



Council of Deans of Health Response to the Health & Care Professions Council's (HCPC) Consultation on Guidance on Conduct and Ethics for Students

29 January 2016

Council of Deans of Health

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<http://www.councilofdeans.org.uk/>.

We welcome the opportunity to respond to this consultation.

Consultation questions

Q1. Do you agree with the structure of the guidance? If not, how could we improve it?

We suggest the structure of the guidance could be improved in the following ways:

- It would be helpful if all the paragraphs could be numbered to make the guidance easier to reference.
- Section on 'Language' (page 5) – the sentence 'This guidance applies to all students as far as possible' would better fit in the section 'About this guidance'.
- We suggested the following addition to the section header '1. Promote, safeguard *and act in* the interests of service users and carers'.
- 6. Manage Risk: we don't think this header is particularly helpful and believe that some of the standards within it are repetitive and would fit better in other sections of the guidance. We would suggest the following changes:
 - 'You should not do anything that you think will put someone in danger or at unacceptable risk'. We believe this standard is repetitive and therefore can be removed.



- Relocate the following standards to 'Section 1. Promote and safeguard the interests of service users and carers':

'You should make sure that you take all appropriate steps to limit the risk of harm to service users, carers and others' and 'You should follow your education provider's or practice placement provider's policy on managing risk'.

- Relocate the standards relating to the health of the student to 'Section 9. Be honest and trustworthy'.

Q2. Do you think that any additional information or guidance should be included in the Guidance on conduct and ethics for students?

Yes, we have the following comments and suggestions:

- The draft standards omit the requirement for students to deal safely with the risks of infection so we suggest that the HCPC may wish to add a standard that specifically covers this. Adding a standard on this would make the guidance more consistent with the guidance on 'Standards of conduct, performance and ethics'.
- Standards should be included relating to multi-professional/multi agency working.
- We would suggest the following additions to the standards (in italics):
 - Section 5. Respect Confidentiality: 'If any confidential information raises concern about the safety or wellbeing of someone, you should discuss with an appropriate member of staff at your education provider or practice placement provider *as soon as you can*'.
 - Section 10. Keep records of your work with service users and carers: 'You should make sure that the records you keep are *clearly written, accurate and appropriate and are completed promptly*'.



Q3. Do you think there are any parts of the guidance which should be reworded or removed?

Yes, in addition to our comments in questions 1 & 2 we would suggest following rewording/changes to the standards:

- Section 3. Work within the limits of your knowledge and skills:
 - ‘You should make sure that you are appropriately supervised for any task that you are asked to carry out’ – we believe that the wording of this standard is potentially ambiguous. Firstly the words ‘appropriately supervised’ are open to interpretation as to what appropriate levels of supervision might be. Secondly, the standard as currently worded seems to place sole responsibility on students to ensure they are supervised. The ‘Standards of conduct, performance and ethics’ clearly outlines that it is the duty of registrants to ‘effectively supervise tasks’ they have asked other people to carry out. Students on pre-registration programmes are not yet registered professionals. We would advise that this standard is reworded to also emphasise the responsibility of registrants for the supervision of tasks carried out by students.
 - ‘You should only carry out an unsupervised task if you feel that you have the appropriate knowledge and skills to do so safely and effectively’. We would suggest that this standard would be better reworded as ‘You must be sure that you have the knowledge, skills and experience to carry out tasks safely and effectively. You should not undertake tasks which are outside the limits of your competence’.
- Section 6. Manage risk: we suggest the fifth standard is reworded to: ‘You should seek advice from a registered medical practitioner or an occupational health professional if you are worried about your physical or mental health. This advice should consider whether, and in what ways, you should change your study, including stopping your studies if this is necessary’.

We suggest the following paragraph (sixth standard) could be removed ‘You should adapt your study or stop studying if your performance or judgement is affected by your physical or mental health and could put service users, yourself or others at risk’.

- Section 9. Be honest and trustworthy: we suggest rewording of the first standard to: ‘You must keep high standards of personal and professional conduct. You should be aware that poor conduct and behaviour may affect someone’s confidence in you and your profession’. This change would bring the draft standards more in line with the ‘Standards of conduct, performance and ethics’.



- **Section 9. Be honest and trustworthy:** You should be aware that *poor* conduct outside your programme may affect whether or not you are allowed to complete your programme or register with us.

Q4. Do you think the addition of guidance on delegation for students is appropriate and clear? If not, why not, or how can we improve it?

We agree that it is helpful to have guidance to support students, education providers and practice placement providers on the delegation of tasks to students. However, we suggest the section could be improved by:

- Making it explicitly clear who is responsible for maintaining oversight for tasks that have been delegated by a student.

Q5. Do you have any comments about the language used in the guidance?

The language used in the guidance is generally clear and easy to understand.

Q6. Do you have any other comments on the guidance?

We have no further comments.

Contact for further information:

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