



Health and Care Professions Council – Standards of proficiency review

Council of Deans of Health written submission – May 2019

The Council of Deans of Health welcomes the opportunity to contribute to this consultation. The Council represents the 85 UK university faculties engaged in education and research for nursing, midwifery and the allied health professions.

Key messages

1. Healthcare professional regulation should be outcome-focused and risk-based.
2. Healthcare higher education is regulated by both professional healthcare regulation and higher education regulation. There is a need to ensure that regulation is not duplicative, but also that regulatory gaps do not occur if regulators were to simultaneously retreat from regulating necessary education and training functions.
3. Regulators should work collaboratively with education providers to enable flexibility and innovation in education and training, which enables student choice, enhances career pathways, allows individuals to meet the requirements of professional registration and upholds patient safety.

Responses

Q1. Do you think the generic standards are set at the threshold level necessary for safe and effective practice?

The generic standards do set a threshold level necessary for safe and effective practice. They are flexible enough to provide longevity and to allow for future developments in practice, education, policy and in population health needs.

The Council particularly supports the inclusion of standard 5 (be aware of the impact of culture, equality and diversity on practice), and standard 11 (be able to reflect on and review practice).

However, the generic standards could place greater emphasis on leadership, interprofessional working, and healthcare professionals acting as advocates for service users.

Q2. Do you think there are any generic standards which should be reworded or removed?

Revised standards may benefit from the reframing of these proficiencies as 'competences' to be met at the point of registration.

Furthermore, the term 'understand' is overused as a prefix in the generic standards and should be used only where learners do not gain the skills to meet this threshold standard in practice settings. For instance, standard 15 'understand the need to maintain the safety of both service users and those involved in their care' should be amended to 'maintain the safety of both service users and those involved in their care'. Professionals should not only understand this skill but also undertake this throughout their practice. This prefix is also used in standards 2, 3, 5, 7, 8, 9, 11, 13.

Whilst the standards are flexible enough to incorporate future developments, they may benefit from an additional focus on ensuring up to date digital skills so that they better fit the technological advances that are likely to transform the healthcare system in the coming years.

Standard 9 should be more explicit regarding the ability to work with others and in multiprofessional teams in a diverse range of practice contexts.

Standard 14 should include a reference to intervention and not just assessment.

Q3. Do you have any comments about the language used in the generic standards?

N/A.

Q4. Do you have any other comments about the generic standards?

Standard 2 could include reference to the ongoing relationship between a registered professional and the Health and Care Professions Council.

Standard 5 could be expanded to include groups based on the protected characteristics listed under the Equality Act 2010.

Q5. Do you think the profession-specific standards are set at the threshold level necessary for safe and effective practice?

N/A. The Council will put forward its response regarding profession-specific standards during the full public consultation across all HCPC regulated professions in 2019/20.

Q6. Do you think there are any profession-specific standards which should be reworded or removed?

N/A.

Q7. Do you have any comments about the language used in the profession-specific standards?

N/A.

Q8. Do you have any other comments about the profession-specific standards?

N/A.

Q9. Do you have any comments about the Standards of proficiency generally?

N/A.

For more information contact:

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