Registration Beyond COVID-19

Next steps for GP returners who wish to remain in the clinical workforce after the COVID-19 emergency period.

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Version 2.1 - 17 September 2020
The information herein is understood as correct at the time of publication
Change Log

Version 2.1

- Revised guidance on provision of indemnity cover to returners by MDOs.
- Updated information on the recommencement of appraisals and revalidation for permanent returners.
Introduction and Scope

During the COVID-19 emergency period, a large number of GPs who had left clinical practice have returned to work on a temporary basis, with significantly reduced regulatory requirements. These GP returners have been deployed to various clinical roles, including with local practices, COVID-19 “hot hubs”, and NHS 111’s COVID-19 Clinical Assessment Service (CCAS), which operates in England but was open to returners from all four nations.

While we do not know when emergency period will end, general practice must be ready for it to do so. This guide aims to support those GP returners who have taken on clinical work during the pandemic response and have now decided that they wish to remain in the clinical general practice workforce on an ongoing basis. It provides information on what “next steps” will be necessary to secure permanent re-inclusion on their national Medical Performers List (MPL), and restoration of General Medical Council (GMC) licence and registration.

Further guidance may be produced to support individuals who wish to support general practice in non-clinical roles (e.g. education or mentoring) on an ongoing basis.

The preparation of this guidance has been led by the RCGP Later Career and Retired Members Group (LCARM). LCARM – along with the whole College - wishes to thank all GPs who have offered their skills, expertise and time during this crisis. For more information on the group, please visit rcgp.org.uk/LCARM or email Dr Mona Aquilina (LCARM Chair) at majkla@btinternet.com.
Current Position

- In response to the COVID-19 pandemic, the GMC provided emergency registration (and restoration of licence to practise) to any doctors who had been off the register for up to six years. Additionally, the licence to practise has been restored to any GP who had maintained GMC registration.
- In England, GPs who had been off the Medical Performers List (MPL) for up to ten years have been considered for re-inclusion on the MPL, in Northern Ireland the limit is five years, in Wales and Scotland, three years. These GP returners may also be known as emergency registered practitioners (ERPs).
- Some GPs who have been out of practice for more than five years may have returned as Medical Support Workers (MSWs), with a limited scope of practice and closer supervision. GP MSW roles require GMC licence and registration and inclusion on the MPL (parallel MSW roles were also developed for secondary care clinicians, with different regulatory requirements).
- There is a single MPL for England, through which all doctors are linked to their local responsible officer (RO). ERPs will be linked to their most recent RO, wherever that is located. Arrangements vary in other nations.
- ERPs have not been subject to the normal regulatory requirements for returning to clinical practice. ERPs remain exempt from both appraisal and revalidation.
- Once re-included on the MPL, ERPs have been able to take on clinical work, with most deployed to NHS 111’s COVID-19 Clinical Assessment Service (CCAS) or making their own arrangements to work in local practice.
- The Clinical Negligence Scheme for General Practice provides indemnity cover for GPs in England and Wales for NHS work. No national scheme is in place in Scotland or Northern Ireland – individuals or practices must arrange coverage.
- Medical Defence Organisation (MDO) membership is required for other areas of work, such as private practice, medico-legal advice and support, GMC disciplinary matters, complaints & coroners court issues. MDOs have provided free membership to some ERPs for COVID-19 related work, however some MDOs are now limiting or withdrawing this coverage.
- Individuals should check their indemnity cover before commencing or continuing with any work.
- We do not know exactly when the emergency period will end, but it is likely to last, at least, to the end of 2020.
- Once government formally ends the emergency period, ERPs will be removed from the MPL, and GMC status will revert to what it was before the pandemic (registered without licence to practise, or not registered).
Likely Way Ahead

- As the first wave of the pandemic has eased, some returners will have stepped back from frontline work, but may have chosen to maintain their status as an ERP, on a 'reserve list', which can be drawn on (with refresher training), in the event of a second wave of COVID-19.
- Due to the national shortage of GPs there is strong encouragement for GPs who wish to return to general practice on a permanent basis to do so.
- Current ERPs can now re-apply for permanent restoration of GMC registration and/or licence to practise, via the GMC online portal at https://webcache.gmc-uk.org/ecustomer_enu/index.aspx. Further guidance can be found at https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/changing-your-status-on-the-register/restoration-to-the-register.
- Similarly, ERPs will need to contact their relevant national body to secure permanent re-inclusion on an MPL.
  - Northern Ireland - http://www.hscbusiness.hscni.net/services/1813.htm;
  - Scotland - https://www.sehd.scot.nhs.uk/pca/PCA2016(M)04.pdf;
- It is likely this process may take eight weeks or more, so anyone interested in returning to clinical general practice on a permanent basis is encouraged to begin the process now. This includes any ongoing work with NHS111, as well as any work in frontline general practice.
- GPs who return to the GMC register with a licence to practise and to the MPL are likely to move to their local RO when they return substantively.
- All revalidations due to take place between 17 March 2020 and 16 March 2021 have been delayed by one year. Clinicians returning to practice on a permanent basis will be subject to the usual revalidation procedures. More information on revalidation can be found at https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation/changes-made-to-revalidation-in-response-to-the-coronavirus-covid-19-pandemic.
Position for different GPs

- GPs who have been out of clinical practice for **2 years or less** can approach their local RO revalidation team who will provide advice and signposting on next steps.
- Those GPs who have been out of practice for **more than 2 years** will be able to regain their licence to practise through the GP Induction and Refresher (I&R) scheme. Generic information can be found via the RCGP website https://www.rcgp.org.uk/training-exams/practice/the-induction-and-refresher-scheme-portfolio-route.aspx. Nation-specific information can be found at:

- In England, discussions are ongoing between Health Education England, NHS England and the GMC regarding streamlining the returns process in England for ERPs who wish to remain in practice.
  - HEE is currently reviewing the I&R process for English GP returners currently working as part of the COVID-19 response. Updates will be on the HEE website https://gprecruitment.hee.nhs.uk/Induction-Refresher.
  - As the timeline and outlook for this review is uncertain, we would encourage those who wish to return via the I&R process to begin the process as soon as possible.

- NHS England and other bodies continue to explore more limited, supervised roles with proportionately reduced regulation, building on the model of the MSW roles. These roles would be likely to suit GPs who have been out of clinical practice for some time (for example, over five years) and need to regain skills and confidence, or those who are looking to ‘step down’ from full independent practice.
  - It is likely that these roles will take time to develop and may be nation specific. We would therefore encourage GPs who are interested in returning to clinical practice at all (even with a more limited scope of practice) to pursue restoration of GMC licence/registration, and re-inclusion on the appropriate MPL through the usual channels.