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Oliver McGowan Mandatory Training – Key Update for Practices (September 2025)

This briefing outlines the current position regarding the statutory requirement for Learning Disability and Autism training (Oliver McGowan Mandatory Training **or equivalent**) for CQC-registered general practices.

Summary of Requirements

Since 1st July 2022, all CQC-registered providers, including general practices, have been legally required to ensure staff receive training in learning disability and autism.

As of 6th September 2025, the training must now meet the **standards** set out in the [Oliver McGowan Code of Practice](#).

Training must be appropriate to role:

- Tier 1 – for staff with occasional contact
- Tier 2 – for staff with regular or direct contact (including non-clinical roles such as receptionists)

N.B. Current information and interpretation of the Code would suggest that the majority of practice staff would be expected to undertake Tier 2 training.

Relevant Legislation

The statutory requirement was introduced under the [Health and Care Act 2022 \(Section 181\)](#)

The [Oliver McGowan Code of Practice](#) came into force on 6th September 2025 having been laid before parliament for 40 days without objection.

The [Care Quality Commission \(CQC\)](#) has confirmed that it will assess compliance under:

- [Regulation 9](#) – Staffing
- [Regulation 18](#) – Person-centered care

Current Training Offer

The ICB has recently offered access to Tier 1 and Tier 2 training.

However:

- Training places are now being charged to practices
- There is no backfill funding to cover the cost of releasing staff.

Practices are therefore expected to fund both the cost of training attendance and staff time away from work with this offer*.

**At the time of writing, this training offer is currently paused, pending further information in regards to funding and primary care rollout in other areas.*

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National Policy and LMC View

The [DHSC Final Impact Assessment \(April 2024\)](#) is a formal policy document published by the Department of Health and Social Care in relation to this code. It outlines the governments intentions and cost assumptions for implementing the statutory training. It clearly states that providers, including general practice, should not be financially disadvantaged:

“It is not the intention that providers should be financially disadvantaged by this policy.”

“The preferred policy option assumes that training and staff time will be funded by government.”

The LMC position is therefore that practices:

- Should not be charged for attending statutory training.
- Should not be expected to fund staff release time.
- Must be supported to comply with the law without financial penalty.

Local Action and Assurance

The LMC and ICB are working together to:

- Secure national funding to support training delivery and backfill.
- Ensure training places are made available to appropriate staff, including non-clinical roles.
- Clarify that Tier 2 applies to non-clinical roles where there is regular patient contact.
- Reduce compliance risks for practices by ensuring that practices are **not left in the current untenable position** between legal obligation and unfunded delivery.

Next Steps

Further updates will be shared as soon as national funding arrangements and training options are clarified. Until then, **practices are advised to take the following steps** to demonstrate reasonable compliance:

1. **Acknowledge the Legal Requirement** - Update training/governance policy to confirm awareness of statutory requirements.
2. **Document Your Plan** – Create a short training implementation plan showing:
 - Which staff are likely to need Tier 1 or Tier 2.
 - That the practice is awaiting funded access.
 - Any correspondence with the ICB or LMC about this.
3. **Offer Interim Awareness Training** – Continue to provide temporary disability and autism awareness training via your chosen provider. Examples are:
 - e-Learning for Healthcare: <https://www.e-lfh.org.uk/programmes/learning-disability-and->



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[autism/](#)

- NHS England: <https://www.autism.org.uk/what-we-do/professional-development#>

4. **Record Staff Engagement** – Track any participation in interim training, internal communications, or staff expressions of interest in the Oliver McGowen training.
5. **Engage with the ICB and LMC** – Respond to local invitations / surveys and express readiness to comply when funded access is available.
6. **Log the Financial Barrier** – Maintain internal documentation (e.g. risk register, meeting notes) stating that the practice is unable to deliver the training due to backfill costs not being covered.