Summary:

Following the November COGPED meeting, a Working Group was set up to agree the way forward regarding calculating and recording time out of training. The members of this group are: John Howard – COGPED; Hilary Diack – COGPED; Fenella Williams – FOGPEM; Kevin Hill - RCGP (Medical Lead); Jonathan Foulkes - RCGP (Medical Lead) and Lisa Johnsen – RCGP.

Below is a summary of the way forward agreed by the group:

- 14 working days remains the trigger for review (as per GMC the statement) which is managed by each LETB/Deanery as they see fit
- Calculations for GP training will continue to be made using calendar days
- A 14 calendar day discretionary allowance per ST year can be applied
- There will be an extra 7 days of flexibility over the whole programme without need for query by the RCGP
- Further flexibility will be considered on a case by case basis with 34 months of time in training the threshold
- Trainees must declare all absence on their Form R and in the Self Rating statement for Competence Area 12, “Fitness to Practice”, which forms part of every ESR
- Working from this, the total number of days absent since the last ARCP Panel review must be added to the box on the new ARCP form by the ARCP panel
- A statement, written by the ARCP Panel, should also be included in the panel certificate (in the “additional comments” section) declaring that all absence has been taken into account by the panel in assessing competence progression when total absence per training year is over 14 days
- Absences of 30 consecutive days or more should be recorded on the ePortfolio as a post (and included in the total days absent reported on the ARCP)

Recommendations for COGPED:

- Agree the proposed uniform method of calculation
- Agree the proposed uniform method of recording absence
- Agree that guidance is formalised

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Implementing the GMC’s Time out of Training Policy paper

The GMC “Time out of Training” policy paper states that absence of trainees should be monitored by Deaneries/LETBs through the ARCP process. Absence of more than 14 working days in one year should trigger a review of their acquisition of competence, possibly with a triggered ARCP panel. Roles in managing absence from training are set out thus:

“The administration of the absence and any extension to training will be undertaken by the relevant deanery in consultation with the relevant College/Faculty where necessary. The GMC support deaneries implementing this guidance flexibly to reflect the nature of the absence, the timing and the effect of the absence on the individuals’ competence. Examples of this flexibility are outlined in the FAQs. The GMC also support the use of targeted training to assist trainees in demonstrating the curriculum competencies without the need for an extension to training.

Q: How will the GMC ensure that deaneries implement this requirement fairly and consistently?

A: The GMC will monitor extensions to training via the review of ARCP data.”

In addition to this, the GMC has established a monthly QA schedule with each College and Faculty. This is proportionate to the number of recommendations made. The GMC selects a recommendation for CCT at random and asks Colleges and Faculties to provide evidence to show that requirements have been met, including:

- The trainee’s posts all add up to the appropriate duration for the programme – and if not, there is an explanation of why this is the case
- Any changes to completion date (due to sickness, maternity leave, part time working etc) have been correctly adjusted

In relation to the CCT audits, the GMC have informed the RCGP that if the total time in training falls below 34 months, this would be the point at which they would query it. It is important to note that it would not be acceptable for a single period of 2 months absence to be overlooked and that the 2 missing months is the aggregate spread over the entire training programme.

Further meetings have been held with the GMC, and the RCGP has been assured that the work of the College Certification team in checking and monitoring all trainees is a robust safeguard to the GMC, and to trainees (and ultimately to patient safety) and must continue. The GMC has also confirmed their wish for the RCGP Certification team to undertake some quality analysis work in addition to this.

Having reviewed previous papers and suggestions and considered new information and guidance, the Working Group agreed a way forward for calculating and recording absence from training.

Calculations

LETB/Deanery administrators have indicated that they are confused by the GMC guidance and would wish to retain the calendar days method of calculation currently used by the RCGP. This would make for consistent, clear communication between the Certification team and LETBs/Deaneries on end of training dates.

In light of this, the proposal is to maintain the method currently used for calculation of training time. This approach has also been endorsed by the GMC.

Proposal

14 calendar days per ST year discretionary absence allowance

- This is two working weeks or 10 working days
- There is no change to the previous method of calculation
- Any time over 14 calendar days absence per ST year to be made up in calendar days
- Queries would not be made when the whole programme is short or over by up to 7 calendar days and all absence has been taken into account
• The extra 7 days allows flexibility between the mismatch of working and calendar days
• A further degree of flexibility could be exercised in individual cases
• For trainees whose progress is not satisfactory, all absence may need to be made up

Recording absence

If a standard method of calculation is to be implemented, it is important that absence is recorded in a uniform way. The purpose of new guidance around recording absence is to:
• ensure that the minimum durations of training requirements are met
• ensure that absence and consideration of it is documented in an agreed manner in Form Rs, the Trainees’ ESRs and in the ARCP panel report
• make absence evident to both LETBs/Deaneries and the RCGP Certification Unit
• reduce the number of queries between the RCGP and LETBs/Deaneries
• improve efficiency
• provide accurate data on how much time in total has been spent in various posts in order for QA work to be undertaken by the RCGP as requested by the GMC

The GMC Time Out of Training statement outlines that it is the responsibility of the trainee to report absences to the deanery, and the responsibility of the deanery to administrate and record these absences. Therefore the RCGP no longer need to be involved in the decision making process around how this will be achieved.

The purpose of the dual entry in both the ESR and Form R is to provide up to date information for the ARCP panel and to ensure the information is available in all parts of the system. Although a trainee’s management of their health is a part of fitness to practice and the sickness absence legitimately therefore contributes to the discussion with the educational supervisor in this competence area, it is not intended that educational supervisors should play any part in “policing” absence as part of the educational supervisor review.

GMC: it is each individual trainees responsibility under good medical practice to be honest and open and act with integrity and as such, to ensure that the deanery are aware of their absences through the deanery reporting requirements.

In addition to the statement, the GMC has said that they expect LETBs/Deaneries to manage this process and to put into place systems to record absence and to report on them as part of the ARCP process. The introduction of a revised ARCP form provides the means to do this as there will now be a field specifically asking for ‘No. of days of Time out of Training since last review’. It should also be evident that the panel has taken all absence into consideration.

Proposal

• Trainees must declare all absence on their Form R and in the Self Rating statement for Competence Area 12, “Fitness to Practice”, before each ESR
• Working from this, the total number of days absent since the last review must be added to the box on the new ARCP panel report by the ARCP panel
  o cumulative total of any single or short multiple periods of absence of 29 days or less
  o and longer periods of absence of 30 days or more
  o periods of 29 days or less should not be documented on the ePortfolio post list
  o if absence is declared after the ARCP panel, this should be added to the total on the next ARCP form
  o the total should include any agreed absence allowance
• Absences of 30 days or more should also be recorded on the ePortfolio as a post
  o 30 or more consecutive days of absence
  o if the absence is taken during a post that the doctor returns to it should be documented in date order
  o all entries should run chronologically and concurrently with no overlapping dates
  o absence entries should include any agreed absence allowance
A statement should also be included on the ARCP form declaring that all absence has been taken into account by the panel in assessing competence progression when the total absence per training year is over 14 days. Suggested phrasing for these standard statements is:

- Having considered all of the absence declared by the trainee, we recommend that
  - a) training should be extended by ____________
  - b) no further training is required.

**Proposed changes**

When the new ARCP form is implemented it needs to be mirrored on the Trainee ePortfolio. In the interim, any absence should be added to the ‘Additional Comments’ box. There will also need to be some instructions added to the ePortfolio for trainees regarding how absence should be declared in Self Rating Competence Area 12. Discussions are planned with the TeP team to determine when these changes can be made.

Upon agreement of the content of this paper, the Certification team will update any internal guidance and provide this to Deanery/LETB administrators and will also update the relevant RCGP web pages in order to provide clear information for trainees.

The Certification team is happy to work with LETBs/Deaneries, providing training materials, targeted training sessions and workshops at meetings.

**Endnotes**


2. Types of absence

Types of absence included in the discretionary allowance or that would be required to be made up and that should be documented:

- Sickness absence
- Maternity leave
- Paternity leave
- Compassionate leave
- Parental leave
- Carer leave
- Sabbaticals
- Jury service

The following types of leave are managed by the LETB/Deanery as they are either linked to training or are employment related. The RCGP do not need to know about these episodes of leave except for annual leave accrued during maternity leave which should be recorded. These types of leave do not count as time off from training and are therefore not included for calculation purposes:

- Annual leave
- Study leave
- Professional leave (including representative meetings)