Dear Sir/Madam

MCA fees consultation

The British Medical Association (BMA) is an apolitical professional association and independent trade union, representing doctors and medical students from all branches of medicine across the UK and supporting them to deliver the highest standards of patient care. On average our membership this year has been around 170,000.”

The Association welcomes the opportunity to respond to the MCA’s fees consultation.

The regulations outline specific medical fees payable to third parties in addition to those paid directly to the MCA. We believe the inclusion of such medical fees is unnecessary and inconsistent with the main principles and purpose behind the regulations and would therefore support the removal of these fees with an alternative arrangement that would allow fees to be determined at an amount that was deemed appropriate (based on market rates) for the work required.

In addition to the anomalous inclusion of the medical fees, we also believe the proposed fee increase is grossly inadequate. Although the group of approved doctors can come from a range of specialty backgrounds including occupational medicine, the vast majority undertaking this work are GPs. General practice is facing increasing and unprecedented pressures with a significant and growing gap between the demand placed upon it and its capacity. These pressures are not limited to one area; general practice is being forced to try and cope with an unsustainable workload, a workforce crisis and inadequate resource.

The percentage of NHS funding spent on general practice has fallen from 10.4% in 2005/6 to 7.4% in 2014/15. In the last decade GP numbers have increased by only 14%, and since 2009 the number of GPs per head of population has declined. GP training posts are not being filled, and increasing numbers of
older GPs are planning to retire. Further, there are increasing numbers of GP partner vacancies, adding often unmanageable workload burden on a smaller pool of partners.

In addition to the costs of maintaining a practice, GPs will also need to cover the costs of administrative staff, healthcare assistants, and the MCA approved doctor. The costs of training are also to be met from this income stream and can be significant including staff training, medical updating and attendance by the doctor at as many of the annual seminars as possible; such costs may reach 10% of the income from MCA medical examinations.

It is also important to note that the proposed fee of £85 is not commensurate with the fees charged by doctors undertaking DVLA medical reports from D4, or for vocational licence holders which are usually significantly higher. Even more importantly approved doctors not only carry out a medical examination, they are also required to reach a decision for which they may be held accountable, not something required under the DVLA system. There is also now an increase in work involved in the assessment where there are medical problems in following ADG guidance and seeking additional medical advice. Given the level of responsibility the fee for an MCA medical examination carried out by an experience and specially identified medical practitioner should at the very least be in line with the increases to inflation from 2006.

All of these factors will place increasing pressures on GPs to revaluate whether the additional work they choose to undertake outside of their NHS contract is necessary and sustainable. It is clear that losing Approved Doctors is neither in the public interest, nor that of seafarers and therefore at the very least the cost of undertaking such work must realistically meet the needs of these doctors.

If the proposed fee is to go ahead it is likely to result in fewer doctors willing to become approved. We are also aware that approved doctors are already receiving requests for examinations from those outside their usual geographical area as they are unable to secure an appointment. Failure to recognise the value of the work by such doctors will increase the inability of seafarers to be seen in a timely manner.

We hope our submission is useful – please do not hesitate to contact us if more information is required. We would also be happy to meet with you to discuss the issues around medical fees in more detail.

Yours sincerely

John Canning
BMA professional fees committee chair