To consider

Policy for handling inquiries, reviews and investigations

Issue

1 The number of inquiries, investigations and reviews, as well as their public and political significance, has increased over the last several years. This has created an increased demand on the organisation and highlighted the need for more consistent and established, but still flexible, structures to manage our engagement and response.

2 This paper explores the challenge inquiries have and will continue to present, the principles we should use to guide our engagement, and suggests a change in the structure of our management to meet future challenges.

Recommendations

3 The Strategy and Policy Board is asked to:

   a Note the principles that should guide our engagement and response to inquiries.

   b Agree to the establishment of a standing Inquiries Project Group, including draft terms of reference to be adopted by the Group at its first meeting, at Annex A.

   c Agree to the establishment of a pool of subject matter experts, who have as part of their job description and objectives support of the organisation’s engagement with and response to inquiries.

   d Note the management tools at Annex B, which will continue to be developed and refined through the work of the Inquiries Project Group.
Policy for handling inquiries, reviews and investigations

Issue

4 In the past 30 years both the number and public and political significance of inquiries commissioned by Government agencies has increased. This cohort of inquiries includes formal Public Inquiries, conducted under statute, independent investigations, commissioned by Government agencies that have a similar structure to Public Inquiries but without a statutory framework, and similar types of reviews, often commissioned to further develop themes or findings of a Public Inquiry or independent investigation, for example the reviews commissioned by the Department of Health following the report of the second Francis Inquiry.

The challenge

5 For us there has been a marked increase in the volume of inquiries since the late 1990s; the most directly relevant of which have included Public Inquiries into Rodney Ledward; Alder Hey Children’s Hospital; Bristol Royal Infirmary; Ashworth Mental Hospital; Harold Shipman; Richard Neale; Clifford Ayling; William Kerr and Michael Haslam; and the Mid-Staffordshire NHS Foundation Trust. There remain several active inquiries requiring our attention, including public inquiries into the Vale of Leven Hospital, the Penrose Inquiry and Hyponatraemia as well as the Morecambe Bay investigation and the Saville investigations.

6 Our past management of engagement with inquiries has been arranged on an ad-hoc basis, drawing from Governance and Policy teams. While this approach has served the organisation’s immediate needs and we have delivered sufficient responses a lessons learned exercise conducted following the conclusion of the Francis Inquiry found that the work has significantly increased demands on staff and financial resources, increased opportunity costs and increased reputational risk. Additionally, the ad-hoc approach has had the consequence of creating gaps in corporate memory, a lack of ownership across the organisation and the increased burden of needing to reinvent the wheel every time given the absence of an established and systematic approach. This exacerbates both the demands and risks associated with our engagement and response to inquiries.

7 The trend in inquiries shows no sign in abating, particularly given the political and social functions they serve, which include fact finding and lessons learnt, political, public and social policy implications, oversight, assigning of accountability, and public catharsis. To continue to reinvent our processes and management structure for every new inquiry leaves us open to significant risk and is not an effective or efficient arrangement.
A principled approach

8 At the most basic level, the requirement for us to cooperate with Public Inquiries is established in statute (the Inquiries Act 2005). For those inquiries that are not statutory, cooperation is not only consistent with our own statutory objective, to protect the public, but is also in the interest of the wider system, in which there is a growing expectation we participate. Indeed, one of the fundamental and consistent lessons of many inquiries, whether in healthcare of other sectors, is the failure of constituent parts of the system to work collaboratively and communicate information proactively. In order to play our part well, we should be mindful of the following principles:

a Fulfilment of our statutory duty and charitable purpose – Our primary objective, as set out in the Medical Act 1983, is to ‘protect, promote and maintain the health and safety of the public’. With this comes a duty to actively participate in the mitigation of risk to patients and public, inherent in the fact finding and lessons learned aspects of inquiries. We also have an accompanying duty to contribute to wider learning in the system in order to improve the quality of care of future patients.

b Transparency – As an organisation we are honest and strive to be open and transparent in everything we do. Sharing information openly and readily with inquiries is essential. The information we hold, while sometimes of limited value on its own, may shed light on things we cannot anticipate when viewed in conjunction with other materials or through a different lens. This emphasises the importance of being open and transparent in order to achieve the other principles set out here.

c Collaboration and cooperation – As part of our normal business we cooperate with a variety of organisations to share ideas, promote good medical practice, identify poor practice and support health professionals. Cooperating with inquiries, regardless of their statutory underpinning, is achieve the good of helping to fulfil our statutory duty and creates opportunities for the improvement of the system as a whole as well as improvement for our organisation.

d GMC institutional learning – In our Values we set out that we are a listening and learning organisation; in order to achieve this we must be open to scrutiny from ourselves and from others. By proactively and openly participating in inquiries we are engaging in processes that may help us to improve our systems and operations in order to be more effective and efficient.

Creating structure and capacity to respond

9 In order to better fulfil the principles set out above, we need to effect an organisational solution that will achieve consistency in the way we deal with inquiries, but gives us the flexibility to react to what is, by nature, an
unpredictable and varied work-load characterised by periods where there may be several inquiries going on at the same time (e.g. 2002-2005), and fallow periods with less or no significant inquiry activity (2005-2008).

10 The lessons learned exercise reached the conclusion that we must establish corporate and individual ownership of the area of work, readiness of resources and sufficient management frameworks and tools to ensure robust decisions are made, clear records are maintained to facilitate audit and corporate memory is captured. This can be achieved through establishing a standing project group, subject matter experts in each directorate and the appropriate tools to support this work as described in the following sections.

Inquiries Project Group

11 A standing Inquiries Project Group would take collective responsibility for the management and oversight of inquiries, including strategic advice to the Chief Executive, Chief Operating Officer, and Directors, and the practical management of varied workload. This would establish corporate ownership and help to address the issue of consistency over time. It would also eliminate the risk of the progress of an inquiry project being dependent on any one member of staff, which carries business continuity risks. Additionally, this Group would develop expertise and continuously refine management systems and tools eliminating the need to reinvent for each new inquiry project.

12 Draft terms of reference for the Inquiries Project Group are at Annex A.

Subject matter experts

13 Inquiries often move at a rapid and unpredictable pace. This creates reputational risk for us if we are not able to flex our resources to meet demands. This can be mitigated through the creation of subject matter experts (SMEs) in each part of the business. SMEs would crucially help to spread the burden of the often detailed and time consuming work of gathering and quality assuring the information needed from the beginning to the end of our engagement with an inquiry. Part of the day job of these SMEs would be to provide information to the Inquiries Project Group in order to deal with the demands of inquiry projects in a robust and timely manner. It is anticipated that some of the SMEs would also be members of the Inquiries Project Group.

14 Making this an explicit part of the SME’s job and including this in their annual objectives and would instil a sense of ownership and responsibility for individual staff members and would ensure that the appropriate expertise is available. This would also facilitate appropriate support for SMEs to prioritise inquiry work when a business need is clearly identified through the Inquiries Project Group. This approach is currently working well in relation to our Law Commission work and has the advantage of not requiring additional recruitment, while ensuring that clear ownership and individual responsibility to deliver the work are created.
To establish an initial structure for managing inquiries, a suite of management tools have been developed. We have been piloting the use of some of these tools in our management of the Vale of Leven and Hyponatraemia inquiries. The following tools are at Annex B.

Risk matrix and activity level guide – presents a filtered view of the corporate risk matrix and poses questions to help determine the level of activity based on the risk level assigned. Using the corporate risk matrix as the basis for this tool ensures consistency in the way the organisation evaluates and responds to risk across the piece.

Responding to an inquiry or review guide – describes all the possible stages of an inquiry and provides guidance about the steps to be taken to ensure we evaluate risk, activity and respond appropriately at each stage.

‘Summary document’ and ‘Information gathering guide’ – capturing the full range of the organisation’s interactions or consideration of the issue an inquiry is established to investigate is an important and early step. This will create a clear record of information gathered and considered over time.

evaluation log – will help the Inquiries Project Group consider how to improve arrangements and systems at the conclusion of each inquiry project.

Finally, to ensure that where an activity or project is identified as forming part of our response to an inquiry, the Corporate Business Planning Team would identify these activities in the operational plans and incorporate them in central reporting processes to provide clear and visible records of delivery progress. At the moment this would only provide a record of where activity is taken forward, but a review of our business planning system will consider how this could be addressed. In the meantime, another means of recording all consideration of recommendations would need to be considered.
Supporting information

How this issue relates to the corporate strategy and business plan

17 This issue is most relevant to strategic aim 5 of the 2014-17 Corporate Strategy: to work better together to improve our overall effectiveness, our responsiveness and the delivery of our regulatory functions. It is also related through the actions it effects to strategic aims 1, 2 and 3.

How the action will be evaluated

18 The Inquiries Project Group would keep the effectiveness of the new management structure under review through reports to the Strategy and Policy Board.

What engagement approach has been used to inform the work (and what further communication and engagement is needed)

19 In 2013 a series of workshops and one on one discussions were held with members of staff who had been involved with the management of our engagement and response to Inquiries in the past, going back as far as the Shipman Inquiry. These meetings drew together lessons learned and supported the development and testing of this policy and the associated structures and tools.

How the issues differ across the four UK countries

20 The conduct of public inquiries is varied across the four UK countries as the legislation underpinning them is slightly different. However, the import and thrust of these types of investigations is the same and the management structures and tools prompt those involved to consider any differences in the implications or necessary management of a given issue, be it UK-wide or country specific.

What equality and diversity considerations relate to this issue

21 The issues that are the subject of inquiries, investigations or reviews are often to do with failings in care of a particular demographic of vulnerable patients, some of whom have protected characteristics. By establishing better structures to manage the way we engage with and learn from investigations, inquiries and reviews we will ensure we capture learning points for ourselves, and assist in capturing the learning for others in relation to any different needs or challenges associated in providing high quality care to these groups.

If you have any questions about this paper please contact:
Kristen Veblen McArthur, Regulation Policy Manager,
kvmcarthur@gmc-uk.org, 020 7189 5389.
Draft terms of reference: Inquiries Project Group

Purpose

1. The Inquiries Project Group is an advisory group to oversee the strategic and practical management of our monitoring of and interaction with public inquiries and other similar investigations and reviews, for example, investigations commissioned by Government agencies.

Duties and activities

2. Monitor the progress of emergent and active inquiries and provide strategic advice to the Director of Strategy and Communication.

3. Assign a ‘risk rating’ to inquiries as soon as they have been established and keep this under review at regular intervals in order to determine the necessary levels of activity required to respond appropriately and robustly. Report these recommendations to the Director of Strategy and Communication for review.

4. Oversee the establishment of project plans related to inquiries and reviews and maintain activity and risk logs. Commission and receive updates on progress in relation to initial evidence collection to inform risk rating and activity levels, the drawing together of evidence submissions, final responses, monitoring of activity in response to recommendations and audits of our delivery of that activity.

5. Oversee and support the pool of subject matter experts established to support our inquiries work and keep under review resourcing arrangements in relation to inquiries, drawing attention of senior staff to any current or anticipated issues.

Working arrangements

6. The Group is chaired by a member of the Regulation Policy Team, and includes members drawn from each of the Directorates. Membership will also include representatives from the Legal and Media teams.
Secretariat support will be provided by the Regulation Policy Team.

The Group reports directly on actions and risks to the Director of Strategy and Communication who will consider when it is necessary to escalate issues and decisions to Directors, the Chief Operating Officer and the Chief Executive, and will keep them regularly updated.

The Group is accountable to the Strategy and Policy Board and will provide a report on activities, risks and issues not less than once a year. Further reports may be necessary depending on the level of activity associated with ongoing inquiries.
Management tools

1 The documents in this annex are intended to provide an initial suite of tools to give structure the management of inquiries. Once established, it is anticipated that the Inquiries Project Group would refine and add to these tools:

a Risk and activity level guide.

b Responding to an inquiry or review guide.

c Summary document template.

d Information gathering guide.

e Template project plan.

f Template risks and issues log.

g Evaluation log.
Risk and activity level guide
**Risk rating an inquiry or review**

The purpose of risk rating an Inquiry or review is to help determine the level of engagement the GMC will need to undertake in relation to the issue and determine the potential resource implication on staff and time. This document should be used in conjunction with the Inquiry and review and ratings should be recorded in the summary document and reviewed at each stage by the standing Inquiries and reviews group.

<table>
<thead>
<tr>
<th>Impact</th>
<th>Minor</th>
<th>Moderate</th>
<th>Major</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Media coverage</strong></td>
<td>Coverage of case / specifics of accusation, coverage once Inquiry published</td>
<td>Coverage connects with role of GMC and perceived inaction, coverage on monthly basis</td>
<td>Claims of GMC deficiency, coverage on a weekly basis</td>
</tr>
<tr>
<td><strong>Reputational impact</strong></td>
<td>GMC aware of concerns but acted appropriately</td>
<td>GMC was aware of concerns and did not act appropriately / uncertain of action</td>
<td>GMC at fault for incidents that occurred, process and procedures failed to mitigate incidents that occurred</td>
</tr>
<tr>
<td><strong>Availability of data</strong></td>
<td>GMC has data on concerns raised relating to Inquiry</td>
<td>GMC holds some data concerning the incidents and FtP about handful of doctors involved</td>
<td>GMC holds large amounts of data concerning the incidents and FtP data about all doctors involved</td>
</tr>
<tr>
<td><strong>Isolated to a Trust, Board or GP Practice</strong></td>
<td>Country-wide impact</td>
<td>UK-wide impact</td>
<td></td>
</tr>
<tr>
<td><strong>Individual poor practice (no evidence of systemic concern)</strong></td>
<td>Poor practice isolated to a segment of practitioners (specialty, Trust/Board, grade)</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Number of patients affected</strong></td>
<td>Individual</td>
<td>Number of cases through a single service provider</td>
<td>Multiple cases across multiple locations</td>
</tr>
<tr>
<td><strong>Issue is older than 5 years and has not recurred</strong></td>
<td>Issue is older than 5 years and has recurred or is between 3 to 5 years old</td>
<td>Issue has occurred in the last 3 years</td>
<td></td>
</tr>
<tr>
<td><strong>Unrelated admin failures not connected to incidents which occurred</strong></td>
<td>Management and systems failure assisted in incidents occurring</td>
<td>Incidents occurred purely due to managements and system failure</td>
<td></td>
</tr>
<tr>
<td><strong>No contact or GMC not asked to submit evidence</strong></td>
<td>GMC asked to submit written evidence</td>
<td>GMC asked for oral evidence / warning of criticism received</td>
<td></td>
</tr>
<tr>
<td><strong>Responding to inquiry</strong></td>
<td>Full response to inquiry, select committee engagement</td>
<td>Full response and further inquiries commissioned</td>
<td></td>
</tr>
</tbody>
</table>

**Likelihood**

<table>
<thead>
<tr>
<th>Possible but unlikely to occur (eg. &lt;40% chance)</th>
<th>More than possible (eg. 40-60% chance)</th>
<th>More likely than not to occur (eg. &gt;60% chance)</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Low</strong></td>
<td><strong>Significant</strong></td>
<td><strong>Critical</strong></td>
</tr>
<tr>
<td><strong>Critical</strong></td>
<td><strong>Critical</strong></td>
<td><strong>Critical</strong></td>
</tr>
</tbody>
</table>
Determining nature and level of inquiry-related activity

Once the risk rating has been decided, the following questions may be used to determine the appropriate level of activity in relation to the inquiry or review. For the higher ratings, questions in the lower ratings should be included.

<table>
<thead>
<tr>
<th>Low</th>
<th>Medium</th>
<th>High</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Monitoring</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Are all teams aware of the inquiry and who the GMC lead is for exceptions reporting?</td>
<td>• Does some evidence require regular monitoring?</td>
<td>• Does all evidence require regular monitoring?</td>
</tr>
<tr>
<td></td>
<td>• Is there regular monitoring with Devolved Offices?</td>
<td>• Attend evidence sessions?</td>
</tr>
<tr>
<td><strong>Resources</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Is the leadership of the project clear?</td>
<td>• Will additional administrative support be needed?</td>
<td>• Are the planned resources for the work insufficient?</td>
</tr>
<tr>
<td>• Are there clear subject matter experts?</td>
<td>• Is it difficult to identify clear subject matter experts?</td>
<td>• Do you need to consider the option of seconding a member of staff to assist with the project?</td>
</tr>
<tr>
<td>• Are all staff aware of who to contact and when?</td>
<td></td>
<td></td>
</tr>
<tr>
<td><strong>Senior staff engagement</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Are Directors and Assistant Directors aware of response progress?</td>
<td>• Does the Chief Executive need to be aware of response progress, risks and issues?</td>
<td>• Do Council need to be engaged and at what stages?</td>
</tr>
<tr>
<td>• Is there regular engagement with Directors/COO concerning risks/issues?</td>
<td>• Will CCST be briefed on risks and issues?</td>
<td>• Will regular updates on risks and issues be needed with Directors/COO/SPB?</td>
</tr>
<tr>
<td></td>
<td>• Does Council/Chair need to be updated?</td>
<td>• Does Council/Chair need to be updated?</td>
</tr>
<tr>
<td><strong>Reactive vs. Proactive</strong>*</td>
<td></td>
<td></td>
</tr>
<tr>
<td>• Should we undertaken any proactive communications with inquiry? - for example encouraging those conducting the inquiry to raise any concerns involving doctors with us.</td>
<td>• Is there need to establish an informal relationship with inquiry? -- for example, informal conversations with inquiry team about evidence</td>
<td>• Is there need to proactively contact stakeholders?</td>
</tr>
<tr>
<td>• Should the engagement be mostly reactive?</td>
<td></td>
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</tbody>
</table>

*Pros and cons of proactive and reactive engagement. Should also be considered if invited to be a ‘core participant’

**Proactive engagement**

- Early involvement can provide and element of influence over the terms of reference and a greater insight and understanding of the process
- Greater control over information that we provide
- Championing concerns that others may have raised with us
- Set parameters for responding – for example ‘this is what we know/this is what we don’t know’
- Seen as transparent and open organisation

**Reactive engagement**

- Fewer resources required, as would only need to respond if required to do so
- Low level of monitoring required

<table>
<thead>
<tr>
<th>Pros</th>
<th>Cons</th>
</tr>
</thead>
</table>
| High level of resources required
- Need to be able to clearly establish ‘our story’ from the outset
- High frequency of horizon scanning and monitoring required to ensure we engage and respond as early as possible.
- More clearly in the considerations of the inquiry because of self-raised profile | Limited engagement and influence
- Potential for criticism in not being proactive about concerns we may have or know about |
Responding to an inquiry or review guide
Responding to an inquiry or review

The purpose of this document is to set out clearly defined steps to help identify the relevant tasks which should be completed at different stages when responding to an inquiry or review. This should be used in conjunction with ‘Risk rating an inquiry or review’, which should be done at each stage and more often if circumstances warrant. The standing project group oversees this activity.

### Need for an inquiry

- On-going horizon scanning
- Media team, intelligence unit, DO's, Public affairs

### Inquiry announced / Chair appointed

1. Assign risk rating and consider activity level (see: risk rating an inquiry or review)
   - Consider:
     - Monitoring
     - Resources
     - Senior staff/Council engagement
     - Proactive vs. Reactive engagement with review/inquiry
2. Appoint senior sponsor
3. Appoint team inquiry lead
4. Begin to compile GMC 'Story'
5. Establish risks and issues logs

**People to contact**
- Senior management team responsible for oversight of Inquiries and Reviews (Senior sponsor).
- Project team secretariat to set out schedule of meetings
- Notify all involved with horizon scanning and monitoring

### Establishing the inquiry

- Planning
- Practical planning for a public inquiry
- Investigation
- Writing up

### Invitations to be core participant

1. Review risk rating and consider activity level
2. Project team to make recommendation for consideration by senior sponsor/Directors
3. Internal comms needed; establish resources to support

### Monitoring evidence

1. Review risk rating and consider activity level
2. Appoint written/oral evidence leads
3. Lead to set out clear objectives for giving evidence
4. Establish schedule for project group to oversee
5. Commission information from relevant teams
6. Update Summary document

**People to contact**
- All involved in horizon scanning
- OCCE
- Subject matter experts outside of project team

**Interim report**

1. Review risk rating and consider activity level
2. Commission information analysis work from subject matter leads

### Warning of criticism

1. Review risk rating and consider activity level
2. Consider any further stakeholder engagement
3. Consider any follow up responses – length of time
4. Track progress of work to address recommendations in Inquiry (using Inquiry/recommendation tracker) until all are included in operational monitoring

**Manage stakeholder relationships**

1. Consider any proactive engagement with stakeholders
2. Ensure that stakeholders are given prior warning if any references are made to them as part of disclosure of information to the Inquiry and/or as part of statements of evidence produced for the Inquiry.

**People to contact**
- Relationships and campaigns
- OCCE
- Media

### After publication

1. Review risk rating and consider activity level
2. Consider any further stakeholder engagement
3. Consider any follow up responses – length of time
4. Track progress of work to address recommendations in Inquiry (using Inquiry/recommendation tracker) until all are included in operational monitoring

**People to contact**
- Media team
- Business planning team and business champions regarding inclusion in operational plans
Summary document template
<table>
<thead>
<tr>
<th>Inquiry</th>
<th>[Name of Inquiry]</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chair</td>
<td></td>
</tr>
<tr>
<td>Scope</td>
<td>[basic detail on why the inquiry took place]</td>
</tr>
<tr>
<td>Announced</td>
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<tr>
<td>Terms of reference</td>
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<tr>
<td>Inquiry website</td>
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<td>Report publication</td>
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### Document History:

<table>
<thead>
<tr>
<th>Version</th>
<th>Date</th>
<th>Name</th>
<th>Summary of changes</th>
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<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>First draft</td>
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### Risk Rating History

<table>
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<tr>
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<th>Decision by</th>
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<tbody>
<tr>
<td>Horizon scanning</td>
<td></td>
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<tr>
<td>Inquiry announced</td>
<td></td>
<td></td>
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<tr>
<td>Invitation to be core participant</td>
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<td></td>
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<tr>
<td>Invitation to give written/oral evidence</td>
<td></td>
<td></td>
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<tr>
<td>Warning of criticism</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Issue initial statement/response</td>
<td></td>
<td></td>
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<tr>
<td>Manage stakeholder relationships</td>
<td></td>
<td></td>
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<tr>
<td>After publication</td>
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</table>
[Name of Inquiry]

[Below is a template for compiling all information relevant to the GMC’s relationship with an Inquiry. Not all sections will apply to every Inquiry. You should only include information in this document which is relevant in helping to capture the GMC ‘Story’ this information should be high level and where more detail is needed – eg, lists of FTP cases, a link to the relevant document should be included]

Background

1  [This section should include background information as to how the inquiry began and a brief outline of the incidents which occurred]

2  [Fill in this section when Inquiry is announced]

GMC interaction with the Inquiry

3  [This section should include any correspondence that we have had with the inquiry, letters, emails, invitations to give evidence etc.]

4  [This section should also include a brief outline of the information provided to the Inquiry, our initial response and follow up actions]

5  [Interaction includes senior level correspondence with CE and CCST]

6  [This section should be regularly updated throughout the process of responding to an Inquiry/Review]

Fitness to practise

7  [This section should be filled in when the Inquiry is announced as this will be the point when the GMC will need to begin gathering relevant information for the Inquiry and information to inform our response]

8  [This section should briefly outline FtP information concerning any doctors which have been involved in incidents identified by the Inquiry, including whether a referral was made, whether an investigation took place, whether a complaint was referred to an FtP hearing and the outcome at each of these stages]

9  [This section should also contain information where any particular complaints have received large amounts of media coverage]

10 [Any interactions the ELS have had with the relevant site/Trust should be included in this section – sub-headings should be used as necessary]
Education

11 [This section should contain information relating to any educational concerns raised through Inquiry or the site/environment which is the subject of the Inquiry]

12 [Give brief details of action taken to address concerns raised relating to site/environment which is the subject of the Inquiry]

Devolved Offices/RLS

13 [This section should detail any interaction that DO’s and RLS have concerning the Inquiry]

14 [Give details of impact Inquiry may have on each of the devolved regions]

FOI requests

15 [Give brief details of any FOI requests that have been received, either as part of the Inquiry or as a result of the Inquiry. List decisions made concerning FOI requests]

Media requests

16 [Media team will be best placed to inform this part of the document]

17 [This section should be updated throughout the process of the Inquiry]

Internal communication

16 [This section should be updated throughout the process of an Inquiry]

[Any additional sections should be added as needed - eg, Monitoring, Revalidation etc.]
Information gathering guide
Inquiries and Reviews

Gathering Information Guide

The purpose of this document is to assist in ensuring that all relevant types of information are considered when drawing together the our story in relation to a particular issue or when responding to a request for information from an inquiry or review.

Types of information

Once an Inquiry or Review has been announced it is likely that information will be requested from a number of organisations, particular regulators. It is important that we understand they types of information that we may hold about a particular incident, doctor or hospital.

Information we hold that is likely to be relevant to and Inquiry or Review includes:

- Concerns raised
- Visits reports
- Monitoring reports
- Any information with regards to approvals
- FtP information
  - case summaries
  - outcomes
  - complaints connected to a particular Hospital
  - ELS meetings
- Revalidation statistics
- Meetings with CEO's involved
- Previous interactions
- Previous media attention
- Press releases

Teams to contact
Education - approvals, visits team
FtP - legal, ELS, change quality and information
Strategy and Comms - media, relationships and campaigns
Registration and Revalidation - Management information, revalidation decisions team
CCST

How far back
Dependant on Inquiry, long running reviews etc.
Relevant information

When considering whether a particular piece of information will be relevant to include as part of the process for responding to an Inquiry, the following questions should be considered:

1. Does it relate to a particular question being asked by the Inquiry?
2. Will the information help to inform the response to the Inquiry?
3. Is the information within the time period of the Inquiry?
4. Does the information relate to the incidents reported in the Inquiry?
5. Is the information capable of illustrating the GMC's interactions?

Additionally, it will be important to consider some practical questions:
- What is the volume of information we are likely to hold?
- How easily can the information be gathered?
- Are there sufficient resources in place to gather and quality assure the information or do additional arrangements need to be made?

Top tips

1. Don’t include every piece of information we own
2. Consider discussion with inquiry to what and how are as expected and helpful
3. Make sure each piece of evidence relates to an aspect of the inquiry
4. Consider whether additional information should be volunteered for context
## Project plan template: Example Inquiry

<table>
<thead>
<tr>
<th>Known inquiry milestones</th>
<th>Start</th>
<th>Finish</th>
<th>Status</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td>Inquiry announced</td>
<td></td>
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</tr>
<tr>
<td>Evidence collection</td>
<td></td>
<td></td>
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</tr>
<tr>
<td>Inquiry scheduled to report</td>
<td></td>
<td></td>
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</tr>
<tr>
<td><strong>Activities</strong></td>
<td><strong>Lead</strong></td>
<td><strong>Start</strong></td>
<td><strong>Finish</strong></td>
<td><strong>Status</strong></td>
</tr>
<tr>
<td><strong>Activity one: Gather evidence for template</strong></td>
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</tr>
<tr>
<td>FTP information</td>
<td>SME</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Education information</td>
<td>SME</td>
<td></td>
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<tr>
<td>Standards information</td>
<td>SME</td>
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<tr>
<td>Registration and revalidation information</td>
<td>SME</td>
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<tr>
<td>Case summaries</td>
<td>SME</td>
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<tr>
<td>ELS information</td>
<td>SME</td>
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</tr>
<tr>
<td>RLS information</td>
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<td></td>
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<td></td>
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<tr>
<td>Media overview</td>
<td>SME</td>
<td></td>
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</tr>
<tr>
<td><strong>Activity two: Written evidence submission</strong></td>
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</tr>
<tr>
<td>Complete draft of statement</td>
<td>Drafting lead (legal)</td>
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<tr>
<td>Obtain Counsel’s advice</td>
<td>Drafting lead (legal)</td>
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<tr>
<td>Additional case detail information</td>
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<tr>
<td>Additional information</td>
<td>SME</td>
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<tr>
<td>Additional information</td>
<td>SME</td>
<td></td>
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<tr>
<td><strong>Activity three: Oral evidence preparation</strong></td>
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<tr>
<td><strong>Activity four: Respond to inquiry recommendations</strong></td>
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</tr>
<tr>
<td><strong>Other relevant activities / tasks</strong></td>
<td><strong>Lead</strong></td>
<td><strong>Start</strong></td>
<td><strong>Finish</strong></td>
<td><strong>Status</strong></td>
</tr>
<tr>
<td>ND/ senior stuff/ Counsel unavailable</td>
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<tr>
<td>Major internal milestones with impact on work programme</td>
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<tr>
<td>Other significant-impact time bound dependency</td>
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</tbody>
</table>
Template risks and issues log
## Template Risks and issue log: Example inquiry

<table>
<thead>
<tr>
<th>Ref</th>
<th>Description</th>
<th>Owner</th>
<th>Before MI</th>
<th>Mitigating action</th>
<th>After MI</th>
<th>Risk rating</th>
<th>Further action</th>
</tr>
</thead>
<tbody>
<tr>
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<tr>
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</tbody>
</table>

### Impact Matrix

<table>
<thead>
<tr>
<th>Probability</th>
<th>Unlikely</th>
<th>Probable</th>
<th>Almost certain</th>
</tr>
</thead>
<tbody>
<tr>
<td>Impact</td>
<td><img src="image" alt="Unlikely Impact" /></td>
<td><img src="image" alt="Probable Impact" /></td>
<td><img src="image" alt="Almost certain Impact" /></td>
</tr>
</tbody>
</table>
Evaluation log
Evaluation

Project

1 [This section should provide a brief outline and description of the work undertaken during the process of the Inquiry.]

Issues

2 [You should fill in the table below detailing the various issues encountered throughout the Inquiry process, the action that was taken to address those issues and whether the action taken resolved the issues.]

<table>
<thead>
<tr>
<th>Issue encountered</th>
<th>Action taken</th>
<th>Resolved</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

What went well?

3 [This section should include detail of what went well during the process of the Inquiry and should include things such as communication between directorates and teams, level of support given and resources. Plus anything else that went well.]

Improvements needed

4 [This section should provide detail of the improvements needed to ensure that issues are not encountered in any further work responding to an Inquiry/Review.]

(What will you/your team do better next time?)

5 [Give examples of how you/your team can approve the way you/they work to ensure Inquiries/Reviews are handled better next time round and what changes are being made to management tools/the policy as a whole]