Factors we will take into account when determining whether the evidence is sufficient when determining the appropriate link between a suitable person and an individual doctor

There are a number of characteristics which, when appearing individually or in combination, are likely to increase our confidence that the suitable person will be able to make a robust revalidation recommendation. These are set out below but are non-exhaustive and we will review each application against our criteria, on a case by case basis. For instance, sometimes we will need to approve special arrangements relating to an individual doctor and will look in detail at any specific, tailored arrangements that are in place.

Employment relationship

This relationship is valid where the suitable person and the doctor work for, or are contracted to, the same organisation and where no legitimate, prescribed connection exists elsewhere.

The applicant should demonstrate through robust, objective and verifiable evidence that:

- the proposed cohort is easily identifiable by virtue of a specific demonstrable relationship with the employer, such as a contractual arrangement, that can be clearly evidenced, and;
- the doctor has no prescribed connection elsewhere by virtue of The Medical Profession (Responsible Officer) Regulations.

Example: An applicant may work for a particular charity which contracts with a number of doctors. As the individual doctors are not directly employed they will not have a prescribed connection. However the working arrangements may be sufficiently similar to allow the Responsible Officer to have access to information and systems required for the Responsible Officer for the charity to be able to have robust oversight of these doctors and make revalidation recommendations about doctors who contract with them.
**Specialism or sector of work**

Where the doctor practices in a small and niche specialism or sector of work, a person may be suitable to assess the doctor’s practice and provide a recommendation as a result of their common understanding of or involvement in the specialism or sector and the fact that contact between them is facilitated and governed by a specialist or sector network.

The applicant should demonstrate through robust, objective and verifiable evidence that:

- the specialism or sector is niche and is clearly defined, and that it will therefore be possible to identify without ambiguity the doctor(s) covered by the scope of approval statement
- the applicant practises or is qualified to practise within that specialism or has sufficiently detailed knowledge of the specialism to enable them to provide the relevant support to doctors and appraisers on matters relating to revalidation
- the applicant has knowledge of the sector in which the doctor works.

**Example 1:** An applicant is qualified as a Clinical Neurophysiologist, a rare and niche speciality. They are approached by a doctor who qualified in the same field wanting them to be their suitable person by virtue of their knowledge in the field.

This is an example where we may consider approving the link, if:

- the doctor has no prescribed connection elsewhere
- the applicant is able to establish formal, appropriate arrangements to have proper oversight into the doctor’s clinical practise
- all the other aspects and requirements of the application are met with verifiable, robust, objective evidence.

**Example 2:** CCG and Regional area teams.

A doctor who works for the CCG as part of NHS England has no connection as the CCGs are not designated bodies. The RO from an NHS England Area team applies to be their suitable person.

This is an example where we may consider approving the link due to the common sector of work between the doctor and the applicant and the applicant’s knowledge of the sector and setting where the doctor carries out a majority of their work.

**Governance arrangements**

There may be circumstances in which specific governance arrangements are in place as a result of a statutory regime or otherwise, which provide a framework for the suitable person which is comparable to that of an RO in relation to the cohort of doctors. Otherwise it allows the proposed suitable person access to the information and systems required which allow them to make a robust and informed revalidation recommendation.
The applicant should demonstrate through robust, objective and verifiable evidence that:

- the connection within the particular regulatory framework is clearly defined in such a way that it will be clear which doctors are covered
- the regulatory or statutory role provides the applicant with sufficient powers and authority for him or her to fulfil the requirements of the role.

**Example:** The Channel Islands have put legislation in place to establish doctors with similar roles to Responsible Officers. We have recognised these doctors as suitable persons for doctors working in the Channel Islands and the Isle of Man as the legislation provides a framework that allows the suitable person access to the information and systems required to allow them to make robust revalidation recommendations.