

FACULTY OF PHARMACEUTICAL MEDICINE

REVALIDATION POLICIES

POLICY: REVALIDATION POLICY FOR DOCTORS WHO PRACTISE OUTSIDE
THE UNITED KINGDOM

VERSION: 1.0

APPROVAL DATE: 2 July 2013

Terminology

- a) Doctor = a doctor with a General Medical Council (GMC) Licence to Practise (LtoP) who has a prescribed connection to the Faculty of Pharmaceutical Medicine (the Faculty) as their designated body (DB).
- b) If a doctor is employed, their medical practice will be considered as practice outside the UK if their contract of employment covering that practice is based upon a legal system which is governed from outside the UK.
- c) If a doctor is self-employed, their medical practice will be considered as practice outside the UK if their contract of service covering that practice is based upon a legal system which is governed from outside the UK.

Purpose

To set out the requirements and processes for individual doctors and the Faculty in order that the Faculty can fulfil its legal responsibilities as a DB for doctors who decide to maintain a GMC LtoP when practising entirely or partly outside the United Kingdom (UK).

The requirements and processes set out in the policy are in addition to those within the Faculty's other revalidation policies and agreements which apply to all doctors unless otherwise agreed with the RO or unless specific to the UK. The additional requirements and processes for doctors who practise outside the UK help to ensure that relevant information is available to the Faculty DB for all doctors wherever their practice is undertaken which may be within different legislative and professional contexts.

If a doctor to whom this policy applies is unable to comply with the additional requirements he or she should contact the Faculty for further advice.

Doctors are reminded that under the main Revalidation Agreement they have an ongoing responsibility to declare to the RO any matter which might impact upon their revalidation.

Process

1. Access to advice from the GMC about the need to maintain a LtoP for doctors who practise outside the UK.

a) The Faculty will ensure that doctors who contact the Faculty concerning their revalidation and for whom this is relevant are aware of current GMC guidance regarding the need to maintain a LtoP if practising entirely outside the UK.

b) The current advice from the GMC is that *'you may not need a licence to practise if you practise entirely outside of the UK. You may decide it is better to give it up. You can still maintain your registration without a licence, and this will indicate you are in good standing with us. You can apply to have your licence restored if you need it at some point in the future'* - http://www.gmc-uk.org/doctors/revalidation/faq_revalidation.asp. Further information about giving up and restoring a licence is available from the GMC at <http://www.gmc-uk.org/doctors/applications.asp>.

c) The GMC also currently advises that *'if you continue to hold your licence to practise while practising abroad, you will need to revalidate. This means you will need to connect to a UK organisation that will support you with your appraisal and revalidation. Only UK organisations can be designated bodies, because the legal rules that determine this only cover the UK'* - http://www.gmc-uk.org/doctors/revalidation/faq_revalidation.asp.

2. Advice from the Faculty about the need to maintain a LtoP for doctors practising outside the UK.

a) If a doctor is practising entirely outside the UK, either permanently or long-term, they should consider relinquishing their GMC LtoP which is a licence to practise medicine in the UK. If a doctor does relinquish their LtoP they may still maintain GMC registration thus demonstrating good standing with the GMC.

b) Doctors practising entirely outside the UK who wish to maintain their LtoP should be aware that they will be required to meet equivalent standards as those doctors based in the UK. In order to meet these standards from outside the UK different requirements and measures will be required by the DB.

3. The Faculty's requirements for Doctors practicing outside the UK

a) If a doctor's medical practice is partly in the UK and partly outside the UK they must include supporting information from their whole practice for their revalidation appraisals. This policy is relevant to any part of a doctor's medical practice outside the UK as defined within this policy.

d) If a doctor's medical practice changes to include medical practice outside the UK as defined within this policy, this policy will then apply to any such medical practice covered by this policy.

4. The Faculty of Pharmaceutical Medicine's requirements as Designated Body for doctors working outside the UK

a) Registration into the Faculty's Revalidation Programme

i) Doctors with a prescribed connection to the Faculty as their DB who practise outside the UK must fulfil additional requirements set out in 4a ii) – v) as part of the registration process into the

Faculty's Revalidation Programme. The documents listed below must be provided in English language and any translations must be provided by a certified and independent translator with the cost of translation being met by the revalidating doctor.

ii) If the doctor is employed, in addition to providing from each current employer a Form R1 and R3, the revalidating doctor must provide additional information about the arrangements for medical governance within their employing organisation/s as follows. If the doctor is self-employed or owns their own company they should refer instead to 4a iii) or iv) below.

- A description of the organisational structure and reporting arrangements relevant to their role
- A description of the arrangements for performance monitoring and review
- A description of the organisation's disciplinary policy and procedures in so far as relevant to fitness to practise medicine
- A description of the organisation's complaints policy and procedures, as relevant to fitness to practice medicine, including how complaints from any clients, patients and the public are managed
- A description of any external quality frameworks or codes of practice relevant to the doctor's role and how any findings are reported
- If the doctor also holds medical registration in the country or countries where their non-UK practice occurs, evidence of their current standing with the local medical regulator/s
- Any other relevant information

iii) If the doctor is self-employed, in addition to providing from each contracting organisation a Form R1 and R3, the revalidating doctor must provide additional information about the arrangements for medical governance related to their practice as follows.

- A copy of the doctor's complaints policy relevant to their own medical practice. This must include a description of the purposes of revalidation, statements that the Faculty is the DB for the doctor, that concerns about the doctor's medical practice should be referred to the Faculty, how clients may contact the Faculty and also that a copy of the doctor's complaints policy is issued routinely to all clients.
- Confirmation that the self-employed doctor will maintain a record of client signatures that show that a copy of the complaints procedure has been issued
- Confirmation that the self-employed doctor will maintain a record of all complaints received from clients, patients and the public and how these are managed
- A description of any external quality frameworks or codes of practice relevant to the doctor's role and how any findings are reported
- If the doctor also holds medical registration in the country or countries where their non-UK practice occurs, evidence of their current standing with the local medical regulator/s
- Any other relevant information

iv) If the doctor owns or part-owns their own company, in addition to providing a Form R1 and R3 from their own company, the revalidating doctor must provide additional information about the arrangements for medical governance related to their practice as follows.

- A description of the organisational structure and reporting arrangements relevant to their role
- A description of the arrangements for performance monitoring and review
- A description of the organisation's disciplinary policy and procedures in so far as relevant to fitness to practise medicine
- A description of the organisation's complaints policy and procedures, as relevant to fitness to practice medicine, including how complaints from any clients, patients and the public are managed
- Confirmation that the doctor will ensure that a record of client signatures is maintained that shows that a copy of the complaints procedure has been issued
- Confirmation that the doctor will ensure that a record of all complaints received from clients, patients and the public and how these are managed is maintained
- A description of any external quality frameworks or codes of practice relevant to the doctor's role and how any findings are reported
- If the doctor also holds medical registration in the country or countries where their non-UK practice occurs, evidence of their current standing with the local medical regulator/s
- Any other relevant information

v) If a doctor is unable to provide any information from one or more of the relevant categories above they must provide a written explanation of the circumstances and reasons for this.

b) Ongoing participation in the Faculty's Revalidation Programme

i) Doctors with a prescribed connection to the Faculty of Pharmaceutical Medicine as their DB and who practise outside the UK must fulfil the additional requirements set out in 4b ii) – vi) as part of their ongoing participation in the Faculty's Revalidation Programme.

ii) The doctor must participate in the Faculty's annual appraisal system requiring participation at a face-to-face appraisal with an appraiser allocated by the Faculty and subject to the Faculty's Appraisal Policy. The appraisal must take place within the time frame specified by the Faculty. The appraisal must take place in the UK and the revalidating doctor will be responsible for meeting any international travel costs and their own costs within the UK. The conduct of appraisals via electronic systems (e.g. Skype, or video conferencing) is not permitted because this does not provide an appropriate setting for an appraisal.

iii) The doctor must provide all supporting information for annual revalidation appraisals in English language. Any translations must be provided by a certified and independent translator with the cost of translation being met by the revalidating doctor.

iv) If the doctor's practice includes the clinical care of patients or the medical care of healthy volunteers he or she must provide evidence, on an annual basis, of good standing with their local

medical registration body in the country or countries where this aspect of their medical practice takes place.

v) If a doctor who is employed either within the UK or outside the UK, has a change of circumstances and becomes employed outside the UK or changes their employer outside the UK, as well the existing requirement to notify the Faculty and to send to the Faculty a new Form R3 signed by themselves, the doctor must also provide the information set out within 4a ii) or iv) above relating to the new employer.

vi) The doctor must participate fully in any investigation concerning their fitness to practise conducted by the Faculty which may require that the revalidating doctor attends face-to-face meetings in London at their own expense. The doctor must also cover any reasonable costs in interviewing the complainant or witnesses or employer over and above those which would be expected as costs of a UK-based investigation.

5. Referral of matters to the GMC

a) If the Faculty concludes that due to the practical limitations associated with a doctor's practice outside the UK it is unable to effectively investigate a concern or to effectively monitor compliance with conditions or undertakings imposed by the GMC, the Faculty will refer the matter, including the identity of the doctor, to the GMC and may do so without prior notification to the doctor.

b) If the Faculty concludes that due to the practical limitations associated with a doctor's practice outside the UK it is unable to effectively fulfil its responsibilities as the doctor's DB it will refer the matter, including the identity of the doctor, to the GMC and may do so without prior notification to the doctor.

c) Failure by a doctor to disclose any information relevant to revalidation may, if considered by the RO to be a concern relating to probity, be reported to the GMC.

6. Sharing of Information

The information provided by the doctor under this policy will be kept on file and may be used during any part of the revalidation process or during any investigation of a concern. The information may also be shared by the DB with FPM appraisers, other ROs or with the GMC.

7. Doctors who practices entirely or partly outside the UK who have working arrangements which are not covered by this policy

If a doctor who practices entirely or partly outside the UK has working arrangements that are not covered by this policy he or she should contact the RO for further advice.