



## SINGAPORE MEDICAL COUNCIL

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CEOs, Chairmen of Medical Boards and Directors of Healthcare Institutions  
HR Directors and Directors of Medical Manpower

### **MEDICAL REGISTRATION REQUIREMENT FOR "HANDS-OFF" OBSERVERSHIP**

Following several queries regarding registration requirements for foreign-trained doctors who are in Singapore for '*hands-off*' observership, the Singapore Medical Council (SMC) has recently reviewed the registration policies for such doctors.

2 The SMC has decided that "hands-off" observers do not need to register with the Medical Council if the observership fulfills the following two conditions:

(a) Scope of Observership

The scope of activities of such observership is restricted to "hands-off" observations only. The observer cannot independently examine patients nor have any direct contact with patients in the absence of his supervisor. He is also not allowed to clerk cases, write prescriptions or review reports or perform any such acts which require him to be registered under the Medical Registration Act (MRA). The observer must be accompanied at all times when observing any procedures including assessments of patients, pre & post surgical procedures.

(b) Duration of Observership

The "hands-off" observership is of 4-weeks or 28 days duration only.

3 SMC will not be responsible for the actions of such "hands-off" observers. The roles and responsibilities of the healthcare institutions, supervisors, and "hands-off" observers are outlined as follow:

### Roles and Responsibilities:-

#### (i) Healthcare Institutions

- Where the observer is not subjected to SMC's requirements for medical registration, the hospital shall bear all the responsibilities and remains accountable for the actions of the observer for the entire duration of the observer's attachment in its hospital. The hospital is to ensure that such observers do not imply or describe themselves or cause patients to believe that they are "registered medical practitioners" under the Medical Registration Act (MRA). Otherwise, the observers will be liable for prosecution.
- The hospital will be responsible for facilitating the entry of the observer e.g. obtaining the necessary visa or pass for purpose of training with relevant authorities.
- The hospital shall put in place appropriate safeguards for ensuring patient confidentiality. The hospital is responsible for informing observers that in the event of observing direct patient care, the patients are entitled to confidentiality and that they must not disclose, discuss or reveal any details about such patients to anyone other than those involved in the observership.
- The hospital is responsible for the actions of the observer; if the observer does anything other than observe (such as deal with any member of the public), the hospital may be reported to the Licensing & Accreditation Branch, MOH, which may cause them to lose their licences as a result and may also be prosecuted for an abetment of an offence.
- The hospital is responsible for administering the agreement(s) (Refer to **Annexes A & B**) and extending a copy of the signed agreements to the SMC for statistical purposes.
- As the observers would be seen as an employee/agent/servant of the Hospital, the hospitals shall be held responsible for any loss caused by the observer's actions. If in doubt, the hospitals are to consult their legal counsels in relation to the status and liabilities of the observer.

- The hospital shall seek legal advice on the issue of malpractice insurance where observers are concerned.
- The hospital shall be responsible for informing the SMC of the commencement/end of the observership of the observer.

(ii) “Hands-off” Observers

- The observers’ only role is to observe their designated supervisor and to learn from their observations.
- The observers must bear in mind that they are not recognised as “medical practitioners” under the MRA. They will be liable for prosecution if they hold/describe or mislead patients to believe that they are ‘medical practitioners’ registered with the SMC.
- The observers cannot participate in patient care or contact, examination, diagnosis, clerking of case notes, writing of prescriptions, writing of reports, medical procedures, research or any other clinical work during the observership.
- In the event of observing direct patient care, the observers must maintain patients’ confidentiality. Disclosure, discussion or revealing of details about such patients in any form to anyone other than those involved in the observership will be strictly disallowed.
- The observers shall act appropriately and in a professional, courteous manner throughout the entire period of his observership.

(iii) Designated Supervisor

- The supervisor must ensure that the observer does not perform any clinical roles or trespass the role of a ‘hands-off’ observer.
- The supervisor is responsible for overseeing the scope of the observer’s area of hands-off training for the entire duration.

- The supervisor must inform the hospital's Human Resource or medical affairs department of the commencement/cessation of the observer's training/observation at the hospital.

4 Kindly bring this notice to the attention of relevant staff in your organisation for compliance. Please email Ms Sim Mong Wey at [Sim\\_Mong\\_Wey@smc.gov.sg](mailto:Sim_Mong_Wey@smc.gov.sg) if you need clarifications. Thank you.



DR TAN CHOR HIANG  
EXECUTIVE SECRETARY (ADMINISTRATION, REGISTRATION &  
ACCREDITATION)  
SINGAPORE MEDICAL COUNCIL

cc Group CEO, Singapore Health Services  
Group CEO, National Healthcare Group

**HANDS-OFF OBSERVERSHIP AGREEMENT**  
*(To be completed by the 'Hands-off' Observer)*

**Instructions:**

- a) The original of the signed agreement is to be submitted to the hospital/ specialty centre (Address: To be filled in by hospital/ specialty centre) for retention.
- b) The hospital/ specialty centre shall extend a copy of the signed agreement to the Singapore Medical Council for statistics.

I, Dr./Mr./Ms. \_\_\_\_\_ of City/State \_\_\_\_\_  
Country \_\_\_\_\_ in consideration of being allowed to participate in a hands-off  
observership (the "Observership") at \_\_\_\_\_ do hereby agree that:

- 1. I understand and agree that my Observership will be for a period from \_\_\_\_\_ to \_\_\_\_\_, and that it shall consist of observing the activities of (department/division/institute:) \_\_\_\_\_.
- 2. I agree that I will obtain a visa or other temporary visitor status from the appropriate authorities for the purpose of participating in my Observership and I agree to maintain and comply with all the requirements of such status for the duration of the Observership.
- 3. I understand that as a hands-off Observer, I will not be registered with the Singapore Medical Council (SMC). In this regard, I am **NOT** recognised as a "medical practitioner" in The Republic of Singapore under the Medical Registration Act (MRA). Consequentially, I am **NOT** to hold myself out as a medical practitioner registered with the SMC, otherwise, I may be liable for prosecution.
- 4. I understand that my Observership is for observation **ONLY** and to learn from those observations. I will not be permitted to participate in patient care or contact, examination, diagnosis, clerking of case notes, writing of prescriptions, writing of reports, medical procedures, research or other work during the Observership. Furthermore, I understand that I will not be permitted to communicate with the patients or their relatives on any diagnosis, management or prognosis of their medical conditions.
- 5. In the event of observing direct patient care, I understand that the patients are entitled to confidentiality and I agree **NOT** to disclose, discuss or reveal any details about such patients to anyone other than those involved in the Observership.
- 6. I understand that I will be observing the activities at a clinical facility and I therefore agree to act appropriately and in a professional, courteous manner during my Observership.

Signed on:

\_\_\_\_\_  
(Participant's Signature)

\_\_\_\_\_  
(Date)

**HANDS-OFF OBSERVERSHIP AGREEMENT**  
*(To be completed by the Supervisor)*

**Instructions:**

- a) The original of the signed agreement is to be submitted to the hospital/ specialty centre (Address: To be filled in by hospital/ specialty centre) for retention.
- b) The hospital/ specialty centre shall extend a copy of the signed agreement to the Singapore Medical Council for statistics.

I, Dr. \_\_\_\_\_, the supervisor of participant (the "Observer") \_\_\_\_\_ in consideration of being allowed to participate in a hands-off observership (the Observership") at \_\_\_\_\_, do hereby agree that:

1. I understand that as a hands-off Observer, the participant will not be registered with the Singapore Medical Council (SMC). In this regard, the Observer is **NOT** recognised as a "medical practitioner" in The Republic of Singapore under the Medical Registration Act (MRA).

2. I understand that the Observership is for the participant to be engaged in observation **ONLY** and to learn from those observations. The Observer should not be allowed to participate in patient care or contact, examination, diagnosis, clerking of case notes, writing of prescriptions, writing of reports, medical procedures, research or other work during the Observership. Furthermore, I understand that the Observer should not be permitted to communicate with the patients or their relatives on any diagnosis, management or prognosis of their medical conditions. I will ensure that the Observer does not perform any clinical roles or trespass the role of a 'hands-off' Observer.

3. I will take responsibility to oversee the scope of the Observer's area of training (hands-off) and observations for the entire duration.

4. I will keep the hospital's HR or medical affairs department informed of the commencement/ cessation of the Observer's training/ observation.

Signed on:

\_\_\_\_\_  
(Supervisor's Signature)

\_\_\_\_\_  
(Date)

\_\_\_\_\_  
(Contact Number)