GMC Consultation: Ensuring that all licensed doctors have the necessary knowledge of English to practise safely in the UK

Response Form

17 September 2013 to 10 December 2013
Thank you for your interest in our consultation. We value the comments you are making and the views we receive will help inform the development of our proposals.

How to use this form

This form needs to be used together with the consultation document.

Please indicate your answer to multiple choice questions by placing an X by your selection. You can also provide further comments in the free text field.

Please save the completed form on your computer.

Alternatively, you can respond to the consultation online through our e-consult website at https://gmc.e-consultation.net.

How to submit this form

You can email your completed form to englishlanguage@gmc-uk.org. If possible, please email this in a Word document, not as a PDF.

You can print off this form and return it by post to the following address:

English Language Consultation
Registration and Revalidation Directorate
General Medical Council
Regents Place
350 Euston Road
London
NW1 3JN

If you have a question about the consultation or need help completing this form, please email englishlanguage@gmc-uk.org or call 0161 923 6602.

Other formats

Our consultations are also available, on request, in alternative formats such as large print or audio. If you would like to receive a copy of a consultation in an alternative format please contact us to discuss your specific requirements in more detail.

Freedom of information

The information you provide in your response may be subject to disclosure under the Freedom of Information Act 2000, which allows public access to information held by the GMC. This does not necessarily mean that your response will be made available to the public as there are exemptions relating to, for example, information provided in confidence and information to which the Data Protection Act 1998 applies. You may request confidentiality by ticking the box below. We will take this into account if a request for your response is made under the Freedom of Information Act 2000.

Please tick if you want us to treat your response as confidential □
Consultation questions

Please note that this response includes the views of both lay and clinical members of the Royal College of Anaesthetists.

Question 1

Do you think it is fair and proportionate to require the same evidence of English language capability from European doctors as international medical graduates?

Yes

Please provide any additional comments, especially if you have answered no or not sure.

Both our lay and clinical members unanimously agree that it is fair to expect evidence of English language capability from European Doctors. Many of our clinical members have reported that international medical graduates have excellent English language skills, but the same cannot always be said for European doctors. It should also be noted that IMGs often train in English, but this is not the case for European doctors. All the more reason therefore to extend the tests to European doctors.

Our members believe that, in order to ensure patient safety, it is essential to require the same evidence of both groups and to ensure that English language skills are assessed consistently for all doctors wishing to practice in the UK. A unified approach will minimise the potential for any accusation of discrimination against the GMC and provide a ‘level playing field’ for all foreign doctors wanting to work in the UK.
**Question 2**

Do you agree that we should not grant a licence to practise to a European doctor when they have been unable or unwilling to show they have the necessary knowledge English to work safely in the UK?

Yes

Please provide any additional comments, especially if you have answered no or not sure.

Our members agree with this proposal; some lay members have suggested that appropriate and fair processes, such as timelines and appeals, should be provided for European doctors to provide evidence of knowledge of English.

**Question 3**

Do you agree that it is fair and proportionate to be able to ask doctors who have no responsible officer or suitable person to demonstrate they have the necessary knowledge of English where we have a concern, as part of their revalidation?

Yes

Please provide any additional comments, especially if you have answered no or not sure.

Our members unanimously support this proposal and they have pointed out that very often it is doctors who do not have a responsible officer who demonstrate unconventional patterns of practice and may work in various locations on a short term basis such as locums. Incidentally this group of doctors is known to be over represented in fitness to practice hearings and serious untoward incidents, therefore it seems proportionate to be able to require evidence of the necessary knowledge of English, if there is a concern about their language skills.

Our lay members also suggested that knowledge of English may be a difficult and sensitive subject to raise at revalidation, and if the necessary evidence was already available, this could be included in the revalidation documents, without the need for sensitive questions.

This would also relieve the appraiser of the responsibility of assessing the appraisee’s English language skills in the revalidation process.
**Question 4**

Do you agree that if there is a serious concern about a registered doctor’s knowledge of English, we should have the power to require a doctor to undergo a language assessment?

Yes

Please provide any additional comments, especially if you have answered no or not sure.

On the whole our members felt that it was fair for the GMC to require a doctor to undergo a language assessment if there was concern about a doctor's knowledge of English and that the test should be of the same standard as the one required by IMGs, with the same requirement of achieving at least score 7 in the IELTS system.

There were some differing views, however, for instances where a doctor had already undergone a test and had passed, for example to register with the GMC. In these cases, some members felt that it would be fair to ask them to resit the test, while others felt that it would be difficult to require a doctor to undergo the assessment again.

**Question 5**

Do you agree doctors should pay the cost of a language assessment where there is a relevant fitness to practise concern?

Not sure

Please provide any additional comments, especially if you have answered no or not sure.

Our members were uncertain on this proposal, mainly for two reasons:

- Registered doctors pay an annual fee to the GMC to maintain their status; some members felt that these doctors already registered with the GMC should not have to pay for the test. However, doctors registering with the GMC for the first time should.
- Other members felt that a consistent approach is necessary for all tests required by the GMC. For example, if doctors do not pay for assessments of their clinical competence in Fitness to Practice proceedings, should they be asked to pay for English language assessments?
**Question 6**

Do you agree that 90 days is a reasonable time period for doctors to comply with a direction to undertake a language assessment?

Not Sure

Please provide any additional comments, especially if you have answered no or not sure.

There was some difference of opinions between members on this proposal. Whilst the majority felt that 90 days is a reasonable time for doctors to comply with the requirement, some members expressed concern that, where lack of English language skills poses a risk to patients, 90 days may be too long for overseas trained doctors already practising in the UK.

**Question 7**

Do you agree that we should be able to indefinitely suspend doctors who fail over time to acquire the necessary knowledge of English to safely treat patients in the UK?

Not sure.

Please provide any additional comments, especially if you have answered no or not sure.

Not all our members agree with this proposal and some suggest a more measured approach. For example suspended doctors should be able to request reviews in order to provide evidence of progress and some support should be offered to Doctors who are experiencing difficulties in acquiring the required level of English. Therefore an ‘indefinite’ suspension might be too strict.

**Question 8**

Do you agree that we should be able to ask doctors to undergo a language assessment when they apply to be restored to the register if there is a concern about their language skills?

Yes
Please provide any additional comments, especially if you have answered no or not sure.

Our members agree that, if there is a real concern about the language skills of the doctor, then it is fair that the GMC should require them to resit the test. If there is no such concern and no evidence that a second test is necessary, then a full English language assessment would be a waste of time and resources.

Your details

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Would you like to be contacted about GMC consultations in the future?

Yes

If you would like to know about upcoming GMC consultations, please let us know which areas of the GMC’s work you are interested in:

- Education
- Standards and Ethics
- Fitness to Practise
- Registration
- Licensing and revalidation
Responding as an organisation

Are you responding on behalf of an organisation?

Yes

If yes, please complete the following questions. If not, please complete the ‘responding as an individual’ section above.

Which of the following categories best describes your organisation?

Body representing doctors

Body representing patients or public

Government department

Independent healthcare provider

Medical School (undergraduate)

Postgraduate medical institution

NHS/HSC organisation

Regulatory body

Other (please give details)

In which country is your organisation based?

UK wide

England

Scotland

Northern Ireland

Wales

Other (European and Economic Area)
Other (rest of the world)

In our consultation reports we often include quotes from respondents. Are you content for the comments you submit to be attributed to your organisation in our consultation reports?

Yes

No