registration option two (i.e. set at PGY2 provisional general with supervision) being implemented. Under that registration category, a requirement to complete a New Zealand based-cultural competence module should be included.

If you require further information regarding this submission, please contact the RANZCP’s New Zealand National Manager, Rosemary Matthews who supports the New Zealand
National Committee. Rosemary can be contacted on 04 472 7265 or by email Rosemary.Matthews@ranzcp.org.

Yours sincerely

Dr Mark Lawrence FRANZCP
Chair, New Zealand National Committee
Tu Te Akaaka Roa

Dr Debbie Antcliff FRANZCP
Chair, Vocational Educational Advisory Body Committee

References


Kelly T (2011) Doctor of deception: Nigerian lived in £1/2m home with children at private schools. But she was hiding a fake ID and may not have been qualified. 2 April 2011, Daily Mail, United Kingdom.

Medical Council of New Zealand (2016) Information on registration. Available at: www.mcnz.org.nz/get-registered/how-to-register

New Zealand Qualifications Authority (2016) information on fees for verification of documents. Available at: www.nzqa.govt.nz