

22 August 2017

Mr Andrew Dawson
Workforce Policy Directorate
Room D1, Castle Buildings
Stormont Estate
Belfast
BT4 3SQ

Northern Ireland office
9th Floor Bedford House
16–22 Bedford Street
Belfast BT2 7FD

Email: gmcnorthernireland@gmc-uk.org
Website: www.gmc-uk.org
Telephone: 028 9031 9945

Dear Mr Dawson

HSC Whistleblowing Framework and Model Policy Consultation

Thank you for giving the General Medical Council (GMC) an opportunity to comment on the draft HSC Whistleblowing Framework and Model Policy.

The General Medical Council (GMC) is an independent organisation that helps to protect patients and improve medical education and practice across the UK.

- We decide which doctors are qualified to work here and we oversee UK medical education and training.
- We set the standards that doctors need to follow, and make sure that they continue to meet these standards throughout their careers.
- We take action to prevent a doctor from putting the safety of patients, or the public's confidence in doctors, at risk.

Every patient should receive a high standard of care. Our role is to help achieve that by working closely with doctors, their employers and patients, to make sure that the trust patients have in their doctors is fully justified.

Why does Whistleblowing Matter

All doctors have a duty to act when they believe patients' safety is at risk, or that patients' care or dignity are being compromised. In addition, doctors with clinical governance or management responsibilities have a duty to help people report their concerns and to enable people to act on concerns that are raised with them.

[Raising and acting on concerns about patient safety \(2012\)](#) sets out our expectations of all doctors.

Whistleblowing can help protect patient safety by ensuring that where fitness to practice issues exist that professional regulators have the ability to investigate and take action.

Scope of the Framework

This framework does not replace professional regulation and standards. We suggest that the details of professional regulators should be added to Annex A.

All healthcare professionals are required by their regulatory bodies to raise concerns through appropriate channels. Failures to do so could breach the guidance of the respective regulators.

Professional regulators also highlight the responsibilities that professionals have in handling complaints and responsibilities to handle these include ensuring that complainants are appropriately supporting the process.

In all of this where a fitness to practice issue is identified it is essential that the employer ensures this is raised with the appropriate professional regulator.

Reporting and Monitoring

Some professional regulators conduct research with professionals. Employers should review this information.

Suspected Fraud

It is likely that cases of fraud would also breach professional standards set by all professional regulators. This should be raised with them, if it meets their thresholds.

Raising a concern

There is no distinction made in the framework between professional regulators and professional organisations, who represent the interests of their members.

Raising concerns externally

This section does not identify the specific role of professional regulators, this should be included.

Raising issues in the media

When professionals raise concerns via the media they need to ensure that guidance from professional regulators is followed.

GMC sources of support

The GMC have produced a [decision making flow chart](#) to guide doctors through what to do if you have a concern about patient safety. Alternatively doctors can talk to the GMC on our Confidential Helpline, 0161 923 6399. It may be helpful to refer to these sources of support in the framework.

If you require any additional information please do not hesitate to get in touch

Yours sincerely

Alan Walker
Head of Northern Ireland Affairs
Email: alan.walker@gmc-uk.org
Telephone: 028 9031 9945