

7 May 2025

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**Chair**

Professor Dame Carrie MacEwen

**Chief Executive and Registrar**

Charlie Massey

Dear Alan

**GMC response to the PSA consultation on the *Standards of Good Regulation and Standards for Accredited Registers***

Thank you for the opportunity to provide feedback on your recent consultation on the *Standards of Good Regulation and Standards for Accredited Registers*. Attached to this letter is our detailed response to the consultation.

We welcome a review of the Standards as an opportunity to assess their current and future relevance, and to identify areas to further enhance and refine them. Overall, we continue to view the Standards as an effective mechanism to assess performance – they offer clarity, consistency and transparency, comparability (across regulators but also the ability to track performance over time) and accountability by setting clear expectations and holding regulators/registers to account. While the review provides the opportunity to enhance and streamline the Standards, we believe they remain broadly fit for purpose.

We are supportive of a number of the proposals outlined in the consultation, for example the proposal to combine Standards 14 and 18. We think Standard 14 could be easily absorbed into Standard 18, provided that the overarching wording of Standard 18 is redrafted to encompass support and accessibility with all fitness to practise processes. Likewise, we understand the rationale to bring the Standards of Good Regulation and Standards for Accredited Registers more in line where possible. However overall, we think it is important the Standards should remain separate given the fundamental differences between statutory regulation and voluntary registers.

We also think there are some specific areas in the consultation where further clarity and exploration is needed, in particular:

- **Introducing criminal conviction checks for self-employed registrants-** It appears that a change in the law would be needed to give us the powers to undertake the checks outlined in this proposal. We have robust processes in place to mitigate risk already so we would need to see more evidence of the current risk and the problem PSA are trying to solve. In the absence of that we do not support the proposal and are of the view that this would be hugely challenging operationally as well as costly, and it would be disproportionate to any possible benefit, which would, in any event, only provide 'point in time' information.
- **Standard 15-** We do not support the proposal to split out Standard 15 into two separate Standards. The Standards are already heavily skewed towards timeliness measures and by splitting this element out we think it will exacerbate that imbalance and give a disproportionate focus on the pace that a case proceeds to the detriment of overall quality and fairness.
- **Leadership, governance and culture-** We agree that these are important components of ensuring regulation and registration works in the public interest. However rather than introduce an entirely new standard, we believe there are opportunities to draw out these components more explicitly through the existing Standards. We think this would be a more proportionate approach and one that has fewer risks. We recognise it is important for the PSA to assure itself that robust processes and policies are in place, and that regulators remain publicly transparent where appropriate and accountable to Councils. However, we believe Council have a clear role in holding the organisation and leadership to account (as set out in legislation) and there is a risk that PSA may end up fettering or duplicating responsibilities. In our response we have offered some examples of where existing Standards could be enhanced to assess leadership, governance and culture. We recognise the PSA's expertise in developing standards and undertaking quality assurance and would welcome sharing our experiences of also conducting quality assurance functions to support development of indicators, which focus on leadership, governance and/or culture.

We are also mindful that PSA are concurrently reviewing the principles of Right Touch Regulation (RTR) with a view to publish an updated version in the autumn. We have recently provided our response to the PSA discussion paper. We look forward to seeing how the principles of RTR are reflected in the updated version of the Standards in due course.

We appreciate that there is likely to be a more targeted consultation later in the year to provide regulators with an opportunity to comment and consider the specificity of wording and proposed

changes. In this regard, we are mindful that some of the proposals set out in the consultation - particularly the proposals around leadership, governance, and culture - are broad and appear to be at the early stages of exploration. We ask that the PSA continue to engage with us, and the other regulators, throughout the development of any possible changes to ensure that the impact and feasibility of introducing changes have been thoroughly tested and the PSA's final decision on any changes are fully informed.

We look forward to discussing plans with you as you develop your thinking and positions but, prior to that, please do let us know if you would welcome clarification or further information on any of the above or any specific issues raised in our consultation response.

Thank you again for the chance to comment on the proposals.

Yours sincerely

A handwritten signature in black ink that reads "Charlie Massey". The signature is written in a cursive style with a long, sweeping tail on the letter 'y'.

**CHARLIE MASSEY**