

Portfolio pathway - policy on the time period for making a review application

Summary of policy

1. Doctors applying for specialist or GP registration using the Portfolio pathway can make a review application, following an unsuccessful full application. They must provide evidence that they have met the recommendations set out in the most recent full application decision or notify us that a procedural error occurred in the processing of the initial application. Doctors should make the request within twelve months of the decision. In exceptional circumstances doctors may request an extension to this period if they have a valid reason for not submitting the review application sooner. Decision makers will have discretion to request clarification or additional information if required.

Background

2. Requirements for entry onto the Specialist and General Practice registers are set out in the Eligibility and Registration of General Practitioners and Specialist Medical Practitioners (Amendment) Order 2022 and General Medical Council (Applications for General Practice and Specialist Registration) (Amendment) Regulations 2022. Both the Order and Regulations sit beneath the Medical Act 1983.
3. The legislation sets out that the doctor must demonstrate that they have the knowledge, skills and experience (KSE) required for practising as an eligible specialist or general practitioner in the UK.
4. Doctors who have completed training outside of an approved training programme in the UK can apply for specialist or GP registration via the Portfolio pathway by providing a range of evidence demonstrating their knowledge, skills and experience.
5. If that assessment is successful and the doctor's application is granted, they are entered onto the Specialist Register or GP Register. If the application is unsuccessful the doctor will receive an evaluation report which sets out deficiencies in their application which they need to

address in order to for their application to be successful. A suite of recommendations detailing how the deficiencies might be addressed will be included in the evaluation.

6. A doctor whose application for specialist or GP registration using the Portfolio pathway is unsuccessful, can request a review of their most recent full application decision if:
 - a) The doctor has evidence to demonstrate that they have met the recommendations from the decision, or
 - b) The doctor can show that a procedural error occurred in the processing of the application.

What is the policy?

8. The doctor should make the request for a review within twelve months of their most recent full application decision. This period of time allows the GMC to be assured that the doctor's knowledge, skills and experience evidenced in their most recent full application remain current.
9. In exceptional circumstances, where the doctor has experienced unforeseen significant events, a doctor can request an extension to this period. Decision makers will take into account and seek to balance the following factors:
 - Situations where the doctor can show that a procedural error occurred in the processing of the application (6b above) will not usually require an extension as this will be straightforward to demonstrate. However, decision makers have discretion to grant an extension if necessary.
 - Our overarching objective set out in the Medical Act 1983 is the protection of the public which includes an objective to protect, promote and maintain the health, safety and well-being of the public. Ensuring that a doctor has maintained and kept their knowledge, skills and experience up to date and recent, provides a level of assurance which contributes to that objective.
 - Where not extending the deadline for the doctor would be disproportionate due to factors such as statutory leave or unforeseen significant events.
 - Ensuring that the length of extension requested is considered in light of the [currency of evidence policy](#), which applies to all the evidence submitted as part of the application.
10. The decision maker should consider whether the doctor has a compelling or exceptional reason why they are unable to request the review within twelve months and require additional time.

Examples include but are not limited to:

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- a. Statutory leave.
 - b. Unforeseen significant events
 - c. Other factors outside the doctor's control for example where no exam sittings are available or it is a rare procedure and no opportunities have arisen to complete the required competency.
11. The decision maker should consider the amount of additional time that the doctor has requested, taking into account the following:
- a) The request should be made as soon as possible after the decision to ensure that the knowledge, skills and experience demonstrated at the point of application are still current, and to ensure that evidence submitted meets our [currency of evidence policy](#).
 - b) Whether the additional time requested is proportionate to enable the doctor to meet the recommendations, taking into account the reason for the extension request and the considerations at (8) above.
11. Decision makers at the GMC will make a judgement based on the information and evidence which has been provided. They will have the discretion to request clarification or further evidence if necessary.

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