

GMC response to consultation on trade negotiations with India

Summary

The inclusion of frameworks for the mutual recognition of professional qualifications in any future trade agreement with India must not undermine the important patient safety checks that we make on doctors wishing to practise medicine in the UK. Whilst we recognise that arrangements for the recognition of professional qualifications can cover a very wide range of professionals and service sectors, where healthcare professionals are concerned, the overriding priority must be protecting patient safety.

It is essential that healthcare regulators have control over access to their registers and are able to determine the standards of entry, regardless of the country in which an applicant has qualified. As such, regulators must be involved in the negotiations with third countries in order to advise on the suitability of including mutual recognition frameworks in each individual trade agreement.

Introduction

- 1 The General Medical Council (GMC) is an independent organisation that helps to protect patients and improve medical education and practice across the UK.
 - We decide which doctors are qualified to work here and we oversee UK medical education and training. There are over 338,000 doctors on the UK medical register. We check every doctor's identity and qualifications before they are able to join the register. We also check with others, such as the doctor's medical school or previous employers, to find out if they have any concerns about the doctor's ability to practise safely, for example inappropriate behaviour, serious health problems, or performance.
 - We set the standards that doctors need to follow, and make sure that they continue to meet these standards throughout their careers.
 - We take action to prevent a doctor from putting the safety of patients, or the public's confidence in doctors, at risk.

- 2 Every patient should receive a high standard of care. Our role is to help achieve that by working closely with doctors, their employers and patients, to make sure that the trust patients have in their doctors is fully justified.

Recognition of professional qualifications

There are different ways to apply for registration with a licence to practise in the UK depending on a doctor's qualifications and experience.

Doctors who have qualified outside the UK are known as international medical graduates (IMGs). Before they are granted registration with a licence to practise, they must satisfy us that they:

- a Hold an acceptable primary medical qualification (PMQ) that meets our criteria
- b Possess the knowledge, skills and experience for practice in the UK
- c Have no outstanding fitness to practise concerns from their practice in other jurisdictions
- d Have the necessary knowledge of English to practise safely in the UK

From 2024 we will introduce the Medical Licensing Assessment, an assessment that will create a common threshold for entry on to the UK medical register. This will ensure that all doctors who obtain general registration with a licence to practise medicine in the UK meet a common threshold for safe practice.

The medical profession has become increasingly mobile and good doctors are in demand across the world. While some doctors relocate permanently to another country to pursue their career, many move for only a few years in order to broaden their experience or undertake particular training. There can be mutual benefits in this sharing of experience. There are currently 29,931 doctors on the UK medical register who gained their primary medical qualification in India. We do not know the number of UK qualified doctors who live and work in India. A trade agreement between the UK and India could provide an opportunity to better support this two-way flow of medical professionals.

Patient safety

However, the inclusion of frameworks for the recognition of professional qualifications in any future trade agreement must not undermine the important patient safety checks that we make on doctors wishing to practise medicine in the UK. It is essential that healthcare regulators have control over access to their registers and are able to determine the standards of entry, regardless of the country in which an applicant has qualified.

For this reason, the inclusion of the recognition of professional qualifications in any future trade agreement should create a framework giving regulators in the UK and India the

option to explore frameworks to recognise each other's qualifications but should not impose blanket recognition. In short, it should be driven by patient safety rather than economic considerations. Patient safety is, and must remain, the principal consideration when considering whether to facilitate access to the medical register as part of an economic trade agreement.

The GMC strongly welcomed the commitments made by the Minister, Lord Grimstone, in the recent parliamentary debates* on the Professional Qualifications Bill when he stated *"The Bill allows us to take action where necessary, while fully respecting the excellence of our professions and the autonomy of regulators to determine who can practise in the UK. Nothing that the Government do will in any way seek to undermine this."*

He went on to say *"This respect for regulator autonomy has been upheld in our approach to trade deals...None of the trade deals or recognition agreements that we have made so far or which we are negotiating will force our regulators to compromise their world-leading standards or to accept professionals who do not meet them."*

When undertaking negotiations with India, we look to the Department of International Trade to demonstrate how these commitments will be assured.

Curriculum comparison

Any provisions that aim at modifying the registration processes in each country must provide continued assurance for patients. To do this, we must have a deep understanding of how medical education and training operates in any potential partner country and assurance that the standards of education and training are comparable to those in the UK. There are over 500 medical schools in India, each delivering their own medical training programmes.

This is important as the award of professional qualifications, including primary medical and specialist medical qualifications, is subject to a wide degree of standards and norms across different jurisdictions. For this reason, it is essential that the Department for International Trade consults closely with healthcare professional regulators before opening negotiations with third countries which may have important differences in their systems of medical education and regulation when compared to the UK.

In addition, as soon as there are significant changes made to the curricula in the UK or partner country, they become less similar and so mutual recognition may no longer be appropriate. Any framework of mutual recognition must be continually monitored and updated to ensure that standards and outcomes remain essentially similar.

* [https://hansard.parliament.uk/lords/2021-05-25/debates/953F3881-B2DD-4CBC-BAD9-30002950AD95/ProfessionalQualificationsBill\(HL\)](https://hansard.parliament.uk/lords/2021-05-25/debates/953F3881-B2DD-4CBC-BAD9-30002950AD95/ProfessionalQualificationsBill(HL))

Frameworks that introduce an element of mutual acceptability and thus necessitate a system of curriculum comparability are operationally difficult to implement and burdensome for both regulators and applicants. This is true for the recently signed agreement with the EFTA countries which reintroduces a framework similar to the EU general system framework. Indeed, applicants may find it quicker and easier to register via existing international medical graduate routes, rather than any 'general system' type framework. For this reason, the EFTA Agreement must not set a precedent for future agreements with other, larger countries or groups of countries.

We would welcome the opportunity to meet with the Department of International Trade to share the intelligence we hold on medical training and qualifications in India and the data that we hold on the numbers of doctors who qualified in that country on the UK medical register.

GMC, July 2021