# Consultation on the future shape of the Accredited Registers programme

# Questions and how to respond

## You can fill in your answers below and send to them back to us by emailing ARconsultation@professionalstandards.org.uk

## The deadline for responding is **18 February 2021**. If you have any queries, or require an accessible version of this document, please contact us on 020 7389 8030 or by email at accreditationteam@professionalstandards.org.uk.

## Please put your answers below each question, you do not have to answer all the questions – only the ones you feel are relevant.

## **Consultation questions**

##### **Question 1: Do you agree that a system of voluntary registration of health and social care practitioners can be effective in protecting the public?**

##### Yes

##### **Question 2: How do you think the Authority should determine which occupations should be included within the scope of the programme? Is there anything further you would like us to consider in relation to assessing applications for new registers?**

##### We believe that occupations should be defined as they are now. There is a difference between a “role” and an occupation, particularly in health care. Occupations have defined competencies and require a set level of qualification. Furthermore an occupation should have an **ethical framework** around which guides behaviours and allows a professional to be accountable to the public.

We believe that any occupation include should only be those used within health or social care

Evidence base. We believe that the current position, where the evidence, or lack of it, is stated clearly, is sufficient but that knowledge-base is the primary factor.

##### **Question 3: Do you think that moving from an annual to a longer cycle of renewal of accreditation, proportionate to risk, will enable the Authority to take a targeted, proportionate and agile approach to assessment? Do you think our proposals for new registers in terms of minimum requirements are reasonable?**

##### Yes.

We agree that minimum standards could be made to work for initial application (rather than best practice) to allow fledgling professions to mature but that these minimum standards should include requirements around continuing professional development to ensure that minimum standards don’t drop below minimum.

##### **Question 4: Do you think accreditation has been interpreted as implying endorsement of the occupations it registers? Is this problematic? If so, how might this be mitigated for the future?**

Yes

We believe that one of the purposes of the register is to confer some form of endorsement of the occupation it registers. If the register cannot be seen to endorse an occupation (and in the absence of further statutory regulation), those non-statutory professions with clearly defined and well-enforced qualification and training requirements will be starved of the recognition they need from employers and the public. Organisations such as ADASS need to be assured that professions that fall within their members’ remit deserve to be regulated and *are* well regulated.

Standards 6 and 8b should allow applicants to demonstrate how they meet the Authority’s standards.

##### **Question 5: Do you think the Authority should take account of evidence of effectiveness of occupations in its accreditation decisions, and if so, what is the best way to achieve this?**

##### Option 1. An occupation should, by definition, be build on knowledge whereas treatments can be based on evidence. Occupations may use a range of approaches: treatments, therapies, equipment etc. but the use of those different types of approach should be based on **knowledge**.

Option 1 allows this to be demonstrated. Putting a time limit on developing a knowledge base would be a further safeguard and also encourage the occupation to train its members appropriately.

##### **Question 6: Do you think that changing the funding model to a ‘per-registrant’ fee is reasonable? Are there any other models you would like us to consider?**

##### Yes.

##### **Question 7: Do you think that our proposals for the future vision would achieve greater use and recognition of the programme by patients, the public, and employers? Are there any further changes you would like us to consider?**

As professional body representing an occupation with clearly defined education requirements (with a common threshold for competence), we would see this as essential. If an occupation has a defined body of knowledge (question 5) it should be assumed by the public that similar the same level of education and similar levels of knowledge can be expected from all professionals (of that occupation) working with them.

##### **Question 8: Do you agree that to protect the public, the Accredited Registers should be allowed to access information about relevant spent convictions?**

##### Yes. This is particularly the case where registrants work with clients who may be considered vulnerable (by various definitions). If a register is to have any true value in protecting the public (and reassuring employers) then knowledge of spent convictions should be accessible to the extent they are in line with registrants on statutory registers.

##### **Question 9: Are there any aspects of these proposals that you feel could result in differential treatment of, or impact on, groups or individuals with characteristics protected by the Equality Act 2010?**

No.

**Question 10. Your name and/or the name of your organisation.**

Rehabilitation Workers Professional Network (RWPN).

**Question 11: How would you describe your organisation (or your own role if more relevant)?**

We are the professional body that represents Vision Rehabilitation Workers and Specialist Habilitation professionals. Our registrants work 1-to-1 with blind, deafblind and visually impaired adults and children (often with co-morbidities or additional disabilities). The majority are employed by social services, NHS and the voluntary sector but a growing number are working in a freelance capacity.

We are currently seeking to join the AR programme. As a professional body with clearly defined qualification and CPD requirements and with a documented profile of professional risk, we support the idea of a category of licensed non-statutory professions that, where appropriate, may be considered for statutory regulation.

## Due to the pandemic, we strongly urge responses by email or through our survey. If this is not possible, our postal address is:

Professional Standards Authority

157-197 Buckingham Palace Road

London

SW1W 9SP

## Please return your response to us by **18 February 2021**.

## **Confidentiality and data protection**

## We will manage the information you provide in response to this discussion paper in accordance with our information security policies which can be found on our website ([www.professionalstandards.org.uk](http://www.professionalstandards.org.uk)).

## Any information we receive, including personal information, may be published or disclosed in accordance with the access to information regimes (primarily the Freedom of Information Act 2000 (FOIA) the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

## If you want the information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence. In view of this, it would be helpful if you could explain to us why you regard the information you have provided as confidential.

## If we receive a request for disclosure of the information, we will take full account of your explanation, but we cannot give an assurance that confidentiality will be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Authority.

## We will process your personal data in accordance with the DPA and in most circumstances this will mean that your personal data will not be disclosed to third parties.