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Serious Adverse Incident Redesign Programme

Serious Adverse Incident and HSC Complaints Policy Branch

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Dear colleagues

Serious Adverse Incident Redesign Programme: Framework for Learning and Improvement from Patient Safety Incident consultation

About the GMC

We work with patients, doctors, physician associates (PAs), anaesthesia associates (AAs) and other stakeholders to support good, safe patient care across the UK. We set the standards doctors, PAs, AAs and their educators need to meet, and help them achieve them. If there are concerns these standards may not be met or that public confidence in doctors, PAs, or AAs may be at risk, we can investigate and take action if needed.

Our team in Northern Ireland continue to work with the Department of Health (Northern Ireland) and others to implement the recommendations from the Inquiry into Hyponatraemia-related Deaths and the Independent Neurology Inquiry.

We welcome the opportunity to respond to this consultation and have restricted our comments to a small number of relevant themes.

Overall vision of the Framework

We are supportive of the overall vision to introduce a new overarching Regional Framework with supporting guidance to deliver a flexible, streamlined and simpler review process, with a focus on learning and improvement, framed within a culture of safety, openness and compassion.

Focus on learning

We also welcome the focus on learning, which aligns with the Department's Being Open policy proposals to create space for reflection on learning from mistakes and the setting out of clear communication when things go wrong. In our response to the Department's consultation on Duty of Candour and Being Open policy proposals we highlighted the duty in our joint guidance [\[1\]](#) with the

Nursing and Midwifery Council (NMC), *Openness and honesty when things go wrong: the professional Duty of Candour*. This sets out the duty doctors, PAs, AAs, nurses, midwives and nursing associates have to be open and honest with people in their care, colleagues and their employer, to encourage a learning culture by reporting errors openly and honestly.

Importance of leadership

We welcome the focus on the role of leaders in the Health and Social Care system to support the implementation of the Framework and deliver improvements. In particular, we welcome training for those in governance and leadership positions on effective oversight of the Framework.

We set clear expectations for those registered with us who are in a formal leadership or management role to promote open and supportive cultures^[2]. We expect them to take active steps to create an environment in which people can talk about errors and concerns safely.

Equality, diversity and inclusion considerations in SAI investigations

We have set ourselves a target as a regulator to eliminate disproportionate fitness to practice referrals by 2026. Ethnic minority doctors are twice as likely to be referred to us by their employer than white doctors. Doctors who gained their medical degree outside the UK are three times more likely to be referred to us than doctors who took their medical degree in the UK.

As part of this work, we regularly review our policies, guidance and processes to make sure they're fair and consistent; and to seek out and mitigate any potential biases. Our Northern Ireland outreach team work with Health and Social Care organisations to help them create supportive and inclusive working and training environments.

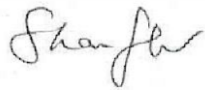
We believe that it is important that there are mechanisms in place to ensure fairness and consistency for all Health and Social Care staff; including equality, diversity and inclusion training for those involved in the SAI investigation process.

^[1] General Medical Council & the Nursing and Midwifery Council (Published June 2015, updated March 2022 and December 2024) *Openness and honesty when things go wrong: the professional Duty of Candour*. Available [online](#)

^[2] General Medical Council (Published March 2012) *Leadership and Management*. Available [online](#)

If you have any queries about our response please contact Claire Andrews, Interim Northern Ireland National Head claire.andrews@gmc-uk.org.

Yours sincerely,



Shaun Gallagher

Director of Strategy and Policy

General Medical Council

^[1] General Medical Council & the Nursing and Midwifery Council (Published June 2015, updated March 2022 and December 2024) *Openness and honesty when things go wrong: the professional Duty of Candour*. Available [online](#)

^[2] General Medical Council (Published March 2012) *Leadership and Management*. Available [online](#)