Council meeting, 13 December 2007

Post-registration qualifications

Executive summary and recommendations

Introduction

At its meeting on 27 September 2007, the Education and Training Committee recommended to Council a plan for future work looking at the area of post-registration qualifications.

The attached paper outlines the planned work.

Decision

The Council is invited to:

- agree the attached paper and timetable;
- agree that it is not necessary, at this time, to establish a Professional Liaison Group (PLG).

Background information

- Paper considered by the Council on 5th October 2005: http://www.hpc-uk.org/assets/documents/10000B65council_meeting_20051005_enclosure04.pdf

Resource implications

- Organisation of and attendance at discussion meeting
- Writing discussion papers for discussion meeting; writing consultation document

Financial implications

- Venue and catering for discussion meeting
- Printing and mail out of consultation document

These implications are included in the budget for the 2007/08 financial year / will be included in the budget for the 2008/2009 financial year.

Appendices

None

Date of paper

3 December 2007

Post-registration qualifications

Background and context

At its meeting on 5 October 2005, the Council agreed to establish a Professional Liaison Group (PLG) to look at the issue of post-registration qualifications. Since that decision, the Council's work on this issue has been delayed in light of the review undertaken by the Department of Health (England) into the regulation of the non-medical professions and the subsequent government White Paper.

The Department of Health (England) publication 'The regulation of the non-medical healthcare professions' concluded: 'Post registration qualifications should be recorded in the Register where the specialism is relevant to patient care and patient safety, and can be defined in terms of extra skills acquired, and is at a level substantially beyond basic registration.' This recommendation was supported in the recently published White Paper 'Trust, Assurance and Safety: the regulation of health professionals in the 21st century'.

The department further concluded: 'Marks in the Register should only be made where the specialism is relevant to patient care and patient safety, can be defined in terms of extra skills acquired, and is at a level substantially beyond basic registration. Work at band 7 of Agenda for Change or its equivalent (for example, a specialist physiotherapy team leader in a stroke unit) ought to be the threshold.'

In our consultation response to 'The regulation of the non-medical healthcare professions', the Council made a number of comments in relation to the recommendations. We said:

'We believe that there should be clear, published criteria for marking the Register, since there will evidently be qualifications that are relevant to registration, and those which are not.

[…]

We anticipate that such criteria could include:

- a clear link between the qualification in question, and a particular function or an occupational role which cannot be adequately and safely carried out within the qualification;

- a risk of harm to the public if the Register is not marked;

- a clear identification of how the identified risk would be mitigated by the Register being marked; and

- the necessity for either function or title to be restricted by marking the Register.'

Legal context
Article 19 (6) of the Health Professions Order ("the Order") 2001 provides that:

"*In respect of additional qualifications which may be recorded on the Register the Council may establish standards of education and training and article 15(3) to (8) and articles 16 to 18 shall apply in respect of those standards as if they were standards established under article 15(1)(a)*"

The rules and Order provide the Council with the powers to:

- record post-registration qualifications or additional competencies in the Register;
- approve post-registration qualifications for these purposes; and
- establish standards of education and training for post-registration entitlements.

It should be noted that the Order does not contain provisions to establish standards of proficiency for post-registration entitlements, only for parts of the Register.

Annotations of the Register
The Council currently annotates the Register to indicate where:

- a chiropodist / podiatrist has completed an approved course of training enabling them to sell/ supply prescription only medicines (POM) and/or administer local anaesthesia (LA);
- a chiropodist / podiatrist, physiotherapist or radiographer has completed an approved course of training enabling them to become a supplementary prescriber.

The Council is required to annotate the Register by another enactment, the Prescription Only Medicines (Human Use) Order 1997, an order under the Medicines Act 1968.

The Council approves both pre-registration chiropodist and podiatry programmes which contain the LA and POM components and stand alone, post-registration programmes.[1] The Council also approves programmes in supplementary prescribing (a purely post-registration entitlement).

A way forward
Given the recent publication of the white paper, the Executive proposes that post registration qualifications is a subject on which the Council can now move forward.

Given the substantial work undertaken by the Council in providing its input into the review of non-medical regulation, in particular the indicative criteria included as part of its consultation response, the Executive proposes that, at this stage, it is not necessary to establish a Professional Liaison Group (PLG).

[1] The Council recently agreed that POM modules which form part of already approved pre-registration programmes can be approved for the purposes of direct entry, subject to an additional paper based assessment against SET 2 of the standards of education and training.

Instead, the Executive proposes that a discussion meeting should take place in early 2008. The meeting would involve representatives from a variety of stakeholders with an interest in this area, including professional bodies, education organisations and employers. The purpose of the meeting would be to benefit from the discussion and input of our key stakeholders in this area. In particular participants would be asked to discuss such issues as:

- Should HPC annotate the Register to show a greater range of post-registration qualifications? If yes, what would the benefits to public protection be? If not, why not?
- Are the indicative criteria included in our consultation response appropriate?
- Should post-registration qualifications be directly approved by HPC (as for pre-registration programmes)? If not, how else might they be approved?
- What existing post-registration qualifications are there and do they meet the indicative criteria?

One of the outcomes of the discussion meeting could be a consultation document outlining our understanding of the issues in this area and draft criteria and inviting comments from our wider stakeholders. The consultation might be a means of engaging with this issue and in forming the Council's next steps.

Proposed Timetable

27th September 2007

Meeting of the Education and Training Committee – recommendation of work to Council

13th December 2007

Council meeting – for ratification

February 2008

Discussion meeting with professional bodies, and other appropriate stakeholders (e.g. employers, education organisations)

(Meeting provisionally scheduled for Tuesday 26 February 2008).

26th March 2008

Meeting of the Education and Training Committee
- Consider outcomes of discussion meeting (including draft consultation document, as appropriate)

27th March 2008

Council meeting
- Consider outcomes of discussion meeting (including draft consultation document, as appropriate)

May, June, July 2008

Consultation (if necessary)

September 2008

Consultation responses brought back to Education and Training Committee and Council (if necessary)