

13 October 2017

Jeremy Glyde
NHS England
Area 3A
Skipton House
80 London Road
London
SE1 6LH

Dear Mr Glyde,

Response to the public consultation: Specialised Gender Identity Services for Adults

Thank you for the opportunity to respond to the consultation on the proposals for new service specifications that describe how specialised gender identity services for adults will be commissioned and delivered in the future for the people of England.

Although you are already aware, to put this reply in context I will briefly outline our role. We are 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 and 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. We expect doctors to be familiar with and follow our ethical guidance and to be willing and able to justify any departure from it.

It is not however within our core remit to comment on service provision. In commenting on this consultation our aim is to ensure that any obligations imposed on doctors will not be inconsistent with the standards we set for doctors' professional practice. Although we haven't specifically commented on the consultation questions because they fall outside our remit, we have made the following general comments:

Continuity of care and information sharing

We welcome any proposal that would support doctors in applying the principles in our guidance on the ground. For instance, making it a requirement for a patient to be registered with a general practice before they can be referred to a Gender Identity Clinic for Adults may facilitate continuity of care and information sharing between the healthcare team.

The interplay between primary and second care in delivering effective care is critical and we expect all doctors to work collaboratively with colleagues to provide safe and effective care to patients. We welcome any proposal that would strengthen and facilitate collaborative working between general practitioners and specialists working in Gender Identity Clinics.

Prescribing arrangements

We note that you have set out a number of options for alternative prescribing arrangements in response to concerns that the current model is not clearly defined and does not provide adequate support for prescribing practitioners. It would not however be appropriate or within our remit to comment on the different options. Our primary concern would be that any new arrangement would not act as a barrier to a doctor following our guidance.

Our position on the professional obligations of doctors in prescribing for trans-patients remains unchanged. We expect doctors to follow the principles in our guidance Good practice in prescribing medicines and devices where we are clear that a doctor should prescribe medicines only if they have adequate knowledge of the patient's health and are satisfied that they serve the patient's needs.

It is important that all doctors keep their professional knowledge and skills up to date and regularly take part in activities that maintain and develop their competence and performance. If a doctor feels they lack knowledge about the healthcare needs of trans-patients, they should in the short term, ask for advice from a gender specialist and in the longer term address any gaps in their knowledge through continuing professional development (CPD). Trans-patients are a group that is rapidly increasing in size and a doctor's CPD needs may change as medicine (and their patient population) changes.

We are aware of the challenges that patients in the trans-community face in accessing healthcare and we hope the proposed service specifications will go some way to make sure they are able to access the specialist services they need.

If you have any queries please do not hesitate to get in touch.



Yours sincerely

Caroline Strickland
Policy officer