

PAAs and AAs: Form and keeping of the register

Introduction

- 1 We're responsible¹ for keeping a register of all physician associates (PAs) and anaesthesia associates (AAs) registered under the Anaesthesia Associates and Physician Associates Order 2024 (the AAPAO)². This register is known as the register of PAs and AAs (the register).
- 2 We're also required to maintain the register³ – we must keep it *'correct in accordance with the provisions of, and made under, [the] Order, and...take steps to guard against, and facilitate the discovery of, [its] falsification'*.
- 3 We have a duty⁴ to record specific information about each registrant within the register⁵. Our [General Medical Council \(Form and Keeping of the Register\) \(Anaesthesia Associates and Physician Associates\) Rules 2024](#) set out our approach to establishing and maintaining the register, including all information that we're required to record as well as other information we've identified as important to have recorded. All references to rules in this policy refer to these rules.
- 4 This policy expands on the requirements set out in our rules and details the rationale for them. The policy also outlines our approach to making amendments to information on the register, and to keeping register information up to date in line with our duty⁶ to maintain the accuracy and integrity of the register.
- 5 In line with good practice we'll regularly review this policy to ensure it remains up to date, fair, proportionate, and effective.

¹ Under article 5(1)(a)(i).

² Under article 6.

³ Under article 5(1)(a)(ii).

⁴ Under article 5(3).

⁵ [PAAs and AAs: Publication and disclosure of registration information](#) sets out the information we'll publish about each registrant and our rationale for publication.

⁶ Under article 5(1).

AAPAO register requirements

- 6 We must keep a single register, divided into two parts, one for PAs and one for AAs. We're also required to keep the register correct and to have systems in place to protect against, and to be able to identify false information⁷. The information that we must record⁸ in the register for each registrant is as follows.
- Registration number⁹ and date of most recent registration.
 - Name¹⁰ and contact details.
 - Information in respect of the person's identity, inclusion of which serves the purpose of protection of the public.
 - Fitness to practise history and appeal decisions.
 - Information related to that person's practice which serves the purpose of protection of the public.
- 7 In addition to this mandatory information, we have discretion¹¹ to record other information in the register.
- 8 In places the legislation¹² refers to information the inclusion of which in the register, the Regulator is satisfied serves '*the purpose of protection of the public*'¹³. We interpret this to include both information which can be seen to directly protect the well-being of the public, as well as information the collection of which promotes public confidence in the professions we regulate. This meets our overarching objectives set out in both the AAPAO¹⁴ and the

⁷ Under article 5(1).

⁸ Under article 5(3).

⁹ This is referred to in the General Medical Council (Form and Keeping of the Register) (Anaesthesia Associates and Physician Associates) Rules 2024 as an associate's General Medical Council reference number, as this is the established name we use.

¹⁰ Guidance on naming convention consistency, and on what name is held on the register will be developed by operational teams.

¹¹ Under article 5(4).

¹² The AAPAO.

¹³ Articles 5(3)(c) & 5(3)(e) reference this in terms of information we must record in the register. Schedule 3, paragraph 4(1)(c) references this in terms of information we must publish.

¹⁴ Schedule 1, paragraph 3(1).

Medical Act 1983¹⁵. We have detailed below how our rules¹⁶ enable us to collect information under this provision.

- 9 We record on the register point-in-time information relating to an individual's registration, as well as ongoing information about them. For example, it's important that we hold information about a registrant's qualifications so we can be assured they have the necessary education and training and are suitable for entry into, and to practise in, a regulated profession the UK. We also hold ongoing information about a registrant's registration which we keep correct and up to date. We publish a subset of this information which allows the public to access accurate information about registrants, including whether an individual is currently registered or not, which promotes confidence in the professions.

Information we must record on the register

- 10 As outlined above, we must record¹⁷ specific information in the register, and this is captured in the rules¹⁸. Collectively, recording this information is important for public protection as it provides:

- **consistency** - we record the same types of information for all registrants, and
- **assurance about the integrity and accuracy of the register** - as we require information on the register to be verified, which is useful in preventing cases of fraud and error.

- 11 There are specific provisions in the AAPAO which relate to the recording of contact details. We must¹⁹ *'prescribe in rules which contact details, including addresses, of associates must be recorded in the register under article 5(3)(b).'*

- 12 We've complied with this duty by outlining in the rules²⁰ which contact details we'll record for each registrant:

- a postal address
- a telephone number

¹⁵ Sections 1(A) and 1(B).

¹⁶ Rule 4.

¹⁷ Article 5(3).

¹⁸ Rule 4(1).

¹⁹ Schedule 4, paragraph 1(3).

²⁰ Rule 4(1)(b).

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- an email address²¹
- 13** The purpose of collecting contact details is so we have an effective means of communicating with our registrants, ensuring that we can share vital information with them. We'll clarify to registration and re-entry applicants which forms of contact details are acceptable – for example a postal address can be any physical address where we can send correspondence.
- 14** The rules²² also require registrants to keep their contact details up to date and the importance of this is reflected in our linked power to remove a registrant's entry from the register if they fail to do so²³.
- 15** Collection and maintenance of these details also allows us to meet the obligations we have around notifications²⁴ (as well as any other legislative requirements to contact registrants).
- 16** The rules²⁵ also cover our identity requirements for registrants ie their:
- date of birth
 - photograph and identification documents which *'are reasonably required by the Regulator as suitable for inclusion in the register'*²⁶.
- 17** The recording of this information is important as it provides assurance about the identity of registrants (and that we've taken steps to verify this), thereby maintaining the integrity and accuracy of the register. As set out in the [registration evidence framework](#), pre-registration ID verification is a vital part of assuring we fulfil our obligation to take steps to guard against and facilitate the discovery of falsification of the register.

²¹ [PAs and AAs: Acceptable contact details for registrants](#)

²² Rule 4(3).

²³ As detailed in rule 4(4).

²⁴ Set out in Schedule 3.

²⁵ Rules 4(1)(c) and 4(1)(d).

²⁶ The detail of our requirements for photographs and acceptable identification documents will be set out in our [ID verification policy](#).

Information as to a person’s practice which serves the purpose of protection of the public

- 18** We must record in the register, for each registrant ‘*such other information in respect of the person’s practice as an associate, inclusion of which in the register the Regulator is satisfied serves the purpose of protection of the public*²⁷.’
- 19** The rules²⁸ set out the information we’ve identified which meets this requirement. Our rationale for recording this information is that:
- it directly relates to a registrant’s practice as an associate, and
 - it promotes and maintains public confidence in the professions we regulate.
- 20** As we’ve decided that the inclusion of this information in the register serves a public protection purpose, and are recording it²⁹, we must separately decide if publishing it is in the interests of public protection³⁰.

Requirement	Explanation	Rationale for how this serves the purpose of protection of the public
Full registration history rule 4(1)(e)	The dates of an individual’s first registration with us and all subsequent changes to registration status (and the corresponding registration statuses).	Allows us and the public to know if an individual was registered at a particular time, whether they’ve previously had their entry removed from the register, and the reasons for any removal. Provides clear information to the public around an individual’s registration history.
Profession rule 4(1)(g)	The profession they’re registered under ie PA and / or AA - the part of the register they appear in.	The AAPAO requires a single register, split into two parts. Individuals may hold dual registration so recording this information provides clarity about which profession(s) an individual is registered under.
Qualifications	This will include the title, awarding body,	Qualifications are the foundation for entry

²⁷ Article 5(3)(e).

²⁸ Rule 4(1)(e), (g), (h), and (j).

²⁹ Under article 5(3)(e).

³⁰ Under Schedule 3, paragraph (4)(c).

<p>rule 4(1)(h)</p>	<p>and year in which the qualification was obtained.</p> <p>This will be the first qualification we've verified and accepted for the purposes of demonstrating the education and training standard required to hold registration as a PA or AA in the UK.</p> <p>We won't record subsequent qualifications in the register, as these wouldn't affect an individual's registration status or provide additional assurance to the public that they've met the standards of education and training required to hold registration³¹.</p>	<p>into the PA and AA professions – recording this information provides assurance to the public that we have assessed registrants as having the necessary education and training to practise in the UK. This information also allows third parties to cross reference with data they may have about registrants.</p>
<p>Annual fee date rule 4(1)(j)</p>	<p>The date on which a person's annual fee is due.</p> <p>We have a duty under the General Medical Council (Fees) (Anaesthesia Associates and Physician Associates) Rules 2024 to notify registrants when their annual fee is due for payment.</p>	<p>Enables employers to access this information so they can ensure their employees remain registered and able to practise.</p>

- 21 We may record additional categories of information relating to an individual's practice on the register in the future if we determine that doing so serves a public protection purpose.

Additional information

- 22 We may³² also record information in the register other than the information which we must record. This discretionary power is supported by the rules³³, which state that entries in the register must allow for the inclusion of additional information. Unlike information which we

³¹ If in the future, a registration condition for associates (eg – prescribing rights) became contingent upon obtaining an additional qualification, we'll consider whether those qualifications should be recorded.

³² Under article 5(4).

³³ Rule 4(2).

must record³⁴ there's no requirement for us to identify a public protection purpose to be able to include this additional information.

- 23** We are neither required nor have discretion to publish any additional information which we record using this discretionary power. Therefore, the information we record under this provision would be information that we wish to collect but which don't consider there is a public protection reason to publish.

Maintaining the accuracy and integrity of the register

- 24** We're required³⁵ to maintain the accuracy and integrity of the register and to take steps to guard against its falsification. This is reflected in the rules³⁶ which require:

- us to keep the register to allow discrete entries to be amended without affecting other entries, and
- that we can trace the entering, amendment, or removal of an entry.

- 25** We maintain the accuracy and integrity of the register in a variety of ways including:

- making amendments to the register, whether independently or at a registrant's request, where we're satisfied information is incorrect or there's been a material change in circumstances
- conducting identity checks for all applicants seeking to join or re-enter the register, including retaining their photograph on record which we may share with relevant external stakeholders under the terms of our [PAs and AAs: Publication and disclosure of registration information policy](#).
- carrying out primary source verification of a variety of evidence during the application assessment process
- use of our powers to remove entries from the register.

- 26** Undertaking these steps gives us assurance that the information in the register is correct, and through this that we're meeting our public protection duty.

³⁴ Under article 5(3)(c) or 5(3)(e).

³⁵ Under article 5(1).

³⁶ Rules 3(3) and 3(4).

Amendments to the register

- 27** We have discretion to make Rules about the entering, amendment, and removal of information in the register³⁷. An ‘amendment’ is a change to information held on the register. This could include adding new information (where none was previously held), changing existing information, and deleting outdated information.
- 28** Having provisions to allow for amendments helps to maintain the integrity and accuracy of the register, and to ensure it remains up to date. The rules³⁸ outline the circumstances when we may make amendments. These circumstances are where:
- the information in the register is either incorrect or there’s been a material change in circumstances since it was recorded
 - a registrant asks us to make an amendment to their entry in the register
- 29** The circumstances in which we’d make an amendment and the evidence we’d request to amend information, will be set out in guidance.
- 30** Registrants can ask us to amend any of the information we hold about them in the register. However, other than contact details³⁹, there’s no requirement for registrants to keep their details up to date. For example where a registrant updates their name or obtains a new identity document, we wouldn’t amend their register entry on their behalf (or request verification, or a copy, of their identity document) unless the registrant asks us to update their registered name.
- 31** When a registrant asks us to amend their register entry, they must provide us with whatever evidence we consider reasonable to support their request. When we amend any information relating to registrant in the register, the rules allow us to retain the previous information in the register, where retention would serve a public protection purpose.

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³⁷ Schedule 4, paragraph 1(2).

³⁸ Rule 5.

³⁹ Rules 4(3) and 4(4) require registrants to keep their contact details up to date, and we may remove a registrant’s register entry if they fail to do so.