

Medical Council Consultation Feedback Form  
Draft Amendments to Registration Rules in particular for the purposes of  
registration in the General Division. – June 2011

Name of individual or group:	Irish Medical Organisation
Organisation and Job Title:	Irish Medical Organisation
Contact details:	IMO House  10 Fitzwilliam Place  Dublin 2  Tel: 676 72 73
Date:	20 June 2011
For group responses, please indicate the number of people responding:	
If you wish to make comment on specific amendments to the rules please enter your comment in the appropriate box below. Space has also been provided at the end of this document for general comment.	
REGISTRATION RULES	
DRAFT AMENDED RULE NUMBER:	COMMENTS:
2.(c)i	
2.(c)ii	
2.(d)i	
2.(d)ii	
10.(d)	
GENERAL COMMENTS:	
<p>GEN1: Do you understand the amendments to the Rules?</p> <p>Yes. The IMO understand that the amendments further clarify the rules allowing physicians with equivalent overseas qualifications to apply for inclusion in the General Division and the Trainee Specialist Division of the register.</p>	

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GEN2: Are there any amendments to the Rules where a principle is not clearly explained?

GEN3: Are there any issues which you feel ought to but have not been addressed by these amendments to the Rules?

The amendments to the Rules still fail to address the following issues raised by the IMO:

1. The Registration Rules fail to make provision for dual registration, whereby a doctor has completed training in one specialty and begins training in another.
2. There is no requirement for doctors outside the state who are providing advice, treatment or diagnosis to patients in Ireland, to be registered with the Medical Council. This currently takes place in Cytology where 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. This would not be allowed in the US where out-of-state practice of medicine without a licence is not allowed.
3. There is another anomaly whereby a physician on the General Register may practice in any speciality without having received formal training in that speciality. 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 Register.

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

The Medical Council must ensure that medical practitioners have a basic grasp of the lingua franca.

The IMO is also calling on the Minister for Health and the Medical Council to review Section 94 Subsection (1) of the Medical Practitioners Act with a view to a process being agreed whereby retired doctors can be permitted to remain on the medical register. The current interpretation of this Section will result in retired doctors being removed from the medical register thus preventing them from intervening in any emergency or accident.