



## Reforming the General Medical Council legislative framework

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### Please review your answers

The 'review your answers' feature lists all the questions that you have answered or had the opportunity to answer.

Clicking on the 'Change' button against an answer will allow you to amend that answer.

After making any amendments you can then click through the survey using the 'Next' button. Previously answered questions retain their answers.

### About you

|                                                            |                                          |                        |
|------------------------------------------------------------|------------------------------------------|------------------------|
| In what capacity are you responding to this survey?        | On behalf of an organisation             | <a href="#">Change</a> |
| What is your name?                                         | Alex Gorton                              | <a href="#">Change</a> |
| Enter your email address here.                             |                                          | <a href="#">Change</a> |
| What type of organisation are you responding on behalf of? | Academic institution                     | <a href="#">Change</a> |
| Where does your organisation operate or provide services?  | The whole of the UK                      | <a href="#">Change</a> |
| What is the name of your organisation?                     | The Faculty of Forensic & Legal Medicine | <a href="#">Change</a> |

### Commencement

|                                                                                                                                                          |          |                        |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------|
| Do you agree or disagree that a specific 'coming into force' date should be included in article 2(2)(b) of the final General Medical Council Order 2026? | Disagree | <a href="#">Change</a> |
|----------------------------------------------------------------------------------------------------------------------------------------------------------|----------|------------------------|

|                                                                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                        |                               |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| <p><b>Please explain your answer.</b></p>                                                                                                                                                  | <p>It is more important to ensure that this is done correctly than simply creating a date given the complexity of ensuring that changes are made. This also reduces the risk of people falling through gaps should mechanisms not be fully in place at the same time. We would, however, support a clear timeline being published.</p> | <p><a href="#">Change</a></p> |
| <p><b>If you have any further comments regarding the commencement of the General Medical Council Order 2026 and the transition to GMC's new legislation, please set them out here.</b></p> | <p>There will need to be legacy arrangements for individuals who are still involved in existing processes as new rules come into force</p>                                                                                                                                                                                             | <p><a href="#">Change</a></p> |

## Governance

|                                                                                                                                                                                                                                                |                                                                                                                                                                                       |                               |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------|
| <p><b>Do you agree or disagree with the inclusion of these requirements in the order?</b></p>                                                                                                                                                  | <p>Agree</p>                                                                                                                                                                          | <p><a href="#">Change</a></p> |
| <p><b>Please explain your answer.</b></p>                                                                                                                                                                                                      |                                                                                                                                                                                       | <p><a href="#">Change</a></p> |
| <p><b>Do you agree or disagree that the provisions set out in parts 2 to 4 of the draft order enable GMC to carry out its governance and operating framework functions appropriately?</b></p>                                                  | <p>Agree</p>                                                                                                                                                                          | <p><a href="#">Change</a></p> |
| <p><b>Please explain your answer.</b></p>                                                                                                                                                                                                      |                                                                                                                                                                                       | <p><a href="#">Change</a></p> |
| <p><b>Do you agree or disagree that the powers and duties in schedule 1 on constitution of the regulator are sufficient to enable GMC and the Medical Tribunal Service to carry out their functions appropriately and proportionately?</b></p> | <p>Agree</p>                                                                                                                                                                          | <p><a href="#">Change</a></p> |
| <p><b>Please explain your answer.</b></p>                                                                                                                                                                                                      |                                                                                                                                                                                       | <p><a href="#">Change</a></p> |
| <p><b>Do you agree or disagree that the powers and duties in the draft order in relation to the Privy Council are sufficient to support GMC to carry out its functions appropriately?</b></p>                                                  | <p>Disagree</p>                                                                                                                                                                       | <p><a href="#">Change</a></p> |
| <p><b>Please explain your answer.</b></p>                                                                                                                                                                                                      | <p>There should be an additional requirement for the GMC to actively engage with relevant bodies such as medical royal colleges, faculties and other recognised standard setters.</p> | <p><a href="#">Change</a></p> |

## Professional Standards Authority for Health and Social Care evidence gathering

Do you agree or disagree that the draft order provides the Professional Standards Authority for Health and Social Care with sufficient and proportionate evidence-gathering powers?

Agree

[Change](#)

Please explain your answer.

[Change](#)

## Education and training

Do you agree or disagree that GMC should be able to approve overseas undergraduate, foundation and postgraduate education and training programmes?

Neither agree nor disagree

[Change](#)

Please explain your answer.

Medical royal colleges and faculties must be included in quality assurance of such programmes and be appropriately consulted. Ultimately they have the subject matter expertise for individual areas of practice. Given the relatively small numbers of clinicians working in Forensic & Legal Medicine and collaboration with overseas organisations we would request that - approval is undertaken in partnership with relevant medical royal colleges - approval processes must take into account speciality specific expertise - approval should not disadvantage UK training opportunities

[Change](#)

Do you agree or disagree that the powers and duties set out in the draft order enable GMC to carry out its education and training functions sufficiently and proportionately?

Disagree

[Change](#)

Please explain your answer.

Medical royal colleges and faculties are the experts in curricula and standards for postgraduate medical education. They must be formally consulted before changing speciality standards. Small specialities must not be disadvantaged by a one size fits all regulatory approach. Training standards should recognise specialities delivered outside traditional NHS training environments with approval processes recognising police, prison, secure settings, SARCs and independent providers as legitimate clinical learning environments where appropriate. Ownership of curricula must remain with colleges and faculties.

[Change](#)

# Postgraduate Medical Education and Training Order of Council 2010

Do you agree or disagree that the PMET Order should be revoked and the categories of speciality in practice should be set out in a new order of council?

Agree

[Change](#)

The current opaque process is not fit for purpose and is not agile enough to recognise portfolio careers and non-traditional areas of practice. There must be a published criteria for recognising specialities, a transparent application process with published reasons for decisions allowing accountability of organisations and individuals within the decision making process. There also needs to be a transparent and accessible appeal or review mechanism. Medical royal colleges and faculties must be consulted and there should be a commitment that should a critical mass of medical royal colleges and faculties request the recognition of new specialities or sub-specialties the default position is that it will be accepted. Smaller specialties must receive equal consideration and consideration given to international lists of speciality areas being used as evidence for the need for new specialist registers being created in the UK.

Please explain your answer.

[Change](#)

## Registration

Do you agree or disagree that doctors should be able to be registered with a complete restriction on registration?

Disagree

[Change](#)

Please explain your answer.

[Change](#)

Do you agree or disagree that the draft order enables GMC to carry out its functions relating to registration sufficiently?

Disagree

[Change](#)

Please explain your answer.

[Change](#)

## Protection of title

Do you agree or disagree that the titles of 'apothecary', 'licentiate in medicine and surgery' and 'bachelor of medicine' should no longer be protected in legislation?

Disagree

[Change](#)

|                                                                                                                                                           |                                                                                                                                                                                                                                                                                                                                                                                     |                        |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------|
| <b>Please explain your answer.</b>                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                     | <a href="#">Change</a> |
| <b>Do you agree or disagree that 'registered medical practitioner' should become a protected title?</b>                                                   | Agree                                                                                                                                                                                                                                                                                                                                                                               | <a href="#">Change</a> |
| <b>Please explain your answer.</b>                                                                                                                        | It remains vital to have appropriate protected titles to identify those who are legally entitled to practice medicine in the UK. this is particularly important in avoiding confusion during assessments in police, prison and other forensic environments where it is vital vulnerable individuals are not placed in the position where they may misunderstand professional roles. | <a href="#">Change</a> |
| <b>Do you agree or disagree that the title of 'physician associate' should be changed to 'physician assistant' and protected in law?</b>                  | Agree                                                                                                                                                                                                                                                                                                                                                                               | <a href="#">Change</a> |
| <b>Please explain your answer.</b>                                                                                                                        | This is in line with the FFLM response to the Leng review. appropriate job titles recognise specific skill sets.                                                                                                                                                                                                                                                                    | <a href="#">Change</a> |
| <b>Do you agree or disagree that the title of 'anaesthesia associate' should be changed to 'physician assistant in anaesthesia' and protected in law?</b> | Agree                                                                                                                                                                                                                                                                                                                                                                               | <a href="#">Change</a> |
| <b>Please explain your answer.</b>                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                     | <a href="#">Change</a> |
| <b>Do you agree or disagree that there should be a transition period in relation to moving from the associate titles to the assistant titles?</b>         | Disagree                                                                                                                                                                                                                                                                                                                                                                            | <a href="#">Change</a> |
| <b>Please explain your answer.</b>                                                                                                                        | This is already well overdue                                                                                                                                                                                                                                                                                                                                                        | <a href="#">Change</a> |
| <b>Should there be any protection of the 'physician associate' and 'anaesthesia associate' titles alongside the proposed new titles?</b>                  | No                                                                                                                                                                                                                                                                                                                                                                                  | <a href="#">Change</a> |
| <b>Please explain your answer.</b>                                                                                                                        |                                                                                                                                                                                                                                                                                                                                                                                     | <a href="#">Change</a> |

## Fitness to practise - mandatory removal from the register

|                                                                                                    |       |                        |
|----------------------------------------------------------------------------------------------------|-------|------------------------|
| <b>Do you agree or disagree with the listed offences set out in schedule 4 of the draft order?</b> | Agree | <a href="#">Change</a> |
| <b>Please explain your answer.</b>                                                                 |       | <a href="#">Change</a> |

Do you agree or disagree that former registrants who have been mandatorily removed from the register following conviction for a listed offence should not be able to apply for re-entry to the register, save for in the limited exceptional circumstances prescribed in the draft order?

Agree

[Change](#)

Please explain your answer.

[Change](#)

## Fitness to practise - grounds for action

Do you agree or disagree with the grounds for action set out in the draft order?

Agree

[Change](#)

Please explain your answer.

We would continue to advocate strongly for retaining health as a standalone ground and welcome it being preserved. The GMC must continue to recognise contexts in which doctors practice understanding that those working in forensic medicine, custody, prisons and secure settings often make high-consequence decisions in environments characterised by incomplete information, competing legal duties, challenging behaviour and significant risk in the same way it does for emergency and pre-hospital medicine.

[Change](#)

## Fitness to practise - proceedings

Do you agree or disagree that the fitness to practise powers and duties set out in the draft order for GMC and the Medical Tribunal Service are sufficient and proportionate for the safe and effective regulation of the professions GMC regulates?

Agree

[Change](#)

Please explain your answer.

[Change](#)

## Interim registration measures

Do you agree or disagree that a fitness to practise panel's power should be extended so that it can impose an interim registration measure during registration proceedings as well as fitness to practise proceedings?

Disagree

[Change](#)

Please explain your answer.

[Change](#)

## Evidence gathering

Do you agree or disagree that the draft order provides GMC with sufficient and proportionate evidence-gathering powers?

Agree

[Change](#)

Please explain your answer.

It should be recognised that there may be additional complications in obtaining material held by police and courts which may have material relevance to fitness to practice proceedings for forensic physicians.

[Change](#)

## Rule-making powers

Do you agree or disagree that the rule-making powers in the draft order are sufficient and proportionate for the regulation of the professions GMC regulates?

Agree

[Change](#)

Please explain your answer.

[Change](#)

## Revision of decisions

Do you agree or disagree that the draft order provides GMC with sufficient and proportionate powers and duties in relation to revision of decisions?

Agree

[Change](#)

Please explain your answer.

[Change](#)

## Appeals

Do you agree or disagree that the powers in the draft order provide individuals with sufficient and proportionate appeal rights?

Agree

[Change](#)

Please explain your answer.

[Change](#)

Do you agree or disagree that GMC should have a right of appeal to these courts against specific interim registration measure and fitness to practise decisions made by a fitness to practise panel?

Disagree

[Change](#)

Please explain your answer.

[Change](#)

Do you agree or disagree that the Professional Standards Authority for Health and Social Care should be able to appeal specific fitness to practise decisions and interim registration measure decisions made by a fitness to practise panel to these courts?

Agree

[Change](#)

Please explain your answer.

[Change](#)

Do you agree or disagree that the draft order provides GMC with sufficient and proportionate powers and duties to administer its appeals function?

Agree

[Change](#)

Please explain your answer.

[Change](#)