

Reference:	FOI.21134.26
Subject:	Responsible Officer (RO) investigations and complaint handling
Date of Request:	24 July 2026

Requested:

For the purposes of this request, "**the material period**" means the period 1 April 2024 to 24 July 2026.

Please provide:

1. The All-Wales framework document(s) — identified by title, publisher, and version — governing the conduct of formal Responsible Officer investigations by Welsh Health Boards, as in force at any point during the material period. Where more than one version has been in force during that period, please supply each.
2. The terms of reference, constitution, or standing operating procedures of the panel(s) convened by Welsh Health Boards under those All-Wales arrangements to review the outcome of Responsible Officer investigations (referred to in Welsh Government correspondence as a "Reference Panel"), as in force at any point during the material period.
3. Any policy, guidance, or standard operating procedure governing the appointment, role, powers, and duties of a person appointed to investigate concerns under the framework at (1) — commonly designated a "Case Investigator" — as in force at any point during the material period, including any provisions relating to:
 - a. engagement with, or notification of, the person who raised the underlying concerns;
 - b. the creation, format, and retention of contemporaneous records of investigative activity; and
 - c. disclosure to relevant parties of the fact that an investigation is underway.
4. The Health Board's own local policy, protocol, or standard operating procedure governing the handling of concerns raised about the conduct, performance, or practice of a doctor employed, engaged, or otherwise connected with the Health Board (including under any sessional, honorary, or third-sector-linked arrangement), as in force at any point during the material period.
5. Any guidance, protocol, template, or standard form used by the Health Board, or by persons appointed to investigate under the framework at (1), governing the making and retention of contemporaneous records of investigative contact (including but not limited to telephone contact) with complainants, witnesses, or other third parties.
6. In anonymised, non-personal form, the following aggregate information relating to formal Responsible Officer investigations opened by the Health Board during the material period:
 - a. the total number of formal investigations initiated;
 - b. the number of those investigations referred to a panel of the kind identified at (2);
 - c. the number of investigations concluded, and the number ongoing at the date of receipt of this request;
 - d. the number of investigations in which the person who raised the underlying concerns was formally identified and engaged as a witness or interested party;

- e. the number of investigations in which the person who raised the underlying concerns was not so engaged.

I would prefer electronic disclosure (PDF, Word, or plain text as appropriate).

Response:

Hywel Dda University Health Board (UHB) does not hold the requested information, as it's RO does not undertake investigations.

Under the Section 45 Freedom of Information Code of Practice, the UHB has a duty to provide advice and assistance, under this duty the UHB provides clarity on the role of the RO below.

The RO is tasked with statutory duties to:

- Ensure that licensed physicians meet their professional standards
- Manage clinical governance
- Facilitate medical revalidation for the General Medical Council (GMC)
- Oversee fitness-to-practise concerns.

Details on the roles and responsibilities of the RO is available on the GMC website. A link to the webpage is provided below:

[The roles and responsibilities of stakeholders for revalidation - GMC](#)

Under the Medical Profession (Responsible Officer) Regulations 2010 (as amended) and Medical Profession (Responsible Officer) Regulations (NI) 2010, the RO retains a statutory duty to make recommendations for the revalidation of doctors. The GMC has published a protocol to support the RO in this process. A link to the webpage is provided below:

[Protocol for making revalidation recommendations - GMC](#)

While the RO does not undertake investigations, any ongoing investigations which relate to capability, performance and conduct are considered as part of the revalidation process. The UHB has established a Responsible Officer Advisory Group (ROAG) to support the role of the RO and the revalidation process, a copy of the Terms of Reference (ToR) for this group is provided at Attachment 1.

Alongside the British Medical Association (BMA), NHS Wales has developed an 'Upholding Professional Standards in Wales' (UPSW) policy, which details the approach for addressing concerns about capability, performance and conduct for all doctors and dentists. A copy of the procedure is provided at Attachment 2. While these investigations are not undertaken by the RO, the RO will assign a Case Manager to evaluate the matter and make an assessment on whether an investigation is required, where an investigation is required the Case Manager will retain responsibility for appointing a Case Investigator.

Additionally, the UHB adheres to the 'Framework for the Management of Performance Concerns in General Medical Practitioners on the Medical Performers List Wales' which provides guidance on the management of the operational aspects of Health Board's Performance Procedures for General Medical Practitioners (GMPs, also termed GPs) who are on a Medical Performers List in Wales. The Framework outlines the process by which teams identify, manage and support GP

Performers when performance concerns arise. A copy of the Framework has been provided, at Attachment 3.

Under the UHB's Section 45 duty to provide advice and assistance, it holds a duty to assist a requestor to refine their request. From the explanation provided above you will see that there are a number of formal processes that could be underway at any one time and may be for consideration by the RO under their statutory duties, while these are not considered 'Responsible Officer investigations' per the requirement of your request, the number of cases managed under these processes could be of interest to you. Should you require any further information on the ROAG or the cases managed under the aforementioned policies, please resubmit a refined request specifying what information you require.