GMC consultation on Proposal to Time Limit Provisional Registration

1. I write with regard to the GMC survey on Proposal to Time Limit Provisional Registration.

2. The Royal College of General Practitioners is the largest membership organisation in the United Kingdom solely for GPs. Founded in 1952, it has over 44,000 members who are committed to improving patient care, developing their own skills and promoting general practice as a discipline. We are an independent professional body with enormous expertise in patient–centred generalist clinical care. Through our General Practice Foundation, established by the RCGP in 2009, we maintain close links with other professionals working in General Practice, such as practice managers, nurses and physician assistants.

3. The College welcomes the opportunity to respond to this survey and our responses to the questions posed are as follows:

1. We are proposing that the maximum period of time that a doctor will be able to hold provisional registration should be three years. Do you think this is appropriate?
Yes, but please see our response to question 7 below. Consideration should be given where doctors have experienced exceptional mitigating circumstances.

2. If you do not think the proposed three year limit is appropriate what do you think the limit should be?

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3. For the time limit you have selected above, why do you think this is more appropriate?

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4. We are proposing that the time limit on PR will not be flexible, but doctors will be able to 'stop the clock' on their period of PR by asking for their name to be removed from the register and then restoring it once they are in a position to start or resume their F1 training post. Do you think this is appropriate?

Yes. This allows doctors who go on maternity leave, become unwell or have an accident to continue their training when circumstances allow.

Limiting the duration of the provisional registration will reinforce the message that its sole purpose is to allow a doctor to take part in an acceptable programme for provisionally registered doctors. It will also help deaneries to manage the expectations of doctors who do not successfully progress through the F1 programme and enable deans to give realistic advice to doctors about their prospects of completing F1 in the timescale proposed.

5. Are there any other considerations that you think we should take into account?

The College believes that consideration should be given to doctors suffering from mental health problems where removal from the register may be less clear cut.

Consideration should also be given to overseas service/international work. If a doctor has been out of medical practice altogether for a long time (or a long time out of medical school) there should be some facility for refreshing their skills and training, because without this there could be a risk to patients. We wonder how
the Provisional Registration system would treat an overseas qualified doctor who had never actually worked in the UK? Could he/she 'stop the clock' and keep their Provisional Registration going without ever working in the UK?

We suggest that you undertake a planned review after 5 years to examine the number and nature of the requests to ‘stop the clock’. This should be declared in advance as well as the fact that the possible outcome could be removal of this option.

6. We are planning to write to all doctors who have already held PR for longer than three years, to let them know what their options are. How do you think we should treat these doctors?

- Erase them from the register (as they will have exceeded the 3 year time limit)
- Provide them with an additional period of time to decide what to do
- Other (Please Specify):

The College believes that these doctors should be treated as if they have just entered the system (ie be given 3 years from the starting date of the new arrangements).

You need to be careful that you are not accused of ‘moving the goal posts’. Doctors who are currently out of practice, but have Provisional Registration would not have expected these rules to be brought in. For example, It would be unfair to someone who had left medical school for personal reasons/ill health/to start a family, but always believed he/she could come back at some stage to have the option suddenly removed.

7. Do you think the proposals to time limit PR might disadvantage particular groups of doctors?

It is possible that they may disadvantage doctors with health problems, doctors who qualified overseas and academics intending to complete training later, but doing full-time research or teaching.
8. If you think there are groups of doctors who might be disadvantaged by these proposals - what action could we take to ensure this is kept to a minimum?

The College believes you could consult these groups to establish their views. However, all doctors need to be aware of the ‘stop the clock’ option at an early stage. You should also consider an appeal mechanism.

9. Do you think that there will be any unforeseen circumstances or problems that we may not have considered, arising from the proposals?

There will inevitably be doctors who were unaware of the change, or who have been abroad for some time and had failed to remove their names temporarily.

10. Do you have any other general comments on the proposals?

Ideally, there should be a system for reflecting on cases initially in case there is an area or group of people who will be unfairly and adversely affected by the changes that were not initially identified.

Career guidance will become increasingly important as you are dealing with people who have already invested at least 5 years of their time and money in training and some may have developed health problems or difficult personal circumstances (eg a spouse who is very ill). Those in charge of the system will need great wisdom and the ability to be flexible in their approach.

We note that the GMC requires those International Medical Graduates (IMGs) applying for full registration to do so within 3 years of obtaining their acceptable foreign postgraduate qualification. You might wish to consider whether the same rationale/time limit should be applied between gaining primary medical qualifications and applying for full registration.

Yours sincerely

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Honorary Secretary of Council