

Progression review policy

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1.0 Purpose

When nominating a trainee for a Certificate of Satisfactory Completion of Specialist Training (CSCST), the Competency Progression Committee (CPC) must be satisfied that the trainee will be a safe and competent independent practitioner. Nomination depends upon the satisfactory completion of theory and practice assessments as well as demonstrating appropriate standards of behaviour, health and professional conduct relevant to future employment as an independent general practitioner.

There are however instances where a trainee fails to meet the requirements for CSCST and may be unfit for a career in general practice. This policy outlines the types of concerns that can be raised in connection to a trainee's fitness to continue training and how the Irish College of GPs (the College) will respond to those concerns.

2.0 Scope

This policy applies to all trainees enrolled on the national GP training programme.

In circumstances where trainees do not adhere to their responsibilities, conduct themselves in a professional manner and follow the rules and regulations of the Irish College of GPs and the professional guidance as set down by the Irish Medical Council (IMC), the Disciplinary Action Policy and Procedure will generally apply.

3.0 Policy statement

3.1 Safety

Issues of patient and person safety take precedence over all other considerations. Any situation where College or clinical staff believe that a trainee's behaviour presents an immediate risk to themselves, or others is beyond the scope of this policy. In such circumstances, the emergency services or relevant authorities should be contacted, and security staff should be informed to aid directing emergency services to the correct location.

If significant concerns about patient safety exist, action should be taken by recommending that appropriate clinical practice safeguards are in place or by removing the trainee from the clinical setting, and where appropriate, referring their case to the Disciplinary Action Committee and / or the Irish Medical Council.



3.2 General principles

The College has a duty to:

- Protect present or future patients, service users and members of the public;
- Give due regard to equality and human rights legislation;
- Safeguard public confidence in the profession;
- Comply with the requirements of the Irish Medical Council (IMC); and
- Ensure that trainees are not awarded a nomination for qualification that permits them to practice if they are not fit to do so.

Should a trainee's suitability for a career in general practice come into question, the Progression Review Committee (PRC or the Committee) may be convened.

3.3 Circumstances where progression review may be initiated

Circumstances leading to an assessment of fitness to continue training by the PRC may include, but are not limited to, the following:

- The trainee's situation creates a high level of concern such that the trainee poses a danger to themselves, or others and the trainee support process would not be appropriate and/or is unlikely to mitigate risk;
- The trainee receiving a "G" recommendation from the CPC ("Failure to progress satisfactorily despite maximal support");
- Referrals from the examinations department (where the trainee has exceeded the maximum number
 of attempts and/or the maximum allowable time limits for summative assessments);
- The trainee consistently fails to meet training requirements within the time limits set by the programme or to act in accordance with the standards set by the College (e.g. not obtaining recommendation "E" or "I" at the last CPC meeting for their training programme);
- A complaint to the IMC against the trainee which was upheld.

The trainee will be informed of the decision to proceed to the PRC in writing and all evidence submitted for review will also be shared with them.

Objectivity, fairness and record keeping are crucial. A trainee will be presumed 'fit' to continue training unless there is evidence to the contrary.



Strict confidentiality of any case assessed for fitness to train will be maintained and information will be disclosed only on a need-to-know basis. All records will be safely stored in a dedicated SharePoint page only accessible by the PRC and a designated member of the GP Training Directorate who provides administrative support. All personal copies must be safely destroyed (i.e. shredded or permanently deleted) once the matter is closed.

3.3.1 Exceeding limits for completion of the MICGP examination

In principle, each trainee who has completed their nominal training period and is due to complete their examinations should be tracked by the GP Training Unit and, if needed, reminded of the time limit to complete their examinations.

If a trainee takes leave at the end of training, and they have completed the requirements for CSCST, except MICGP examinations, (CPC Recommendation "I"), the CPC should inform the GP Training Unit who will track the trainee's progression against the limits set by the MICGP Exams Regulations.

A trainee who exceeds exam time limits or has exhausted the permitted number of exam attempts as specified by the MICGP Exam Regulations will be brought before the Progression Review Committee who will determine whether the trainee should be removed from the training programme.

3.3.2 IMC decision regarding a complaint

A trainee against whom the IMC's Fitness to Practise Committee has imposed the following sanctions will be removed from the training programme by the PRC:

- Transfer a doctor's registration to another division of the register
- Cancellation of a doctor's registration
- Prohibition of a doctor from applying for restoration to the register for a specified period

The PRC may allow a trainee against whom the IMC's Fitness to Practice Committee imposed the following sanctions to remain in the GP training programme:

- Advice, admonishment or a censure in writing
- A censure in writing and fine not exceeding €5,000
- Attachment of conditions to a doctor's registration

If the IMC suspends registration for a specified period, the trainee may remain on the training programme, but the CPC will put their progress on hold by way of Recommendation "H" (Trainee Inactive due to extended leave) for the equivalent period. The trainee will be required to inform their employer of their suspension.



3.4 Powers of the progression review committee

The Progression Review Committee may:

- Remove a trainee from the training programme;
- Allow a trainee to remain on the training programme, subject to the successful completion of additional assessments, remediation and/or training as specified by the Committee; or
- Allow a trainee to continue in the training programme.

3.5 Criteria for assessment

There will be clear criteria for assessment of a trainee's fitness to continue training, with decisions supported by written evidence that have been shared with the trainee. All parties involved in the review and decision-making process will consider the following:

- The completeness of the evidence provided;
- The extent of the support provided to the trainee, if applicable, in resolving the concerns;
- Options available, if any, for the trainee to rectify their situation;
- The impact of the Committee's decision on the College's obligation to the wider community, public interest, and patient safety;
- Conflicts with existing regulations and policies arising out of the decision;
- The fairness and reasonableness of the decision so as not to disadvantage others undertaking the same training programme or appear to show bias.

3.6 Appeals

Should the trainee not be prepared to accept the decision of the PRC, they have a right to appeal per the Appeals Policy.

If an appeal has been lodged by the trainee, no notification to the IMC or employer about the decision of the PRC (if one is required) will be made until the determination of the appeal.

3.7 Notification to the employer

Where a progression review procedure is initiated by the College, this will be notified to the employer in circumstances including but not limited to the following:

- Where there is a concern regarding patient safety;
- Where there is a concern regarding staff safety;
- In the event that the Trainee Agreement is terminated;
- Where the Trainee has been dismissed from the training programme.



3.8 Notification to the Irish Medical Council

If the trainee does not progress as required and they would be a risk to patient safety, the College should notify the IMC as information.

If the trainee is removed from a programme due to falling short of professional standards and/or engaged in misconduct and is a risk to patient safety, the Committee Chair or their delegate will inform the IMC by submitting a complaint regarding the trainee's behaviour.

3.9 The role of the support person

A trainee may request the presence of a support person during the PRC meeting; if not, they should be encouraged to do so. A support person may be a family member, a senior clinical colleague not involved in training, or a union or legal representative.

The role of a support person may include but is not limited to:

- Assisting the trainee in understanding the progression review process;
- Assisting the trainee in understanding their rights and responsibilities;
- Helping the trainee to prepare for meetings or hearings;
- Providing emotional support to the trainee.

The role of a support person is subject to clear limits:

- Support persons cannot interfere with or disrupt proceedings in any way and cannot speak on behalf of a trainee, though the trainee may confer with them;
- Support persons must maintain confidentiality and respect the privacy of the individual.

3.10 Special circumstances

3.10.1 Illness and sick leave

Where a trainee is certified as unfit to participate, the trainee must provide documentary proof of same to the Scheme Director (SD) immediately on receipt. The PRC and/or SD will then adjourn the progress of the referral under this Policy until such time as the trainee is certified as fit to participate in the process. The SD and PRC reserve the right under this Policy to require a trainee to undergo assessment where there is a concern in respect of the trainee's fitness to participate in this process and they may be placed on temporary suspension pending receipt of such confirmation. Any period of time during which the trainee is regarded as unfit to participate will be advised to the Employer under the College agreement with the HSE.



3.10.2 The trainee refuses to cooperate

Where the trainee refuses to attend meetings or hearings or does not otherwise cooperate with the process set down in this document, the College reserves the right to refer the matter for disciplinary action under the relevant policy.

3.10.3 The trainee voluntarily resigns from the programme

This policy applies only to trainees enrolled on the national GP Training Programme. As such, the process is discontinued in cases where the trainee voluntarily resigns from the programme in writing. The trainee will be provided with documentation validating their training up the point of resignation.

If the trainee resigns from the programme prior a PRC hearing, the hearing will not proceed, and no outcome arises. The fact the trainee was referred under this Policy will be recorded and retained on their file.

If the trainee resigns while the PRC deliberates, the proceedings shall be concluded per meeting procedures. The trainee forfeits their right to appeal in so doing and a finalised ruling may then be issued by the PRC.

If the trainee resigns from the programme following the issuing of a provisional ruling, they forfeit their right to appeal in so doing and a finalised ruling may then be issued by the PRC.



4.0 Roles and responsibilities

Scheme Directing Team (SDT)	Ensure complete records are available for the Scheme Director and the National Directorate of GP Training and the PRC	
Scheme Director (SD)	 Provide complete records as requested Available for advice and guidance 	
Competency Progression Committee	Determine a trainee's progression status and make recommendations	
National Director of GP Training (ND)	 Consider whether the trainee is safe/fit to train based on evidence presented Notify the authorities or IMC, where warranted Chair the PRC Notify the employer and trainee 	
Progression Review Committee (PRC or the Committee)	 All members of the PRC will adhere to the terms of reference detailed in the Procedures The Chair, Secretary and members of the PRC will execute their functions in accordance with College guidelines 	
Appeals Committee	The following decisions do not involve academic judgment and may be appealed under the Appeals Policy: 1. Decisions about the fairness of procedures 2. Where there is evidence of bias or maladministration by way of failure to follow policy and procedure.	
Trainee	Inform their Scheme Director and where relevant, the employer, if they are subject of a formal complaint, involved in a serious incident or if they have been referred to the IMC.	



5.0 Definitions

Fitness to continue training	A trainee's ability to engage fully with the training programme whilst maintaining appropriate standards of performance, and physical, psychological and emotional attributes that will enable them to carry out their responsibilities in a professional, competent and safe manner, and which does not have a negative impact on the trainee, or others.
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6.0 Related and supporting documentation

- Progression Review Committee Procedures
- Trainee Support Policy
- Disciplinary Action Policy
- MICGP Exam Regulations
- Grounds for complaints to the IMC
- IMC Guide to Professional Conduct & Ethics for Registered Medical Practitioners

7.0 Contact

GP Training Quality Assurance and Enhancement

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