

Responsible Officer and Appraisal Networks Information Sheet 35

LATE FEEDBACK SUBMISSION AS A CAUSE OF REVALIDATION DEFERRAL (v1.0, Nov 2019)

A persisting reason for a recommendation to defer revalidation is when a doctor has not presented patient and colleague feedback at appraisal as required by GMC. This means their supporting information is insufficient to permit a positive recommendation by the responsible officer.

It is the doctor's responsibility to submit their information in readiness for their revalidation. If they have not submitted their feedback by the last appraisal before their recommendation date, the default position is for their responsible officer to recommend deferral until after the following appraisal.

Prevention is better than cure: doctors are strongly encouraged to obtain patient and colleague feedback early in their revalidation cycle, and before their second-last appraisal at the latest. Appraisers are encouraged to guide doctors to do this. Responsible officers are encouraged to track when doctors have met the minimum GMC requirement so that a doctor who has not can be guided to do so.

If a doctor submits feedback after their final appraisal but before their recommendation date, the responsible officer may consider, case by case, whether to review and accept the information outside appraisal and make a positive recommendation to revalidate. Key factors include whether a suitable exercise has been undertaken, appropriate reflection by the doctor has been recorded, and this has been discussed with their appraiser or suitable member of the appraisal team, e.g. medical appraisal lead. Other factors include the timescale involved, proactivity by the doctor in addressing the matter, and whether there are other reasons to warrant deferral. The responsible officer can seek advice, e.g. from their Employer Liaison Adviser (ELA).

An organised approach by the doctor reduces the need for these complex and potentially stressful decisions. This minimises unnecessary concern for the doctor and disruption to them and their professional standards team.

Failure to comply with professional requirements may be a sign of wellbeing issues; it is good to bear this in mind if a doctor makes a late submission.

Best practice is to seek feedback on a continuous basis as opposed to a 'once in a cycle minimum'. The evolution of systems to support this approach is desirable.

<https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation/guidance-on-supporting-information-for-appraisal-and-revalidation/supporting-information-for-appraisal-and-revalidation>

https://www.gmc-uk.org/-/media/documents/responsible-officer-protocol_pdf-56096180.pdf

This information sheet is relevant to all designated bodies in England

These information sheets are written on an ad hoc basis, on issues of relevance to responsible officers and their teams, medical appraisers and doctors.

The latest version of all ROAN Information Sheets is available online via our SharePoint site. Contact england.revalidation-pmo@nhs.net for access.

