



Sub-engagement & non-engagement policy

This policy is introduced to ensure that a consistent approach is adopted for all doctors connected to FPH for the purpose of revalidation. It explains the steps FPH will take as a Designated Body when a doctor fails to engage with revalidation. This policy follows the guidance on non-engagement¹ laid out by the General Medical Council (GMC). If a doctor fails to engage with revalidation without reasonable cause, the GMC may withdraw their licence to practise.

Introduction

In the UK, all licensed doctors must take reasonable steps to ensure their Responsible Officer (RO) has the evidence required to make a revalidation recommendation to the GMC. A doctor is not engaging in revalidation where, in the absence of reasonable excuses, they do not fully participate in the processes established by FPH as a Designated Body. If a doctor is not engaging, without good reason, the Responsible Officer (RO) may refer the doctor to the GMC. The GMC will then begin a regulatory process that can result in a doctor's licence to practice being withdrawn.

Categories and local processes

Experience tells us that doctors connected to FPH fail to engage for two main reasons:

1. The doctor does not pay their annual revalidation fee as outlined in our User Agreement, and/or
2. The doctor does not organise and/or complete their annual appraisal in a timely manner. This includes engaging in the whole process pre-appraisal and post-appraisal.

Non-engagement where the doctor does not pay their fee

Members are invoiced when they first join the service, and then annually at the end of January thereafter. Invoices should be paid either on or before the due date indicated on the invoice, and always before the appraisal meeting, whichever is the earlier. The due date will be clearly indicated on the invoice and the members appraisal month will be clearly communicated to them on our Revalidation Management System (RMS)

If the invoice due date comes and the fee has not been settled, FPH will send 3 reminders at the last known email address as follows.

30-60 days overdue – email from FPH Revalidation Team requesting that payment is made within 7 days.

60-90 days overdue – email from FPH Director of Education, Standards & Advocacy notifying that we are unable to schedule their next appraisal until payment is received – RO copied in.

¹ <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation/making-a-recommendation-about-a-doctors-revalidation/recommendations-of-non-engagement>

90-120 days overdue – email from the RO stating that they are contravening the terms of the FPH User Agreement and non-payment will be considered non-engagement.

Seven days after the third reminder email, FPH will report this to our GMC Employer Liaison Officer (ELA) and assume the member does not want to continue to revalidate and will remove the doctor from the FPH list of prescribed connections on GMC Connect.

Non-engagement where the doctor does not organise and/or complete their appraisal

FPH will normally allocate an appraiser 4 months before the appraisal month. This will be done in our RMS and an automated email will then be sent to the doctor, advising them of the match and prompting them to organise a meeting date.

Reminder emails will be sent from our RMS to prompt the member to organise their appraisal meeting. The FPH Revalidation Team will start getting involved a month before a meeting is due to have been organised. We first contact the appraiser to see if the member has been in touch, and if they can give us any background information. If need be, the Revalidation Team will contact the member directly asking to report any extenuating circumstances that are preventing them from completing their appraisal by their appraisal month. A one- or three-month delay can be granted at this moment, without involving the FPH RO. However, if there are suggestions that the member would need longer to comply, or the member is not responding in a timely manner, the FPH RO will be informed and this information will be shared. It will then be up to the RO to decide if the circumstances are suitably extenuating to grant a missed appraisal or if the issue should be escalated further.

If the doctor still does not organise their appraisal, the RO will normally issue a non-engagement letter which will be sent by email (Appendix 1A), requesting that the appraisee make contact with either the RO or the FPH Revalidation Team within 28 days to discuss their lack of engagement, and to agree a formal action plan with regards to their appraisal.

If the appraisee does not comply and fails to engage within the 28 days period, the RO will normally inform the GMC in the following manner:

- Where the appraisee is within the notice period (i.e. within 4 months of their revalidation date), the RO will submit a notification of non-engagement to the GMC.
- Where the appraisee is outside their notice period, the RO will submit a REV 6 Form (notice of a non-engagement concern) to the GMC advising of Non-Engagement. If the appraisee continues not to engage and fails to complete their appraisal by their revalidation submission date, the RO will submit a further notification of non-engagement to the GMC and this will trigger the doctor's revalidation date being brought forward.

Consequences of non-engagement

When a doctor's revalidation date is reached and a doctor has not adequately engaged, the RO will normally make a non-engagement notification to the GMC. This automatically results in the GMC initiating an investigation into the doctor's conduct.

For the RO to make a notification of non-engagement, he/she must be assured that:

- the doctor was provided with sufficient opportunity and support to engage with revalidation but failed to do so and/or
- there are no extenuating circumstances which would fully account for the doctor's failure to engage

It is up to the FPH RO to decide if a doctor has any extenuating circumstance for not engaging in the process.

Where there is an extenuating circumstance, it may be appropriate for the RO to request that the doctor's revalidation recommendation date is deferred. The RO also has discretion to authorise a missed appraisal, and in very exceptional circumstances a second missed appraisal (though this has only happened once).

What this means in practice

1. The connected doctor must pay their revalidation fees in a timely manner.
2. The doctor must respond to communications from the FPH Revalidation Team (FPH staff, Lead Appraiser and appraisers) and RO in a timely manner.
3. The doctor must inform the FPH Revalidation Team of any changes in contact details.
4. The doctor must tell the FPH Revalidation team or RO if they face difficulties that compromise their ability to engage.

Whilst the FPH Revalidation Team will continue to make the process of appraisal as straightforward as possible, connected doctors **MUST** engage with this process fully. Doctors should complete and submit their supporting information not less than 2 weeks before their appraisal meeting. This gives the appraiser adequate time to review the documentation that is submitted and request clarification/additional information, if required.

The FPH Revalidation Team will make every effort to ensure that the appraisal process runs to time (and when it doesn't investigate each case). The doctor must contribute by ensuring that they respond to their appraiser, review the appraisal summary and complete the process within the specified periods.

Review

This policy will be reviewed every two years by the Workforce Standing Committee.

May 2024 – For renewal in May 2026

