

Improving quality, protecting patients

**Consultation on the proposed
standards for the Register of
Healthcare Science Practitioners by
the Academy for Healthcare Science**

**Summary of analysis of responses to
consultation**

March 2014

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Executive summary

In December 2013, the Academy for Healthcare Science published *Improving quality: protecting patients: proposed standards for the Register of Healthcare Science Practitioners*. This consultation document set out the Academy's belief that statutory regulation of the entire Healthcare Science workforce is necessary to protect the public and ensure safe and effective practice. It also made clear that statutory regulation would take a number of years to achieve, and that a voluntary register – accredited by the Professional Standards Authority for Health and Social Care (PSA) – was a necessary step towards this ambition. *Improving quality: protecting patients* details proposals for three sets of standards:

1. **Standards of proficiency**, which set the minimum levels of knowledge, skills and competences that a person would need to demonstrate at the point they are admitted to the register
2. **Standards of conduct**, which detail in ***Good Scientific Practice*** how Healthcare Science practitioners should conduct themselves in their professional, personal and business lives
3. **Standards of continuing professional development**, which state how registrants should keep their skills, knowledge and competences up-to-date.

The Academy conducted a formal consultation on these proposals, which ran for three months to 28th February 2014. A wide range of stakeholders (professional bodies, individual professionals, service users / patients and patient representative organisations) were invited to respond to the consultation via an online survey. The Academy also facilitated a consultation stakeholder event in London on 19th February 2014. In total, 136 responses were received via the online survey and over 40 people attended the stakeholder consultation event. Several emails were also received during the consultation period and have been included in the analysis.

Standards of proficiency

Overall, there was broad support for the approach taken in developing the standards of proficiency and in the overall content of the proposed standard with over 80 per cent of respondents supporting the approach and believing the standards were at an appropriate level.

Several people raised the need / desire for the statutory regulation of Healthcare Science practitioners. There was some confusion about the purpose of these standards, in particular the difference between standards of proficiency (which are about the skills, knowledge and competences that someone needs at the point at which they register) and standards of conduct (which are about how registrants should conduct their work). There was also confusion over whether the standards were intended to apply to

Healthcare Scientists already covered by statutory regulation. Several comments highlighted the complexity of a regulatory landscape that involved numerous voluntary and statutory registration bodies.

Similar issues were also reflected in the stakeholder consultation event. In addition, some issues around threshold levels were raised, and whether the standards were pitched too high or not high enough.

Standards of conduct

There was broad support for the use of **Good Scientific Practice** as the standards of conduct for registrant Healthcare Science practitioners, with over 80 per cent of respondents supporting this proposal.

Standards of continuing professional development

There was broad support for the proposed standards, with over 80 per cent of respondents supporting the proposal that the Academy's standards should be in line with those used by the Health and Care Professions Council for those parts of the Healthcare Science workforce that are regulated by protection of title. A number of respondents raised the need for guidance for registrants on how they might meet the

standards, and the need to make it easy and straightforward for registrants to record how they have met the standards.

Other issues

Respondents to the online survey and participants at the stakeholder consultation event raised the need / desire for the statutory regulation of Healthcare Science practitioners and the need to continue working towards this end. It is clear that some believe the Academy's current work is a distraction from this aim, while others think it is a necessary step towards statutory regulation.

The relationship between the Academy and existing voluntary registration bodies and professional bodies was also raised as a potential area of conflict or concern. It is clear that many stakeholders do not want to see duplication of effort by these organisations, even though they do not necessarily recognise that some parts of the practitioner workforce are not covered by either a professional body or a voluntary registration scheme.

Next steps

This analysis of responses to the consultation will be considered by the Academy for Healthcare Science. It will decide whether changes to the proposed standards should be

made in response to the views expressed in the consultation – and if so, what those changes will be. The Academy hopes to complete this consideration by May 2014 and will then publish its response and the standards for the Register of Healthcare Science Practitioners.

Section 1: the consultation

1.1 Background to the consultation

The Academy for Healthcare Science is the uniting voice of the diverse Healthcare Science workforce in the UK, bringing together a wide range of scientific disciplines in healthcare.

One of the key tasks of the Academy for Healthcare is to uphold professional standards across Healthcare Science. By ensuring healthcare staff are of a good standard, safe and effective services are provided and a broader assurance is given to the public and commissioners of services. The Academy's continuing ambition is to see statutory regulation put in place across the entire Healthcare Science profession. However, the Academy has set a key objective to establish an appropriate and effective system for the registration and regulation of Healthcare Science practitioners who are not currently regulated by law through the Health and Care Professions Council.

The Academy believes that this regulation is at the heart of demonstrating and developing the professionalism of the Healthcare Science workforce which, in turn, is key to the delivery of safe, high quality services to improve outcomes for patients.

As part of the process of establishing an appropriate and effective regulatory system for the workforce, the Academy is establishing a Register of Healthcare Science Practitioners and will seek accreditation of this register by the Professional Standards Authority for Health and Social Care (PSA).

In June 2013, the Academy began working with existing voluntary registration bodies and related professional bodies across a number of Healthcare Science specialisms, service users and others to develop a set of standards governing admission to, and continued registration with, the Academy's Register of Healthcare Science Practitioners. This process culminated in the publication of a consultation on proposed:

- **standards of proficiency**, which set out the knowledge, skills and competences that someone would need to demonstrate in order to be admitted to the register
- **standards of conduct**, which detail the minimum standards that registrants should meet once registered as they conduct their professional lives
- **standards of continuing professional development**, which state how registrants should keep their skills, knowledge and competences up-to-date throughout their registered working lives.

1.2 The consultation process

The consultation document, *Improving Quality: Protecting Patients*, was published on the Academy's website at the beginning of December 2013. The consultation lasted for a period of three months and was conducted on a dedicated microsite, accessed via the Academy's website or unique URL. Key stakeholders – including groups representing patients and service users – were invited to respond to the consultation by email. In addition, a consultation stakeholder event was held in London on 19 February 2014, which was attended by over 40 professionals and patient representatives.

1.3 Responses to the consultation

One hundred and thirty six responses were received via the dedicated consultation website. Feedback from the consultation stakeholder event was collated and is also included in this analysis.

In terms of the website responses, 107 (n=107/136, 78.7 per cent) were submitted by individuals and the remainder were submitted on behalf of organisations. Figure 1 below gives the breakdown of responses by organisations – by the organisation type – which is then presented in Table 1.

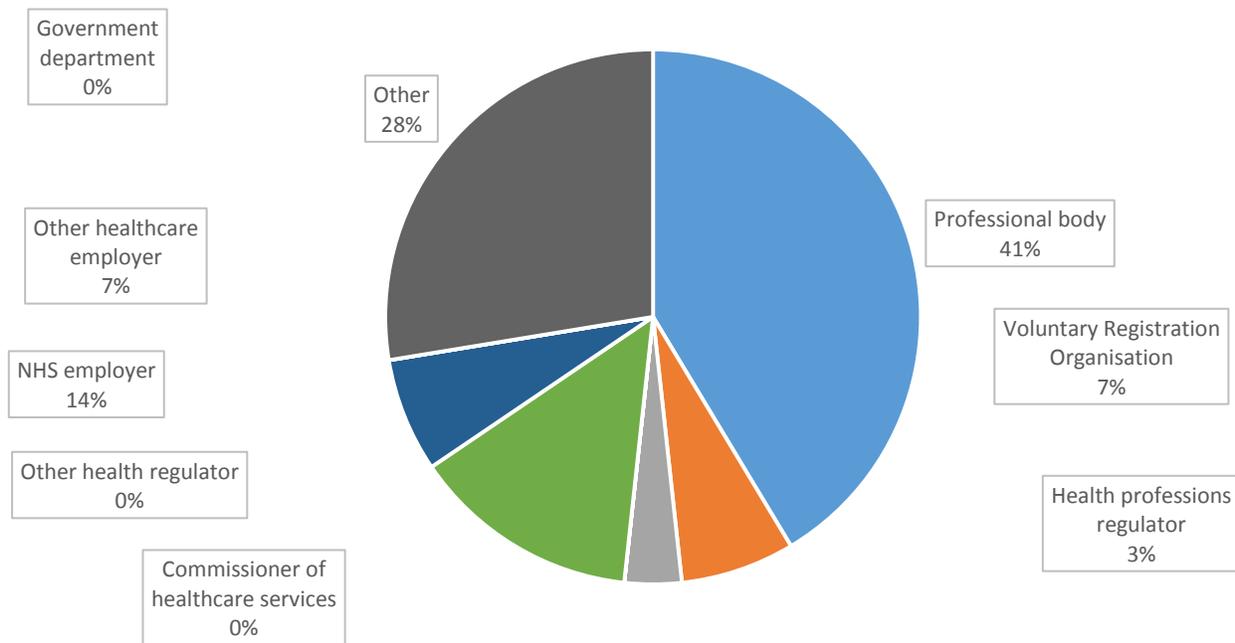


Figure 1: Breakdown of organisation respondents by organisation type (n=29/136)

Type	Number	Percentage	Cumulative percentage
Professional body	12	41.4%	41.4%
Voluntary Registration Organisation	2	6.9%	48.3%
Health professions regulator	1	3.5%	51.8%
Other health regulator	0	0.0%	51.8%
Commissioner of healthcare services	0	0.0%	51.8%
NHS employer	4	13.8%	65.6%
Other healthcare employer	2	6.9%	72.5%
Government department	0	0.0%	72.5%
Other	8	27.6%	100%
Total Responses	29	100%	

Table 1: Breakdown of organisation respondents by organisation type (n=29/136)

For the 107 responses submitted on behalf of individual respondents, Figure 2 and

Table 2 present a breakdown of these respondents by type.

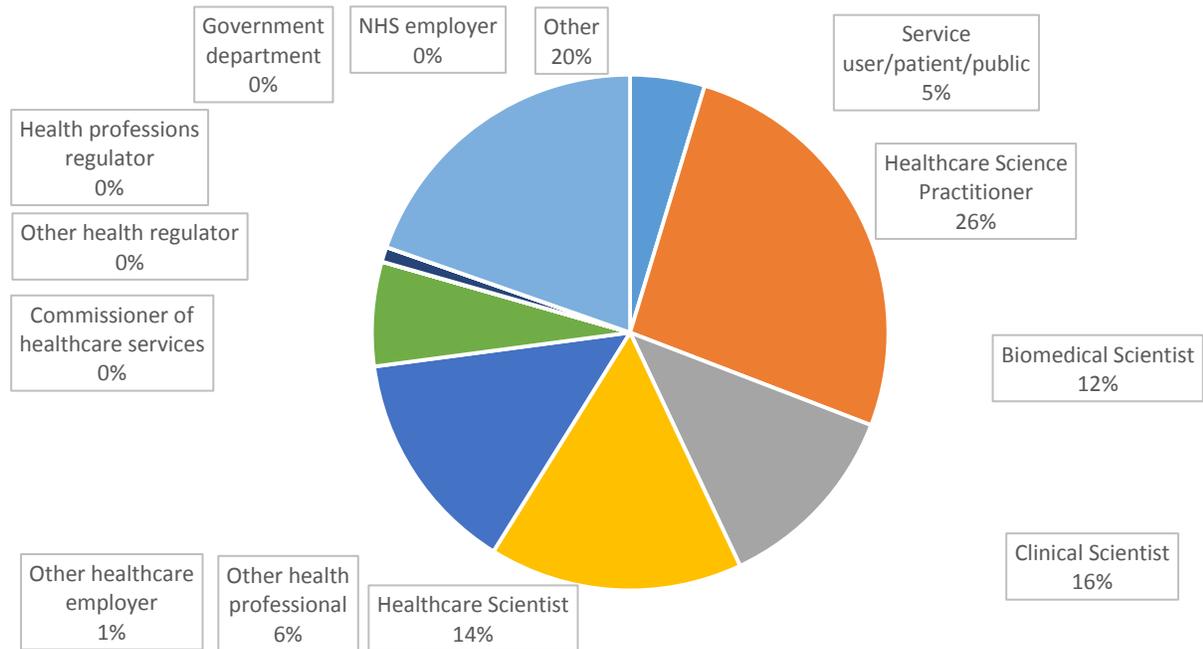


Figure 2: Breakdown of individual responses by individual type (n=107/136)

ype	Number	Percentage	Cumulative percentage
Service user/patient/public	5	4.7%	4.7%
Healthcare Science Practitioner	28	26.2%	30.8%
Biomedical Scientist	13	12.1%	43.0%
Clinical Scientist	17	15.9%	58.9%
Healthcare Scientist	15	14.0%	72.9%
Other health professional	7	6.5%	79.4%
Health professions regulator	0	0.0%	79.4%
Other health regulator	0	0.0%	79.4%
Commissioner of healthcare services	0	0.0%	79.4%
NHS employer	0	0.0%	79.4%
Other healthcare employer	1	0.9%	80.4%
Government department	0	0.0%	80.4%
Other	21	19.6%	100.0%
Total responses	107	100.0%	

Table 2: Breakdown of individual responses by individual type (n=107/136)

1.4 Analysis of data

The consultation survey contained 15 questions about the proposed standards of proficiency, conduct and continuing professional development. Twelve were closed questions – asking for a ‘yes’, ‘no’ or ‘don’t know’ response – and included an open comments section. The survey also included questions about the respondents.

Descriptive data analysis was undertaken in SPSS. Qualitative analysis was undertaken of the comments made. In this document, both the qualitative analysis and the individual comments made (with information about the type of respondent) is presented. Five respondents asked that their contributions should not be published, and their comments are therefore not included in this report. The qualitative analysis also draws on the views represented at the stakeholder consultation event held in London on 19th February 2014. These are the aggregated views from the event. It should be noted that some individuals may have submitted a response to the consultation via the website as well as attended the workshop.

Conclusion

This report provides a summary of the analysis of responses to a consultation conducted on the proposed standards of proficiency, CPD and conduct for the Register of Healthcare Science Practitioners being established by the Academy for Healthcare

Science. A copy of the full report is available on request from the Academy for
Healthcare Science.