

PAAs and AAs: Publication and disclosure of registration information

Introduction

- 1** This document sets out our policy on the publication and disclosure of registration information¹ relating to physician associates (PAs) and anaesthesia associates (AAs). PAs and AAs have been brought into the scope of GMC regulation by The Anaesthesia Associates and Physician Associates Order 2024 (the AAPAO).
- 2** This policy relates only to PAs and AAs, and we have a separate [Registration and revalidation publication and disclosure policy for doctors](#). Our approach differs for doctors and PAs and AAs because of the differences in the legislation governing the different registrant groups².
- 3** Registrants may have more than one entry in our registers³ if they're registered as both a doctor and a PA and / or an AA. In those circumstances, we're required to take a different approach to publication and disclosure of information depending on their profession. We'll apply the approach to publication and disclosure set out in the policy relating to the relevant profession, which means that we may publish certain information about their registration as a doctor which we wouldn't about their PA or AA registration, and vice versa.
- 4** In line with good practice we'll regularly review this policy to ensure it remains up to date, fair, proportionate, and effective.

¹ It doesn't apply to the publication of fitness to practise information about PAs and AAs, which is covered by [AP Policy on publication and disclosure of fitness to practise information for Physician Associates and Anaesthesia Associates](#).

² Doctors will remain regulated under the Medical Act 1983 until the UK government enacts further reform for doctors in the future.

³ Our registers include registers for doctors (comprising the principal list of the register of medical practitioners, and the GP and specialist registers), and the register of PAs and AAs.

Glossary

- 5 The following terms are used throughout this policy and should be read with the definitions below.

Annual fee	The fee payable for continuing to hold registration.
Appeal	An appeal against a decision which is appealable ⁴ .
Appeal decision(s)	The headline outcome(s) of an appeal ⁵ .
Appeal determination(s)	An appeal body's reasons for their appeal decision. Appeal determinations may vary in content, detail, and length, depending on factors such as (but not limited to) the type of appeal, the appeal outcome and the appeal body which made the decision.
Appellant	A person who may appeal a decision we've made under the AAPAO.
Applicant	A person who makes an application ⁶ for entry to the register of PAs and AAs (the register), either as a first-time registration applicant, or as an applicant for re-entry to the register. Re-entry applicants are also known as former registrants .
Associate	A person registered under the terms of the AAPAO ie a registered PA or AA ⁷ .
Decision	A decision or part of a decision made under the AAPAO or rules made under the AAPAO; a finding made by a decision maker. Decision in this policy means the decision maker's full and detailed decision – the explanation for their decision. It covers decisions to remove entries from the register, and revisions of removal decisions we've taken.

⁴ Under article 16 or 17.

⁵ As set out in articles 16 and 17 of the AAPAO: dismiss the appeal; quash the decision under appeal; substitute for the decision under appeal a decision that could have been made; remit the matter to be disposed of in accordance with directions.

⁶ Under article 6.

⁷ As set out in article 2(1).

Disclosure	The sharing of information that we don't publish with external parties. Disclosure may be reactive (where we provide information to someone who has asked us for it), or proactive (where we take the initiative to disclose information where we've identified a need to do so).
Former registrant	A person who's unregistered but has previously held registration and may also be an applicant and / or an appellant.
GMC reference number	An associate's unique registration number ⁸ .
Online register entry	A subset of a register entry published on our website for current and former registrants. An online register entry is different from a register entry , which may contain information we aren't either required or empowered to publish in an online register entry .
Overarching objectives	The objectives set out in the Medical Act 1983 (the Act) ⁹ and the AAPAO ¹⁰ , to protect, promote and maintain the health, safety, and well-being of the public, and promote and maintain public confidence in, and proper professional standards and conduct for, members of the professions we regulate.
Publication	Making information about our registrants (current and former) available to anyone. We publish information in response to legislative requirements (such as the AAPAO requirement to publish specific information about each registrant) or because of actions we take (such as removals from the register or appeal decisions), or because we consider that publication is in the public interest or serves a public protection purpose.
Register	The register of PAs and AAs (the register) we're required to keep by the AAPAO ¹¹ which is distinct from the registers of doctors ¹² which we're required to keep by the Act. The register is split

⁸ As required by article 5(3)(a).

⁹ Sections 1(1A) and 1(1B).

¹⁰ Schedule 1, paragraph 3(1)(a)(ii).

¹¹ Article 5(1)(a)(i).

¹² 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.

	<p>into two parts - one part for PAs and one part for AAs - and includes all registered associates who are legally able to practise in their profession(s) in the UK, having met the required standards and requirements for registration.</p> <p>We keep the register on our internal database systems. It contains all the information we're required to collect and hold about registered associates by the AAPAO and the General Medical Council (Form and Keeping of the Register) (Anaesthesia Associates and Physician Associates) Rules 2024¹³.</p> <p>The register doesn't contain any information about former registrants or unsuccessful applicants. Information about former registrants is held separately from the register in our database.</p>
Register entry	<p>An entry in the register containing information relating to a single registrant. We also hold additional information about registrants, such as their protected characteristics, which doesn't form part of their register entry.</p> <p>A single registrant may have more than one entry in the register at the same time, if they're registered in both professions, and may also have an entry in the medical register if they're also a registered medical practitioner.</p> <p>A register entry is different from an online register entry – the information we record in a register entry may be different, and more expansive, than the information which we're not required or have discretion to publish in an online register entry.</p>
Registrant	A person registered under the AAPAO ¹⁴ .
Registration information	All the information we publish about associates (current and former registrants). This includes mandatory and discretionary publication and covers information from register entries as well as other information, includes but not limited to:

¹³ As required by article 5 of the AAPAO and the General Medical Council (Form and Keeping of the Register) (Anaesthesia Associates and Physician Associates) Rules 2024.

¹⁴ As defined in article 2.

	<ul style="list-style-type: none"> ● removals from the register ● appeal decisions, and ● appeal determinations. <p>It also includes information we choose to disclose to third parties, such as the types of information described in Operational disclosure.</p>
Registration status	<p>This is recorded on an associate’s register entry and published on their online register entry and indicates whether they currently hold registration. It has a basic format of either Registered or Not registered.</p> <p>Where we’ve removed an entry or entries relating to an associate from the register (so that they no longer hold registration), we’ll add extra text to their registration status (both in their record in our database, and in their online register entry) to explain why they were removed (see Removal). We’ll also do this where an associate has died and has been removed for another reason.</p>
Removal	<p>The removal of an associate’s entry or entries from the register, which means that they cease to hold registration. When this happens, they become a former registrant and don’t appear in the register. Removal also means our decision to remove the associate’s register entry.</p>
Revision	<p>The process of changing a decision.</p>
Share and sharing	<p>Referring to and covering both publication and disclosure of registration information.</p>

Why do we share registration information?

- 6 Our functions and powers are set out in statute. For PAs and AAs this is principally the AAPAO, which contains several sections relevant to the sharing of registration information, both by publication and disclosure.

General provisions in the AAPAO

- 7 **Schedule 1, paragraph 3(1)(a)** sets out that we have the objective of promoting and maintaining public confidence in, and proper professional standards and conduct for the PA and AA professions, in addition to our overarching objective of the protection of the public in the Act.
- 8 **Schedule 1, paragraph 3(1)(c)** requires us to discharge our functions in a way which is transparent, accountable, proportionate, and consistent in meeting the objective at paragraph 3(1)(a).
- 9 **Schedule 1, paragraph 3(1)(d)** requires us to co-operate where appropriate and practicable with *'persons concerned with the employment (whether or not under a contract of service), education or training of associates or the services they provide'*¹⁵.

Specific provisions in the AAPAO

Publication

- 10 **Article 5** requires us to keep a single register of PAs and AAs and sets out the information which must be recorded in the register in respect of each registrant.
- 11 **Schedule 3, paragraph 3** gives us the discretion to publish a range of information, primarily about actions we've taken under the AAPAO in relation to registration.
- 12 **Schedule 3, paragraph 4(1)** places a duty on us to publish a range of registration information about current registrants. We must also publish other information about current registrants, if we're satisfied that publication serves public protection purposes.
- 13 **Schedule 3, paragraph 4(2)** places a duty on us to publish additional information about PAs and AAs. This covers current and former registrants and, in some circumstances, PAs and AAs who haven't ever held registration (unsuccessful registration applicants), until we decide that publication ceases to serve public protection purposes.
 - Removals from the register due to convictions for certain criminal offences¹⁶.

¹⁵ This duty is in addition to similar obligations created for us in Section 1(1A) and (1B)(a) of and paragraph 9A(1)(b)) of Schedule 1 of the Act around co-operation which, although primarily concerning doctors, also involve co-operation with those who might engage with PAs and AAs.

¹⁶ Removals under article 9(1)(c).

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- Warnings issued to registrants by case examiners or panels¹⁷.
 - Interim and final measures imposed by case examiners or panels, and
 - Decisions of internal and external appeal bodies¹⁸.

Disclosure

14 Schedule 3, paragraph 1(1) gives us broad discretion to disclose information relating to (any of) our functions under the AAPAO regardless of when or where the information arose.

Other relevant statutory provisions

- 15** We also work within a wider legal framework which sets out how we can use the information we hold, which includes the following legislation.
- UK General Data Protection Regulation.
 - Data Protection Act 2018.
 - Human Rights Act 1998.

What informs our approach to information sharing?

16 We publish and disclose registration information to help meet our overarching objective and the legal obligations described above. We must discharge our functions in a way which is transparent, accountable, proportionate, and consistent¹⁹. Sharing information about applicants, former and current registrants and appellants is an important aspect of being an open and transparent regulator, and supports us in:

- protecting, promoting, and maintaining the health, safety, and well-being of the public
- promoting and maintaining public confidence in the professions we regulate
- promoting and maintaining proper professional standards and conduct for members of the professions we regulate.

17 The key purpose of providing public information about registrants is so that stakeholders can check whether a PA or AA is registered and see relevant information about them. By doing

¹⁷ Warnings under article 10(3)(a)(ii) or 10(5)(a)(ii).

¹⁸ Appeal decisions under articles 16(5) or 17(6).

¹⁹ Schedule 1, paragraph 3(1).

so, we support public protection and uphold the public interest by making sure that key stakeholders can access information that is relevant to how we regulate. It also allows others to hold us to account for actions that we take.

Principles

18 Our approach to sharing information is informed by the following principles. As a public body, we must comply with our legislative duties in the discharge of our functions. This is an overarching consideration, which will take priority if conflicts arise with the other principles.

Transparency

19 Our stakeholders have an interest in being able to access information about PAs and AAs – including current and former registrants as well as individuals who haven't held registration. Publishing information provides assurance that all current registrants have demonstrated the standards that are needed to practise as a PA or an AA in the UK and provides clarity to stakeholders about a PA or AA's registration status. It also ensures that we're open about actions we take, and how and why we've taken them.

Accountability

20 Sharing information enables our stakeholders to understand how and why we've taken certain actions, allowing them to hold us to account about how we have undertaken our regulatory activities.

Proportionality

21 We consider how much information must be shared, the impact of publication on individuals concerned, and how long we should publish the information. Where discretion exists, we balance the interests of the public against those of applicants, registrants, and appellants, and third parties.

Consistency and fairness

22 We'll share information consistently and fairly. We'll consider the distinct requirements, circumstances, and needs of affected individuals, and our public protection objective through the different ways in which we might share information.

What information do we publish?

23 There's information we're required to publish and that we choose to publish covering a range of registration information as set out below²⁰.

Mandatory publication

24 We're required to publish the following information about every current registrant. We also publish the same information about former registrants²¹.

- Full name.
- GMC reference number²².
- Date of most recent registration.
- Whether a registrant is a PA and / or an AA – their profession.

25 We're also required to publish²³ other information where we've identified that doing so serves a public protection purpose. This is the information we record in a registrant's register entry²⁴, as follows.

- Relevant qualifications, including the year in which they were obtained.
- Date of first registration.
- Registration history – all changes (with dates) to registration status after first registration.
- Conditions which registration is subject to under article 8²⁵.
- Any fitness to practise history²⁶.
- The date on which the registrant's annual fee is due.

²⁰ This is a non-exhaustive list, which may change over time as we gain more practical experience of regulating PAs and AAs.

²¹ Provided that we published it while they held registration.

²² Article 5(3)(a) requires us to include a registration number – we refer to this as GMC reference number.

²³ Under schedule 3, paragraph 4(1)(c).

²⁴ Under article 5(3)(e).

²⁵ PA and AA registration won't be subject to any conditions at the beginning of regulation; we'll update this policy accordingly when conditions are introduced.

²⁶ Publication of fitness to practise history is covered [here](#).

26 We must also publish the following information, until we decide that publication is no longer required for public protection. Publication of this information isn't limited to current registrants.

- Removal of register entries where the PA or AA has a conviction for an offence listed in schedule 2 of the AAPAO.
- Warnings issued, and interim and final measures imposed, by case examiners or panels²⁷
- Appeal decisions made by panels and courts²⁸.

Discretionary publication

27 We can also publish other information about current and former registrants, as set out below.

- Removals from the register²⁹.
- The reasons for the determination of appeals if we consider publication to be in the public interest.
- Information relating to former registrants which we've already published under the **Mandatory publication** requirements.

Changes to published registration information

28 We're required to remove entries from the register in some circumstances and have the discretion to do so in others. We have the discretion to revise specific decisions on the grounds of error of fact or law or where there's been a material change of circumstances since the decision was made. Additionally, associates have the right to appeal many of our decisions.

29 This means we'll need to review and amend the information we publish about associates, and we'll do this by updating registration statuses and by publishing relevant decisions.

Registration status

30 Amending registration status where it has changed is important so that stakeholders can see when we've taken action. It ensures the integrity of the register, and that appropriate

²⁷ Under article 10. Publication of this information is covered [here](#)

²⁸ Under articles 16(5) and 17(6) respectively.

²⁹ Under article 9(2).

information is published online. The different ways we'll update registration status is set out below.

Removals

- 31** We'll publish removals by indicating a headline reason for the removal against an associate's registration status on the online register and publishing our removal decisions. We'll update an associate's published registration status on the online register when we remove a register entry, and we'll provide the headline reasons for the removal, as set out below.
- 32** We'll use the following registration statuses where an associate has been removed from the register:
- Not registered - removed after fitness to practise process.
 - Not registered - removed conviction for listed offence.
 - Not registered - removed registration procured fraudulently.
 - Not registered – removed registration made incorrectly.
 - Not registered - removed did not meet revalidation standards.
 - Not registered – registrant requested removal.
 - Not registered – removed did not comply with a fitness to practise assessment.
 - Not registered - removed non-compliance with revalidation assessment procedure³⁰.
 - Not registered - non-payment of annual fee³¹.
 - Not registered - removed inappropriate or inadequate indemnity arrangement and / or insurance policy.
 - Not registered - removed ineffective means of contact.
 - Not registered - removed did not provide information following statutory request from regulator.
 - Not registered - removed did not comply with condition imposed on registration³².

³⁰ PAs and AAs won't be required to revalidate at the beginning of regulation; we'll update this policy accordingly when revalidation is introduced.

³¹ The annual fee required to maintain registration.

³² PA and AA registration won't be subject to any conditions at the beginning of regulation; we'll update this policy accordingly when conditions are introduced.

Death removals

33 We consider it important to publish the removal of an entry from the register because an associate has died³³. Doing so can help to prevent fraud and / or identity theft and is important to maintaining an accurate register and our overarching objective to protect the public. For example, in circumstances where a person might seek to obtain entry to the register on a fraudulent basis by using the details of a deceased registrant.

34 We'll use the following registration status on the online register for deceased registrants.

- Not registered – removed deceased.

Where an associate has died but was previously removed for another reason

35 We may learn an associate has died after we've already removed their entry for another reason and published the removal reason and decision. There may be other instances where an associate died, but we weren't aware of their death when we removed their entry and published the removal reason and decision.

36 In both scenarios, we'll continue to publish the original removal on the online register entry in the former registrant's registration history using their registration status, and we'll continue to publish the removal decision. Registration history will include the original primary headline removal reason, but we'll add extra information to indicate that the former registrant has died.

37 In practice, this means that registration history on the online register entry will include layers of information, with the most recent entry indicating that the associate has died. The previous registration status will show the original reason for removal of the associate's register entry, as in the example below.

- Not registered - associate deceased - GMC informed after removal from register.
- Not registered – removed non-payment of annual fee.

38 Using a different registration status in this way for the most recent published update about a former registrant differentiates between circumstances where we've been required to remove a register entry because a PA or AA has died, and where we learn of a PA or AA's death after their removal from the register for a different reason.

39 Where we learn that these circumstances apply to a dual registrant (ie someone who holds registration as both a doctor and / or a PA or AA), we'll take the same approach to updating

³³ Under the provisions in Schedule 1 paragraph 5(1).

their registration status on the medical register as we will for their registration status on the register of PAs and AAs.

Revision and appeal of removals

40 Where removal decisions are revised or successfully appealed, former registrants will return to the register as associates. In these circumstances, the revision and appeal outcomes will have changed a previous decision. To confirm the associate's return to the register, we'll update their registration status on their online register entry to say:

- Registered

41 We'll only retain the removal on the associate's registration history on their online register entry. This is to reflect the period when they didn't hold registration, to ensure continued publication of their full registration history, and to maintain the integrity of the register. We'll remove the original removal reason and update the associate's registration history for the relevant period to say:

- Not registered

Removal and revision (of removal) decisions

42 All removals and revisions of removal decisions will have an associated written decision. We'll publish all removal decisions, for all removal types, in addition to the headline removal reason we add to the former registrants' registration status. We'll also publish revision decisions where we've revised an earlier removal decision. We won't include decision makers' names in the published decisions, as we don't consider it proportionate for this information to be publicly available.

43 Decision makers will consider whether decisions should be published in full, in part, or not published at all. In doing this, they'll consider factors including but not limited to:

- Any legal obligations to publish information which might apply.
- Whether there are any legal restrictions³⁴, or ongoing civil or criminal investigations / proceedings which would prevent publication or restrict the amount or type of information we're able to publish.

³⁴ Such as judicial orders limiting or preventing publication.

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- The public interest and public protection purpose served by making decisions available to stakeholders.
 - The specific individual circumstances involved and the likelihood of any of serious harm to the physical or mental wellbeing of the associate or another party who may be referred to in the decision.
 - The associate's legal rights under the UK GDPR, the Human Rights Act, the Equalities Act, and other relevant legislation.

Appeal decisions and determinations

- 44** We must publish all appeal decisions, and we can publish the reasons for an appeal determination if we consider publication to be in the public interest.
- 45** We'll publish the following headline information about appeals.
- Appellant name.
 - Appeal body.
 - Appeal type.
 - Appeal outcome³⁵:
 - dismissal of the appeal
 - quashing of the decision under appeal
 - substitution for the decision under appeal a decision that could have been made
 - remittal of the matter to be disposed of in accordance with directions.
 - Decision date.
 - Date decision took effect.
- 46** We'll also publish all appeal determinations wherever possible. Determinations are more than the appeal outcome and include specific detail about the appeal body's reasons for their decision. They could be the determinations of our internal appeal panels, or external court judgments. We won't usually amend or redact appeal determinations unless the specific circumstances require it, following the principles and factors guiding publication of removal and revision decisions set out 13.

³⁵ As set out in articles 16 and 17 of the AAPAO.

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- 47** Internal appeal panel determinations will include the names of the parties to the appeal ie the appellant, panel members considering the appeal, and any legal or other representatives. They won't include the name of the decision maker who made the original decision.
- 48** For external appeals, we'll aim to publish a link to a determination published elsewhere³⁶, where we can, rather than the determination itself, although we'll publish the determination if we can't link to it online. The information we'll publish will be limited by the information produced by the external appeal bodies, and whether there are any restrictions placed on publication of that information by those bodies.

When do we publish registration information?

- 49** There are different timescales and circumstances relating to the publication of the different elements of registration information.

Online register entry

New / re-entering registrants

- 50** When an associate gains registration, either as a new or re-entering registrant, we'll create an online register entry for them and publish the mandatory and discretionary registration information set out above. We'll update the online register entry while the associate holds registration or if they're removed from the register.

Former registrants

- 51** When an associate's registration ceases, we'll continue to publish their online register entry in the same way as we did when they held registration, subject to the publication time periods for former registrants. The information we display on the online register about former registrants will make it clear that they're not registered and will provide a headline reason for the removal of their entry from the register.

³⁶ For example [Search results - Find case law - The National Archives](#).

Decisions and appeal determinations

52 Publication of decisions and appeal determinations will take place when the associate has been notified of the decision³⁷. There may be circumstances where immediate publication in this way isn't possible, and we'll publish those decisions and determinations as soon as we're able to.

External court appeals

- 53** For external decisions over which we have limited control we're reliant on the notification processes applied by those bodies to get details of the appeal outcome. We may only learn of outcomes and determinations after they've been handed down and provided to the appellant. We'll publish these decisions and determinations when we receive formal notification of them, following the approach set out for internal appeal decisions.
- 54** We may not always publish an external appeal determination at the same time as publishing the appeal decision itself, given the variability in receiving notification of the decision and the detail we'll receive about the outcome.
- 55** Formal notification in this context will be evidence of the appeal body's decision, which we may receive directly from the appeal body, or from the appellant and / or their legal representative (if they have one). We'll verify this evidence before publishing the appeal decision and determination.

Where do we publish registration information?

56 We publish registration information on our website, using a combination of the online registers and a dedicated decisions webpage.

Online registers

- [Our online registers](#) allow anyone to check the registration status of PAs and AAs, and identifies them by their name, GMC number, and profession, and confirms their registration status. An online register search will return a selection of information about each PA and / or AA:
 - the information we're legally mandated to collect and hold on the register, and

³⁷ This is when they have been deemed served the notification.

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- additional information against each online register entry.

57 Our registers can also be searched to find doctors and view their registration status and other relevant information.

Decisions webpage

58 We'll publish decisions on removals, revisions, and appeals decisions and determinations separately from online register entries, on a dedicated decisions webpage. We'll link removal and revision decisions back to the affected individual's online register entry, and vice versa, to enable stakeholders to see all the information relating to and affecting that individual's registration status.

How long do we publish registration information?

59 The length of time we publish information about PAs and AAs will depend on whether they hold registration or have left the register, and on the type of information being published.

Online register entry

Registrants

60 We'll publish the information described above for all associates while they hold registration, although publication of some of this information may be time-limited – see below for information about appeal decisions and [here](#) for information about warnings, interim and final measures.

Former registrants

- 61** We can publish information about associates once they've left the register if we've already published that information³⁸.
- 62** There are strong public interest arguments in publishing former registrant information, which include the following:

³⁸ Under Schedule 3, paragraph 4.

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- Allowing police or international regulators to confirm an associate’s registration status without having to make a request to us.
 - Enabling the public to check the status of a former registrant who could be claiming to be registered.
 - When non-practising former registrants are working in unregulated health-related roles, publishing registration information prevents them from working under false pretences.
 - Ongoing publication allows patients to check that the associate held appropriate registration at the time they provided treatment to them.
- 63** We won’t publish indefinitely all the information contained in their online register entries. After an associate leaves the register, we’ll continue to publish the information we published while they were registered for 10 years. At this point, their published registration status will change to:
- Not registered
- 64** Publishing removal reasons for a defined period means that we’ll only publish information which is adequate, relevant, and limited to what’s necessary. After we stop publishing the removal reason and any related decision, we’ll continue to publish the remainder of the former registrant’s online register entry indefinitely. We’ll consider requests to remove entire online register entries from publication on a case-by-case basis, as set out below.

Removals, revisions, and appeals

Removals

- 65** After 10 years we’ll stop publishing removal decisions when we remove the headline removal reason from the former registrant’s registration status.
- 66** We’ll consider requests to stop publishing removal decisions before the publication limit is reached on a case by case basis, balancing the factors we’ll consider on initial decision publication.

Revision decisions, appeal decisions & determinations

- 67** We’ll publish revision decisions and appeals decisions and determination on the decisions webpage for three months from the date that either:

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- the decision is served on the associate for revision decisions and internal appeals, or
 - the date on which we receive formal confirmation of the decision for external appeals.
- 68** This time limit will apply whether the PA or AA holds registration, has left the register, or hasn't ever held registration, and aims to achieve a balance between:
- transparency about decisions taken by internal and external decision makers
 - proportionality and fairness – continued / ongoing publication doesn't serve the interests of the associate or the public, or a public protection purpose.
- 69** Where a published internal appeal is subsequently appealed to an external appeal body, we'll continue to publish the internal appeal decision and determination until the external appeal has concluded. At that point we'll publish all related appeal decisions and outcomes (internal and external) for three months, even where the initial three-month publication period would otherwise have expired. This is because it's important to maintain a historical record of appeals and as they won't be linked to the appellant's online register entry.

Removing online register entries from publication

- 70** In limited circumstances we'll remove online register entries from publication, although we'll continue to hold the information on our systems and may still disclose it on request. Our decision makers will consider requests for the removal of online register entries on a case-by-case basis in line with our decision-making guidance. When considering these requests, we'll balance the factors set out 13.

Disclosure

- 71** We have broad discretion to disclose any information about any matter, regardless of when or where it arose, relating to our functions. This power isn't limited to disclosure of information about current registrants and covers disclosures about former registrants as well as associates who haven't held registration, subject to compliance with data protection legislation.
- 72** When deciding whether to disclose information, we'll consider the general principles transparency, accountability, proportionality, and consistency and fairness. We'll also consider the disclosure principles set out below.

Disclosure principle 1 – Clear purpose

73 Any disclosure of information will be for a clear purpose, which will support our activities, those of the recipient, or the individual concerned, and will have a basis in law. An example of a clear purpose for disclosure is to ensure patient safety, which we'll consider when making decisions. Potential recipients include:

- other health sector organisations
- safeguarding bodies
- regulators, or
- law enforcement agencies.

Disclosure principle 2 – Proportionality

74 We'll only disclose information which we're satisfied is reasonably necessary for the purpose we've identified. We'll exercise discretion regarding sensitive information which would identify anybody other than the PA or AA, and about disclosures which could have a significantly detrimental impact on them. This includes considering disclosure of a health condition or revealing their location when they're at risk of harm.

75 We'll take account of additional risks when disclosing to different recipients and in circumstances where the information might be shared more widely. Any final decision on disclosure will be made by an appropriate decision maker.

Disclosure principle 3 – Individual's interests

76 We'll consider the potential impact on the individual of any disclosure. We'll usually contact them before making a disclosure so they're aware, especially if the disclosure is in response to a specific request about them.

77 In some circumstances, we may disclose without informing the individual if it's in the public interest to do so. For examples, a disclosure to the police or another regulatory body in connection with an investigation. We'll consider the purpose and likely impact of the disclosure, the sensitivity of the information and any urgent circumstances.

Disclosure principle 4 – Information security

78 We'll take appropriate steps to verify the identity of the requester by using our identification protocols. We'll disclose information using an appropriately secure method depending on the nature of the information.

How do we disclose information?

Contact Centre

79 Our Contact Centre will share information we publish about specific associates on request.

Register download service

80 We'll provide associates' online register entries as a downloadable file, through a chargeable subscription service³⁹. This service allows subscribers to download a data file containing online register entries, as well as daily update files with changes to the register. Download data includes an associate's name, GMC reference number, date of registration, and whether any interim or final measures are currently active.

Operational disclosure

81 Our operational teams may disclose information about PAs or AAs, in a variety of circumstances, as set out below. We'll disclose registration information which isn't publicly available to relevant third parties when it's necessary to assist them with their functions or legitimate interests. Third parties include, but aren't limited to:

- UK health departments
- organisations which employ and / or contract with PAs and AAs
- other regulators, both in the UK and internationally, and
- other bodies where appropriate.

82 We've set out below some (non-exhaustive) circumstances where we'll disclose registration information which isn't publicly available, either on request or proactively.

³⁹ This service won't be available when regulation of PAs and AAs starts but will be provided at a later date.

PA and AA course providers

83 We may need to discuss a registration application with an applicant's course provider if we or they have concerns about an applicant's fitness to practise. This may include disclosing details of an application including the fitness to practise declaration and any concerns we have. If we refuse an application based on this information, we'll share our reasons with the applicant and the relevant course provider. We do this to enable the course provider to provide support to the applicant and address any wider concerns.

Royal Colleges

84 We may need to verify the information provided in support of some applications, for example, relating to an applicant's current PA or AA voluntary register inclusion. We may share evidence from those applications with the relevant Royal Colleges⁴⁰ to support our decision making.

Referees

85 We must ensure that applicants are suitable for registration. We may disclose details of registration applications to referees named in those applications so we can verify the information provided to us.

Healthcare organisations including regulators

86 We'll provide information to healthcare organisations which enables them to carry out their functions, and to safely and efficiently employ or contract with PAs and AAs. This may include registration status, annual fee due date, contact details, and PA or AA's ID photograph.

87 We may also discuss an application with an applicant's employer (if they have one) if we need to discuss outstanding documentation or other aspects of an application.

88 When we share information with employers / contracting bodies, we'll do so at an appropriate level within those organisations to ensure that those responsible for corporate and clinical governance are aware of the information.

⁴⁰ The Royal College of Anaesthetists for AAs; currently the Faculty of Physician Associates (FPA) at the Royal College of Physicians for PAs, although this will change in 2025.

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- 89** Where we've removed a register entry, we'll disclose relevant information to healthcare organisations and / or regulators. We'll do this either in response to requests for the information, or proactively where we know that the individual concerned has registration or may be seeking employment as a PA or an AA in the UK or internationally.
- 90** We'll disclose registration information on request to healthcare organisations and other healthcare regulatory bodies in the UK and internationally, if we decide that they require it for their purposes and disclosure is compatible with the principles in this policy. For example, when an employer needs registration information to carry out their own personnel, identity, or misconduct investigations. This information may include the PA or AA's contact details and ID photograph.
- 91** We may also disclose the reasons for a refused registration application if the disclosure:
- will enable the recipient to carry out their regulatory functions
 - is compatible with our duty under the AAPAO to co-operate with those involved in employment, education or training of associates or the services they provide, and
 - would serve a public protection purpose.

Law enforcement agencies

- 92** We'll share information which relates to potential criminal matters linked to registration with relevant law enforcement agencies eg information about fraudulent applications disclosed to the police.

Disclosure and Barring Service and Disclosure Scotland

- 93** The Disclosure and Barring Service (DBS)⁴¹ and Disclosure Scotland (DS) are bodies established under legislation⁴² to administer schemes for vetting all individuals who want to work or volunteer with vulnerable people. Under these schemes DBS and DS have the power to bar (prevent) individuals from working with children and / or vulnerable / protected adults.
- 94** Under the relevant legislation we have the power to refer information we hold to DBS and DS which suggests that a person poses a risk of harm to children or vulnerable / protected

⁴¹ DBS operates across England, Wales, and Northern Ireland.

⁴² The Safeguarding Vulnerable Groups Act 2006 and The Protection of Vulnerable Groups (Scotland) Act 2007 respectively.

adults. Both DBS and DS have the power under their respective legislation to request specific information from us about individuals they're considering whether to bar.

- 95** This means that we may sometimes share information with DBS and DS about applicants, registrants, and former registrants, such as registration applications they've made to us. These disclosures will be handled following established processes and guidance.

Certificates of Current Professional Status

- 96** Certificates of Current Professional Status (CCPS) are a mechanism to share information among international healthcare regulators. They confirm that registrants are or have been registered in the UK, are in good standing, and provide details of (current or previous) restrictions on practice and / or registration. International regulators use CCPS to inform decisions about whether to register applicants.
- 97** The current international regulatory position for PAs and AAs, with limited global formal regulation of the professions and limited international movement of PAs and AAs themselves, means that it's likely that we may be asked to provide CCPS (or similar) to organisations in countries where PAs and AAs are unregulated.
- 98** To achieve our aims of public protection we'll take a flexible approach to the provision of CCPS, which will depend on whether formal regulation is in place in the countries where PAs and AAs are seeking to practise. PAs and AAs will be able to ask the Contact Centre to send a (manual) CCPS notification to relevant international organisations.
- 99** Whether formal regulation is in place or not, where current fitness to practise restrictions are in place for PAs and AAs, we'll include them on outgoing CCPS as standard. Where there's an ongoing fitness to practise investigation which hasn't led to any restrictions (such as interim measures) we won't usually refer to the investigation at all on CCPS, although we may consider doing so on a case by case basis.
- 100** We may sometimes delay issuing a CCPS where current fitness to practise restrictions aren't in place, but where it's clear that they're likely to be imposed soon. CCPS are generally considered to be valid for three months from date of issue and, in these circumstances, issuing CCPS before the imposition of restrictions could lead to the provision of inaccurate information. A senior decision maker will decide whether to delay issuing CCPS in this way on a case by case basis.

Formal professional regulation in place

101 We have broad powers to disclose fitness to practise information about associates if disclosure would be in the public interest. We'll share associates' current and past registration status and full fitness to practise history⁴³ (including restrictions which are no longer published, following their removal from publication under the terms of [DC23402 AP Policy on publication and disclosure of fitness to practise information for Physician Associates and Anaesthesia Associates](#)), with international PA and AA regulators on request⁴⁴, except for:

- interim measures, where the PA or AA wasn't found impaired or received a warning, which will only be disclosed while in publication.
- warnings, which will only be disclosed while in publication (for two years).

102 Where formal regulation is in place, we may sometimes be asked to share CCPS with a non-regulatory organisation. This is likely to be where the CCPS is required for a regulatory purpose, even though the recipient organisation isn't a recognised CCPS receiving regulatory authority, but the relevant regulator uses a third party organisation as a data processor. We'll only share CCPS with third parties in these circumstances where the PA or AA gives us prior explicit consent.

No formal professional regulation in place

103 Where there's no formal regulation in place for PAs or AAs, we'll take a flexible approach, given the lack of a central organisation for international employers to approach for information. We consider that a lack of functioning international regulation indicates a greater UK public interest in disclosure (including of historical fitness to practise information). International information sharing in this way is in the UK public interest for public protection reasons.

104 Where there's fitness to practise information about a PA or AA which isn't in the public domain (ie historical information outside the relevant publication period and therefore not published on the online registers), and we're aware that the PA or AA is considering working internationally, we'll share that information in the public interest with relevant international organisations, including (but not limited to) those in the list below.

⁴³ Current and expired restrictions published on the online registers, as well as expired final measures - conditions and suspensions, but not warnings.

⁴⁴ This approach is applied to all requests for this information made by international regulators, through any channel or mechanism, and is in addition to all proactive provision of this information.

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- Current and prospective employers - a prospective employer becomes a current employer after an offer of employment has been made and accepted.
 - Organisations which hold voluntary register(s) of PAs and / or AAs.
 - Non-regulatory organisations which fulfil a role for the above organisations, such as acting as data processors, where the PA or AA gives us prior explicit consent.
 - PA and AA professional organisations that have an identifiable role in receiving such information.
 - Government-level departments / ministries of health.
 - International PA and AA course providers.

105 We won't usually share CCPS directly with a PA or AA but will confirm the information which we included on their CCPS if asked to do so. Similarly, we won't share CCPS with employment agencies, as it's possible they may share the CCPS directly with the PA or AA.

106 Decisions to provide CCPS in these circumstances will be made by a senior decision maker informed by the reason(s) why the CCPS is required, as well as evidence to confirm this, such as an email from the organisation or a website address where this is confirmed. Where the recipient would be an organisation, we'll verify their details before issuing a CCPS.

Dual registrants

107 Registrants may have more than one entry in our registers if they're registered as both a doctor and a PA and / or an AA. These registrants will have separate online register entries on the online registers, but each entry will indicate that they hold dual registration, and stakeholders will be able to navigate between them.

108 As for all registrants, current fitness to practise restrictions will be visible on the relevant online register entry. Those restrictions may apply only to registration as a doctor, or as a PA and / or AA, or both, depending on the circumstances in which restrictions were put in place and the issues they're intended to cover. Stakeholders will be able to see all restrictions across all online register entries.

109 Where we're asked to provide a CCPS for a PA or AA who holds dual registration, we'll usually provide details of all fitness to practise information relating to that PA or AA, covering all their register entries, including where the information doesn't relate to the profession which they're seeking to practise internationally. We consider that this approach is important to ensure full disclosure to relevant international organisations, allowing them to

assess whether the information might be relevant for their purposes, and is in the public interest and meets a public protection purpose. If we've refused registration to an applicant, we'll share the reasons for our decision with an international regulator or recognised employer (where there isn't a regulator for PAs or AAs), if doing so would be compatible with the principles in this policy and our statutory obligations.

110 When deciding whether to share information with international regulators, we'll consider the information we hold about the PA or AA, such as information about previous international practice, or even their registered means of contact, to help us identify the appropriate bodies to receive the information.

Information about individuals who don't hold registration

111 We may sometimes receive information which relates to an individual who isn't registered with us. These individuals could be working as, or training to become, PAs or AAs, or could be working in another healthcare profession. In these circumstances we'll consider the concerns raised following the approach set out in [PAs and AAs: Pre-regulation and pre-registration concerns..](#)

Exceptional circumstances

112 This policy sets out the circumstances which will usually apply to the sharing of registration information. Other circumstances may arise when we decide to share information outside the terms of this policy. Whenever we decide to do this, it'll be on a case-by-case basis and will follow the principles set out in this policy as well as the obligations and any limitations imposed on us by our governing legislation.

113 Requests which fall outside this policy, but relate to our registration and revalidation functions, may be dealt with using alternative legal routes such as the Freedom of Information Act or exemptions in the Data Protection Act.

114 If a member of the public asks us for registration information, we'll disclose anything which is currently published. Requests for information which isn't currently published will be considered for disclosure under the Freedom of Information Act by our Information Access team. However, we won't usually disclose this information unless there's an overwhelming public interest justification.

Published 13 December 2024