

Medical Revalidation and the Responsible Officer Regulations (England)

A Guide for Non-Executive Directors

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NHS

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Situation prior to 2012

- Doctor qualifies - Provisional Registration
- One Foundation Year – Full Registration
- Subject to payment of annual fee and no GMC action - registered for life

New Regulations (revision in pipeline in 2013)

STATUTORY INSTRUMENTS

2010 No. 2841

HEALTH CARE AND ASSOCIATED PROFESSIONS

DOCTORS

The Medical Profession (Responsible Officers) Regulations
2010

Made - - - -

24th November 2010

Coming into force - -

1st January 2011

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Glossary

- **Responsible Officer (RO).** Board level licensed doctor appointed by Board to be responsible for systems for medical staff recruitment, monitoring of quality and safety, appraisals, revalidation recommendations and remediation.
- **Designated Body.** Organisation which employs, contracts or acts in professional supervisory role for doctors.
- **Prescribed Connection.** Linkage between doctor and organisation as defined in Regulations.
- **Licence to Practise.** Legal permission for doctor to treat patients, prescribe and certify deaths etc.
- **Revalidation.** Process whereby GMC receives recommendations and renews, defers or investigates doctors' fitness to practise.
- **GMC.** Professional regulator for doctors. Maintains Register of Medical Practitioners.
- **ORSA.** Organisations' self-assessments of the readiness of their systems to support revalidation

From 3 December 2012, GMC requires Doctors to revalidate their Licences to Practise

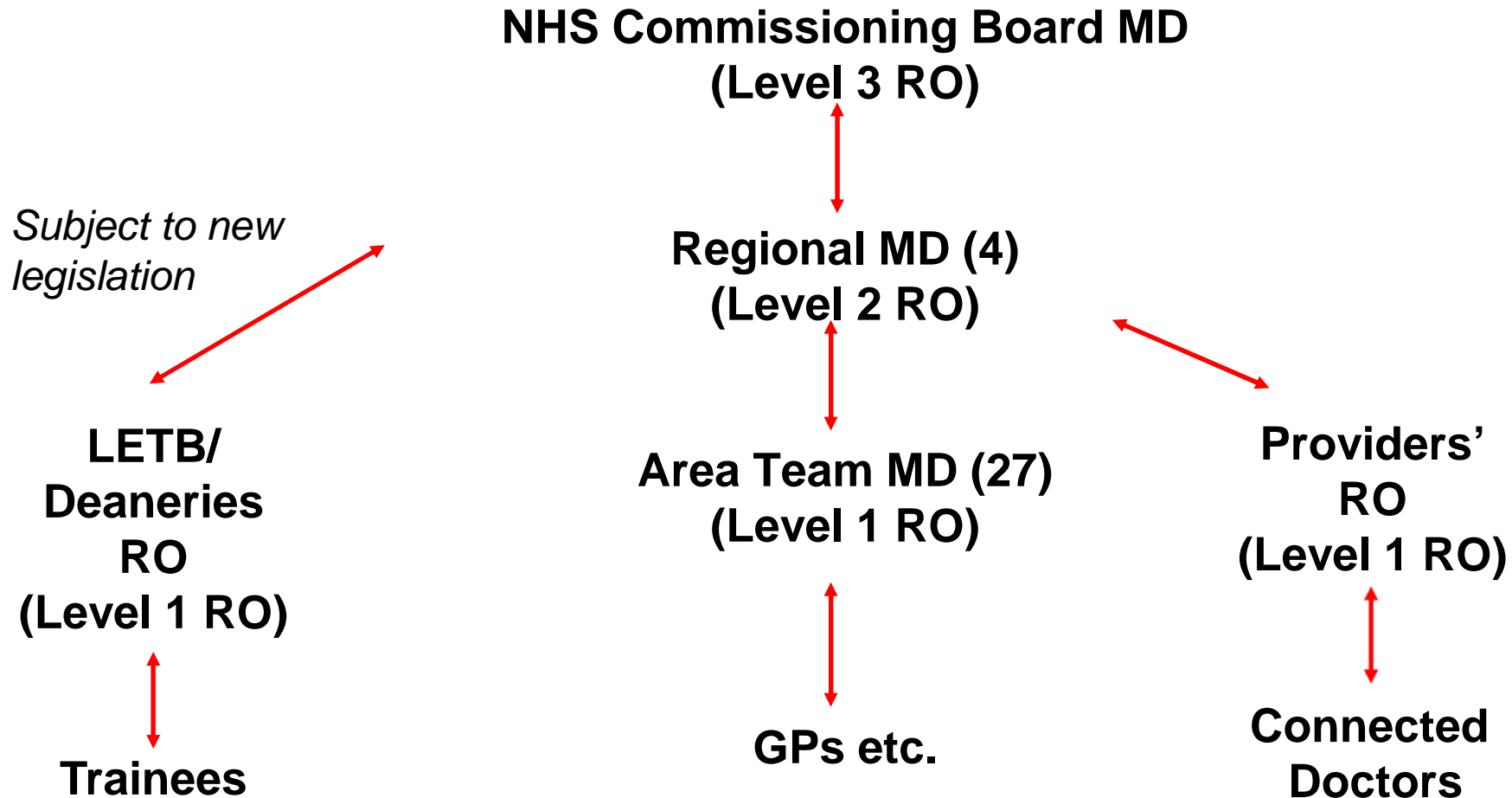
- Licensed doctors will have to revalidate, usually every five years.
- Based on having regular appraisals that are based on the core guidance for doctors, [Good Medical Practice](#).
- Supported by a hierarchy of Responsible Officers

Revalidation is Just One Component of the Statutory Clinical Quality and Safety Measures in the Responsible Officer Regulations

- Enhanced Recruitment Checks
- Assurance that Doctors are Appropriately Qualified for Proposed Duties
- Better Appraisals
- Records of Outcomes, Adverse Events etc.
- Information Sharing across Sectors about Doctors
- Earlier Remediation
- Statutory Duty of Organisation to Provide Resources to RO

Hierarchy

(excluding Public Health for clarity)



Scale of the Task (UK)

Register*	No. of doctors	%	No. of doctors licensed	%
Specialist Register	74,449	29.47%	70,368	29.70%
GP Register	62,453	24.72%	60,068	25.36%
Total no. of doctors on LRMP	252,653	100.00%	236,898	100.00%

LRMP: List of Registered Medical Practitioners

Why Revalidation? Which Airline would you choose?

**OUR PILOTS
WERE ALL
TRAINED
(years ago)**



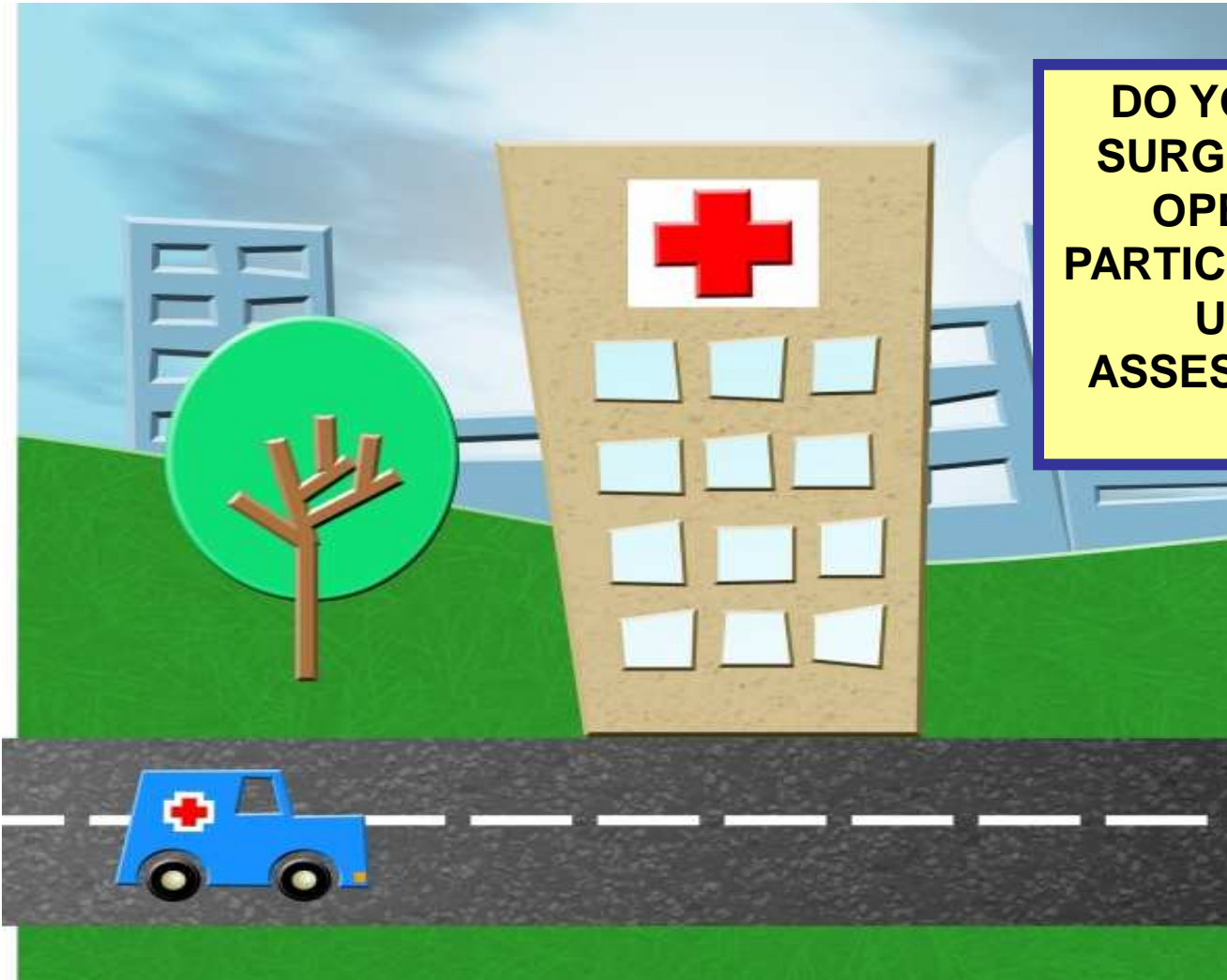
Why Revalidation? Which Airline would you choose?



**OUR PILOTS ALL
UNDERTAKE
REGULAR TRAINING
AND ASSESSMENT**

Why Revalidation?

DO YOU KNOW IF THE SURGEONS ABOUT TO OPERATE ON YOU PARTICIPATE IN REGULAR UPDATES AND ASSESSMENT OF THEIR RESULTS?



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Scheduling doctors for revalidation



The Challenge

**HOW TO USE REVALIDATION
TO SECURE THE BEST OUTCOMES
FOR PATIENTS AND DOCTORS**

OUTCOMES

- **PATIENTS & PUBLIC:**
 - HIGH QUALITY EXPERIENCE AND OUTCOMES
 - REASSURED AND CONFIDENT
- **DOCTORS:**
 - BETTER TEAM WORKING
 - CONFIDENCE THAT ISSUES ARE ADDRESSED
 - INDIVIDUAL SUPPORT AND WELL-BEING
- **MEDICAL DIRECTORS**
 - SUPPORTED
 - ADVICE AND CONSISTENCY

Enhanced Appraisal is the Cornerstone of Revalidation

- The GMC requires that doctors must demonstrate their fitness to practise in all the areas in which they work
- Appraisal covers all aspects of practice inside and outwith the employing organisation
- Records of Annual Appraisal must be maintained
- Responsible Officers use Appraisals and other sources of information to make recommendations to the GMC

Six Types of Supporting Information Required for Appraisal

1. Continuing professional development
2. Quality improvement activity
3. Significant events
4. Feedback from colleagues
5. Feedback from patients
6. Review of complaints & compliments

Responsible Officers make Recommendations to GMC

Options:

1. No Concerns, GMC revalidates
2. Doctor failing to engage with process (GMC acts)
3. Deferral, revalidation date reset, e.g. Doctor on Maternity Leave

Concerns about Fitness for Practise should be referred to the GMC in the usual way and should not await the revalidation date.

Responsible Officers' Support and Advice

- GMC has appointed Employer Liaison Advisers on a regional basis to support ROs.
- Level 2 RO can advise on issues
- RO networks have been established.

Special Circumstances

If there is an appearance of bias between RO and Doctor (e.g. married to each other) or a severe and enduring conflict of interest, e.g. RO and Doctor litigating against each other, the level 2 RO may be asked to approve the appointment of an Alternative RO for that doctor, or group of doctors.

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Suggestions for Constructive Challenges 1

- What integrated systems are in place for monitoring doctors' performance?
- How does the organisation support staff-grade doctors and associate specialists, recognising good practice, encouraging and supporting development and learning?
- What are the annual percentages for completed appraisals for each grade of doctor?

Suggestions for Constructive Challenges 2

- What percentages each grade of doctor have completed appraisals in year?
- What systems are in place for monitoring the impact of the organisation's implementation of the regulations on equality and diversity issues?
- How is the quality of medical appraisals assured?
- How is the quality of medical recruitment checks assured?

Suggestions for Constructive Challenges 3

- How many doctors have require remediation in year?
- How is this remediation supported and funded?
- How is patient input to feedback on doctors obtained?
- What percentage of revalidation recommendations have had to be deferred and why?
- How is the organisation meeting its statutory duty to support the RO in implementation of the regulations?

Information Sources

- Revalidation Support Team

<http://www.revalidationsupport.nhs.uk/index.php>

- General Medical Council

<http://www.gmc-uk.org/doctors/revalidation.asp>