

June 2021

Londonwide LMC's response to consultation questions posed in the NHSE document "Regulating healthcare professionals, protecting the public"

Closing date for comments to the consultation is 16/6. The consultation document can be seen [here](#).

About Londonwide LMCs

Londonwide Local Medical Committees (Londonwide LMCs) is the clinically led independent voice of general practice in the capital, supporting Local Medical Committees; bodies recognised in statute (NHS Act) which represent the interests of all local GPs and their teams. We aim to secure the future of general practice in London through our work with all partners in the health and social care sector and beyond. We support and represent over 7,000 GPs and over 1,100 practice teams in London through our 27 locally elected committees. We ensure that London's GPs and their practice teams have access to the information and support they need to help them provide the best possible service to their nearly 9 million patients.

Response

Londonwide LMCs welcomes this opportunity to respond to the consultation questions posed in the NHSE document "Regulating healthcare professionals, protecting the public". We have chosen to respond to specific questions within the consultation. See below:

1. Do you agree or disagree that regulators should be under a duty to co-operate with the organisations set out above? Please give a reason for your answer.

We are content with the introduction of a duty to co-operate between regulators, provided data protection safeguards are put in place to prevent the sharing of patient identifiable information.

2. Do you agree or disagree that regulators should have an objective to be transparent when carrying out their functions and these related duties? Please give a reason for your answer.

We are content with the statement that regulators should operate transparently when carrying out their functions and related duties, with the caveat that matters pertaining to a registrant's health should not come into the public domain. There should be clear guidelines for balancing the regulator's obligation for transparency with protection of confidentiality and fairness to healthcare professionals.

Approaches such as concealing the identities of the individuals involved from the general public while regulatory proceedings are under way, with publication of those details to follow after a conclusion has been released, could help to protect patients and professionals' confidentiality and reduce the chances that public reactions to the participants becomes more influential to decision-making than is appropriate. An objective to be transparent is a good thing in principle, but not to the degree that unintended consequences are overlooked.

We also hold that there should be the option to hear matters in private/ keep matters confidential if there is deemed to be a risk of serious harm to the registrant associated with a public hearing or matters coming into the public domain. Such determinations would need to be decided on a case by case basis with reference to medical evidence.

3. Do you agree or disagree that regulators should be required to assess the impact of proposed changes to their rules, processes and systems before they are introduced? Please give a reason for your answer.

Agree: regulators should be required to assess the impact of proposed rule, process and system changes, but we would need further detail on the proposed assessment criteria and the way in which these impacts will be weighted/ assessed before commenting further.

4. Do you agree or disagree with the proposal for the constitution on appointment arrangements to the Board of the regulators? Please give a reason for your answer.

Disagree: whilst para 69 references the appointment of current or former registrants, there is no longer an obligation to have at least one registrant on the Board. Whilst it is not disputed that Board members should be appointed on merit, it is imperative that the Board includes a minimum of one current registrant to provide a voice for the profession. With particular regard to the GMC, we would welcome further detail on how any changes would ensure adequate Board representation across the breadth of regulated specialisms.

5. Do you agree or disagree that regulators should be able to set their own fees in rules without Privy Council approval? Please give a reason for your answer.

Agree: the GMC currently set their own fees without Privy Council approval. However we believe that the reference at para 72 to this measure making regulators directly accountable to registrants is misplaced in that registrants are mandated to pay the fee.

6. Do you agree or disagree that regulators should be able to set a longer-term approach to fees? Please give a reason for your answer.

Agree in principle: we would, however, suggest that regulators should have a mandatory obligation to set out their longer-term approach to fees, rather than this being a permissive measure (para 73 as currently worded reads as an option rather than an obligation).

7. Do you agree or disagree that regulators should be able to establish their own committees rather than this being set out in legislation? Please give a reason for your answer.

Agree: with the caveat that all committees should have the correct balance of sector specific subject matter experts.

8. Do you agree or disagree that regulators should be able to charge for services undertaken on a cost recovery basis, and that this should extend to services undertaken outside of the geographical region in which they normally operate? Please give a reason for your answers.

Agree in principle: however there should be associated safeguards in place to avoid any third parties simply passing the costs onto the registrant/prospective registrants. As a safeguarding measure, we believe discussions should be held with professional/ representative bodies prior to charges being on-passed to individuals.

9. Do you agree or disagree that regulators should have the power to delegate the performance of a function to a third party including another regulator? Please give a reason for your answer.

Disagree: whilst there may be some logic in delegating administrative functions such as the holding of a register and the administration that surrounds fitness to practice procedures, matters such as setting standards pertaining to conduct or performance should sit with the relevant regulator. We do, however, agree that regulators should closely collaborate to ensure consistency of standards and to share best practice.

10. Do you agree or disagree that regulators should be able to require data from and share data with those groups listed above? Please give a reason for your answer.

Disagree: information should only be disclosed in an anonymised form and with the prior knowledge and consent of the registrant unless there is a public interest justification for sharing the information in the absence of consent (or indeed when consent is declined).

We believe that there is a pressing need to carefully consider and comply with data protection and data sharing requirements. The long list of organisations at para 89, and the vagueness regarding new organisations that could be asked to share data with the regulators, needs further clarification.

We would also ask for further detail on the distinction drawn between “statutory objectives” in para 89, and “statutory responsibilities. It is unclear what consideration, if any, has been given to the practical implications or any assessment of the risks to the rights of data subjects. We believe that further detail is needed on data protection considerations and risks.

Barriers to obtaining data often arise from inadequate training, lack of investment in information governance, and failure to coherently articulate what specific the data is needed and why; rather than any legal barriers, for which powers to obtain data are needed to remedy. Existing data protection law provides a permissive gateway for regulators to request disclosure of personal data from other bodies (see Article 6.1.e and Article 9.2.g, plus DPA 18 Schedule 2, part 2) and for this data to be supplied if the disclosing body can be satisfied that the disclosure is fair, lawful, necessary and proportionate. The proposals in the document give the impression that power to compel disclosure is under discussion – which would perhaps make things simpler for the regulatory bodies, but would have a significant impact on individuals’ data protection rights and wider rights in practice.

11. Do you agree or disagree that regulators should produce an annual report to the Parliament of each UK country in which it operates? Please give a reason for your answer.

Agree: with the caveat that any such annual report does not identify directly or through the use of identifiable references, the identity of individual registrants.

12. Do you agree or disagree that the Privy Council’s default powers should apply to the GDC and GPhC? Please give a reason for your answer.

No comment.

13. Do you agree or disagree that all regulators should have the power to set:
- standards for the outcomes of education and training which leads to registration or annotation of the register for individual learners;
 - standards for providers who deliver courses or programmes of training which lead to registration;
 - standards for specific courses or programmes of training which lead to registration;
 - additional standards for providers who deliver post-registration courses of programmes of training which lead to annotation of the register; and
 - additional standards for specific courses or programmes of training which lead to annotation of the register?

Please give a reason for your answer.

Agree: it is helpful to have agreed national standards prescribed by the regulator and we agree that annotations to the register will more accurately reflect the extent of expertise of the registrant. Much more detail is required in relation to the scope of educational and training courses to which this will apply and how this fits in with courses approved by other bodies (for example - Universities, Royal Colleges, HEE etc).

14. Do you agree or disagree that all regulators should have the power to approve, refuse, re-approve and withdraw approval of education and training providers, qualifications, courses or programmes of training which lead to registration or annotation of the register? Please give a reason for your answer.

Agree: for quality assurance reasons it would be helpful to have the regulator's approval of providers, courses and qualifications, however the following matters also need to be determined:

- 1 What range of providers, courses and qualification fall within scope.
- 2 The approval process should be transparent, easy to follow and timely.
- 3 The approvals process should not become a barrier to the introduction of what otherwise would be valued educational programmes and/or qualifications.
- 4 What are the associated costs and who would meet them?

15. Do you agree that all regulators should have the power to issue warnings and impose conditions? Please give a reason for your answer.

Disagree: whilst the regulator would need to have powers to ensure that providers, courses and programmes meet the requisite standards, we believe that under the proposals in this consultation either withdrawal of approval or the imposition of conditions would suffice, without the requirement to issue a warning.

16. Do you agree or disagree with the proposal that education and training providers have a right to submit observations and that this should be taken into account in the decision-making process? Please provide a reason for your answer.

Agree: the process should be clearly stated and there should be an opportunity to provide oral as well as written submissions.

17. Do you agree that:

- education and training providers should have the right to appeal approval decisions;
- that this appeal right should not apply when conditions are attached to an approval;
- that regulators should be required to set out the grounds for appeals and appeals processes in rules?

Please provide a reason for your answer.

Partially agree: we are content with proposals that education and training providers should have the right to appeal approval decisions, and that regulators should be required to set the grounds for appeals and appeals processes in rules.

Disagree: however, we believe that there should be a clearly stated right of appeal and associated process, and do not agree that the right to appeal should not apply when conditions are attached to an approval.

18. Do you agree or disagree that regulators should retain all existing approval and standard setting powers? Please provide a reason for your answer.

Agree.

19. Do you agree or disagree that all regulators should have the power to set and administer exams or other assessments for applications to join the register or to have annotations on the register? Please provide a reason for your answer.

Agree: this promotes consistency in relation to standards and the addition of annotations to the register will be a more accurate reflection of the registrant's expertise.

20. Do you agree or disagree that this power to set and administer exams or other assessments should not apply to approved courses or programmes of training which lead to registration or annotation of the register? Please provide a reason for your answer.

Agree: this would appear to be a duplication.

21. Do you agree or disagree that regulators should be able to assess education and training providers, courses or programmes of training conducted in a range of ways? Please provide a reason for your answer.

Partially agree: whilst this appears to be a pragmatic approach, clarification is sought with regard to para 126. In advance of the introduction of any such fees, we would expect consultation to take place with any existing providers who might be affected prior to charges being on-passed.

22. Do you agree or disagree that the GMC's duty to award CCTs should be replaced with a power to make rules setting out the procedure in relation to, and evidence required in support of, CCTs? Please give a reason for your answer.

No comment.

23. Do you agree or disagree that regulators should be able to set out in rules and guidance their CPD and revalidation requirements? Please give a reason for your answer.

Agree: it is helpful to have prescribed standards and guidance, however the standards should be realistic and achievable. We welcome the inclusion of the reference to consultation in para 142, namely that regulators are required to consult with employers and other key stakeholders when proposing any changes to their existing rules on CPD and/or revalidation.

24. Do you agree or disagree that the regulators should hold a single register which can be divided into parts for each profession they regulate? Please give a reason for your answer.

Agree: it makes sense to have a consistent approach and hold a single register which can be subdivided.

25. Do you agree or disagree that all regulators should be required to publish the following information about their registrants:

- Name
- Profession
- Qualification (this will only be published if the regulator holds this information. For historical reasons not all regulators hold this information about all of their registrants)
- Registration number or personal identification number (PIN)
- Registration status (any measures in relation to fitness to practise on a registrant's registration should be published in accordance with the rules/policy made by a regulator)
- Registration history

Please provide a reason for your answer.

Agree: the list should also include annotations. We also believe that when registrants come off the medical register they should be afforded the right to request that their information is removed. Similarly, consideration should be given to what information, if any, is retained and made available pertaining to deceased registrants.

26. Do you agree or disagree that all regulators, in line with their statutory objectives, should be given a power allowing them to collect, hold and process data? Please give a reason for your answer.

Partially agree: it is unclear what the purpose is of granting explicit powers for activities which are already permitted; regulators can already process personal data under the UKGDPR and the Data Protection Act 2018, provided they can evidence a suitable purpose, an appropriate lawful basis, necessity, proportionality and compliance with all of the other data protection principles. There is a significant risk that granting explicit powers could result in a degradation of compliance with existing data protection law, resulting from the sense of entitlement to data which overshadows the attendant responsibilities for safely and responsibly processing it. Agreement is therefore conditional on the basis that data is collected and processed in accordance with the current data protection legislation.

27. Should they be given a discretionary power allowing them to publish specific data about their registrants? Please give a reason for your answer.

Partially disagree: this proposal requires clearer definition as to the nature, extent and purpose of the proposed publication of this data. As outlined in our earlier response to question 10, we believe that there is a pressing need to carefully consider and comply with data protection and data sharing requirements. We would also ask for further detail on the distinction drawn between "statutory objectives" in para 158, and "statutory responsibilities. It is unclear what consideration, if any, has been given to the practical implications or any assessment of the risks to the rights of data subjects. We believe that further detail is needed on data protection considerations and risks.

There is no prohibition in existing data protection law against regulatory bodies publishing personal data related to the regulatory activities they carry out, provided that this publication is fair, lawful, transparent, necessary, proportionate, carried out with regard to accuracy, relevance and adequacy. The context, nature and scope of the data, and the circumstances which demand publication, need to be articulated before the question can be given due consideration. Similar to question 26, there is a significant risk that granting explicit powers could result in a degradation of compliance with existing data protection law, resulting from attempts to circumvent the requirements of data protection law for convenience, rather than facing genuine legal barriers to carrying out necessary processing.

28. Do you agree or disagree that all regulators should be able to annotate their register and that annotations should only be made where they are necessary for the purpose of public protection? Please give a reason for your answer.

Agree: with the clarification that annotations should not solely be used for the purpose of public protection but could be used to denote a registrant's scope of practice and expertise, as referenced in paras 159 and 160.

29. Do you agree or disagree that all of the regulators should be given a permanent emergency registration power as set out above? Please give a reason for your answer.

Agree: this allows regulators the flexibility to use emergency powers in unprecedented circumstances such as the recent and ongoing Covid19 pandemic.

30. Do you agree or disagree that all regulators should have the same offences in relation to protection of title and registration within their governing legislation?

Agree.

31. Do you agree or disagree that the protection of title offences should be intent offences or do you think some offences should be non-intent offences (these are offences where an intent to commit the offence does not have to be proven or demonstrated)? Please give a reason for your answer.

Agree: we agree that intent should be considered. Whilst it is difficult to foresee a circumstance in which a person inadvertently used a protected title, the consideration of intent (as opposed to a strict liability approach) allows the wider circumstances that led a person to using the title to be taken into account.

32. Do you agree or disagree with our proposal that regulators should be able to appoint a deputy registrar and/or assistant registrar, where this power does not already exist? Please give a reason for your answer.

Agree.

33. Do you agree or disagree with our proposal that regulators should be able to set out their registration processes in rules and guidance? Please give a reason for your answer.

Partially agree: however it is unclear on what basis any additional assessment would take place (as outlined in para 193) if a prospective registrant has been determined to have "passed all of the qualifying examinations or other assessments necessary for obtaining an acceptable UK or international qualification for the profession they wish to work in". The process and criteria for any additional assessment should be transparent and publicly available.

34. Should all registrars be given a discretion to turn down an applicant for registration or should applicants be only turned down because they have failed to meet the new criteria for registration? Please give a reason for your answer.

Agree: on the basis that the new criteria for registration are transparent and in effect prescribe that a prospective registrant should be currently be fit to practise in the UK and have a discretionary element (ie to meet any other requirements set by the regulator), this removes the requirement for the discretionary powers of the registrar.

35. Do you agree or disagree that the GMC's provisions relating to the licence to practise should be removed from primary legislation and that any requirements to hold a licence to practise and the procedure for granting or refusing a licence to practise should instead be set out in rules and guidance? Please give a reason for your answer.

Agree: subject to the rules and guidance being clear and not introducing unnecessary additional burdens, cost, and/ or bureaucracy for registrants.

36. Do you agree or disagree that in specific circumstances regulators should be able to suspend registrants from their registers rather than remove them? Please give a reason for your answer.

Agree: suspension is preferable to removal pending further investigation. There should be a mechanism by which registrants can be restored promptly to the register once administrative matters are resolved. We also believe that consideration should be given to the impact of an "administrative" suspension on the inclusion of a registrant on the Performers List (which may require an amendment to the Performers Lists Regulations).

37. Do you agree or disagree that the regulators should be able to set out their removal and readmittance processes to the register for administrative reasons in rules, rather than having these set out in primary legislation? Please give a reason for your answer.

Agree: with the caveat that the option of suspension is adopted unless or until it becomes apparent that the registrant has wilfully not complied with their administrative obligations.

38. Do you think any additional appealable decisions should be included within legislation? Please give a reason for your answer.

No: the list appears to be comprehensive.

39. Do you agree or disagree that regulators should set out their registration appeals procedures in rules or should these be set out in their governing legislation? Please give a reason for your answer.

Neither agree nor disagree: the appeals procedures should be fair, accessible, transparent, and clearly stated (either in legislation or by the regulator).

40. Do you agree or disagree with our proposal that the regulators should not have discretionary powers to establish student registers? Please give a reason for your answer.

No comment.

41. Do you agree or disagree with our proposal that the regulators should not have discretionary powers to establish non-practising registers? Please give a reason for your answer.

Agree: we see little useful purpose in having a separate non-practising register, and believe that earlier proposals around the extension/ use of annotation could fulfil any need to identify non-practising registrants.

42. Do you agree or disagree that the prescriptive detail on international registration requirements should be removed from legislation? Please give a reason for your answer.

Neither agree nor disagree: on the basis of the proposals currently available, there is not enough information to provide reassurances that this may not lead to the registration of registrants that may not be currently fit to practise in the UK.

43. Do you agree or disagree with our proposal that regulators should be given powers to operate a three-step fitness to practise process, covering:

- 1: initial assessment
- 2: case examiner stage
- 3: fitness to practise panel stage?

Please give a reason for your answer.

Agree: the proposals appear to largely mirror current GMC procedures save for the fact that the case examiners have wider ranging powers, which allows for a case to be resolved at an earlier stage and without recourse to a fitness to practise panel. This also allows the registrant the opportunity for their case to be heard by a fitness to practise panel in the event that they do not accept the case examiners' proposed findings and/or measure.

44. Do you agree or disagree that:

- All regulators should be provided with two grounds for action – lack of competence, and misconduct?
- Lack of competence and misconduct are the most appropriate terminology for these grounds for action?
- Any separate grounds for action relating to health and English language should be removed from the legislation, and concerns of this kind investigated under the ground of lack of competence?
- This proposal provides sufficient scope for regulators to investigate concerns about registrants and ensure public protection?

Please give a reason for your answers.

Agree: we are content with the two stated grounds for action with the following caveats;

1. The term "Lack of competence" should be replaced by the term "Performance" (which could retain the definition of a registrant being unable to or having failed to provide care to a sufficient standard).
2. That safeguards are increased as stated to look after the welfare of registrants who have health conditions throughout the course of the procedures.
3. That registrant anonymity is observed unless there is a public interest justification for sharing the information in the absence of consent (or indeed when consent is declined).

45. Do you agree or disagree that:

- all measures (warnings, conditions, suspension orders and removal orders) should be made available to both Case Examiners and Fitness to Practise panels; and
- automatic removal orders should be made available to a regulator following conviction for a listed offence?

Please give a reason for your answers.

Agree: increasing the measures available to case examiners allows for a case to be resolved at an earlier stage and without recourse to a fitness to practise panel. This also allows the registrant the opportunity for their case to be heard by a fitness to practise panel in the event that they do not accept the case examiners' proposed findings and/or measure. We agree that automatic removal orders should be made for the convictions listed (with the prescribed safeguards pertaining to appeal).

46. Do you agree or disagree with the proposed powers for reviewing measures? Please give a reason for your answer.

Agree.

47. Do you agree or disagree with our proposal on notification provisions, including the duty to keep the person(s) who raised the concern informed at key points during the fitness to practise process? Please give a reason for your answer.

Agree: care must be taken to preserve the confidentiality of registrants when notifying those that raised the concern and other parties in advance of the substantive decision being made. Once the substantive decision has been made, save for health related measures [which should remain confidential] the decision would be in the public domain.

48. Do you agree or disagree with our proposal that regulators should have discretion to decide whether to investigate, and if so, how best to investigate a fitness to practise concern? Please give a reason for your answer.

Agree: with the caveat that a registrant should retain the right to make no comment.

49. Do you agree or disagree that the current restrictions on regulators being able to consider concerns more than five years after they came to light should be removed? Please give a reason for your answer.

Disagree: the five year rule is a safeguard against vexatious complainants bringing unmeritorious historical complaints. We believe it should remain in place, but regulators should have the right to waive the five year rule if there is a patient safety and/or public interest justification for doing so (for example - an allegation of historical sexual abuse).

50. Do you think that regulators should be provided with a separate power to address non-compliance, or should non-compliance be managed using existing powers such as “adverse inferences”? Please give a reason for your answer.

Agree with the introduction of a separate power: a specific power and clearly defined process to deal with non-compliance would be helpful.

51. Do you agree or disagree with our proposed approach for onward referral of a case at the end of the initial assessment stage? Please give a reason for your answer.

Agree: the possibility of amalgamating multiple concerns and dealing with them as a single case is preferable to dealing with concerns separately and/or sequentially, as can be the case currently.

52. Do you agree or disagree with our proposal that regulators should be given a new power to automatically remove a registrant from the Register, if they have been convicted of a listed offence, in line with the powers set out in the Social Workers Regulations? Please give a reason for your answer.

Agree.

53. Do you agree or disagree with our proposals that case examiners should:

- have the full suite of measures available to them, including removal from the register?
- make final decisions on impairment if they have sufficient written evidence and the registrant has had the opportunity to make representations?
- be able to conclude such a case through an accepted outcome, where the registrant must accept both the finding of impairment and the proposed measure?
- be able to impose a decision if a registrant does not respond to an accepted outcomes proposal within 28 days?

Please give a reason for your answers.

Agree: with the caveat that mitigating circumstances should be taken into consideration in relation to the imposition of a decision if a registrant was unable to respond within 28 days for reasons that were beyond their control.

54. Do you agree or disagree with our proposed powers for Interim Measures, set out above? Please give a reason for your answer.

Agree: on the basis that there is the safeguard of the interim measures panel if the registrant disputes the decision.

55. Do you agree or disagree that regulators should be able to determine in rules the details of how the Fitness to Practise panel stage operates? Please give a reason for your answer.

Agree: with the caveat that rules setting out the details of how the Fitness to Practise panel operates should be clear and transparent.

56. Do you agree or disagree that a registrant should have a right of appeal against a decision by a case examiner, Fitness to Practise panel or Interim Measures panel? Please give a reason for your answer.

Agree.

57. Should this be a right of appeal to the High Court in England and Wales, the Court of Session in Scotland, or the High Court in Northern Ireland? Please give a reason for your answer.

Agree: to the High Court in England.

58. Do you agree or disagree that regulators should be able to set out in Rules their own restoration to the register processes in relation to fitness to practise cases? Please give a reason for your answer.

Agree.

59. Do you agree or disagree that a registrant should have a further onward right of appeal against a decision not to permit restoration to the register? Please give a reason for your answer.

Agree.

60. Should this be a right of appeal to the High Court in England and Wales, the Court of Session in Scotland, or the High Court in Northern Ireland? Please give a reason for your answer.

Agree: to the High Court in England.

61. Do you agree or disagree that the proposed Registrar Review power provides sufficient oversight of decisions made by case examiners (including accepted outcome decisions) to protect the public? Please provide any reasons for your answer.

Agree.

62. Under our proposals, the PSA will not have a right to refer decisions made by case examiners (including accepted outcome decisions) to court, but they will have the right to request a registrar review as detailed above. Do you agree or disagree with this proposed mechanism? Please provide any reasons for your answer.

Agree: with the caveat that the removal of the GMC's right to appeal a decision made by a fitness to practise panel needs to be expressly stated.

63. Do you have any further comments on our proposed model for fitness to practise?

No.

64. Do you agree or disagree with the proposed approach to the regulation of PAs and AAs? Please give a reason for your answer.

Agree.

65. In relation to PAs and AAs, do you agree or disagree that the GMC should be given a power to approve high level curricula and set and administer exams? Please give a reason for your answer.

Agree: giving the GMC power to approve high level curricula, set and administer exams for PAs and AAs will promote consistency in relation to both training and standards.

66. Do you agree or disagree with the transitional arrangements for PAs and AAs set out above? Please give a reason for your answer.

Agree.

67. Do you agree or disagree that PAs and AAs should be required to demonstrate that they remain fit to practise to maintain their registration? Please give a reason for your answer.

Agree.

68. Do you agree or disagree with the benefits identified in the table above? Please set out why you've selected your answer and any alternative benefits you consider to be relevant and any evidence to support your views.

Agree.

69. Do you agree or disagree with the costs identified in the table above? Please set out why you've chosen your answer and any alternative impacts you consider to be relevant and any evidence to support your views.

Agree.

70. Do you think any of the proposals in this consultation could impact (positively or negatively) on any persons with protected characteristics covered by the general equality duty that is set out in the Equality Act 2010, or by Section 75 of the Northern Ireland Act 1998?

- Yes – positively
- Yes - negatively
- No
- Don't know

Please provide further information to support your answer.

Don't know.

Contacts

For further information about Londonwide LMCs' response to this consultation please contact Sam Dowling, Director of Communications on sam.dowling@lmc.org.uk.