

General Medical Council

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Christine Elliott, Chair of Council
John Barwick, Chief Executive and Registrar
Health & Care Professions Council HCPC
184-186 Kennington Park Road
London
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Dear Christine and John,

The GMC's response to HCPC's strategy consultation

The GMC welcomes the HCPC's invitation to review its draft corporate strategy. We are pleased to have the opportunity to provide feedback and are keen to promote greater alignment across regulators in order to better support the UK healthcare landscape.

We are in the process of finalising our own strategy and aim to publish it in mid-November. I am attaching the latest version. I think there is a good read-across between our strategies, in particular your strategies 'Promote and role model high quality professional practice' and 'Build a resilient, healthy, capable and sustainable organisation', and two of our own strategic themes: 'Enabling professionals to provide safe care' and 'Investing in our people to deliver our ambitions'.

In addition, throughout our strategy, we have put a strong emphasis on promoting equality, diversity and inclusion (ED&I), partnership working and making evidence-based decisions – this aligns with HCPC's ambitions. We believe strongly in the importance of regulatory collaboration to ensure that healthcare professionals are supported, and that

issues are addressed in the most effective manner possible, and we look forward to continuing our joint working in forums such as CEORB.

We would be very happy to meet and discuss any of the above as well as to share our experience of strategy development with your team if helpful.

Our role

1. The General Medical Council (GMC) is an independent organisation, accountable to Parliament with a mission to protect patients and improve medical education and practice across the UK. Specifically, we are mandated under the Medical Act (1983) to:
 - Decide which doctors are qualified to work in the UK and oversee UK medical education and training.
 - Set the standards that doctors need to follow, and ensure that they continue to meet these standards throughout their careers
 - Take action to prevent a doctor from putting the safety of patients, or the public's confidence in doctors, at risk.

We will also be taking on the regulation of physician associates and anaesthesia associates over the next 2 years, and so like you will become a multi-professional regulator. I am sure we have much to learn from your experience in this area.

Our Strategy

2. Our new corporate strategy runs from 2021-2025 and is due to be launched in mid-November 2020. There are four key themes:
 - Enabling professionals to provide safe care
 - Developing a sustainable medical workforce
 - Making every interaction matter
 - Investing in our people to deliver our ambitions

General comments on HCPC's strategy

3. In this section we have set out our general comments on the HCPC's draft strategy and outlined our own strategic thinking and activity where relevant. In the following section we have sought to answer the specific questions you raised. We hope that this is helpful and that it may serve to highlight opportunities for collaboration.
4. As a general observation we have found it helpful in the development of our own strategy to align our strategic themes and activities with key priorities and outcomes of the healthcare system in order to demonstrate the relevance and value-add of our regulatory activity to the system and to individuals. In our comments below we have highlighted some areas where this linkage could be reinforced.

5. We advocate the adoption of an evidence- and risk-based approach to ensure that regulation is right-touch and that the regulatory burden is proportionate to the potential for harm. We would be happy to share learning with you in this area, as I believe our two organisations have much to learn from each other.
6. The GMC is keen to promote a culture of professionalism and leadership in medical education and medical practice, raising and acting on concerns and reflective practice.
7. The GMC believes support for the profession and for promoting ED&I are critical to being an effective regulator and employer, and for this reason we have made them central to our new strategy.
8. With regard to the ongoing impact of COVID-19, we would highlight the following areas as being particularly relevant:
 - New ways of working: flexibility in how we work to better support systems and reduce bureaucracy. Ensure we safely enable new ways of delivering care (eg remote consultation).
 - Workforce and wellbeing: mental health and wellbeing are a growing issue for public/patients, staff and the profession, and has a significant impact on retention of healthcare professionals.
 - Patient involvement: needing to involve the public in recovery plans and what systems will look like in the future.
 - Inequalities: needing to take tangible action on inequalities highlighted by the pandemic (as employers and regulators).
 - National/regional divergence: tailoring what we do to meet differences across nations and growing regional autonomy where appropriate.
 - Collaboration: the need for closer collaboration between regulatory partners and other bodies to reduce bureaucracy and improve support to patients and healthcare professions.

Specific comments in response to consultation questions

Question 1 - Do you agree with our proposed vision? Please provide comments.

The proposed vision is concise and to the point.

As you will know, the GMC is also in the process of becoming a multi-professional regulator as we will be regulating Physician Associates and Anaesthesia Associates in the future. We would welcome the opportunity to discuss the challenges of multi-professional regulation.

We have developed a vision for 2030 to go alongside our five-year corporate strategy. GMC's vision is as follows:

'Our vision is rooted in the people we work with and for. We will be an effective, relevant and compassionate regulator for patients, the public and professionals, and as an employer.

We will foster a culture of equality, diversity and inclusion in everything we do as a regulator and employer.

We will work to deliver wider health system goals by working in partnership with others. Evidence will drive our decisions.

We will be a multiprofessional regulator focusing on supporting professionals in the places they work. This requires unified action from us all – regulators, employers and educators.'

Question 2 - Do you agree with our proposed purpose? Please provide comments.

There is a strong read-across here to the GMC's own purpose (set out in Statute), which is to:

- protect, promote and maintain the health, safety and wellbeing of the public
- promote and maintain public confidence in medical professionals
- promote and maintain proper professional standards and conduct for medical professionals

A key element is a strongly supportive approach to registrants, encouraging understanding and appreciation of the need for professional standards and conduct.

Question 3 - In our draft Strategy we have identified three core activities – regulation, learning and prevention. Do you think these are the right activities? Please provide comments.

Regulation consists of the core regulatory activities – register, standards, education QA, FTP. These map very closely to the GMC's key regulatory functions.

We support the emphasis on *Learning* and *Prevention*. Stakeholder engagement and effective and appropriate use of data are essential to delivering impactful and right-touch regulatory services. Noteworthy here is the resonance with our own strategic theme 'Enabling professionals to provide safe care', which has a focus on improving working environments and cultures, and making them supportive, inclusive and fair for medical professionals.

As a general point, we wonder if the core activities could be linked more closely to strategic objectives and outcomes. For example the role of the core *Regulation* activities in protecting the public could perhaps be highlighted more. *Learning* might also include promoting learning cultures within the professions, including Continuing Professional Development (CPD) and reflective practice. With regards to *Prevention*, it might be helpful if more detail could be given concerning the exact nature of the prevention, and how this is to be achieved. In our corporate strategy, we have aimed to ensure our strategic aims are seen as the way of delivering our regulatory functions, so that they are not seen as separate but as driving everything we do.

Question 4 - We have proposed a set of four key values. Do you think these are the right values for the HCPC? Please provide comments.

HCPC's values of *Fair, compassionate, inclusive and enterprising* are similar to the GMC's own values, which are 'Integrity, excellence, collaboration, fairness and transparency'.

We have already mentioned our focus on ED&I above. We believe that effective regulation is compassionate and people-focused and prioritises support and prevention. We support HCPC's commitment to fairness and inclusivity, which is a key theme of much of our work with registrants, for example in embedding recommendations from three reports we commissioned last year which highlight the importance of compassionate, inclusive environments to safe care, and the factors that may mean certain doctors face different challenges¹. Collaboration with partners and stakeholders plays a key role here.

The HCPC values are helpfully underpinned by a set of 'We will ...' and 'We will deliver ...' behaviours and outcomes. We wonder whether the link between the values and the behaviours and outcomes could be made more explicit.

Question 5 - We have suggested six strategies to underpin our core work – do you consider these are clear, understandable and appropriate? Please provide comments.

The six strategies are clear and understandable. In some cases we wonder if the relevance and importance of the strategies could be reinforced by linking more closely to key regulatory and healthcare priorities and outcomes which they support, eg. *Develop insight and exert influence 'to promote safety and well-being'*.

1. Continuously improve and innovate

This objective aligns closely with our strategic theme 'Making every interaction matter', which says that every person who interacts with us – through our processes or our communications – should be met with empathy and efficiency. This will include making sure that all our interactions are inclusive and tailored to individual needs. This aspect could perhaps be brought out more in the text.

We support HCPC's commitment to continuous improvement and the use of digital services to provide a better user experience and improve operations, although we are very conscious of the need to ensure that services are accessible and do not increase inequalities. We would be happy to work together to understand how best to achieve this as a professional regulator.

2. *Promote and role model high quality professional practice*

This is similar to the GMC's strategic theme 'Enabling professionals to deliver safe care'. As well as professionalism, our strategic theme focuses on leadership as well as the importance of supportive working environments. We would be happy to work together on this to align our messages where needed.

3. *Develop insight and exert influence*

Please see the comment above about linking to regulatory outcomes. As mentioned earlier, we take an evidence-based and data-driven approach to decision-making and

¹ <https://www.gmc-uk.org/about/how-we-work/corporate-strategy-plans-and-impact/supporting-a-profession-under-pressure>

risk management in our strategy, and would be happy to work together with you on this in the future.

4. *Be visible, engaged and informed*

Again, the title could perhaps be reinforced by linking to health/regulation outcomes. There are elements which correspond to the GMC theme 'Enabling professionals to provide safe care'. The GMC works proactively at all levels to shape policy and support registrants, employers, educators, patients and the public. Our Outreach teams work with professionals and organisations at a local level to support quality improvement and patient safety, as well as promoting fair, transparent and representative clinical and staff governance. This is another area where we can work together, especially as the pandemic has highlighted the importance of coordinating and aligning messages to the healthcare profession.

5. *Build a resilient, healthy, capable and sustainable organisation*

This is similar to the GMC themes 'Investing in our people to deliver our ambitions' and 'Making every interaction matter', and we would be happy to share learning on how best to do this.

6. *Promoting the value of regulation*

This corresponds to the GMC's 'Enabling professionals to provide safe care' and 'Making every interaction matter'. The title could perhaps be reworded to 'Promote the value of regulation' for the sake of consistency with the wording of the other 5 strategies. Another possible change might be to link this strategy to outcomes, eg. '*Enhance the value of regulation*' or '*Make regulation more effective*'.

Question 6 - Do you consider there are any aspects of our proposals that could result in equality and diversity implications for groups or individuals based on one or more of the following protected characteristics, as defined by the Equality Act 2010 and equivalent Northern Irish legislation? If yes, please explain what could be done to change this.

- *Age*
- *Gender reassignment*
- *Disability*
- *Pregnancy and maternity*
- *Race*
- *Religion or belief*
- *Sex*
- *Sexual orientation*

The GMC has just developed its next Corporate Strategy and we have undertaken an Equality Impact Assessment (EQIA) to support this work, which we are happy to share with HCPC if helpful. We presume that HCPC is also undertaking an EQIA of the strategy as it will help HCPC to identify whether the strategy might have any impacts on groups who share protected characteristics and the mitigations that could be put in place. We engaged with diverse groups e.g. our diversity staff networks and our

strategic ED&I forum of doctors who helped inform our strategy and ensured that ED&I was embedded across and within each of our corporate strategic objectives.

We notice that inclusivity is one of your values. There may be opportunities to strengthen the strategy narrative to ensure this is reflected more strongly. For example, the equality, diversity and fairness section on page 3 could include how you ensure you are an inclusive organisation. And on pages 6 and 10 where you mention being an 'excellent employer', you could perhaps talk explicitly about how you want to ensure that you are an inclusive employer and how you will value and use the unique skills that colleagues bring to the workplace to deliver your services and benefit both your registrants and wider customer base. We would be happy to put you in touch with our ED&I Team if you would like to discuss this further.

Question 7 - Do you have any other comments about the draft Corporate Strategy?

No.

In summary

The GMC believes strongly in the importance and value of working with others to improve healthcare regulation and support across the system, and we are pleased to see our strategic ambitions align well with yours. We look forward to working collaboratively with you on realising our strategies in the future. If there is anything in the above that you would like to explore further, please do not hesitate to let us know.

Yours sincerely,



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Attached: GMC Corporate Strategy 2021-25