

# PAAs and AAs: ADM5 - English language

## Introduction

1. This guidance is for authorised decision makers (ADMs) who are asked to consider whether Physician Associates (PAs) and Anaesthesia Associates (AAs) applying for registration meet the standard of proficiency in the English language determined by us under article 3(1) of the Anaesthesia Associates and Physician Associates Order ('AAPAO').
2. This guidance aims to ensure consistency, fairness and proportionality in our approach to making decisions. ADMs should read it in conjunction with the ['Principles which apply to decision-making'](#), across all our registration and revalidation functions.
3. This guidance sits under our [Registration evidence framework](#), which sets out the overarching policy for PA/AA registration.

## Basis for assessing evidence of English language proficiency

4. The AAPAO requires us to determine standards applicable to associates, and sets out what these must relate to. This includes 'proficiency in the English language'<sup>1</sup> and we have set this as one of the nine standards that applicants must demonstrate they meet when applying for registration<sup>2</sup>.
5. The procedural requirements that applicants for PA/AA registration must comply with are set out in the General Medical Council (Registration) (Anaesthesia Associates and Physician Associates) Rules ('the rules')<sup>3</sup>. The rules set out the information which must accompany a registration application<sup>4</sup>, and we explain how applicants can demonstrate proficiency in the English language, and the types of evidence ADMs accept, or may accept, in our:
  - [Registration evidence framework](#), and
  - [PAAs and AAs: English language requirement policy](#)
6. To assess whether an applicant meets the standard of proficiency in the English language, ADMs must assess evidence provided by the applicant<sup>5</sup>. The rules also give us powers to make further enquiries, and/or to undertake verification checks<sup>6</sup>.
7. Where discretion is exercised to accept evidence to demonstrate one or more parts of the

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<sup>1</sup> Part 2, Article 3(2)(e), the AAPAO.

<sup>2</sup> Under Part 3, article 6(1)(a), of the AAPAO.

<sup>3</sup> Made under paragraph 4(1)(a) of Schedule 4 of the AAPAO.

<sup>4</sup> Under rule 5(2).

<sup>5</sup> Under rule 5(2)(i).

<sup>6</sup> Through enquiries, and/or requests for information under rule 6(1), and/or verification under rule 6(5).

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standards or information requirements for registration, ADMs must be satisfied of this in the context of the totality of the applicant's overall evidence.

## Meeting the evidence requirements for English language

8. To meet the standard of proficiency in the English language, applicants will need to provide evidence to satisfy us that they have the necessary knowledge of English to practise safely in the UK. We have set the standard at the level we can be assured that applicants can communicate effectively with patients and healthcare professionals in English across all four areas of proficiency (listening, speaking, reading, and writing).
9. Applicants can provide a range of evidence to demonstrate that they meet the standard for proficiency in the English language, as detailed in our [English language requirements policy](#).
10. We accept evidence that is up to two years old<sup>7</sup> prior to an application being submitted.
11. The types of evidence applicants provide may differ depending on their individual circumstances, and ADMs can exercise discretion when assessing evidence.

## Factors to consider

12. ADMs should use the checklist below to decide whether an applicant has provided satisfactory evidence that they meet the standard for proficiency in the English language.
13. All decisions must be made on a case-by-case basis and take into account the associate's individual circumstances.
14. The evidence ADMs rely upon to reach a decision must be robust, objective, independent and verifiable.
15. ADMs will need to consider:
  - whether any of the information available identifies any concerns about the applicant's English language proficiency, and if so
  - whether there is sufficient robust, objective, independent and verifiable information to provide assurance that the applicant has fully addressed these concerns to the extent that we would continue to fulfil our duty for public protection if the applicant were granted registration?
16. If the ADM is not satisfied then the application must be refused<sup>8</sup>.

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<sup>7</sup> This is based on research from the British Council which recommends that English language test scores are valid for two years to ensure reliability of the test results since language skills may deteriorate over two years ([2013 research](#)).

<sup>8</sup> Under part 2, rule 6(9)(b)(i).

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## Checklist

17. When considering whether an applicant has satisfied the ADM that they meet the standard across all four areas of English language proficiency, the ADM should consider whether the applicant has demonstrated proficiency in English language by holding:
- a UK PA/AA qualification, or
  - a valid pass in an English language test we accept?
18. If the applicant's evidence meets the above, and information available does not identify any concerns about the applicant's English language proficiency, ADMs are likely to be satisfied that the applicant meets the standard for proficiency in the English language.
19. Where an applicant has provided evidence of a relevant qualification from a country on our [list of acceptable English language speaking countries](#), the ADM may consider that this satisfies the standard for proficiency in the English language, if it meets either of the following sets of requirements:
- a) a relevant qualification from a country on our [list of acceptable English language speaking countries](#), **and** the applicant is also a national of a country on this list, or,
  - b) a relevant qualification from a country on the GMC's [list of acceptable English language speaking countries](#), and the applicant has practiced there continuously since it was awarded.
20. In considering whether practice was continuous ADMs should consider:
- the nature of the practice in English (eg was this as a PA or AA, or other comparable title)
  - whether it has been continuous or periodic over the preceding two years
  - whether there are any gaps of more than three months?
21. Where none of the above apply to the applicant, the ADM should consider whether the applicant has provided other evidence from the below list, and whether this satisfies the ADM that the standard has been met:
- a relevant qualification<sup>9</sup> taught and examined in English, where:
    - it was awarded within the two years prior to the application being submitted, and
    - all elements of the relevant qualification were taught and examined solely in English, and
    - at least 75% of course related clinical interaction, including personal contact with patients, their families and other healthcare professionals, was conducted in English i.e. without any translation support.

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<sup>10</sup> See considerations for what may constitute continuous at paragraph 19.

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- employer references which evidence that the applicant has practised continuously<sup>10</sup> as a PA or AA (or other comparable title) in a country on our [list of acceptable English language speaking countries](#) for at least the two years before their application was submitted.
  - another English test used to gain registration as a PA or AA with a regulatory authority in a country on our list of acceptable English language speaking countries<sup>11</sup>
  - another UK healthcare qualification and registration in the UK with the healthcare regulator for the profession the applicant's qualification permits entry to, as well as confirmation that the other regulator has no concerns about the applicant's English language proficiency.

22. Where the applicant has provided evidence of an English language test accepted by another regulatory authority, the ADM should consider whether:

- the test assessed knowledge in all four areas of English language proficiency: reading, writing, speaking and listening,
- the test was passed within two years of the application being submitted,
- the English language test was a mandatory requirement for registration with the regulatory authority, and
- the applicant was granted registration with the regulatory authority on the basis of this English language evidence.

23. Where an applicant has provided other evidence (as listed at paragraph 20) to demonstrate their English language proficiency, or where there are concerns about the applicant's English language proficiency, the ADM should consider whether:

- the language evidence provided was gained within the two years prior to the application being submitted
- the language evidence submitted indicates continuous, or periodic use of English
- the language evidence relates to training or practise as a PA or AA
- the evidence demonstrates that the applicant can read, write, speak and listen in English to the required level
- any language triggers have been identified by advisers / contact centre. Language triggers are:
  - an applicant requiring a translator or other person in order to communicate with the GMC on their behalf,

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<sup>10</sup> See considerations for what may constitute continuous at paragraph 19.

<sup>11</sup> We maintain a list of [acceptable English language speaking countries](#), which is based on the [UK government list of nationals who do not need to prove their knowledge of English language](#). We retain discretion to add or remove countries on the list on receipt of new and verifiable evidence.

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- an applicant stating that they cannot speak English.

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