

**GMC Consultation on the Licence to Practise and
Revalidation Regulations 2012**

Response Form

October 2011 – January 2012

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 Regulations 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 revalidation@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 revalidation@gmc-uk.org or call 0161 923 6602.

Our consultation ends on **Tuesday 17 January 2012**. Please ensure we have received your response by this date.

Our consultation document is available at www.gmc-uk.org/doctors/revalidation/10707.asp

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, for example, information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box below. We will take this into account if a request for your response is made under the Freedom of Information Act 2000.

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, check the analysis is fair and accurate, 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: Are the principles upon which we have built the regulations, the right ones?

Yes

No

Not Sure

Question 1b: If you answered 'no' or 'not sure' please give further details.

Question 2a: Are the arrangements set out in regulation 3 for withdrawing a licence to practise where a doctor has failed to co-operate with the revalidation process reasonable?

Yes **X**

No

Not Sure

Question 2b: If you answered 'no' or 'not sure' please give further details.

Question 3a: Are the circumstances in which a doctor may be required to revalidate as a pre-requisite to restoring a licence to practise appropriate?

Yes **X**

No

Not Sure

Question 3b: If you answered 'no' or 'not sure' please give further details.

Question 4a: Do you think that the powers in regulation 5(2) for the Registrar to vary a doctor's revalidation date provide the right balance between flexibility to respond to doctors' individual circumstances and the ability to respond to protect the public interest?

Yes

No

Not Sure

Question 4b: If you answered 'no' or 'not sure' please give further details.

Question 5a: Is the statutory minimum notice period of three months given to the doctor before a revalidation submission is due sufficient?

Yes **X**

No

Not Sure

Question 5b: If you answered 'no' or 'not sure' please give further details.

Question 6a: Do you think we should explore the possibility of allowing additional UK organisations to perform the functions a Responsible Officer in evaluating doctors' fitness to practise and making recommendations to the GMC regarding doctors' revalidation?

Yes **X** – We should like to know how organisations such as pharmaceutical companies will be required to demonstrate their suitability to perform this function

No

Not Sure

Question 6b: If you answered 'no' or 'not sure' please give further details.

Question 7a: Are there other factors, besides those listed in regulation 5(15) which the Registrar should take into account when deciding whether a doctor should be revalidated?

Yes

No **X**

Not Sure

Question 7b: If you answered 'yes' or 'not sure' please give further details.

Question 8a: Can you think of any reason why there might be adverse consequences for a doctor in deferring their revalidation?

Yes

No **X**

Not Sure

Question 8b: If you answered 'yes' or 'not' sure' please give further details and say how any adverse consequences might be avoided.

Question 9a: Do the regulations provide sufficient flexibility in the revalidation process to make it possible for all licensed doctors to demonstrate their continuing fitness to practise?

Yes **X**

No

Not Sure

Question 9b: If you answered 'no' or 'not sure' please give further details.

Question 10a: Are there particular groups of doctors for whom the Regulations would have an unfair or disproportionate impact?

Yes

No

Not Sure **X**

Question 10b: If you answered 'yes' please give further details and say how that impact might be mitigated.

The regulations might have a disproportionate impact on UK registered doctors working abroad for a period of time. We would like to see some clarification of recommendations for the process of their revalidation.

In the first cycle of revalidation doctors will require more than 3 months notice of submission.

Doctors, particularly in the first wave of revalidation, will need more specific information on the type of supporting information that should be brought to appraisal.

Your details

Name	Mrs K Swanston
Job Title	Chief Executive Officer
Organisation	Faculty of Pharmaceutical Medicine
Address	3 rd Floor 30 Furnival Street London EC4A 1JQ
Email	k.swanston@fpm.org.uk
Contact Tel	020 7831 7662

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