Sir Peter Rubin  
Chairman  
The General Medical Council  
Regents Place  
350 Euston Road  
London  
NW1 3JN  

Dear Sir Peter,

Consultation on the General Medical Council (Licence to Practice and Revalidation) Regulations

The Academy and Medical Schools Council support the principles of certainty, fairness, flexibility, minimalism and transparency, which have guided the preparation of the Licence to Practice and Revalidation Regulations. We acknowledge the need for the regulations to be sufficiently broad to encompass the entirety of the medical profession and the constraints of the legal framework on how this is achieved.

In terms of the consultation, we would like to make two main points, which for clarity are set out below.

Transparency

The succinctness of the regulations led to many initial questions and concerns that were allayed through helpful communication with colleagues at the GMC. We understand that more detailed information will shortly be published in the form of a guidance document. As expressed to colleagues at the GMC, it would have been informative and reassuring to have this guidance published, at least in draft form, at the same time as the regulations. We highlight the need for continuing robust communication and urge that the guidance document be as comprehensive as is practical.

Certainty

Ensuring an equitable approach for doctors wishing to revalidate is pivotal. The small number of doctors that won’t have a connection to a Responsible Officer (RO) may include those that work within, and benefit, the wider healthcare context. Careful thought needs to be given to how these doctors are able to revalidate and we support the proposal that additional UK organisations be considered to perform RO functions. An important caveat to this will be the need to ensure consistency in quality and accountability.

We would like to thank you for your continuing engagement with the Academy and the Medical Schools Council on this matter. If you would like the Academy or the Medical Schools Council to provide support or input, please do get in touch. Susie in the Academy office will be pleased to facilitate this: suzanne.candy@acmedsci.ac.uk.

With kind regards,

Yours sincerely,

Cc Richard Marchant, GMC