Transitional arrangements to the 2021 GMC-approved curricula and assessment system, incorporating Annual Review of Competence Progression (ARCP) derogation guidance for Cellular Pathology: Histopathology, Diagnostic Neuropathology, Paediatric and Perinatal Pathology and Forensic Histopathology 2022

Introduction
Throughout the pandemic, the Medical Royal Colleges have worked collaboratively to support trainees and trainers and mitigate against the impact of the disruption on trainees’ progression through training with the GMC and Statutory Education Bodies. In September 2021, the GMC confirmed that the approved derogations would remain in place throughout the period of disruption caused by the pandemic.

Therefore, to support ARCP panels and to aid flexibility, we have developed joint transitional arrangements and ARCP derogation guidance.

These transitional arrangements are for the Cellular Pathology NTN holders in a GMC-approved UK training programme (leading to the award of the CCT or CESR(CP)) who are transferring to the relevant 2021 GMC-approved UK curriculum and assessment system. These transitional arrangements reference the GMC policy statement: Transition of learners to a new curriculum.

These transitional arrangements apply to trainees who entered the relevant training programme prior to 1 August 2021 and are on either the 2015 histopathology or the 2012 diagnostic neuropathology/paediatric and perinatal pathology/forensic histopathology GMC-approved curricula. The only exception to this applies to trainees who have passed the FRCPath Part 2 examination and whose provisional CCT date is on or before 31 July 2023.

As a guide the GMC consider two years from the curriculum implementation date to be a reasonable transition period for all trainees (including less than full time trainees) to have moved to new curricula. Trainees in their final year of training with a CCT date on or before 31 July 2023, or for whom it would not be in the interests of patient safety or impractical to support to move to a new curriculum, will normally remain on the curriculum in place prior to the new approval.

General Principles
- Trainees transferring to the relevant 2021 GMC-approved UK curricula and assessment system will not be able to revert to their previous curriculum.
- Trainees transferring curriculum should proceed to the relevant ST year, e.g. a trainee who has satisfactorily completed ST4 in their existing curriculum should proceed to ST5 in their new curriculum.
- To ensure the maintenance of the educational quality, standards, and integrity in the transition from the existing GMC approved curricula.
- To ensure fairness and equity for all trainees.
- To ensure that curriculum capabilities and mapping are undertaken by the LETBs/Deaneries.
- To minimise disruption as trainees' progress to CCT/CESR(CP).
These transitional arrangements were endorsed by the Histopathology CSTC on 10 March 2022 and published on 27 April 2022.

**General guidance for trainees and trainers in the cellular pathology specialties**

- Trainees must follow any adopted national practice and safety guidance with respect to the handling of fresh tissues and their own personal conduct inside and outside of work premises.
- Routine autopsy practice and training restrictions should now be lifted within individual training programmes. If not, then the trainees must work with their Training Programme Directors to seek sufficient experience to satisfy curriculum requirements prior to moving to the next stage of training.
- Sick leave/special leave should be discussed with Educational Supervisors/TPDs as normal and taken into consideration by the ARCP panel.

**Critical progression points for histopathology, diagnostic neuropathology, forensic histopathology, and paediatric and perinatal pathology**

- The critical progression points are for trainees moving from stages B to C and stages C to D as well as any trainees in Stage D who have sufficient evidence to demonstrate that they have completed their training.
- Trainees in Stages B and C who have sufficient evidence to present to the ARCP panel of the curriculum defined competencies and who are in possession of the FRCPath Part 1 may be awarded an outcome 1 and be moved to the 2021 curriculum as defined by their specialty training year at ARCP. Trainees in Stages B and C who are not in possession of the FRCPath Part 1 (for progression to Stage C) and FRCPath Part 2 (for progression to Stage D) should be awarded the appropriate ARCP outcome and be moved to the 2021 curriculum as defined by their specialty training year at ARCP.
- Trainees at the end of Stage C and in possession of FRCPath Part 2 who have sufficient evidence to present to the ARCP panel of the curriculum defined competencies; and who have a CCT date on or before 31 July 2023 may be awarded an outcome 1. Such trainees can remain on their existing curriculum and are not required to move to the 2021 curriculum.
- Trainees in stage D who have sufficient evidence to present to the ARCP panel of the curriculum defined competencies may be awarded an outcome 6 and apply for CCT if they are within 6 months of their projected CCT date.

**The recommended minimum data set for each year of training**

For the 2022 ARCPs, it is expected that the Educational Supervisors Structured Report (ESSR) will be a key part of the evidence. It may include an indicative assessment of the trainee, mindful of the impact of Covid-19.

The portfolio of evidence provided by the trainee for the period under review can include:

- any workplace-based assessments completed. The number of workplace-based assessments required for each year or stage of training is indicative\(^1\). These can include any undertaken during redeployment which demonstrates evidence of generic or other relevant skills;
- any indicative cases undertaken;
- an MSF (although trainees who have not completed a required MSF but are otherwise satisfactory must undertake their MSF in the following year).

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\(^1\) Please see the relevant curriculum for information about indicative numbers ([Histopathology](#), [Diagnostic Neuropathology](#), [Forensic Histopathology](#), [Paediatric and Perinatal Pathology](#)).
suitable and appropriate alternative evidence (see ‘Learning Experiences’ listed in each curriculum for guidance). any College exams completed.

Where there is overall evidence that a trainee is generally achieving progress and competences at the expected rate but has not been able to provide the indicative number of workplace-based assessments, suitable and appropriate alternative evidence can be taken into consideration.

Where there is overall evidence that satisfactory progress is not being made and an indicative number of workplace-based assessments has not been provided, trainees will generally be required to complete additional workplace-based assessments in the following year, as determined by the ARCP Panel. Under the new 2021 curricula, trainees are now expected to undertake Assessment of Performance (AoP) and Supervised Learning Event (SLEs) throughout their training. In general, SLEs are designed to be formative in nature; as such they are best suited to determining educational progress in different contexts. AoP is a summative assessment exercise designed to review, appraise, and feedback on a trainee’s performance. Further information can be found in the relevant curricula.

The ARCP Panel are encouraged to be very clear with all trainees about any additional training, capabilities, assessments, or other requirements that must be achieved in the following year and document these accordingly.

There is clear guidance in each curriculum and/or in additional guidance about the requirements for each stage or year of training. ARCP Panels are encouraged to refer to these, and existing ARCP guidance, and make an overall judgement about progression for each trainee, taking into account the impact of Covid-19.

**Preparation prior to the ARCP**
- Trainees will first need to meet with their educational supervisor to discuss the transfer in preparation for their ARCP.
- The trainee with their educational supervisor must review all their training and highlight any training gaps. The educational supervisor will recommend where they will progress on the 2021 curriculum.
- In preparation for the ARCP, the educational supervisor must state in the trainee’s ESSRs the capabilities identify that the trainees still need to meet in the new curriculum and recommend a provisional CCT date to the ARCP panel.
- From the point at which trainees transfer into the relevant 2022 GMC-approved curriculum and assessment system, they will have to complete all the subsequent curriculum and assessment requirements within the relevant GMC-approved programme. Trainees will not have to go back and complete previous training requirements.
- Trainees will still have to achieve all curriculum requirements in the indicative training period for the award of the CCT which will be five years (if trainees do not wish to undertake the optional training packages in cervical cytology or higher autopsy training).
- If a trainee’s provisional CCT date is around 31 July 2023, the College will allow some flexibility as to whether the trainee is required to transfer. The trainee/educational supervisor should contact College to discuss further prior to confirming arrangements.
- It is recognised that there will be some trainees with exceptional circumstances and therefore it is recommended that you contact the College in order that we can discuss and agree on an appropriate way forward. This may include the need to contact the General Medical Council for further advice.

**Conducting the ARCP**

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2 Histopathology and Diagnostic Neuropathology trainees should refer to pages 13 and 14, Forensic Histopathology trainees should refer to pages 18 and 19 and Paediatric & Perinatal trainees should refer to pages 19 and 20 of their respective curricula.
ARCPs can take place virtually, via secure videoconferencing, on appropriate platforms as determined by each deanery or LETB. The privacy of the individuals involved must be maintained, regardless of the physical location of all participants.

The ARCP outcome should be recorded on the revised RCPPath Amended ARCP Outcome Form (under ‘College Guidance and Advice’). For trainees awarded an outcome 10.1 or 10.2, the ‘Supplementary documentation for ARCP Outcome Form’ must also be completed detailing what is required for a trainee to complete during the subsequent year of training. These forms should be emailed to the Royal College of Pathologists (training@rcpath.org). Outcomes will be recorded in the Royal College of Pathologists database which records trainee progress and subsequently updated in the trainee’s e-portfolio.

**Criteria for non-progression**
The criterion for non-progression is as follows:
- Serious concerns arising out of a recent Multi-Source Feedback exercise (if undertaken).
- Any evidence presented in relation to serious probity/patient safety concerns.
- Trainees who have not passed FRCPath Part 1 or FRCPath Part 2.

**Circumstances where a complete ARCP panel would be advised**
The circumstances where a complete ARCP panel would be advised are where trainees are making unsatisfactory progress and where an outcome 2, 3, 4, 5 outwith Covid derogations or 10.2 is likely.

**Amendments to the person specification needed to facilitate career progression of trainees who have been unable to acquire capabilities in their core programme due to the impact of Covid-19**
None.

**Advice regarding capabilities that may be gained in an acting up position within a defined education/development plan.**
Trainees who have spent additional time in Stage C while waiting to complete their FRCPath Part 2 examination may, if they are on track to complete their training satisfactorily, spend reduced time in Stage D (a minimum of six months), and/or may accumulate evidence of competences during an acting up position within a defined training and development plan. Six months is the minimum period allowable for Stage D in order to ensure that trainees have been able to obtain suitable competencies in independent reporting prior to the award of the Certificate of Completion of Training (CCT) and taking up a consultant post. For those cellular pathology specialties that have independent reporting guidance, this can be followed as a guide and any training recorded appropriately. Trainees are encouraged to follow the course of action that is right for their individual circumstances and with the support of their Educational Supervisor/Training Programme Director.

**References**
Gold Guide 8th edition

GMC policy statement: Transition of learners to a new curriculum

Histopathology curricula and ARCP links (2015)
Histopathology curricula and ARCP links (2021)

Diagnostic Neuropathology curricula and ARCP links (2012)
Diagnostic Neuropathology curricula and ARCP links (2021)

Forensic Histopathology curricula and ARCP links (2012)
Forensic Histopathology curricula and ARCP links (2021)
Paediatric and Perinatal Pathology curricula and ARCP links (2012)
Paediatric and Perinatal Pathology curricula and links (2021)

Any queries concerning the transitional process should be directed to:

Jenny Maginley
Training Manager
Tel: 020 7451 6741
Email: training@rcpath.org
<table>
<thead>
<tr>
<th>Curricular component</th>
<th>Comment</th>
<th>Recommended ARCP outcome</th>
<th>Recommended Action</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Cellular Pathology ST1</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>COVID-19 has caused disruption to training including redeployment</td>
<td>E.g., Limitation of exposure to specimen range and experience, MDT, courses, QIPs and research opportunities.</td>
<td>ARCP 10.1</td>
<td>Move to relevant specialty training year in ICPT curriculum.</td>
</tr>
<tr>
<td>No disruption to training</td>
<td>Trainee on course to complete requirements for year of training, including acquisition of relevant examination. Assessment of Practice completed.</td>
<td>ARCP 1</td>
<td>Move to ST2 ICPT curriculum.</td>
</tr>
<tr>
<td>No disruption to training</td>
<td>Concerns raised about trainee (e.g., including general progress, probity and patient safety)</td>
<td>ARCP 2, 3 or ARCP 4 (with a preceding outcome 3)</td>
<td>Move to relevant specialty training year in ICPT curriculum.</td>
</tr>
<tr>
<td><strong>Cellular Pathology ST2</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Covid has caused disruption to training including redeployment</td>
<td>E.g. Limitation of exposure to specimen range and experience, MDT, courses, QIPs and research opportunities.</td>
<td>ARCP10.1</td>
<td>Move to relevant specialty training year in ICPT curriculum.</td>
</tr>
<tr>
<td>No disruption to training</td>
<td>Trainee on course to complete requirements for year of training, including acquisition of relevant examination.</td>
<td>ARCP 1</td>
<td>Move to ST3 ICPT (progressing to HST after 30 months or WTE).</td>
</tr>
<tr>
<td>No disruption to training</td>
<td>Concerns raised about trainee (e.g., including general progress, probity and patient safety)</td>
<td>ARCP 2, 3, or 4</td>
<td>Move to relevant specialty training year in ICPT curriculum.</td>
</tr>
</tbody>
</table>

**Cellular Pathology/Histopathology/Diagnostic Neuropathology/Forensic Histopathology/Paediatric and Perinatal Pathology ST3**

| Covid has caused disruption to training including redeployment | E. g. Limitation of exposure to specimen range and experience, MDT, courses, QIPs and research opportunities. | ARCP10.1 | Move to the relevant ST3 point. For trainees being moved to ST3 in the 2021 curriculum, it should be confirmed if this is to the ICPT curriculum or HST curriculum. Acquisition of FRCPath Part 1 is required for transition to ST3 HST. |
| FRCPath Part 1 examination not passed | Completion necessary for progress to HST in 2021 curriculum. Balance between satisfactory progress and pressurising by extra requirements in already busy curriculum. | ARCP 10.2 (if due to COVID-19) or ARCP 3 (if not due to COVID-19) | Move to relevant point in ST3 ICPT curriculum. |
| No disruption to training | Trainee on course to complete requirements for year of training, including acquisition of relevant examination and coverage of ICPT curriculum. | ARCP 1 | Move to ST4 HST. Acquisition of FRCPath Part 1 is required for transition to HST. |
| No disruption to training (passed FRCPath Part 1) | Concerns raised about trainee (e.g., including general progress, probity and patient safety) | ARCP 2, 3, or 4 | Move to the relevant ST3 point. For trainees being moved to ST3 in the 2021 curriculum, it should be confirmed if this is to the ICPT curriculum or HST curriculum. Acquisition of FRCPath Part 1 is required for transition to ST3 HST. |

**Histopathology/Diagnostic Neuropathology/Forensic Histopathology/Paediatric and Perinatal Pathology ST4**

<p>| Covid has caused disruption to training including redeployment | E. g. Limitation of exposure to specimen range and experience, MDT, courses, QIPs and research opportunities. | ARCP 10.1 | Remain on current curriculum if CCT date on or before 31 July 2023 (assuming expected pass in FRCPath Part 2 by November 2022) or Move to ST5 in the appropriate HST curriculum if |</p>
<table>
<thead>
<tr>
<th><strong>FRCPath Part 2 examination not passed ARCP</strong></th>
<th>Completion necessary for progress to ST5. Balance between satisfactory progress and pressurising by extra requirements in already busy curriculum.</th>
<th>ARCP 10.2 or ARCP 3 (if not due to COVID-19)</th>
<th>CCT date after 31 July 2023 and/or FRCPath Part 2 expected to be passed from May 2023.</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>No disruption to training (passed FRCPath Part 2)</strong></td>
<td>Trainee on course to complete requirements for year of training, including acquisition of relevant examination.</td>
<td>ARCP 1</td>
<td>Remain on current curriculum if CCT date on or before 31 July 2023 or Move to ST5 in the appropriate HST curriculum if CCT date after 31 July 2023.</td>
</tr>
<tr>
<td><strong>No disruption to training (passed FRCPath Part 2)</strong></td>
<td>Concerns raised about trainee (e.g., including general progress, probity and patient safety)</td>
<td>ARCP 2, 3 ARCP 4 (with a preceding outcome 3)</td>
<td>Remain on current curriculum if CCT date on or before 31 July 2023 or Move to ST5 in the appropriate HST curriculum if CCT date after 31 July 2023.</td>
</tr>
<tr>
<td><strong>Histopathology/Diagnostic Neuropathology/Forensic Histopathology/Paediatric and Perinatal Pathology ST5</strong></td>
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<tr>
<td>Covid has caused disruption to training including redeployment</td>
<td>E. g. Limitation of exposure to specimen range and experience, MDT, courses, QIPs and research opportunities.</td>
<td>ARCP 10.1</td>
<td>Complete training on current curriculum if CCT date on or before 31 July 2023. Do not transition to new curriculum.</td>
</tr>
<tr>
<td>No disruption to training</td>
<td>Concerns raised about trainee (e.g., including general progress, probity and patient safety)</td>
<td>ARCP 2, 3 ARCP 4 (with a preceding outcome 3)</td>
<td>Complete training on current curriculum if CCT date on or before 31 July 2023. Do not transition to new curriculum.</td>
</tr>
<tr>
<td>Completion of training</td>
<td>Trainee on course to complete training, including the acquisition of relevant examination.</td>
<td>ARCP 6</td>
<td>CCT date will be on or before 31 July 2023. Complete training on current curriculum. Do not transition to new curriculum.</td>
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