

Medical Council Consultation Feedback Form
DRAFT Section 11 Registration Rules July 2010

Name of individual or group:	Irish Medical Organisation (IMO)
Organisation and Job Title:	
Contact details:	IMO House 10 Fitzwilliam Place Dublin 2 Tel: 01 676 72 73
Date:	14 September 2010
For group responses, please indicate the number of people responding:	6500
<p>If you wish to make comment on specific rules please enter your comment in the appropriate box below. Space has also been provided at the end of this document for general comment.</p>	
GENERAL DIVISION	
Draft Rule Number:	COMMENTS:
1.	
2. (a)	
2. (b)	
3. (a)	
3. (b)	
3. (c)	
SPECIALIST DIVISION	
4.	
5.	
6. (a)	
6. (b)	
7.	

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DRAFT Section 11 Registration Rules July 2010

TRAINEE SPECIALIST DIVISION	
8.	
9.	
10. (a)	
10. (b)	
10. (c)	
11.	
12.	
ENGLISH LANGUAGE SKILLS	
13.	
GENERAL COMMENTS:	
<p>GEN1: Do you understand the Rules?</p> <p>The IMO understands that the draft amendments to the Registration rules intends to allow physicians with equivalent overseas qualifications to apply for inclusion in the general division and specialist division of the Register using their overseas qualification rather than the Pre-Registration Examination (PRES). This appears to be a pragmatic recognition that these equivalent qualifications are at least as suitable as the PRES to determine eligibility.</p>	
<p>GEN2: Are there any rules where a principle is not clearly explained?</p> <p>There was an irregularity with the General Register where a doctor could come to Ireland practice medicine for just less than one year and at the time when he would have show proof of his ongoing competence assessment he could leave the country, having practiced for one year without ever having been assessed.</p> <p>The Certificate of Experience approach to entry onto the General Register must guarantee that the doctor has undergone some form of assessment.</p>	
<p>GEN3: Are there any issues which you feel ought to but have not been addressed by these rules?</p> <p>There is another anomaly whereby a physician on the General Register may practice in any speciality without having received formal training in that speciality. This undermines the value of the Specialist Register. It appears this anomaly is not addressed by these rules.</p> <p>The IMO are of the view that only those who are specialist trained and registered should practice independently. This would not necessarily mean that those on the General Register must work in a fully supervised and structured training environment but that their practice should have clinical oversight by someone who is on the Specialist</p>	

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Register.

The rules also fail to address the unforeseen consequence arising from the Medical Practitioners Act 2007 and the restrictions placed upon doctors registered on the Specialist Training Register (in that they cannot undertake clinical work such as locum work outside of the post which they are registered in).

GEN4: If you wish to make comment generally on the draft Rules, please use the space provided below:

The IMO would like to make a further comment regarding the rules of registration. Currently cervical smear tests are sent to US company Quest Diagnostics for analysis under contract with the National Cancer Screening Service. US Doctors sign off on the results of these tests without being registered with the Irish Medical Council. The Medical Practitioners Act should be amended to include the requirement for Irish registration for Doctors outside the State supplying services to this State.