

Public Consultation & Proportionality Assessment

Amendment to Registration Rules

You are invited to take part in our public consultation on changing our Registration Rules. These rules are changing to include the General Medical Council Professional and Linguistic Assessments Board (PLAB) exams as an alternative to the Medical Council's Pre-Registration Examination System (PRES) exams. The General Medical Council is the regulator of doctors in the UK.

The Medical Council is seeking the views of the public on adding an additional equivalent exam alternative. It is proposed that the current Registration Rules will be amended to include the PLAB, which will formally recognise its equivalence.

The draft Medical Council (Registration)(Amendment) Rules 2026 can be viewed [here](#).

We are also conducting a proportionality assessment on the proposed Registration Rules. As part of this assessment, and in addition to the request for general feedback, we are seeking stakeholder's views in respect of the proportionality of the amendments to the Registration Rules.

Proportionality

Directive 2018/958 of the European Parliament (which we will refer to as the Proportionality Directive) requires a proportionality assessment to be carried out by Member States before the introduction of a professional regulatory provision. A professional regulatory provision is a new, or the amendment of an existing, legislative, regulatory or administrative provision that restricts access to, or the pursuit of, a regulated profession. Medicine is a regulated profession in Ireland.

The Directive was transposed into Irish law by the European Union (Regulated Professions Proportionality Assessment) Regulations 2022 (S.I. No. 413 of 2022).

A proportionality assessment on the proposed Registration Rules amendment is necessary. As part of this proportionality assessment, the Medical Council is issuing a survey inviting stakeholders views. The responses to the survey questions will assist with this proportionality assessment. The Council is committed to ensuring that risk management is embedded both as part of normal day to day business, and informs the strategic, business and operational planning and performance of the organisation.

Background

The Medical Council has launched a public consultation on proposed new Registration Rules, which will amend the Medical Council's existing registration rules.

There are different ways to register with the Medical Council if a doctor wishes to practice in Ireland. Doctors who have qualified outside of the EU / EEA, and who do not hold a higher qualification, or an internship from a list of countries which is deemed equivalent to the Irish internship programme, may be required to pass, or be exempt, from the Pre-Registration Examination System ("PRES").

The PRES consists of two exam based elements:

- (i) PRES 2: a written exam made up of multiple-choice questions
- (ii) PRES 3: a clinical based assessment of Communication, Interpretation and Practical Skills

Additional information regarding the PRES can be found [here](#). There are a number of exemptions from the PRES exam. The full list of exemptions can be found on our website [here](#).

The General Medical Council in the UK also requires certain doctors who have qualified overseas to complete the Professional and Linguistic Assessment Board ("PLAB"). Similarly, there are two parts to the PLAB exam – PLAB Part 1 and PLAB Part 2.

Currently, some international doctors, who do not hold a higher qualification or an internship from a list of countries where that internship is deemed equivalent with the Irish internship programme, must pass PRES 3 to gain registration with the Medical Council.

The Medical Council is aware of issues with accessibility of the PRES 3 exam, arising from limited availability and resulting in long waiting times. This creates delays in doctors becoming eligible to enter the Irish workforce. To address this, the Medical Council conducted a review of comparable international assessments. Following this assessment, the Medical Council is of the view that the UK's PLAB 2 exams are an equivalent alternative.

Adding the PLAB 2 as an alternative exam to the Irish PRES Level 3 exam will alleviate delays for doctors seeking registration and increase efficiency in the registration process. In turn, this will enable eligible doctors to enter the healthcare system.

The Medical Council has generally recognised PLAB level 1 exam as equivalent to PRES level 2 exam in practice, and the proposed changes also reflect this administrative practice.

The Medical Council is of the view that the PLAB is equivalent (from a standards perspective) to the PRES exam. As such, the proposed Registration Rules provide for the following additional exemptions from the PRES exam:

- a. Applicants who have qualified outside of the EU / EEA and who have passed the PLAB 1 exam will be exempt from sitting the PRES 2 exam in order to gain access to the register.
- b. Applicants who have qualified outside of the EU / EEA and who have passed the PLAB 2 will be exempt from sitting the PRES 3 exam in order to gain access to the register.

As these Registration Rules relate to access to the profession a proportionality assessment is required. If you wish to engage with the Medical Council's consultation and proportionality assessment, please answer the survey questions at 1 – 2 below.

Privacy Notice / Data Protection

This survey is aimed at registered doctors, registered health care professionals, representative bodies and other relevant stakeholders, including the public. The survey is being conducted by the Medical

Council. Any personal information submitted to the Medical Council will be treated strictly in accordance with the General Data Protection Regulation 2016/679 and the Data Protection Act 2018.

Please note people can request to see the submissions we receive under the Freedom of Information (FOI) Act 2014 so information provided in the survey may be released in response to an FOI request. This is more likely to happen with responses from organisations. This means that the requestor might receive your answers to the survey, however, any personal information included in responses would be redacted prior to release.

Survey Outline

This survey should take no longer than 10 minutes to complete. Excluding information about you, the survey asks 2 questions.

Closing Date

The public consultation period will be live from 9th – 22nd June 2026.

Survey

1. About you

1.1. Are you completing this survey:

(a) In your personal capacity

Yes No

(b) As an authorised representative of an organisation/body, expressing the views of that organisation/body

Yes No

Note: if you are providing the views of an organisation, it is necessary that you provide your organisation name, your position and your name.

1.2. What is your name

Ryan Duffy

1.3. What organisation do you work for (if any)?

PSI- The Pharmacy Regulator

1.4. What is your job / position / role?

TCQR Holistic Assessment Officer

1.5. Describe your interest in this consultation process?

The PSI is the statutory regulator of pharmacists and pharmacies in Ireland, with responsibility for protecting public health and safety by regulating the practice of pharmacy.

We have an interest in this consultation given its relevance to:

- Access to regulated health professions
- Recognition of third-country qualifications and assessment routes
- Ensuring proportionate regulatory requirements while maintaining public safety

The PSI regularly engages with cross-regulator developments where they may inform broader regulatory approaches to registration, competence assurance, and patient protection.

2. Eligibility for Registration

Please complete the following question and provide a brief summary to support your response.

When answering the question, please have regard to the underlying objectives of the Medical Council, which include promoting and better ensuring high standards of professional conduct and professional education, training and competence among registered medical practitioners.

All doctors practising medicine in Ireland must be registered with the Medical Council.

Doctors who have qualified outside of the EU / EEA who want to register in the general or the trainee specialist division may be required to sit the Pre-Registration Examination System ("PRES").

The Medical Council has formed the view that the UK's General Medical Council's ("GMC") Professional and Linguistic Assessment Board ("PLAB") is equivalent to the PRES.

Therefore:

2.1 Do you think it is justified and proportionate that applicants who have qualified outside of the EU / EEA and who have passed a relevant PLAB exam are exempt from sitting the equivalent PRES exam in order to be eligible for registration with the Medical Council?

The PSI supports, in principle, the recognition of alternative assessment pathways such as the PLAB, where these can be demonstrably shown to assess competence to a standard equivalent to the PRES. Enabling applicants to meet registration requirements through an equivalent examination route can represent a proportionate approach, particularly where it reduces unnecessary duplication and addresses practical constraints, such as limited examination capacity, without compromising standards.

In considering proportionality, it is important that the primary objective of registration requirements, namely, the protection of the public through the assurance of practitioner competence, is maintained. Recognition of an alternative examination should therefore be underpinned by clear and robust evidence of equivalence, including alignment in the assessment of clinical knowledge, practical skills, and professional behaviours.

The PSI also considers that communication and linguistic competence are fundamental components of safe and effective practice and are central to ensuring that an alternative assessment pathway remains proportionate from a public protection perspective. In this context, the inclusion of a communication element within the PLAB is an important safeguard. Given that the PLAB is administered by a regulator outside the EU/EEA, it is

important that there is clear assurance that the linguistic and communication standards assessed are appropriate to the Irish healthcare context and support effective engagement with patients and the wider healthcare system.

Subject to these considerations, the PSI considers that the proposed approach is consistent with the principles of proportionality, in that it facilitates access to the profession while maintaining the necessary safeguards to protect patient safety and public confidence.

2.2 Please provide any general observations you may have on the proposed Rule change to regard PLAB exams as equivalent to the PRES exams?

The PSI welcomes the Medical Council's intention to address delays and improve the efficiency of registration pathways, while maintaining appropriate standards of competence. The proposal to formally recognise PLAB as an equivalent assessment route has the potential to reduce unnecessary duplication and support timely access to the profession, which is consistent with a proportionate, risk-based regulatory approach.

A key consideration in this context is the basis on which equivalence has been determined. It is important that this is supported by clear and transparent evidence demonstrating alignment between PLAB and PRES in terms of the knowledge, skills, and professional behaviours assessed, as well as the standard expected of candidates. This transparency supports confidence in both the regulatory decision-making process and the resulting registration outcomes.

The PSI also emphasises the importance of ongoing quality assurance. Where alternative assessment pathways are recognised, it is important that equivalence is subject to periodic review to ensure that standards remain aligned over time supported by monitoring of outcomes such as registration trends, performance of registrants, and any relevant fitness to practise considerations. This enables a responsive, evidence-informed approach to maintaining public protection.

Overall, the PSI considers that the proposed amendment represents a reasonable and proportionate approach, if equivalence is robustly evidenced, clearly articulated, and subject to ongoing oversight, with public protection remaining central to the registration framework.

The public consultation is open from 9th – 22nd June 2026. You can provide your feedback by emailing communications@mcirl.ie with the phrase "Registration Public Consultation" in the subject line.