

The General and Specialist Medical Practice (Education, Training and Qualifications) Order 2010

The Postgraduate Medical Education and Training Order of Council 2010

Consultation Questions

Response Form

Please fill in and / or tick the appropriate response

Name David Williams

Contact address Faculty of Public Health, 4 St. Andrews Place, London

Postcode NW1 4LB

Contact Telephone 02072240642

E-mail educ@fph.org.uk

Confidentiality of information

We manage the information you provide in response to this consultation in accordance with the Department of Health's **Information Charter**. Information we receive, including personal information, may be published or disclosed in accordance with the access to information regimes (primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in most circumstances this will mean that your personal data will not be disclosed to third parties.

Summary of the consultation

A summary of the response to this consultation will be made available before or alongside any further action, such as laying legislation before Parliament, and will be placed on the Consultations website at <http://www.dh.gov.uk/en/Consultations/Responsestoconsultations/index.htm>

I do not wish my response to be passed to other UK Health Departments

I do not wish my response to be published in a summary of responses

Please indicate all the countries to which your comments relate:

UK-wide **and/or**
England **Northern Ireland**
Scotland **Wales**

Are you responding:

- ~~as a member of the public~~
- ~~as a health or social care professional~~
- on behalf of an organisation

If you are responding as a member of the public, please supply the following details:

Profession

If you are responding as a health or social care professional, please supply the following details:

Profession

Country of qualification
Please indicate as appropriate:

UK **Other EEA** **Rest of World**

Area of work

NHS
Social Care
Private Health
Voluntary
Regulatory Body

Professional Body
Education
Union
Local Authority
Trade Body
Other (please give details)

If you are responding on behalf of an organisation, please supply the following details:

~~NHS~~
~~Social Care~~
~~Private Health~~
~~Voluntary~~
~~Regulatory Body~~
Professional Body
~~Education~~
~~Union~~
~~Local Authority~~
~~Trade Body~~
~~Other~~ (please give details)

The General and Specialist Medical Practice (Education, Training and Qualifications) Order 2010

The Postgraduate Medical Education and Training Order of Council 2010

Consultation Questions

Reason for joint consultation on the draft orders

Q1: Do you support the proposed approach which puts the overarching framework into the Medical Act 1983 and the details into subordinate legislation to be made under new powers in that Act?

Support ()

Not Support ()

Unsure (x)

Comments

It is difficult to see what alternative there is to that proposed in this question. This seems to be the legislative route created by Parliament in the past. Either the question isn't needed, or there are alternatives that the document does not describe which may be better.

Please note that the questions listed in Annex B and in the response form are not the same as those in the text of the document. In particular Question 1 & 7 are significantly different.

Problems caused by the current split of responsibilities between two Bodies

Q2: Do you agree that responsibility for all medical education and training, together with the associated legal powers, should be vested in a single body?

Agree ()

Disagree ()

Unsure (x)

Comments

The UKPHR and recruitment of non-medics still does not have the same statutory basis as the GMC/PMETB. Merging PMETB and the GMC creates a single organisation that has the same functions for medics as the UKPHR does for non-medics.

FPH suggests that:

1. UKPHR should be put onto the same statutory footing as the merged GMC/PMETB?

Or

2. The UKPHR should merge with the GMC/PMETB into a single organisation?

Q3: Do you agree that PMETB merging into GMC is the preferred method of creating an ideal regulatory body in medical education?

Agree ()

Disagree ()

Unsure (x)

Comments

FPH is worried by the continued exclusion of non-medical specialist who currently work in Public Health and see the merger as a good time to rectify this.

The alternative of taking the education regulatory roles from GMC & placing them within an enlarged PMETB are not explored. The proposed response to the policy driver (Tooke) is to bring all regulation under a single body. This may be, but isn't necessarily, in keeping with the aspirations of that report. I believe Tooke wanted all medical-education related regulation to be brought under a single body which could be achieved by 1) a regulator of doctors, 2) a regulator of medical education. It may be that the proposed solution is the best one, but I'm not clear that that has been explored in the consultation document.

Q4: Do you agree that the cost drivers and benefits identified in the impact assessment are the main cost and benefit drivers of the options set out?

Agree ()

Disagree ()

Unsure (x)

Comments

Insufficient information to respond. But the option in Q3 above does not seem to have been explored.

Transition to the new arrangements

Q5: Do you agree that it makes sense to merge the two bodies before waiting for the outcome of the comprehensive review of the system?

Agree ()

Disagree (x)

Unsure ()

Comments

Q6: Do you agree that it makes sense to integrate procedures in respect of both undergraduate and postgraduate education where possible, unless there are compelling reasons not to do so?

Agree (x)

Disagree ()

Unsure ()

Comments

Q7: Do you agree that in merging PMETB's statutory functions with those of the GMC, the Council should continue to have the flexibility to organise those new functions in such a way as to carry them out efficiently and effectively and should not be

required to replicate the same statutory committee structures that were specified for PMETB?

Agree **(x)**

Disagree **()**

Unsure **()**

Comments

Which may influence the answer to Q3