

**Martina Moore**

Organisational Change Director  
Department of Health  
Castle Buildings  
Belfast  
BT4 3XX

21 September 2021

## Family practitioner services independent appeals consultation

**Dear Martina,**

The British Medical Association (BMA) is an apolitical independent trade union and professional association representing doctors and medical students from all branches of medicine across the UK. Our mission is we look after doctors so they can look after you.

We welcome the opportunity to respond to this consultation on the establishment of the proposed Family Practitioner Services Independent Appeals process. This consultation is informed by conversations held with our members, particularly the Northern Ireland General Practitioners Committee (NIGPC).

The commitment contained within the consultation document to learn from the best practice of the establishment of the NAP is particularly welcome. Our comments focus on four key issues and we thank the department for progressing with this important work given the impending closure of the board.

### Independence

We believe that is essential any appeals panel can maintain true independence from the department. It is important that no barriers are in place and any/all relevant information can flow to the appeals panel, from the department when necessary.

No mention is made in the consultation document of the governance for any of the panels, we believe a commitment to benchmarking this against existing best practice would be a positive step.

Additionally, the panel and process must be clear and simple ensuring it can be easily followed by all appellants.

### Appropriate training

It is essential that those who are selected to sit on the panel not only have the relevant experience for the role but also receive appropriate training on how to carry out the role. A commitment to this is not

**National director (Northern Ireland):** Claire Armstrong

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made in the consultation document. We believe a commitment to providing appropriate training for all selected panel members would sit well in the “proposed structure for independent appeals” contained in the consultation document.

Lack of detail

It is incredibly difficult to give a thorough response to this consultation as the document itself is very light on detail. No detail is given on the type of appeals that are likely to be heard, or the remit of the panel that this process will replace.

We feel that issues such as accountability, governance, independence, and recruitment are not covered in sufficient detail throughout the consultation document. We would welcome additional information on these issues and how they will be taken into consideration throughout the establishment and lifetime of the panel.

LMC representation

Finally, we would like to ensure that anyone appearing before an appeals panel would be entitled to representation from their local medical committee (LMC). Those attending an appeals panel should have this opportunity made clear to them.

Once again, we would like to thank you for the opportunity to respond to this consultation. Should you have any further queries in relation to our consultation response please contact Jenna Maghie, senior policy executive, in the first instance via [jmaghie@bma.org.uk](mailto:jmaghie@bma.org.uk)

Yours sincerely



**Dr Alan Stout**  
Chair, NIGPC.