



JOINT MEDICAL CONSULTATIVE COUNCIL

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Chairman: Alan Russell FRCOG

Mr Niall Dickson  
Chief Executive and Registrar  
General Medical Council  
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04/01/2011

Dear Niall

I am writing to you with regard to the Responsible Officer guidance released by the Department of Health on 26 July 2010.

At its meeting in October 2010, the JMCC discussed Revalidation and considered the new guidance for Responsible Officers. The Council welcomes the guidance and feels the information will be very useful in terms of establishing practitioners within these most important roles across NHS organisations.

We would also like to suggest a slight amendment to paragraph 3.10 on page 9 of the guidance if we may.

It was felt by a number of members that the current wording in paragraph 3.10 suggests that, should any concerns regarding a doctor's fitness to practice arise during appraisals, a Responsible Officer can precipitate a referral to the General Medical Council (GMC) prior to a thorough investigation taking place.

In order to ensure this process is not open to abuse and/or hasty or erroneous recommendations to the GMC, the JMCC would like to suggest the following amendment to the paragraph:

'3.10 Every doctor will be appraised annually by a trained appraiser. Concerns about conduct or performance are unlikely to come to light for the first time during the appraisal process itself, but if they do, they will obviously need to be dealt with there and then. The responsible officer should be informed by the appraiser about any significant concerns that arise, i.e. those of a sufficiently serious nature to call into question the doctor's fitness to practise, as these are likely to require specialist input from the appropriate Medical Royal College or Faculty, NCAS or other relevant body. Arrangements for remediation, supervision or suspension may also need to be put in place. If the responsible officer is concerned at any time, including at the time of appraisal, that the doctor might present a risk to patients, ***the responsible officer will arrange for a thorough internal investigation of concerns to take place, before referring the doctor to the GMC, should concerns prove to be founded.***'

The JMCC would appreciate it if you would consider amending the paragraph to that of the words above, or to similar effect, to ensure that the process is clear.

I look forward to hearing from you with regard to this matter.

Yours sincerely



Dr Alan Russell  
Chairman  
Joint Medical Consultative Council