

GMC Consultation

Revalidation: The Way Ahead

Response Form

March – June 2010

Thank you for your interest in our consultation. We value the comments you are making and the views we receive will help inform the development of our proposals.

You can print off this form and return it by post to the following address:

Revalidation Consultation
Revalidation Team
Continued Practice and Revalidation Directorate
General Medical Council
Regents Place
350 Euston Road
London
NW1 3JN

You can also return the form electronically to thewayahead@gmc-uk.org. Indicate your answer to multiple choice questions by placing X by your selection. Please save the completed form on your computer then attach it to the email.

If you have a question about the consultation or need help completing this form, please email thewayahead@gmc-uk.org or call 020 7189 5280.

Our consultation ends on Friday 4 June 2010. Please ensure we have received your response by this date.

Our consultation document is available at www.gmc-uk.org/thewayahead

Other formats

Our consultations are also available, on request, in alternative formats such as large print or audio. If you would like to receive a copy of a consultation in an alternative format please contact us to discuss your specific requirements in more detail.

Freedom of information

The information you provide in your response may be subject to disclosure under the Freedom of Information Act 2000, which allows public access to information held by the GMC. This does not necessarily mean that your response will be made available to the public as there are exemptions relating to information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box provided.

Please tick if you want us to treat your response as confidential

Data protection

The information you supply will be stored and processed by the GMC in accordance with the Data Protection Act 1998 and will be used to analyse the consultation responses and help us to consult more effectively in the future. Any reports published using this information will not contain any personally identifiable information. We may provide anonymised responses to the consultation to third parties for quality assurance or approved research projects on request.

Consultation questions

Question 1a: Do you agree that revalidation should be based on a single set of processes for evaluating doctors' performance in practice, rather than split into the separate elements of relicensing and recertification?

Yes ✓

No

Not Sure

Question 1b: If you have any further comments please expand here

The Faculty of Pharmaceutical Medicine fully supports this proposal.

Question 2: Do you agree that revalidation should be based on a continuing evaluation of doctors' performance in the workplace?

Yes ✓

No

Not Sure

Question 2b: If you have any further comments please expand here

The Faculty of Pharmaceutical Medicine takes the view that the process should be pragmatic not bureaucratic.

It is not clear how provision would be made for those in niche rôles or who are at the top of a hierarchy.

Question 3a: Do you agree with the proposals for dealing with the most common situations where a Responsible Officer may not be in a position to make a positive recommendation?

Our proposal for Scenario A

Yes

No

Not Sure ✓

Our proposal for Scenario B

Yes ✓

No

Not Sure

Our proposal for Scenario C

Yes ✓

No

Not Sure

Question 3b: If you have any further comments please expand here

Scenario A

We do not consider this proposal to be practical.

Scenario C

The Faculty of Pharmaceutical Medicine would not have access to NCAS so would refer to the GMC if and when it became necessary.

Question 4: Do you agree that the Colleges and Faculties should not be involved in the recommendations made by the Responsible Officer to the GMC?

Yes ✓

No

Not Sure

Question 5: If so, what do you think the role should involve? Please tick all of the following that you think should apply:

Setting standards and defining specialty information ✓

Advice and guidance for appraisers ✓

Advice and guidance for Responsible Officers ✓

Audit and quality assurance of the recommendation process

Other

Question 5b: If you selected 'Other' or have any further comments, please expand here

We would wish it to be noted that the structure of Question 4 makes the question confusing by putting the question in the negative.

Paragraph 79 of the Consultation Document appears to conflict with the basic model and whilst the Faculty of Pharmaceutical Medicine supports the basic model and the concepts of the Responsible Officer and appraisal, we strongly disagree with the principles contained in the last sentence of paragraph 79.

We do not consider it appropriate for the Faculty to be involved in audit or quality assurance of the recommendation process.

Question 6a: Do you agree that for trainees, successful progression through training should be the means of securing revalidation?

Yes ✓

No

Not Sure

Question 6b: If you have any further comments please expand here

The Faculty of Pharmaceutical Medicine fully endorses this principle.

Question 7a: Do you agree with our proposals for the revalidation of doctors with no medical practice of any kind?

Yes

No

Not Sure ✓

Question 7b: If you have any further comments please expand here

The Faculty of Pharmaceutical Medicine finds it difficult to respond without a clear definition of “medical practice”. This needs to be defined by the GMC, not by individual Colleges and Faculties. In the absence of a clear definition, the question is meaningless.

Question 8a: Do you agree that the list of registered and licensed medical practitioners should indicate the field of practice on the basis of which a doctor has secured revalidation?

Yes ✓

No

Not Sure

Question 8b: If you have any further comments please expand here

The Faculty would request clarification as to the degree of detail that would be recorded; for example, would the register state “Pharmaceutical Medicine” or give details of the branch such as Pharmaceutical Medicine - Clinical Pharmacology”, or Pharmaceutical Medicine - Health Economics”?

How would the register appear for doctors who work across a number of fields of practice, e.g. “Pharmaceutical Medicine, Cardiology”?

Will there be a defined list of fields of practice or will it be free text?

Question 9: Do you agree that, for the purposes of revalidation, the *Good Medical Practice* Framework is an appropriate basis for appraisal and assessment?

Yes ✓

No

Not Sure

Question 10: Do you have any further comments on the proposed use of the *Good Medical Practice* Framework?

The Faculty of Pharmaceutical Medicine welcomes the GMC's confirmation that not every generic standard can be complied with.

Question 11a: Is the overall approach to the development of standards and supporting information for revalidation reasonable?

Yes ✓

No

Not Sure

Question 11b: If not, what else is necessary?

The standards need to be interpreted in the light of the specific job the doctor is employed to carry out. Thus the process of revalidation should not be driven by College/Faculty standards if they are not relevant to the individual's practice; however, the approach is deemed reasonable as long as the standards relate definitively to the doctor's practice.

Question 12a: Is the supporting information proposed by the Colleges and Faculties meaningful, practicable and proportionate for the majority of doctors in clinical practice?

Meaningful

Yes

No

Not Sure

Practicable

Yes

No

Not Sure

Proportionate

Yes

No

Not Sure

Question 12b: If not, or you have any further comments please expand here

This question relates to clinical practice and therefore has not been answered by the Faculty of Pharmaceutical Medicine. If the question was widened to include the standards for non-clinical practice then our comment would be that the supporting information required by the GMC is too detailed and extensive to be practicable and proportionate.

Question 13a: Do you agree that these are the appropriate principles to guide doctors' Continuing Professional Development (CPD) activity in relation to revalidation?

Yes ✓

No

Not Sure

Question 13b: If not, what alternative approach is required?

Question 14a: Do you agree with our approach to patient and public involvement in revalidation? (Please tick all the options you agree with)

Involvement through questionnaire feedback to doctors

Yes

No

Not Sure

Involvement in the Responsible Officer's recommendation and quality assurance

Yes ✓

No

Not Sure

Involvement in the GMC decision making process where concerns are raised

Yes ✓

No

Not Sure

Question 14b: If not, what others arrangements would you suggest?

The Faculty of Pharmaceutical Medicine regard it as essential that lay involvement especially in RO involvement and GMC decision-making must be unbiased and preferably should have some understanding of the specialty. We consider this to be particularly important for pharmaceutical medicine.

Question 15a: Do you agree that GMC Principles, Criteria and Key Indicators for Colleague and Patient Questionnaires in Revalidation are appropriate for evaluating these types of questionnaires for revalidation?

Colleague Questionnaires

Yes

No

Not Sure ✓

Patient Questionnaires

Yes

No

Not Sure

Question 15b: If you have any further comments please expand here

Patient questionnaires are not relevant to pharmaceutical medicine, therefore this question has not been answered.

Question 16a: Do you agree that doctors should be required to participate in colleague and patient (where applicable) feedback at least once in each five year cycle?

Yes ✓

No

Not Sure

Question 16b: If you have any further comments please expand here

Question 17a: Do you think that there should be a mechanism for making sure that colleague and patient questionnaires comply with our criteria for revalidation?

Yes ✓

No

Not Sure

Question 17b: If you have any further comments please expand here

Question 18a: Do you agree that revalidation should be introduced initially in areas and organisations where local systems are developed and sufficiently robust to support the revalidation of their doctors?

Yes ✓

No

Not Sure

Question 18b: If you have any further comments please expand here

Question 19a: Do you agree with our proposed approach for the initial roll-out of revalidation?

Yes ✓

No

Not Sure

Question 19b: If not, what alternatives do you suggest?

Question 19c: If you have any further comments please expand here

Question 20a: Do you agree that a deadline should be set for organisational readiness for revalidation?

Yes ✓

No

Not Sure

Question 20b: If you have any further comments please expand here

Your details

Name

Job Title

Organisation

Address

Email

Contact Tel

Would you like to be contacted about GMC consultations in the future?

Yes ✓ No

If you would like to know about upcoming GMC consultations, please let us know which areas of the GMC's work you are interested in:

- Education ✓
- Standards and Ethics ✓
- Fitness to Practise ✓
- Registration ✓
- Licensing and revalidation ✓

Data protection

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Responding as an individual

Are you are responding as an individual?

Yes No ✓

If yes, please complete the following questions. If not, please complete the 'responding on behalf of an organisation' section below.

Which of the following categories best describes you?

Doctor

Medical educator (teaching, delivering or administrating)

Medical student

Medical manager

Medial researcher

Member of the public

Other healthcare professional

Other (please give details)

What is your country of residence?

England

Northern Ireland

Scotland

Wales

Other – European and Economic Area

Other - rest of the world

Information about you

To help ensure that our consultations are reflecting the view of the diverse community, please fill in the information below. Although we will use this information in our analysis of the consultation response, it will not be linked to your response.

What is your age?

Under 24

25 – 34

35 – 44

45 – 54

55 – 64

65+

Are you:

Female

Male

Do you consider yourself to have a disability according to the terms given in the Disability Discrimination Act (DDA)*?

Yes

No

*The DDA protects disabled people. The Act defines a person as disabled if they have a physical or mental impairment, which has a substantial and long term (i.e. has lasted or is expected to last at least 12 months) and adverse effect on the person's ability to carry out normal day-to-day activities.

Examples of conditions include depression, dyslexia, diabetes, hearing impairment, visual impairment, epilepsy and arthritis

What is your ethnic origin? (Please tick one)

Asian or Asian British

Bangladeshi

Indian

Pakistani

Any other Asian background,
please specify

Black or Black British

African

Caribbean

Any other Black background,
please specify

Chinese or other ethnic group

Chinese

Any other background,
please specify

Mixed

White and Asian

White and Black African

White and Black Caribbean

Any other Mixed background,
please specify

White

British

Irish

Any other White background,
please specify

Responding as an organisation

Are you are responding on behalf of an organisation?

Yes

No

If yes, please complete the following questions. If not, please complete the 'responding as an individual' section above.

Which of the following categories best describes your organisation?

Body representing doctors

Body representing patients
or public

Government department

Independent healthcare provider

Medical School (undergraduate)

Postgraduate medical institution

NHS/HSC organisation

Regulatory body

Other (please give details)

In which country is your organisation based?

UK wide ✓

England

Scotland

Northern Ireland

Wales

Other (European and
Economic Area)

Other (rest of the world)

In our consultation reports we often include quotes from respondents. Are you content for the comments you submit to be attributed to your organisation in our consultation reports?

Yes ✓

No