

## Response ID ANON-4XV2-SK6Q-S

Submitted to NHS Delivery - a new national delivery organisation to lead transformation across our health and social care system  
Submitted on 2025-11-28 09:26:03

### Questions

1 Do you agree that creating a new national organisation to drive forward digital transformation and system change – beginning with the consolidation of NES and NSS into one organisation – is the right approach to deliver the ambitions set out in Scotland's Population Health Framework and Service Renewal Framework?

Don't know

Please explain your response.:

We note that the consultation seeks views on the proposal to establish NHS Delivery as a single national organisation to drive forward essential digital transformation and system change in health and social care. It is not for us to comment specifically on the decision to establish NHS Delivery, however we want to take this opportunity to set out that we are keen to support the transition.

We welcome the commitment that a key immediate priority for the new organisation is 'Ensuring continuity of all NES and NSS services for staff, partners and the public'. In fulfilling our statutory purpose, we have multiple key links across several parts of NES and NSS, allowing us to ensure doctors, Physician Associates (PAs) and Anaesthesia Associates (AAs) deliver good, safe patient care within a complex medical education and training landscape and wider healthcare system. These include

- Supporting our role in quality assurance of doctors' postgraduate training
- Information and data sharing, including providing us with Certificates of Experience to allow doctors to apply for registration
- As the designated body for postgraduate trainees in Scotland, NES is responsible for appraisal, revalidation and recommendation functions, directly impacting on our ability to revalidate doctors

Any disruption to the functions we rely on can bring risks. A seamless transition of these functions into NHS Delivery will therefore be vital to ensure we are able to carry out our statutory duties to support good, safe patient care across the UK.

We would very much appreciate the opportunity to feed into any considerations for change in these areas and would be very happy to pick up directly with the relevant teams during the transition period. We believe our insights could support the successful transition of NES and NSS functions into NHS Delivery as well as any related policy development and drafting instructions for the changes ahead of any legislation being brought forward.

Question 2 (a) Do you agree with the proposed strategic objectives for the new organisation (driving innovation, delivering Once for Scotland services, and streamlining structures)?

Don't know

Please explain your response.:

We are broadly supportive of the overall ambition to drive forward digital transformation and system change. Through the GMC Future of Education and Career Development programme, the GMC is currently developing a new education framework with updated standards that better reflect the changing needs of patients, learners, and the healthcare system. The framework will maintain a strong focus on patient safety, high-quality education, and flexibility so it can adapt as needs evolve. It will support a broader range of learning environments and career pathways and strengthen support for educators who need protected time and resources to teach and supervise colleagues and students. The framework will also embed equality, diversity, and inclusion (EDI) more explicitly across all standards.

Achieving these objectives requires a concerted system-wide approach, and there are several areas where we expect to be working with the new body carrying out the "Statutory Education Body function" in Scotland to achieve our aims. To date we have had positive engagement with NES on our programme of work and have seen good alignment with NES' own Education Reform programme on areas such as:

- the need to develop and support educators
- identifying new and more flexible delivery models for education
- ongoing work to eliminate the attainment gap in postgraduate education

This work is well aligned with the strategic objective to drive innovation and we look forward to continuing our joint working with NHS Delivery to ensure that the education and training of medical students and doctors is fit for the future. Given the importance of this work for patients and the wider population in Scotland, we would like to see a commitment to prioritise work on education, training and workforce development set out in the strategic objectives of NHS Delivery.

Question 2 (b) Should the organisation consider additional strategic objectives?

Yes

If yes, please specify using the text box below:

We would like to see a clear commitment in the strategic objectives that NHS Delivery sees education, training and workforce development as an organisational and strategic priority, and by extension ensures that the Health Boards in Scotland do the same.

By continuing the work currently being carried out by NHS Education for Scotland, NHS Delivery will play a key role in education, training and workforce development of doctors and other healthcare professionals. We consider this to be an important priority for the new organisation. Given the central role that the education, training and development of the workforce will have in helping NHS Delivery realise its stated ambitions, we want to see more detail on how NES' education and career development functions will continue to be delivered as an organisational priority. Whilst there is a focus on service development – particularly in the community and integration of systems – a more explicit focus on the workforce that will enable and deliver these shifts would be welcome.

In addition, we would be supportive of strengthening the emphasis on ED&I in the strategic objectives for NHS Delivery. Addressing disadvantage in medicine is an important area of work for the GMC, reflected in the targets we set in 2021 to eliminate two areas where we've seen sustained evidence of inequality – (1) disproportionate levels of fitness to practise referrals and (2) discrimination in education and training faced by ethnic minority doctors and international medical graduates. We are supportive of NES's work on Advancing Equity in Medical Education, and their commitment to working with us on Welcome to UK Practice to support induction for international medical graduates.

Question 3 Are there services or functions currently delivered by other organisations (in addition to what NES and NSS already do) that should be delivered only by NHS Delivery to improve consistency and reduce duplication?

Not Answered

If yes, please specify using the text box below:

Question 4 What areas of national delivery could be improved by NHS Delivery to make services more efficient or better joined-up?

Making better use of data and digital tools, Strengthening workforce development and training

Other (please indicate below)::

As mentioned elsewhere in our response, we would welcome improvements in data sharing and data access and we want to work in collaboration with NHS Delivery to improve data sharing between our organisations where possible.

The ambition to strengthen workforce development and training in NHS Delivery is welcome. We are keen to continue to support such work taking place in Scotland. As the UK's regulator of doctors, physician associates and anaesthesia associates, we're able to provide an evidence-based perspective on the medical workforce and workplace experiences. We believe our unique data and insights will be helpful to you as you consider the difficulties facing the healthcare system and how these can be addressed through NHS renewal. Our Future of Education and Career Development programme is directly linked to this ambition and we ask that our positive engagement with NES to date on these issues is carried forward by NHS Delivery as a priority.

There is scope to further improve efficiencies and join-up by prioritising collaboration with partners across the health and social care landscape in Scotland and across the UK. We welcome NES' commitment to collaboration with us and others to date. It is important that that joint working arrangements continue with NHS Delivery. This should include prioritising joint working with the Statutory Education Bodies across the UK, and attendance and engagement at external fora in Scotland such as the Sharing Health and Care Intelligence Network.

Question 5 Are there any existing services, programmes, or functions currently delivered by NES or NSS that you believe could be stopped, scaled back, or redesigned (or handed over to another organisation) to better align with current priorities and system-wide impact?

No

If yes, please explain in the text box below:

We are not able to comment on any existing services, programmes or functions that could be stopped, scaled back, or redesigned.

Conversely, we strongly want to stress that the activities currently carried out by NES need to remain a priority and continue to be delivered by the new organisation. This includes the delivery of the activities set out in the NES strategic plan. We particularly encourage that there be no disruption to the core duties NES carry out in relation to the delivery of postgraduate education and training for doctors, and more widely the education, training and workforce development of all healthcare professions.

We also want to highlight a number of specific initiatives currently being delivered by NES that need to remain a priority within NHS Delivery. This includes but is not limited to:

- Workforce wellbeing initiatives including the Trainee Wellbeing Service
- ED&I initiatives including the Advancing Equity in Medical Education programme and related programmes to provide induction and ongoing support to International Medical Graduates and their supervisors
- Leadership initiatives
- NES' Medical Education Reform programme
- Co-Chairing of the Sharing Health and Care Intelligence Network
- Co-Chairing of the MAPs Programme Board
- Chairing and organisation of the RO Network

Question 6 Do you agree that NHS Delivery should lead the development of national digital capabilities (e.g. Electronic Health Records, digital inclusion, data architecture) for Scotland's health and social care system?

Not Answered

Please explain your response.:

Question 7 Should NHS Delivery be tasked with improving data sharing, data access and interoperability across health and social care?

Yes

Please explain your response.:

Our experience of using shared data to improve our regulation and to contribute to improved patient safety, is that fragmented systems and approaches can make the practical use of shared data a significant challenge. This is evidenced by our 'shared data platform' -pooling data with CQC and NMC in England to address this challenge, and the necessity of us having multiple sharing agreements bespoke to every organisation and topic across the system. We have no specific view as a regulator on what the role remit or function of NHS Delivery should be here, but we recognise that there would be benefit in considering common shared principles and objectives about data sharing which are established by a credible national body. We believe this could drive wider benefits and benefits to our regulation.

The establishment of NHS Delivery will require careful attention to how existing MoUs and ISAs are honoured and renewed. Effective data sharing between our organisations is important from both a patient safety and workforce planning perspective. We would welcome improvements in data sharing and data access, and want to work in supportive collaboration with NHS Delivery to improve data sharing between our two organisations, and wider organisations in Scotland, where possible.

Question 8 Do you believe NHS Delivery should be tasked with the lead national support role in innovation development & adoption, service redesign, change management, improvement, and commissioning?

Yes

Please give a reason for your answer in the text box below.:

NHS Delivery can play a positive role in sharing and implementing best practice across services. Consistency and accountably should be key principles underpinning work relating to improvement and change in NHS Scotland, as these are important principles to ensure patient safety.

Question 9 As NHS Delivery evolves in the longer term, what additional capabilities, functions or bodies should be considered for integration into a single national delivery capability that supports the aspirations of the Service Renewal Framework?

Please provide your answer in the text box below:

Question 10 What principles should guide decisions about future expansion of NHS Delivery's remit and structure?

Examples might include: Alignment with the Service Renewal Framework and Public Service Reform Strategy. Evidence of system-wide benefit. Avoidance of duplication. Stakeholder consensus. Legislative clarity and accountability.:

Decisions about future expansion of NHS Delivery, as part of the wider work on NHS Renewal in Scotland, will need to be guided by principles to prioritise patient safety and experience, and workforce wellbeing. Alongside these guiding principles, we have previously highlighted to Scottish Government that we think that NHS Renewal should ensure due consideration is given to:

- Effective strategies to improve the wellbeing and retention of doctors, PAs, AAs and students
- Compassionate leadership and supportive and inclusive environments free from discrimination
- The evolution of education and training to adapt to the changing workforce
- Increases in trainer capacity and protected training time

We encourage Scottish Government to engage with us and other stakeholders on any future expansion of NHS Delivery, and will be keen to offer our expertise, data and insights to such discussions.

Question 11 What mechanisms should be put in place to review and adapt NHS Delivery's remit and performance post-launch?

Please add your response in the text box below:

Ongoing review and adaptation are important principles when managing a considerable change. We note the reference to stakeholder engagement and are keen to offer our input and support to support the success.

We will welcome the opportunity to provide feedback on the performance of the functions of NHS Delivery which we have an interest in including but not limited to

- delivery and quality assurance of postgraduate medical education and training
- workforce data
- data and information sharing
- quality assurance of revalidation

- workforce development and innovation

## About you

What is your name?

Name:

Karin Bredfelt

Are you responding as an individual or an organisation?

Organisation

What is your organisation?

Organisation:

General Medical Council

Further information about your organisation's response

Please add any additional context:

The Scottish Government would like your permission to publish your consultation response. Please indicate your publishing preference:

Publish response only (without name)

Do you consent to Scottish Government contacting you again in relation to this consultation exercise?

Yes

What is your email address?

Email:

gmcsotland@gmc-uk.org

Where did you hear about this consultation?

Scottish Government website

If other, please say where::

## Evaluation

How satisfied were you with this consultation?

Neither satisfied nor dissatisfied

Please enter comments here.:

How would you rate your satisfaction with using this platform (Citizen Space) to respond to this consultation?

Very satisfied

Please enter comments here.: