Guidance on remaining a suitable person and reapproval

1 This document outlines the process for suitable person (SP) reapproval.

2 Regulations 6(6) and 6(7) of the Licence to Practise and Revalidation regulations allow the GMC to receive revalidation recommendations from SPs for licensed doctors who do not have a connection to a responsible officer (RO) under the responsible officer regulations. The approval of a SP 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.

3 Once an individual has been approved as a SP by us, they’ll need to participate in checks to make sure they continue to meet the criteria and the principles outlined below. They must also adhere to the statements in the declaration in the application. They must engage with the GMC when we ask them for information.

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

5 We want to ensure SPs adhere to the following principles:

- **Consistency**: they make recommendations within the submission period, taking into account the information in the RO protocol and understand the principle of consistency in making recommendations by engaging with other SPs and ROs at RO and SP events and training.

- **Quality**: they have the appropriate procedures in place to maintain oversight over the quality of an individual’s practice.

- **Accountability**: they remain accountable to the GMC who can appoint as well as remove approval of an individual as a SP. They participate in quality checks and respond when requested to provide information.
The process

6 The reapproval of a SP will take place once every two years. If we have concerns about a SP’s ability to carry out the role, we can also request information to consider if they should remain approved at any time. We will check that the SP:

- has attended responsible officer reference groups, suitable person reference groups or appropriate training events to support their role
- has made all recommendations in a timely fashion within the submission period
- has responded promptly and appropriately to communications from the GMC
- continues to maintain a connection to a RO or SP
- has the correct doctors connected to them
- has quality assured their appraisals
- has remained continually registered and licensed

Information requested from SPs

7 We will ask the SP to provide:

- up to date contact information
- details of when policies and procedures have been reviewed and copies of any those that have changed or been amended.
- confirmation of their list of connected doctors is correct
- details of attended RO or SP training events/meetings
- details of any quality assurance check of appraisals and the outcome.

Reapproval

8 We will review the information provided by the SP and if they have continued to meet our criteria to be approved, have adhered to the principles outlined above and there are no concerns, we will reapprove the individual to continue to act as an SP and inform their RO or SP.
Suitable persons who don’t meet the checks

9 Wherever possible, we will provide reasonable time and opportunity for the SP to demonstrate how they meet the criteria and adhere to the principles as outlined above.

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

11 Where concerns arise about an SP who is also a RO, we will consider whether those concerns are also relevant to their role as a RO. If we consider the concerns to be relevant to their RO role then we will follow our managing and responding to information about revalidation guidance unless they relate to the individual’s fitness to practise.

12 The assistant registrar will take a full account of all the facts and write to the SP directly with a final decision and notify their RO or SP. Details of the factors that we take into account when considering whether to remove recognition can be found here.

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