

POLICY DOCUMENT

Failure to Comply with the Requirements of the Training Programme (NI Deanery Policy)

Policy Review Schedule

Date first Approved by ROG:

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February 2017

Policy Owner: Administrative Director

Amendment Overview

Version	Date	Pages	Comments	Actioned
2014 – 1.0	01/04/2014		Policy created.	Margot Roberts
2014 – 1.1	01/11/2014	Page 9	Policy renamed and revised and submitted to ROG for approval	Margot Roberts
2014 – 1.2	04/2/2015	Pages 8 & 9	Policy further revised and submitted to ROG for approval. Approved subject to minor revision.	Margot Roberts
2015 – 1.3	04/2/2015	Cover page and Page 8	Minor revisions made for circulation to trainees and publication on website	Margot Roberts
2015 – 1.4	10/03/2016	9	Incorporated guidance on non-completion of Form R	Denise Hughes

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Policy Influences

This policy has been influenced by the following:

- Management of Trainees Requiring Support (NI Deanery)
- ARCP Policy for Hospital Specialty Training
- GP ARCP Guidance
- GMC Protocol for Making Revalidation Recommendations
- A Reference Guide for Postgraduate Specialty Training in the UK (Gold Guide 2014)

Policies Impacted

This policy may have an impact on the following:

- Educational Agreement for Doctors in Training in the NI Deanery
- Learning and Development Agreement for the Provision of Postgraduate Medical and Dental Training and Education

Role of the Northern Ireland Medical and Dental Training Agency

The Northern Ireland Medical and Dental Training Agency (NIMDTA) is an Arm's Length Body sponsored by the Department of Health, Social Services and Public Safety (DHSSPS) to train postgraduate medical and dental professionals for Northern Ireland. NIMDTA seeks to serve the government, public and patients of Northern Ireland by providing specialist advice, listening to local needs and having the agility to respond to regional requirements.

NIMDTA commissions, promotes and oversees postgraduate medical and dental education and training throughout Northern Ireland. Its role is to attract and appoint individuals of the highest calibre to recognised training posts and programmes to ensure the provision of a highly competent medical and dental workforce with the essential skills to meet the changing needs of the population and health and social care in Northern Ireland.

NIMDTA organises and delivers the recruitment, selection and allocation of doctors and dentists to foundation, core and specialty training programmes and rigorously assesses their performance through annual review and appraisal. NIMDTA manages the quality of postgraduate medical and dental education in HSC Trusts and in general medical and dental practices through learning and development agreements, the receipt of reports, regular meetings, trainee surveys and inspection visits. It works in close partnership with local education providers to ensure that the training and supervision of trainees support the delivery of high quality safe patient care.

NIMDTA recognises and trains clinical and educational supervisors and selects, appoints, trains and develops educational leaders for foundation, core and specialty medical and dental training programmes throughout NI.

NIMDTA is accountable to the General Medical Council (GMC) for ensuring that the standards set by the GMC for medical training, educational structures and processes are achieved. The Postgraduate Medical Dean, as the 'Responsible Officer' for doctors in training, has a statutory role in making recommendations to the GMC to support the revalidation of trainees. Revalidation is the process by which the GMC confirms that doctors are up to date and fit to practice. NIMDTA also works to the standards in the COPDEND framework for the quality development of postgraduate Dental training in the UK.

NIMDTA enhances the standard and safety of patient care through the organisation and delivery of relevant and valued career development for general medical and dental practitioners and dental care professionals. It also supports the career development of general medical practitioners and the requirements for revalidation through the management and delivery of GP appraisal.

NIMDTA aims to use the resources provided to it efficiently, effectively and innovatively. NIMDTA's approach to training is that trainees, trainers and educators should put patients first, should strive for excellence and should be strongly supported in their roles.

1. Introduction

The GMC in its guidance for Responsible Officers (ROs) requires the RO to inform the General Medical Council (GMC) if a doctor has failed to engage with any of the local systems or processes (such as appraisal) that support revalidation. For trainees the Annual Review of Competence Progression (ARCP) is used to assess progress of trainees towards a Certificate of Completion of Training (CCT) and a recommendation by the RO for revalidation.

On joining a foundation or specialty training programme each trainee is required to sign an educational agreement which sets out the conditions of their appointment. These include participating proactively in the assessment, appraisal and programme planning processes, maintaining regular contact with the Head of School and Specialty/Foundation Programme Director and regularly taking part in educational activities:

Trainees are required to comply with these conditions with the understanding that failure to do so may result in a non-engagement outcome for revalidation and/or an unsatisfactory ARCP outcome.

This paper sets out a process to be applied when trainees show persistent inadequate participation in the requirements of their training programme.

2. Identification of non-participation

Some trainees do not engage with what is required of them to progress in their training programme.

This may become manifest by:

- Failure to comply with regulatory requirements eg inclusion on the GMC register; inclusion on the Primary Medical Performers List (PMPL)
- Poor record keeping on e-portfolio
- Poor attendance at formal education events
- Unexplained absences
- Non-attendance at meetings with Trainer (clinical or educational supervisor), Training Programme Director or Head of School
- Taking study leave without approval
- Non-completion of workplace based assessments
- Non-attendance at ARCP where required

A separate process is followed (appendix 2) if a trainee fails to submit a completed Form R on commencement of training or at ARCP.

3. Process

Once a concern about inadequate participation is expressed or identified by the clinical or educational supervisor the trainee should be referred to the relevant lead educator (Head of

School, Specialty or Foundation Training Programme Director). It is important to ascertain at the outset whether there are any mitigating circumstances as to why the trainee is not participating, for example the trainee might be ill or in need of additional support. Failure to attend a meeting with the lead educator will result in automatic referral to the relevant senior educator within NIMDTA ie the Associate Dean for Foundation/Specialty Training or the GP Director.

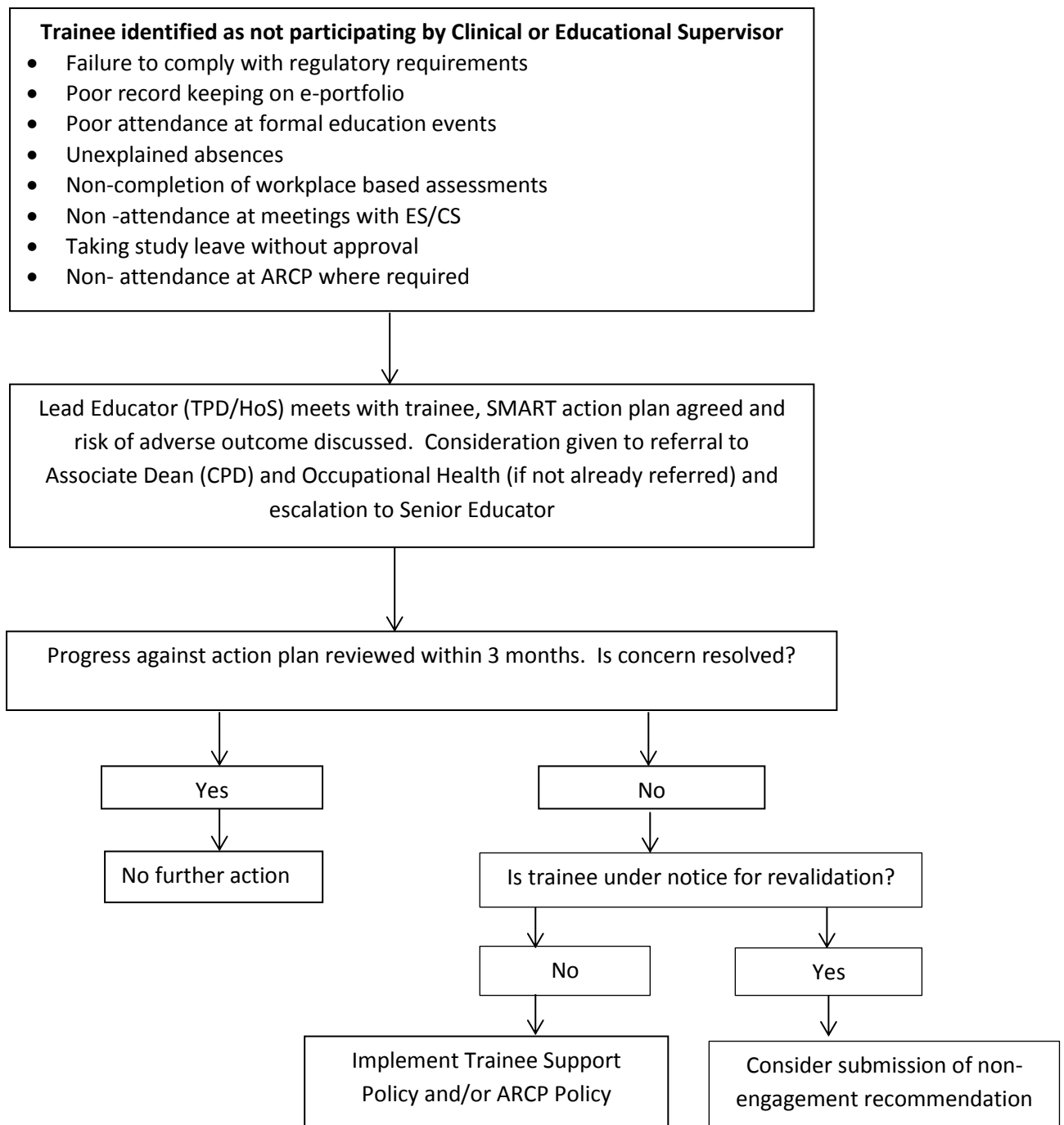
On referral, the lead educator should meet with the trainee and a written record of the meeting taken, shared with the trainee and retained on file. The risk of receiving an adverse ARCP outcome should be clearly explained to the trainee and documented and an action plan agreed for review within three months. The action plan should have clearly stated objectives and identify any additional educational support required by the trainee. Consideration should also be given at this stage as to whether the trainee should be brought to the attention of the relevant senior educator within NIMDTA, particularly if there is a likely risk of the trainee receiving an adverse outcome at the next ARCP.

If the trainee is ill or requires additional support he/she should be referred to Occupational Health (if this has not already occurred), the Associate Dean for Career and Personal Development for support and referral to the Trainee Support Review Group. The concerns should also be escalated to the senior educator within NIMDTA.

Progress against the action plan will be reviewed within the timeframe set and if the concerns have not been resolved the Trainee Support Policy and/or ARCP Policy will be invoked and the Postgraduate Dean informed.

The Postgraduate Dean, as the Responsible Officer (RO), may contact the GMC's Employer Liaison Adviser at any time if a doctor is not engaging with the revalidation processes. As a result, the RO may be required to submit a REV6 form to the GMC to alert the GMC that the doctor is not engaging. The GMC will write to the doctor to remind them that they are obliged to participate in the ongoing processes that support revalidation in order to maintain their licence to practise. An exception to this would be if a doctor is under their period of notice for revalidation in which case the RO may make a revalidation recommendation of non-engagement.

Appendix 1 - Flow chart for Trainees not participating



Appendix 2

Guidance on actions to be taken if a trainee fails to submit a Completed Form

All trainees are required to complete a Form R upon commencement of training and then annually as part of the ARCP process. This is to ensure that the 'trainee re-affirms his/her commitment to training and thereby remains registered for their training programme'.

A complete Form R must be received 4 weeks in advance of ARCP to allow consideration of the revalidation recommendation. Failure to provide a Form R in advance of ARCP will result in an Outcome 5. If the trainee submits an updated Form R within the agreed timeframe the appropriate outcome for progression can be awarded.

If the completed Form R is not received within the initial 2 week period, the trainee will be written to and required to meet with their Lead Educator (Head of School or Training Programme Director or Associate Dean), This correspondence will inform them they have a further 4 weeks from the date of this letter or are at risk of receiving an Outcome 4. A template letter is provided below.

If a trainee is being considered released from the training programme as a result of non-engagement, this will be discussed with the GMC Employer Liaison Advisor.

Dear Trainee

Re: Non Submission of Form R (Part B)

Despite the additional 2 week deadline following your Outcome 5 at ARCP, you have still not submitted your Form R.

By not submitting your Form R (Part B) within the specified timescales you are failing to engage with revalidation. There is now a risk that a recommendation of non-engagement will be made to the GMC which can ultimately result in you losing your Licence to Practise.

A meeting has been arranged with your (Lead Educator) at **(Time, Date, Venue)** as my designated representative to discuss the reasons behind your failure to submit your Form R.

If a completed Form R is not received by (4 weeks from date of letter) you are at risk of receiving an Outcome 4 and will be released from the training programme and this will be discussed with the GMC Employer Liaison Advisor.

Please confirm your attendance to (Specialty Administrator)

Yours sincerely

Professor Keith Gardiner
Postgraduate Dean, Responsible Officer