

Implementation Period GDM – for applications received before 1 Jan 2021

Guidance for assessing the acceptability of overseas Primary Medical Qualifications

Purpose of this guidance

- 1 This guidance is for decision makers who are required to determine whether an overseas primary medical qualification (PMQ) is acceptable to us, on the basis that it meets our criteria. This guidance aims to ensure consistency, fairness and proportionality in our approach to making decisions in this area.
- 2 This guidance should be read in conjunction with the [principles which apply to decision-making](#) across all our registration and revalidation functions.

Legislation and criteria

- 3 Where an individual seeking registration falls under sections 19, 21, 21B, 21C, 27A and 27B of the [Medical Act 1983 \(as amended\)](#) ('Act'), one of the conditions they must meet is to satisfy the Registrar that they hold*, or have passed all the qualifying examinations necessary for obtaining, an acceptable overseas qualification†.
- 4 Under Section 21B(2) of the Act, an 'acceptable overseas qualification' means 'any qualification granted outside the United Kingdom, where that qualification is for the time being accepted by the General Council as qualifying a person to practise as a medical practitioner in the United Kingdom.' The General Council have delegated this role to the Registrar, as stated in our [schedule of authority](#).
- 5 The Registrar fulfils the function of deciding which overseas qualifications are acceptable for the purposes of registration in the UK by agreeing criteria that all

* In considering whether an applicant 'holds' the qualification, the Registrar may be asked to consider evidence submitted by an applicant and decide whether they are satisfied that the medical qualifications were genuinely awarded to the applicant and are therefore authentic (this is covered in more detail in paragraph 15)

† Section 21B(1)(a) of the Act

overseas qualifications must meet. Our [criteria for acceptable overseas primary medical qualifications](#) (PMQs), and amendments made to the criteria, are approved through our executive governance framework. The [criteria for acceptable overseas PMQs](#) are published on our website

- 6** This guidance relates to consideration of whether applicants have an acceptable overseas qualification in respect of their primary medical qualification only. We hold a separate list of [acceptable Postgraduate qualifications](#) which can be used as evidence that a doctor has the [necessary knowledge, skills and experience](#) for full registration with a licence to practise.
- 7** Applicants are also required to meet a number of other requirements in order to be eligible for registration. Therefore a determination that an overseas PMQ is acceptable, does not necessarily mean that the individual will be granted registration. Further information about the criteria that apply to registration can be found in our factsheets on sections [19](#), [21](#), [21B](#), [21C](#), [27A](#) and [27B](#) of the Act.
- 8** Applicants cannot appeal to us against our decision that an overseas PMQ is not acceptable. It is at our discretion to determine what we will consider acceptable. Schedule 3A of the Act lists the appealable registration decisions, which include a decision not to grant registration under section 21B of the Act*, and a decision not to include qualifications which do not meet our criteria on the register†.

When we consider the acceptability of overseas PMQs

- 9** An assessment of the acceptability of an overseas qualification may be required in a number of circumstances, including:
 - applications for GMC registration with an overseas PMQ
 - prior to an individual sitting the PLAB test
 - queries from an individual doctor about the acceptability of their overseas PMQ
 - applications for the review of an overseas PMQ from the body or institution awarding the PMQ (for example where the PMQ is currently listed on our unacceptable or case by case list)
 - where evidence comes to light that raises a question about the acceptability of an overseas PMQ which we currently accept.

* Schedule 3A, paragraph 2(1)(ka), 'a decision not to direct that a person be registered under section 21B of this Act (full registration of persons with an overseas qualification)'.
† Schedule 3A, paragraph 2(1)(l) 'a decision not to register a qualification under section 26(1) . . . of this Act (registration of qualifications)'.

- 10** A review of an overseas PMQ may result in one of the following outcomes:
 - a** The qualification is considered acceptable at this moment in time
 - b** The qualification is currently acceptable only in some cases:
 - c** The qualification is currently not acceptable:
- 11** The outcome of our assessment of an overseas PMQ will be shared with the individual and/or institution concerned.
- 12** If an individual's overseas PMQ is being assessed as part of their application for registration, the Registrar will make a decision about their application based on the outcome of that assessment and information relating to the other registration requirements. If it is determined that the PMQ does not meet our criteria, the Registrar will be unable to grant registration to an individual relying on this overseas PMQ. The Registrar's decision about the application for registration will reference the unacceptable overseas PMQ assessment within their reasoning for not granting registration.
- 13** Where an overseas PMQ is found acceptable and the individual intends to undertake PLAB, they can then do this providing they meet the other requirements and comply with the process.
- 14** Where the overseas PMQ has not previously been assessed by us, or the assessment has changed its status, we will notify the institution of a review. We will also publish or remove (where necessary) the PMQ from the list of unacceptable, or acceptable only in some cases, PMQs on our website.

Considering the authenticity of overseas PMQs*

- 15** Where an overseas PMQ is found to be acceptable, the decision maker should satisfy themselves that the applicant holds the qualification. There are two ways in which the decision maker can be satisfied that the qualification is authentic and held by the applicant:
 - a** The applicant has had their medical qualifications verified independently by ECFMG.
 - b** The applicant has submitted non-standard evidence which satisfies you that the applicant's qualification is authentic. There is separate guidance for decision makers asked to consider this.

* Except applications under S27A and S27B of the Act.

Burden of proof

- 16** The burden of proof in these cases is on the applicant or institution applying for the review. Decision-makers should bear in mind at all times that we require applicants and institutions to satisfy us of the criteria on the basis of robust, objective, independent and verifiable evidence.

Factors to consider

- 17** To be acceptable, a qualification must meet all of our [criteria for acceptable overseas qualifications](#), as published on our website. A qualification which does not meet all of the criteria cannot be accepted.
- 18** You should use the factors in the table below to help you assess whether an applicant's overseas PMQ meets our criteria.
- 19** All decisions must be made on a case by case basis and, where the assessment relates to an individual's PMQ, will take into account the doctor's individual circumstances.

| Checklist | |
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| <i>To apply for GMC registration you must satisfy the GMC that you hold, or have passed all the qualifying examinations necessary for obtaining, an 'acceptable overseas qualification'. An acceptable overseas qualification meets all the criteria approved by the GMC. A qualification which does not meet all of the criteria cannot be accepted. The criteria are set out below:</i> | |
| 1 | |
| <i>Criteria a: It must be a primary medical qualification in allopathic medicine that:</i> | |
| <i>i) has been awarded by an institution listed on the World Directory of Medical Schools;</i> | |
| <i>ii) AND, is currently acceptable to the GMC.</i> | |
| 2 | <p>When considering whether the primary medical qualifications and/or individual modules were in allopathic medicine, you may wish to consider:</p> <ul style="list-style-type: none">Examples of what we consider to be acceptable allopathic medicine modules are provided in our guidance for institutions on completing the Medical School qualification review form. These include: general biology, chemistry, anatomy and physiology |

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| | <ul style="list-style-type: none"> ■ Examples of what we do not consider to be modules in allopathic medicine are also provided in our guidance for institutions on completing the Medical School qualification review form, and include: physiology of the chakras, herbology, traditional Chinese medicine (TCM) diagnostics and 'elemental medicine'. ■ Whether there are any modules in non-medicine subjects, for example: social history, physical education, or languages. ■ The modules and subjects which commonly form part of approved UK primary medical qualifications. ■ Whether, regardless of any modules that are not in allopathic medicine, the doctor's programme of study includes at least 5,500 hours of study in allopathic medicine over the required minimum number of years (see criteria d)? |
| 3 | <p>Overseas PMQs must meet all of our criteria at the current time in order to be acceptable to us. Just because a qualification met our criteria in the past, does not mean that it remains acceptable to us now.</p> <p>However if we have previously confirmed that an overseas PMQ is acceptable to us, then it is possible that the legal principle of legitimate expectation might apply. Consideration of the following principles may help you to determine whether this might apply in each case:</p> <ul style="list-style-type: none"> ■ whether there is evidence that we have previously given a clear, unequivocal and unqualified response in confirming that the overseas PMQ was acceptable ■ whether there is sufficient public interest to outweigh the unfairness to the individual or institution in refusing to honour the assurance given and recognise the qualification ■ the context within which confirmation about the acceptability of the PMQ was given at the time; was it clear at the time that information was being sought for this purpose, or is the evidence being taken out of context? |
| <p><i>Criteria b: Primary European medical qualifications will always be acceptable. Where a qualification is not listed in the directory it will be otherwise acceptable to the GMC only where the reason that it is not listed is because:</i></p> <p><i>i) the country, under whose auspices the qualification is issued, is not recognised by the United Nations; AND/OR</i></p> | |

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| | <p>ii) <i>the qualification was awarded by an institution that either no longer exists or no longer delivers medical education and the GMC can be satisfied as to the veracity of the individual's</i></p> |
| | <p><i>Criteria c: Where relevant, the institution listed in the directories must have sufficient contact details (address or email address or fax number or telephone number) to allow verification of the qualifications it has issued.</i></p> |
| | <p><i>Criteria d: It must have been awarded after a programme of study comprising at least 5,500 hours over a minimum period of years, depending on your circumstances.</i></p> <p><i>Please click on the relevant link below which explains the basic medical training requirements your qualification must meet, depending on whether you are:</i></p> <p>i) <u>An EEA national or person relying on EC rights, with a non-EEA PMQ</u></p> <p>ii) <u>A UK or non-EEA national (not relying on EC rights with a non-EEA or UK PMQ)</u></p> |
| | <p><i>Criteria e: If you have studied at more than one institution and that study has contributed to the award of your primary medical qualification it will only be acceptable where:</i></p> <p>i) <i>the institution is part of a recognised twinning programme or a recognised campus of another institution</i></p> <p>ii) <i>OR, it has not been possible to complete your qualification at one institution for justifiable reasons;</i></p> <p>iii) <i>AND, the course credits which contributed to the award of your qualification must not have included credits transferred from another institution where you failed.</i></p> |
| 4 | <p>In determining whether the institution is part of a recognised twinning programme or a recognised campus of another institution, you may wish to consider whether:</p> <ul style="list-style-type: none"> ■ you are satisfied that there is a clear formalised agreement between the different institutions, which we have confirmed with all institutions involved? ■ there is any evidence supporting the arrangement from the regulatory body or government of the country (or countries concerned)? |

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| | <ul style="list-style-type: none"> ■ there is clarity about how the programme is delivered across the different institutions (for example what aspects of the curriculum, and how many clock hours, are studied at each institution)? ■ there is clarity on who is responsible for oversight of the quality of teaching and supervision, and for ensuring that this is consistent across all sites at which the PMQ is delivered? ■ in cases where the awarding body country differs from that in which some or all of the PMQ is delivered, the PMQ is accepted in the awarding body country? If not, does this cause us any concern? ■ where a twinning arrangement is in place, the teaching in each institution builds on that delivered at the previous institution to ensure that the full curriculum is delivered? <p><u>In all cases</u>, you must be satisfied that no course credits which contributed to the award of the PMQ came from another institution where the student failed.</p> |
| 5 | <p>When considering whether the reason for a student being unable to complete their qualification at one institution is justifiable, you may wish to consider whether the reason:</p> <ul style="list-style-type: none"> ■ was due to circumstances beyond the individual's control? <p style="margin-left: 40px;">For example: conflict or political unrest; the impact of extreme environmental conditions; disability* – where the reason preventing the individual from completing their PMQ at one institution arises from their disability; bullying or whistle blowing; and closure of the institution attended.</p> ■ concerned the individuals personal circumstances (eg relocation of family or job, marriage), and if so, whether the individual is able to satisfy us that their performance and conduct was not in question at the previous institution(s). ■ concerned their exclusion, for example on the grounds of misconduct or poor performance, or an attempt to avoid expulsion on the grounds of performance or conduct, regardless of whether any other justifiable reason may also be present? |

* Disability under the Equality Act 2010 is defined as a physical or a mental condition which has a substantial and long-term (meaning lasting 12 months or more) impact on your ability to do normal day to day activities.

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| | <p>In considering whether we are satisfied that the reason for attendance at multiple institutions did not concern issues with the individuals performance or conduct, you may also wish to consider the number of institutions that the individual attended, and the length of time spent at each institution.</p> <p><u>In all cases</u>, you must be satisfied that no course credits which contributed to the award of the PMQ came from another institution where the student failed.</p> |
| <p><i>Criteria f: You must have undertaken clinical rotations (clinical clerkships) as part of your primary medical qualification which have provided you with appropriate clinical experience, meaning:</i></p> <ul style="list-style-type: none"> <i>i) the clinical rotations must have been of an acceptable duration</i> <i>ii) AND, have included exposure to medicine and surgery</i> <i>iii) AND, were overseen and/or approved by the institution you attended</i> <i>iv) AND, formed part of your overall programme of study.</i> | |
| 6 | <p>While there is no absolute acceptable duration, and there is considerable variation in the duration of clinical rotations within UK PMQs, you should consider how the duration of clinical rotations compares to UK PMQs.</p> <p>In considering whether the clinical rotations were of an acceptable duration, you should consider both the duration of individual clinical rotations, and the overall duration of clinical rotations within the PMQ.</p> <p>You may wish to consider whether the duration of clinical rotations undertaken as part of the PMQ are sufficient to enable the following principles (which apply to UK PMQs) to be met:</p> <ul style="list-style-type: none"> ■ A general increase in the duration and responsibility of clinical rotations as the student progresses through the programme. ■ Experience in a range of specialties and settings, and with a range of patient groups representative of those the student would expect to see when working as a doctor within the country in which they are training. ■ The clinical rotations provide sufficient practical experience to achieve the learning outcomes required for graduates. ■ Clinical rotations are of sufficient duration to enable the student to become a member of the team, and to allow team members to make reliable judgements about the students' abilities, performance and progress. |

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| 7 | <p>As a broad indication of what constitutes medicine and surgery we will refer to the list of the specialty areas which constitute medicine and surgery in the UK as represented on our website under the:</p> <ul style="list-style-type: none"> ■ list of specialties of the Joint Royal Colleges of Physicians Training Board. <p style="text-align: center;">And,</p> <ul style="list-style-type: none"> ■ list of specialties of the Joint Committee on Surgical Training. <p>Where necessary, you may also wish to consider the fields of the UK CCT specialties in the CCT curricula.</p> |
| 8 | <p>In considering whether the clinical rotations were overseen and/or approved by the institution a student attended, you may wish to consider whether:</p> <ul style="list-style-type: none"> ■ the clinical rotations were arranged by the institution awarding the PMQ? <ul style="list-style-type: none"> ■ If the institution awarding the PMQ did not arrange the clinical rotation(s), are you satisfied that the locations and specialties in which the clinical rotation(s) will take, or took, place were formally agreed with the institution? ■ there are formal written agreements in place between the institution and all clinical placement providers, covering issues such as: <ul style="list-style-type: none"> ■ roles and responsibilities for the placement ■ defined learning objectives for the placement ■ arrangements needed to ensure that students have appropriate learning opportunities to meet the learning outcomes ■ resources, including access to facilities within the placement ■ process for raising concerns about the way the placement is being run and how these problems will be addressed ■ there are arrangements in place to ensure the effectiveness of the placements, for example to monitor and evaluate the quality and quantity of teaching, supervision and feedback in the placement? |
| 9 | <p>In considering whether the clinical rotations formed part of a student's overall programme of study, you may wish to consider whether:</p> |

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| | <ul style="list-style-type: none"> ■ Is it clear how the clinical rotations fit within the overall programme (when they are scheduled within the programme and how long they should be)? ■ Does the institution approve and oversee the content of the clinical rotations (in terms of the specialty area and curriculum areas to be covered/learning outcomes)? ■ Do clinical rotations increase in duration, responsibility and complexity in line with the curriculum? |
| 10 | <p>Where the qualification presented by the applicant satisfies the above criteria you should consider whether the applicant holds the qualification:</p> <ul style="list-style-type: none"> a Has the applicant had their qualification independently verified by ECFMG? Or b Has the applicant submitted non-standard evidence which satisfies you that the applicant's qualification is authentic? In these instances the decision maker should refer to the separate guidance for decision makers on this issue (GDM46) <p>The burden of proof is on an applicant to demonstrate to the satisfaction of the Registrar that they hold an acceptable qualification, rather than it being for the Registrar to prove that the qualification is not held by the applicant.</p> |
| <p><i>Criteria g: Where the qualification held by an applicant fails to satisfy any one or more of the above criteria that application must be refused (on the grounds that the applicant does not hold an acceptable overseas qualification).</i></p> | |

Last updated: July 2018