

21 October 2019

Nursing and Midwifery Council
23 Portland Place
London
W1B 1PZ

Regent's Place
350 Euston Road
London NW1 3JN

Email: gmc@gmc-uk.org
Website: www.gmc-uk.org
Telephone: 0161 923 6602
Fax: 020 7189 5001

Dear Candace,

The GMC's response to the NMC strategy consultation

As a fellow professional regulator, we share the NMC's commitment to patient safety and hope to continue working closely on the development of our respective strategies. We welcome the opportunity to provide feedback on your initial thinking and keen to encourage greater regulatory alignment, sharing our priorities with other regulators to better support the UK healthcare landscape.

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.

Our Strategy

- 2** Our current corporate strategy runs from 2018–2020. We are in the process of developing our next corporate strategy from 2021-2025, which will continue our direction of travel. Our current aims are:
 - Supporting doctors in delivering good medical practice

- Strengthening collaboration with our regulatory partners across the health services
- Strengthening our relationship with the public and the profession
- Meeting the changing needs of the health services across the four countries of the UK

Specific comments on the NMC's 2020 – 2025 Strategy

- 3** The draft vision statement is closely aligned with our ambitions and some of the work we currently have in progress. The commitment to "... a more just, learning culture for everyone" aligns with our aims in our Supporting a Profession under Pressure programme. We look forward to working with the NMC on achieving this as we develop our 2030 vision and 2021-2025 corporate strategy.

Dynamic approach to shaping practice

- 4** We support the dynamic approach to shaping practice, in the context of future innovation, for example the importance of continued improvement to standards and revalidation (as we did with our Taking Revalidation Forward programme) and look forward to seeing the outputs of this work and feeding this into our policy development. We can share learning in developing GMC-regulated credentials to support the potential priority of looking at regulating at advanced or specialist practice.
- 5** We have also been asked by the DHSC to bring Physician Associates and Anaesthesia Associates into regulation. This reflects ongoing changes to models of care and creates an opportunity for PAs and AAs to maximise their contribution to the workforce, while ensuring high standards are maintained to meet the needs of patients. Of course, this follows the recent bringing of the Nursing Associate role into regulation by the NMC and we have much we can learn from your experience.

Building a better relationship with the public

- 6** Akin to the NMC, our core purpose is protecting the patients and the public, hence we share your commitment to public engagement and feel there is opportunity for us to engage collaboratively and join up our narratives. We have been particularly focused on improving the user experience on our website to improve accessibility as well as maintaining our plain-English tone of voice. Our customer contact centre recently received accreditation from the Institute of Customer Service last year.

Strengthening the relationship with our professions

- 7** We are supportive of the NMC's approach here and share similar aims to build our relationship with our regulated profession. Like the NMC, we are also keen to deepen understanding of our registrants' practice so we can better support them in their working life.
- 8** We have begun a programme on Supporting a Profession Under Pressure. This piece of work seeks to understand how we, working with our partners, can address the issues that have been raised with us about the environments in which doctors work, and the impact of systems pressures on medical practice. It focuses on wellbeing, fairness and a just culture.
- 9** For example, we have worked with others to develop additional advice on how professionals can approach reflection; improved support for doctors to raise and act on concerns; and worked on induction. We also commissioned three major independent reviews:
 - ***Independent review of gross negligence manslaughter and culpable homicide*** - Leslie Hamilton and his working group have published their review into how the law on gross negligence manslaughter and culpable homicide are applied to medical practice. The review highlighted the need for a just culture in healthcare and improving consistency across local, coronial, criminal and regulatory processes
 - ***Fair to Refer? report*** - We have published independent research by Dr Doyin Atewologun and Roger Kline, which explores why some groups of doctors are referred to us more than others. The recommendations focused on improving support for doctors new to the UK, addressing systemic issues that may affect doctors' professional performance and ensuring engaged, positive and inclusive leadership is more consistent across the NHS
 - ***Mental Health and Wellbeing Review*** - Prof Michael West will shortly be publishing his independent UK-wide review into doctors and medical students' wellbeing in the workplace. The findings from this review will enable us to work together with organisations across the UK to agree priority areas for collaborative action that can help tackle the causes of poor wellbeing
- 10** Supporting a profession under pressure and delivering good and safe patient care cannot be done in isolation. We would be keen to work with the NMC on the above issues to join up the wider picture of supporting and strengthening relationships with professions in a clinical environment, a particularly important endeavour as practice moves towards a model of team care. We have worked with the NMC in piloting the Professional Behaviours Patient Safety programme and run shared training between the NMC and MPTS (the medical practitioners tribunal service). We welcome more of these kinds of opportunities to join up our work and strengthen our relationships with the professions.

Using and sharing research, data and intelligence

- 11** As part of our GMC corporate strategy, we are committed to upstream regulation. Similar to the proposed NMC approach, the GMC believes that good use of our own data coupled with data from around the system would advance the upstreaming agenda and we can work with the NMC to share our data to create a fuller picture. Currently the NMC and GMC have a memorandum of understanding which demonstrates our alignment and shared understanding of using data in healthcare. We are also delighted to have recently run a 'data jam' event between the NMC, GMC and HCPC where we jointly explored how we could better analyse our respective data sets in collaboration.
- 12** The next steps for us could be to consider an approach to joint reporting and we are happy to share learning from developing our State of Medical Education and Practice reports with you.
- 13** We are also committed to researching inequalities, for example the work we are doing around differential attainment which exists in both undergraduate and postgraduate contexts, across exam pass rates, recruitment and Annual Review of Competence Progression outcomes and can be an indicator that training and medical education may not be fair. We welcome collaborating with the NMC on the aforesaid areas.

Closer collaboration with others

- 14** We are very supportive of this aim and keen to work with the NMC as we have expressed through this response – it aligns well with one of our current strategic aims: to strengthening collaboration with our regulatory partners across the health services. We know several our teams already have a close working relationship and we are grateful for the joint work we have done so far, for example the joint regulators horizon scanning group or looking at the potential impacts of new technology. We look forward to continuing working together on this.
- 15** We believe regulatory alignment (sharing priorities and approaches with other regulators) is important to give us a greater impact, increase consistency and lead to 'right touch regulation' through reducing duplication and hence welcome the continuance of our close working relationship. Potentially, we could share our approaches to local clinical governance, or align frameworks where appropriate. We believe it is best to focus on a few key areas for regulatory alignment and cooperation, these could be: induction, CPD, unprofessional behaviours and clinical leadership.

Developing our strategies at similar times has already given us a way to sense check where we are, as well to join up the narrative between the GMC and NMC. We look forward to further working collaboratively with you, particularly over the next year. If there is anything here you would like to explore further, please don't hesitate to let us know.

Yours sincerely,

Tim Aldrich
Assistant Director, Strategy
Email: tim.aldrich@gmc-uk.org
Telephone: 07780 838748