

Doctors, PAs, and AAs: Overarching principles for registration and revalidation decision makers

Introduction

- 1 It's important that patients trust doctors, physician associates (PAs), and anaesthesia associates (AAs), and have confidence that they're competent in their field and abide by high ethical standards. Our duty is to protect this public interest by maintaining the integrity of our registers ie the:
 - **medical register** - the registers of doctors¹ which we're required to keep by the Medical Act 1983 (the Act).
 - **register of PAs and AAs** - the register of PAs and AAs we're required to keep by the Anaesthesia Associates and Physician Associates Order 2024 (the AAPAO)², which is distinct from the medical register.
- 2 We do this by ensuring that:
 - only doctors, PAs, and AAs who are suitably qualified and fit to practise can gain entry to the relevant register and (for doctors only) obtain a licence to practise.
 - all licensed doctors regularly demonstrate that they are up to date and fit to practise medicine through revalidation³.
- 3 This document sets out the key overarching principles that apply to decision making in relation to our registration and revalidation functions. It applies to formal decisions that involve the exercise of discretion⁴ by a decision maker. Examples of these decisions are listed below.

¹ The register of medical practitioners comprising the principal list, the emergency powers doctors list, and the visiting overseas doctors list; the specialist register; and the GP register.

² Article 5(1)(a)(i).

³ PAs and AAs won't be required to revalidate at the beginning of regulation; we'll update this guidance accordingly when revalidation is introduced.

⁴ Discretion means acting on one's own authority and judgement. For example, where legislation uses the word 'may', the decision-maker is given a discretionary power.

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- a A decision by the Registrar⁵ under the Act or the AAPAO or delegated legislation eg when deciding whether:
 - the criteria (doctors), or standards and requirements (PAs and AAs) for registration are met⁶
 - to withdraw a licence to practise because they've failed to meet the revalidation requirements, without reasonable excuse (doctors only)
 - to remove a PA or AA's entry from the register of PAs and AAs⁷
 - to grant an applicant re-entry to the register of PAs and AAs.
 - b An Appeal Panel's decision on an appeal⁸.
 - c A Case Manager⁹ or Internal Appeal Manager's¹⁰ decision¹¹.
- 4 This document doesn't apply to our administrative decisions or business processes, that don't result in formal decisions.

Our regulatory decision making principles

- 5 Our approach to decision making is aligned to the Professional Standards Authority's principles¹² that regulation should be:
- proportionate

⁵ Or Assistant Registrar or an Authorised Decision Maker acting under delegated authority.

⁶ This applies whether the applicant is entitled to registration if the criteria are met (UK-qualified doctors only) or whether the Registrar retains discretion whether to register the applicant (internationally qualified doctors, and all PAs and AAs).

⁷ Under article 9 of the AAPAO.

⁸ Under [Schedule 3A \(Registration and Training Appeals\)](#) or [3B \(Licence to Practise and Revalidation: Appeals\)](#) of the Act (doctors); under article 16 of the AAPAO and the [General Medical Council \(Internal Appeals\) \(Anaesthesia Associates and Physician Associates\) Rules 2024](#).

⁹ A Case Manager is a legally qualified person designated by the Registrar for the purposes of the conduct of appeals under [The General Medical Council \(Registration Appeals Panel Procedure\) Rules Order of Council 2010](#) (doctors only).

¹⁰ An Internal Appeal Manager is a person employed by the Regulator who gives directions and makes decisions under the [General Medical Council \(Internal Appeals\) \(Anaesthesia Associates and Physician Associates\) Rules 2024](#).

¹¹ Under the Act and the [\(The General Medical Council \(Registration Appeals Panels Procedure\) Rules 2010\)](#) (doctors); under the [General Medical Council \(Internal Appeals\) \(Anaesthesia Associates and Physician Associates\) Rules 2024](#).

¹² [Right-touch regulation 2015](#).

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- consistent
 - targeted
 - transparent
 - accountable, and
 - agile.
- 6 Our decision making principles are used by all teams responsible for making regulatory decisions across our organisation. They aim to support our work to continue to drive fairness, proportionality, objectivity, and transparency within our statutory regulatory decision making.

Proportionality

- 7 Decision makers must take a proportionate, risk-based approach to decision making. This means they must:
- be clear on the options available to them
 - ask themselves, in the context of the decision they're making, what's required and no more than is necessary to protect the public, and / or deal with cases fairly and justly, in a timely way
 - where appropriate, consider the impact on those affected by the decision in the context of our statutory duties.

Transparency

- 8 Decision makers must be open about how they make decisions and what the outcomes of those decisions are. They must give clear reasons for their decisions and record decisions in a way that they can be understood, using plain English and clear language.

Objectivity

- 9 Decision makers must be objective in their approach to decision making and must make evidence-based decisions. They'll do this:
- in accordance with our published policies, guidance and criteria to ensure consistency
 - by considering relevant information (including changing circumstances), triangulating and evaluating information where appropriate, and deciding what weight to attach to the evidence available

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- by setting aside their personal feelings and beliefs, and challenging their own biases, assumptions and views, and those of others
 - by maintaining a curious and open mind and being open to perspectives from others.

Fairness

- 10** Decision makers must act fairly and be consistent when making decisions. They must:
- seek to identify, consider and address the risk of bias in the decision making process
 - take steps to mitigate against personal feelings, beliefs or conflicts of interest unfairly influencing their decisions

Appropriate decision makers

- 11** Decisions must be taken by individuals with the right skills, competency, and experience. Decision makers will only make specific decisions if they can demonstrate they've the required skills, competency, and experience to do so.

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