

Licencing and revalidation for doctors working abroad

Background

In order to work in the UK all doctors must be [registered](#) with the General Medical Council (GMC) *and* hold a [licence to practice](#). Since December 2012, retaining the licence to practise depends on revalidation every five years through a process of annual appraisals. It is important to understand that the GMC licence to practice is a *licence to practice in the UK*.

Understanding your licence to practice and the process of revalidation will help you make decisions as you go and smooth your return to working in the UK after a period abroad. The system is less complicated than sometimes appears and the GMC website (though difficult to navigate) has clear information.

After ten years of revalidation the process and advice for doctors working abroad is now clearer and hopefully simpler. This document contains an overview of the options and is accurate at the time of writing. More detailed guidance is available on the GMC website.

What you need to know about revalidation.

Most doctors working in the UK are 'connected' to the GMC via a **designated body (DB)**, this will generally be the institution contracting the doctor, e.g., an NHS Trust, area NHS team for GPs, private clinic etc. The process of revalidation involves having annual appraisals and collecting a portfolio of supporting evidence, which is assessed by a **Responsible Officer (RO)**, the person within each DB who oversees revalidation. Every five years recommendation is made to the GMC in support of revalidation and the doctors licence to practice is renewed.

For doctors in training posts revalidation is dealt with by the deanery and the responsible officer makes a revalidation recommendation based on the Annual Review of Competence Progression (ARCP), most trainees barely notice this happening!

There are two other methods that a minority of doctors use to revalidate without being connected to a designated body.

- **Suitable Person** - A Suitable Person is the equivalent of a Responsible Officer (RO) for someone without a connection to a designated body
- **Annual Returns** – this involves revalidating directly with the GMC, submitting annual information and sitting a five-yearly assessment.

Each of these revalidation methods can be found [here](#) along with the detailed guidance.

Key terms	
Designated Body (DB)	The institution through which doctors connect to GMC. This is usually NHS trust, NHS area team or a private hospital / provider.
Responsible Officer (RO)	The person within the DB in charge of revalidation – a very useful person!
GMC registration	The register holds the names of all those doctors in 'good standing' with the GMC. To work in the UK the doctor also needs a licence to practice.
Licence to practice	Licence issued by GMC allowing doctor to work <i>in the UK</i> .

Suitable Person (SO)	In rare situation doctors without a DB connect with the GMC and revalidate through a Suitable Person
Annual Returns	Doctors who have neither a DB nor a SO can connect directly with the GMC for revalidation. They provide 'annual returns' demonstrating that they meet criteria for revalidation.
Certificate of Good Standing (CGS)	Certificate issued by medical regulator to demonstrate that there have not been concerns about your practice.

What are the options for doctors working overseas?

What you decide will be determined by your circumstances, the most relevant being the length of time you plan to be out of the UK and whether you have the ability / desire to return regularly for locum work in the UK. For many, having a licence to practice is a part of our 'identity' as doctors. Don't be swayed by emotions as you decide the best course of action!

The options:

- Relinquish your licence to practise but remain registered
- Maintain connection with a UK designated body and revalidate through that
- Use the GMC 'Annual Returns' Route
- Find a Suitable Person who can make a revalidation recommendation for you

For most doctors the only practical options will be to continue regular spells of work each year in the UK and maintain a connection with a DB or relinquish the licence to practice whilst working overseas.

1. Relinquish your licence and then restore it upon return

This is the GMC's recommendation for doctors working wholly overseas for more than a year.

Restoring a licence is straightforward (and free) three documents (plus their translations) need to be produced:

- Certificate of Good Standing from host country's regulatory body
- Provision of Medical Services statement from employer (on form UD8)
- Passport

<https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/changing-your-status-on-the-register/apply-for-or-restore-a-licence-to-practise>

The Certificate of Good Standing (CGS) must be obtained from the medical regulatory body of the country you have been working in.

- If you have worked in more than one country during the past 5 years, you will need a certificate from each country.
- If you are no longer registered in a particular country, it will be a 'Certificate of Past Good Standing.'
- The certificates must have been issued no more than 3 months before you use them (ie they 'expire' after 3 months)
- There is a database of regulatory bodies around the world, if you are in doubt where yours should come from.

- Documents need to be provided in the original language accompanied by a full translation.
- The GMC recognise that in some settings it will be difficult to obtain a CGS, and guidance states *“if you have been volunteering overseas in a medical capacity, and have concerns about not being able to obtain a certificate of good standing, please submit your application and speak to your adviser.”*

What does it mean to be registered without a licence to practise?

- Your name appears on the GMC online register as ‘registered without a licence to practise.’
- The GMC will provide a Certificate of Good Standing (CGS) at any time, free of charge. Request a CGS through your online account and it will be emailed directly to the institution or regulatory body in the host country.
- You pay the annual retention fee to the GMC, this is much lower than the fee required to maintain a licence. There is an additional reduction for those on low incomes.
- There is no requirement to have annual appraisals or collect supporting evidence, although appraisal, CPD and quality improvement activities are good practice.

It is possible to relinquish registration altogether and be removed from the General Medical Register. Some doctors do this in order to save money but it is not advisable as the doctor can no longer be shown to be in good standing with the GMC, which may affect registration in their host country. It can also be difficult to re-register upon return.

Possible problems

- Doctors without a licence may not be accepted by a host country. Thus far we only know of one CMF member who has encountered this problem. However, several countries use the word ‘licence’ in their requirements for overseas doctors to gain local registration. They may not understand the UK’s two-tier system in which registration is separate from licensing. The GMC has a [document for overseas regulators](#) explaining that a UK licence is not necessary.
- A number of organisations require doctors to hold a licence. These include VSO, MSF, Red Cross and some academic institutions. Some CMF members have had to address these issues and CMF is happy to provide more information.
- In some countries it may be difficult to obtain a CGS from the regulatory body for a host of reasons. It can be useful to talk to someone who has worked in the same place before you go to check what you’ll need to do to get the documents you need. Leave plenty of time for this – wheels sometimes turn very slowly in government departments, but remember the documents are only valid with the GMC for 90 days after issue! The GMC is aware of that this is a problem in some countries, if you have any difficulty contact them directly and early for advice.
- There is a concern that not having a licence may disadvantage people applying for UK jobs from abroad, this should not be the case.

2. [Maintain connection with and revalidate through a UK designated body](#)

If you remain connected to a designated body while you are away, you may be able to revalidate through that institution, if the RO gives approval. The connection might be through an honorary contract with a hospital trust. Some GPs maintain contact with a GP surgery and return for a few weeks each year to work and do an appraisal. Realistically, this is only feasible if you are able to guarantee to return regularly to the UK.

Locum agencies have designated body status so it may be possible to revalidate through an agency if working regularly for them. Those doctors whose work involves a significant amount of public health may consider '[Revalidation Subscription](#)' with the Faculty of Public Health.

All the usual requirements for revalidation must be met, including annual appraisal with a UK approved appraiser and producing a portfolio of supporting evidence and the GMC is clear that the majority of supporting evidence should relate to UK practice.

3. The Annual Returns Route

The Annual Returns route is a means of revalidating directly through the GMC. For some doctors this will be the only way they can revalidate if they want to maintain a licence. However, it is not easy. There must be an appraisal every year and all the paperwork has to be done every year (Certificate of Good Standing, information about job, employer, references, probity statement etc). Submitting the annual return costs £261.

There will also be a revalidation assessment every five years. This is a multiple-choice paper, sat in UK currently costing £1,187.

4. Suitable Person

A Suitable Person is the equivalent of a Responsible Officer (RO) for someone without a connection to a designated body. They review the appraisals and supporting evidence and decide whether they can recommend a doctor to be revalidated. The GMC has to approve every SP individually and their guidelines for approval are stringent. The same criteria for practice within the UK apply. Whilst in theory the GMC might approve a SO, in practice this has not proved an option.

A note for doctors in training.

Revalidation for trainees happens through the ARCP process. If all the requirements of the training programme are met, revalidation will happen automatically. Trainees doing Out of Programme Experience (OOPE) remain on their training scheme and so remain licensed with the GMC. Those who go away between jobs (e.g. after F2 or CT2) are no longer employed by a UK body and may have problems retaining their licence. If away for less than a year, it is usually possible to keep a licence and then get back on track for revalidation when starting a new job back in the UK. In order to retain a National Training Number (NTN) you need to keep your licence to practice. Make sure that you get clear advice before you leave.

Practical Advice

- Plan ahead. Both leaving and returning to the UK make sure you are clear about your revalidation and licencing options. You can apply to restore your licence to practice three months in advance.
- The following information may make the GMC process smoother:
 - Make sure that you have your GMC online account up to date. You can use your account to alter registration and revalidation details.
 - Where possible use your registered email address to communicate with the GMC (this cuts down their need for security checks).
 - If the Overseas Regulatory Body and your employer send their documents directly from a recognised email address to the GMC this may reduce the length it takes to verify the documents (this is not always possible).
 - If contacting the GMC is difficult you can ask for 'Third Party Authorisation' so that a nominated person in the UK can act on your behalf.

- Do not be afraid to ask for advice, ask:
 - The GMC by email or telephone helpline
 - Seek advice from the RO of your DB before you leave the UK
 - If you are on a training scheme talk to your LETB or Deanery
 - Ask the CMF, email fi.mclachlan@cmf.org.uk
- Remember that returning to the UK you may need other documents (including a police check for DBS clearance) that are easier to obtain whilst in your host country. For more information about the wider issues of 'going out and coming back' look at the 'Preparing for Change' resource on the CMF website.

Relevant GMC advice

The GMC website has clear and detailed information but is not always easy to navigate. If you find a page you need email the link to yourself so that you don't lose it!

Here are some key links:

'Connection Tool' find out your Designated Body <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation/my-db-tool>

Should I relinquish my licence / registration? <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/changing-your-status-on-the-register/giving-up-and-restoring-your-licence-or-registration/should-i-give-up-my-registration-or-just-my-licence-to-practise>

How to relinquish licence <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/changing-your-status-on-the-register/giving-up-your-licence-to-practise>

How to restore licence <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/changing-your-status-on-the-register/apply-for-or-restore-a-licence-to-practise>

Explanation of registration and licencing for Overseas Regulators https://www.gmc-uk.org/-/media/documents/revalidation-fags-for-overseas-regulators-and-overseas-organisations---dc5322_pdf-54464136.pdf

Different ways of revalidating - <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation#doctors-with-a-designated-body>

Annual returns - <https://www.gmc-uk.org/registration-and-licensing/managing-your-registration/revalidation/appraisals-and-annual-returns-for-doctors-without-a-responsible-officer-or-suitable-person>

Finally

Dealing with GMC issues of registration and licencing can seem intimidating. In practice the options are usually straight-forward and restoring a licence to practice in the UK on return from a spell away is generally without problem. Plan ahead, keep in touch with the GMC and ask if you are not sure!

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