

Irish Association of International Doctors (IAID)

trainus.forireland@gmail.com

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To:

The National Recruitment Committees

The Irish College of General Practitioners (ICGP)

The Royal College of Physicians of Ireland (RCPI)

CC:

HSE National Doctors Training and Planning (NDTP)

The Medical Council of Ireland (IMC)

The Minister for Health

Re: Urgent Concerns Regarding New Barriers to Direct Entry to Postgraduate Training for Overseas International Medical Graduates (IMGs)

Dear Chairs of the Recruitment Committees,

On behalf of the Irish Association of International Doctors (IAID), I am writing to formally express our deep concern regarding the recently introduced changes to the eligibility and supporting documentation requirements for this year's postgraduate medical training recruitment process.

The Irish Association of International Doctors (IAID), formerly known as *Train Us for Ireland*, is a national representative organisation established to support, advocate for, and promote fair career progression for International Medical Graduates (IMGs) working in or aspiring to work in the Irish healthcare system. Since its establishment, IAID has worked collaboratively with the Department of Health, the HSE, the Medical Council of Ireland, postgraduate training bodies, and policymakers to address barriers affecting internationally trained doctors and to strengthen Ireland's medical workforce.

As President of IAID, I, Dr Liqa ur Rehman, previously led the advocacy efforts through our former organisation, Train Us for Ireland, that contributed to and acknowledged the legislative reforms introduced in 2020 under the Regulated Professions (Health and Social Care) (Amendment) Act, which removed longstanding barriers preventing many non-EEA doctors from entering the Trainee Specialist Division of the Medical Council and enabled all doctors eligible for General Division registration to apply for postgraduate specialist training. This was followed by the Department of Health's 2021 Community Preference policy reforms, which expanded first-priority eligibility to include additional groups, including doctors holding Stamp 4 permission. While overseas International Medical Graduates requiring employment permits have continued to remain in the lowest recruitment priority category, these reforms nevertheless preserved their ability to apply and compete for training on merit within the established recruitment framework.

We are therefore particularly concerned to see new administrative requirements introduced that appear to reverse the spirit and practical effect of those important reforms.

Until the previous recruitment cycle, both the ICGP and RCPI maintained a transparent and equitable application pathway that enabled suitably qualified overseas-based International Medical Graduates (IMGs) to apply directly for postgraduate training programmes, irrespective of their immediate immigration status, provided they met the required academic, professional, and regulatory standards.

The introduction of a mandatory requirement to upload evidence of an existing Irish immigration permission (Stamp 4, Stamp 4 EUFAM, Stamp 1G or Stamp 1H) under the "Eligibility to Work in Ireland" section at the time of application represents a significant departure from previous practice. Furthermore, the additional condition that "changes in immigration status after submission will not be considered" effectively prevents many highly qualified overseas doctors from even having their applications assessed, despite meeting all other eligibility criteria.

IAID believes that these newly introduced restrictions are disproportionate, unfair, and inconsistent with Ireland's long-standing commitment to attracting and retaining international medical talent.

Circumvention of the 2020 Legislative Reforms and the 2021 Department of Health Policy

The legislative amendments introduced in 2020 and the subsequent 2021 Department of Health policy reforms were intended to broaden access to postgraduate specialist training and improve career progression and retention within the Irish health service. Although overseas applicants requiring employment permits have always remained subject to Community Preference and therefore the lowest recruitment priority, they have historically been permitted to submit applications and compete on merit within that framework.

The newly introduced requirement to hold and upload evidence of an existing Irish immigration permission at the time of application, together with the policy that changes in immigration status after submission will not be considered, effectively prevents many overseas doctors from entering the recruitment process altogether. This represents a significant departure from previous recruitment practice and undermines the intent of both the 2020 legislative reforms and the 2021 Department of Health policy.

Furthermore, it has come to IAID's attention that doctors holding Stamp 4 permission do not always appear to be treated consistently within the Community Preference framework. We respectfully request greater transparency regarding how Community Preference is applied in practice, including the criteria used to determine priority categories, to ensure that applicants holding the same immigration permission are assessed fairly, consistently, and in accordance with published Department of Health policy.

Disproportionate Impact on Fully Qualified Doctors

Many overseas IMGs affected by these changes already hold Irish Medical Council registration or have fulfilled all requirements necessary for registration, including verification of qualifications, English language proficiency, and professional examinations. Many are fully eligible to enter the Trainee Specialist Division upon appointment.

Preventing these doctors from applying directly to training programmes unnecessarily diverts them into non-training service posts or encourages them to pursue specialist training opportunities in countries with more predictable recruitment pathways, such as the United Kingdom or Australia. At a time when Ireland continues to experience significant medical workforce shortages, introducing additional barriers to highly qualified candidates appears counterproductive.

Lack of Notice and Transitional Arrangements

These changes have been introduced without meaningful consultation, advance notice, or transitional arrangements.

Many overseas doctors have invested considerable time and financial resources over several years in obtaining Irish Medical Council registration, EPIC credential verification, English language examinations, professional examinations, annual registration retention, and associated administrative costs specifically with the expectation of applying for Irish postgraduate training.

Introducing a fundamentally different eligibility requirement without adequate notice has significant consequences for career planning and undermines confidence in the transparency and predictability of the recruitment process.

Practical Impact and Recruitment Timelines

It is also important to consider the practical impact of these changes. We understand that only a relatively small proportion of doctors ultimately commence postgraduate training directly from overseas each year. If this is indeed the case, the administrative burden associated with assessing these applications is likely to be modest, while maintaining an open and merit-based recruitment pathway offers substantial benefits to the Irish healthcare system.

We would welcome the publication of recruitment data demonstrating:

- the number of overseas applicants each year;
- the number shortlisted;
- the number offered training places
- the number who ultimately commence training; and
- the number who faced visa delays.

Such information would help ensure that future policy decisions are transparent, evidence-based and proportionate.

Furthermore, recruitment for July training programmes is generally completed several months before commencement, typically by March or April. This ordinarily provides successful candidates with sufficient time to complete employment permit applications, visa processing and relocation before the July intake.

While delays may occasionally occur in individual cases, these should be managed on a case-by-case basis rather than by imposing blanket eligibility restrictions that prevent overseas doctors from submitting applications in the first place.

Importance of Consultation and Good Governance

IAID also believes that any policy or administrative change that materially affects doctors registered with the Irish Medical Council should be developed through meaningful stakeholder consultation before implementation.

Doctors pay substantial annual Medical Council retention fees to maintain their registration, often at considerable personal financial sacrifice. Many International Medical Graduates, particularly those from low- and middle-income countries, continue to maintain active Irish registration for many years while pursuing employment and postgraduate training opportunities in Ireland.

These doctors are important stakeholders within the Irish medical profession. They deserve transparency regarding changes that directly affect their professional opportunities and should be afforded an opportunity to contribute to consultation before significant policy decisions are implemented.

Meaningful engagement with representative organisations and IMC registrants would strengthen confidence in recruitment processes, improve policy development, and promote fairness, transparency, and accountability.

IAID Requests

In light of the above, IAID respectfully requests:

1. An immediate review of this year's documentation requirements to allow overseas applicants who otherwise meet all professional and regulatory criteria to submit applications.
2. The introduction of a provisional application pathway enabling successful overseas candidates to provide evidence of immigration permission closer to the commencement of training, consistent with existing recruitment timelines.
3. Publication of recruitment data relating to overseas applicants and successful appointments to ensure future policy decisions are evidence-based and proportionate.

4. A commitment to meaningful stakeholder consultation with IAID, Public Consultation i e Irish Medical Council registrants, NDTP, and other representative organisations before introducing future changes to eligibility criteria, recruitment processes, or supporting documentation requirements.

Ireland has earned an international reputation for welcoming talented doctors from around the world. We respectfully submit that postgraduate medical training should continue to be based primarily on professional merit, clinical competence, and commitment to patient care rather than administrative barriers that can be addressed after selection but before employment commences.

We would welcome the opportunity to meet with representatives of the ICGP, RCPI, NDTP, the Medical Council of Ireland and the Department of Health to discuss these concerns and to work collaboratively towards solutions that are fair, transparent, and aligned with Ireland's long-term medical workforce needs.

We look forward to your response.

Yours sincerely,

A handwritten signature in black ink, reading 'Liqa' in a cursive script.

Dr Liqa ur Rehman, FRCPCH, MRCPI

President, Irish Association of International Doctors (IAID)

Former IMC Council Member