

17 November 2022

Ms Briega Donaghy

Chief Executive

RQIA

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CC Emer Hopkins: [emer.hopkins@rqia.org.uk](mailto:emer.hopkins@rqia.org.uk)

Dear Ms Donaghy,

## GMC comments on RQIA's Draft Strategic Plan 2022-27

The General Medical Council's (GMC) role is to protect patients and improve medical education and practice across the UK. As part of this, we oversee UK medical education and training, and we set the standards that doctors need to follow throughout their careers. We also take action where necessary to prevent a doctor from putting the safety of patients or the public's confidence in the profession at risk.

In 2021 we published [our strategy](#) 2021-25, developed with and for patients, medical professionals and partners. The ambitions set out in your Draft Strategic Plan align with the key themes in our strategy, including regulators working together, the value of sharing our data and insights and Equality, Diversity and Inclusion. We welcome the opportunity to respond to this consultation and have restricted our comments to key themes aligned to your draft strategic objectives. We have included additional comments on Equality, Diversity and Inclusion and Northern Ireland's Independent sector.

### Strategic Objective One: Provide an independent view on the quality of health and social care services against required standards through Regulation

- Members of our Northern Ireland (NI) UK Advisory Forum have highlighted the importance of maintaining trust and confidence in regulatory processes, following a number of high-profile Inquiries and Reviews in NI.

- We note your commitment to ensure the transparency of your regulatory processes and welcome opportunities for collaboration with other regulators, and partners in the NI health and social care system, to support this work.

### **Strategic Objective Two: Improve safety and quality through effective information gathering and create networks to share learning, good practice and adopt improvement.**

- We welcome RQIA's commitment to sharing learning and information with other regulators.
- We will continue to share our data and insights with you to help improve environments and address inequalities. The data and intelligence we collect, for example through the national training surveys, can be used to promote good practice and identify and address poor practice.
- Recommendations from public inquiries continue to help us adapt our ways of working for the better. We are committed to taking forward the recommendations from the Independent Neurology Inquiry for us and, where appropriate, in collaboration with RQIA and others, to better protect patients.

### **Strategic Objective Three: Create sustainable relationships and partnerships that expand our reach and add expertise and support to achieving our objectives**

- We value the relationship we have with RQIA, including your membership of our Northern Ireland UK Advisory Forum and regular engagement with your Chair and senior colleagues.
- Your commitment to maintaining collaborative forums, such as the NI Joint Regulators' Forum, is very welcome.
- The GMC is fully committed to progressing a 'Shared Emerging Issues Protocol' for NI in partnership with RQIA and other professional regulators.
- We welcome regular reviews of the Memorandum of Understanding (MOU) that we have between our organisations.
- The GMC regularly carries out annual perceptions surveys of the views of our key stakeholders and we would be happy to share our learning from this process.

## Strategic objective Four: Use our findings to influence policy decisions, raise standards and inform service transformation

- We note your commitment to ‘Engage with political and community leaders to ensure dialogue that enables shared issues and open lines of communication’.
- Via the NI Joint Regulators’ Forum, there is opportunity to explore joint communication activity to improve the understanding of regulation and contribute to a culture of openness and transparency.

## Equality Diversity and Inclusion

- The Health and Social Care workforce in NI is becoming increasingly diverse. Our recent [\*The state of medical education and practice in the UK: The workforce report 2022\*](#) shows a 60% increase in International Medical Graduates (IMGs) joining the NI workforce.
- The UK health service relies on the contribution of IMG doctors, but we know that this group of doctors and doctors from minority ethnic backgrounds are at risk of bias and stereotyping.
- Tackling discrimination and inequality in medicine is an urgent priority for everyone supporting the health services. It’s the right and fair thing to do. It’s also vital to helping retain doctors working in the NI and to support high quality patient care.
- Using research and data, we’ve identified areas of inequality, which we and other organisations can work together to address. And we’ve set targets to help us all keep focused on creating long-lasting changes.
- We want to eliminate two areas of inequality affecting doctors. These are:
  1. The disproportionate pattern of fitness to practise complaints we receive from employers, in relation to a doctor’s ethnicity and place of qualification.
  2. Discrimination, disadvantage and unfairness in undergraduate and postgraduate medical education and training.
- We welcome the ongoing discussion and collaboration of RQIA, and other partners in NI, to address these issues in NI.

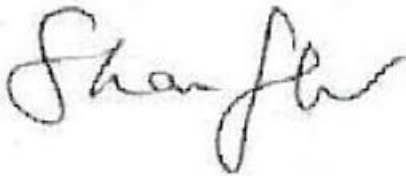
## Oversight of the Independent Sector in NI

- We recognise the important role RQIA has in providing oversight of Independent Sector healthcare organisations in NI.

- Your recent appointment of a new Medical Lead at RQIA, who is the Responsible Officer (RO) for doctors working in the Independent Sector, is a good opportunity to enhance this oversight function.
- Our Employer Liaison Adviser provides supports the Medical Lead to fulfil the statutory functions of their RO role. We regard this role as vital in contributing to whole system patient safety.

I would welcome the opportunity have an introductory meeting with you early in 2023 to share my reflections from the development of our corporate strategy. Our Northern Ireland team will liaise with your office to find suitable date and time to meet. In the meantime Jane Kennedy, Northern Ireland National Head ([jane.kennedy@gmc-uk.org](mailto:jane.kennedy@gmc-uk.org)) is available to address any queries you may have about our response.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Shaun Gallagher', written in a cursive style.

Shaun Gallagher  
Director of Strategy and Policy  
General Medical Council