

Guidance on remaining a suitable person for medical revalidation

Regulations 6(6) and 6(7) of the Licence to Practise and Revalidation regulations allow the GMC to receive revalidation recommendations from suitable persons for licensed doctors who do not have a connection to a Responsible Officer under the Responsible Officer regulations. The approval of a suitable person is at the discretion of the GMC. Details of the factors that we take into account when approving a suitable person application can be found [here](#).

Responsibilities of the suitable person

Once an individual has been approved as a suitable person by us, they'll need to participate in regular checks to make sure they continue to meet the criteria.

These checks will be a combination of operational checks that we will undertake as well as a self-declaration from they will need to fill out providing information about their role.

We will look to see that the suitable person:

- has attended Responsible Officer reference groups, suitable person's reference groups or appropriate training events per year to support their role
- has made all recommendations in a timely fashion within the submission period
- continues to maintain a connection to their Responsible Officer or suitable person
- has doctors connected to them
- has remained continually registered and licensed.

We will ask the suitable person to confirm they:

- continue to hold a position with similar responsibilities to a Responsible Officer
- have systems in place to make sure doctors have access to an annual appraisal as per *Good Medical Practice*
- continue to be engaged with Responsible Officer networks and training events.

As part of our long term review of suitable persons, we will also ask for evidence to support recommendations made for a percentage of doctors within the suitable person's cohort. This may include viewing the appropriate policies and documentation to support this review.

Lastly, we will always undertake checks based at any time based on triggers such as complaints, lapses from the register or fitness to practise concerns that are raised.

Additional checks for suitable persons who are also Responsible Officers

There will be circumstances when a suitable person who is approved due to their role as a Responsible Officer, may no longer be able to fulfil the role if they cease to be a Responsible Officer.

Suitable persons who are Responsible Officers have to meet a number of requirements outlined by their organisation. For example, In England, they are required to participate in the [FQA \(Framework for Quality Assurance\)](#) which includes monthly, quarterly and annual reporting against a range of areas outlined in the Responsible Officer regulations including numbers of appraisal and monitoring performance and responding to concerns.

The following triggers may lead us to question the viability of the suitable person role:

- suitable person loses their connection to their Responsible Officer/suitable person
- concerns about suitable person's role as a Responsible Officer arise
- suitable person is no longer a Responsible Officer.

In these situations we will need to ensure they can continue to prove that they have systems and processes in place to meet the role of a suitable person and that they continue to hold a position similar to that of a Responsible Officer.

If concerns arise about their ability to perform their role as a Responsible Officer we will review their role as per the [managing and responding to information about revalidation](#) guidance unless there are fitness to practise concerns.

Depending on the outcome of any concerns or issues raised, we may need to remove their approval to be a suitable person and write to their doctors about what they need to do to revalidate.

Suitable persons who can no longer remain in the role

There will be circumstances, foreseen and unforeseen, where a suitable person may no longer wish to remain in the role. In these situations, we will need to consider whether they can find an appropriate replacement that we will need to approve. If this is not possible, we will write to doctors directly to inform them of their options to revalidate.

Suitable persons who don't meet the checks

Wherever possible, we will provide reasonable time and opportunity for the suitable person to demonstrate how they meet the criteria outlined in our checks.

Where there is evidence that a suitable person is no longer meeting the criteria for the role through any of the checks conducted above, the assistant registrar may decide to remove recognition as a suitable person.

The assistant registrar will take a full account of all the facts and write to the suitable person directly with a final decision.

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