

Council meeting, 27 March 2013

Policy and Standards Department Work Plan 2013-2014

Executive summary and recommendations

### **Introduction**

The Policy and Standards Department Work Plan for the period 1 April 2013 to 31 March 2014 is attached.

The 'standards work plan' has been replaced by a short statement setting out our approach to formal consultation with stakeholders and to periodic review of the standards.

### **Decision**

The Council is invited to approve the attached workplan (subject to minor editing amendments and any changes agreed at the meeting).

### **Background information**

- The work plan will be included as paper to note at the Education and Training Committee's meeting in June 2013.

### **Resource implications**

The resourcing of the Department is set out in the attached workplan.

### **Financial implications**

The financial implications of the planned work are accounted for in the Policy and Standards budget for 2013-2014.

### **Appendices**

See paper.

### **Date of paper**

15 March 2013

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## **Policy and Standards Department**

### **2013-2014 Work plan**

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## 1. Introduction

- 1.1 This document sets out a plan for the work of the Policy and Standards Department in the financial year 2013-2014.

### Policy and Standards planning

- 1.2 The nature of the issues that the Department deals with are such that work undertaken will consist of both planned projects and work which arises as a result of external factors, such as changes in Government policy and other developments that can be unpredictable. Flexibility is important in regularly reviewing priorities and allocating resources accordingly.
- 1.3 The following projects have been identified as relative priorities for the Department in the coming year.
- Annotation of qualifications in podiatric surgery.
  - Guidance for disabled people wanting to become health and care professionals.
  - Mid Staffordshire NHS Foundation Trust Public Inquiry.
  - Professional indemnity insurance.
  - Review of the standards of conduct, performance and ethics.
  - Review of the standards of proficiency.

### Resourcing

- 1.4 The Department currently consists of five employees.

Michael Guthrie	Director of Policy and Standards
Vacant position	PA to Director of Policy and Standards and PA to Director of Communications
Charlotte Urwin	Policy Manager
Alison Croad	Policy Officer
Selma Elgaziari	Policy Officer

## About this document

- 1.5 This document is divided into seven sections.
- Section 2 provides a summary of some of the projects successfully delivered in 2012-2013.
  - Sections 3 to 5 describe the projects for 2013-2014 in more detail, grouped into three areas: developing and maintaining the existing business; external policy developments; and on-going activities.
  - Section 6 outlines potential projects for the period 2014-2015 to 2015-2016.
  - Section 7 looks at the risks owned by the Department.
- 1.6 Many of the activities outlined in sections 3 to 5 of this document are subject to discussion / approval by the Council or a Committee as appropriate.
- 1.7 There are two appendices to this document.
- Appendix 1 provides a summary table of projects for the 2013-2014 financial year, referenced against the HCPC's strategic objectives.
  - Appendix 2 outlines the HCPC's approach to consultation and review of standards, including an indicative timetable for periodic review of the standards.

## **2. Projects delivered in 2012-2013**

2.1 This section outlines some of the projects successfully delivered in the last financial year.

### **Developing and maintaining the existing business**

- A consultation was held on a proposal to amend the standards of education and training to make the involvement of service users in approved education and training programmes a compulsory requirement.
- The review of the standards of proficiency continued. Six sets of revised standards of proficiency were agreed. A number of other sets of standards were at various stages of the review process.
- The review of the standards of conduct, performance and ethics commenced with market research commissioned with registrants and service users. Other activities included seeking the views of service users with experience of cancer care and hearing impaired service users.
- The work on annotation of the Register continued. It was decided that it was unnecessary to annotate qualifications in neuropsychology. Further work took place to support annotation of qualifications in podiatric surgery including development of a work plan and meetings with stakeholders.
- The Department continued to review fitness to practise final hearing decisions.
- CPD sample profiles were published on the HCPC website for a variety of different professions.

### **Health and Social Care Act 2012 and the Command Paper 'Enabling Excellence'**

- Draft criteria were developed for approving Approved Mental Health Professional Training in England. A consultation was launched on the draft criteria.
- The results of the consultation on student fitness to practise and registration were analysed. The results of the consultation and an appraisal of the options were presented to the Council.
- A policy statement on proposals for regulating the adult social care workforce in England was produced.

## Other

- We continued to participate in Department of Health work to extend independent prescribing to physiotherapists and chiropodists / podiatrists. A consultation was held on draft standards for prescribing.
- The multi-variant analysis of fitness to practise data, a part of the on-going work on revalidation, was completed.
- The Department co-ordinated the HCPC's Professional Standards Authority (PSA) performance review submission for 2012-2013 and wrote some of the content.
- The Department participated as members of various working groups and attended numerous other groups and meetings with stakeholders, including delivering presentations.
- Six responses to external consultations were made. Eleven HCPC consultations commenced in 2012-2013.

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### **3. Developing and maintaining the existing business**

3.1 This section outlines the Department's activities in 2013-2014 which are focused on developing and maintaining the existing business. For example, this includes the following.

- Developing and reviewing standards, guidance and other documents.
- Reviewing processes, approaches and policy positions.
- Undertaking or commissioning research to identify areas for further development or improvement.

#### **Service user and carer involvement in education and training programmes approved by the HPC**

3.2 In 2012-2013 a consultation was held on a proposal to amend the standards of education and training to make service user involvement a mandatory requirement in approved programmes.

3.3 At its meeting in March 2013, the Education and Training Committee agreed that the standard should be for 'service user and carer involvement'.

3.4 The activities in this area in the coming year will include the following.

- Revising the proposed standard and guidance in light of responses to the consultation.
- The Education and Training Committee and the Council will be asked to approve the exact text of the revised standard and guidance for implementation in the approval and monitoring processes at an agreed date.
- Communicating the outcomes of the consultation with external stakeholders including education providers and interested service users and carers.
- Assisting the Education Department with the development of a pilot for service user and carer visitors.

## **Review of the standards of proficiency**

- 3.5 The review is being taken forward on a rolling basis, with standards for the professions (excluding social workers in England) being reviewed in batches. In 2012-2013, six sets of revised standards of proficiency were agreed by the Council.
- 3.6 The review involves the following.
- Producing a collated draft of the existing profession-specific and detailed generic standards against the new structure of 15 generic standards.
  - Seeking the views and comments of the professional bodies on changes that they consider may be necessary to the standards.
  - Considering that information to produce a proposed draft for consultation.
  - Publicly consulting on a draft set of standards for each profession.
  - Analysing responses to the consultation and revising the draft standards accordingly.
  - Republishing the new standards and implementing them on an appropriate basis in the operational processes.
- 3.7 In 2013-2014, it is planned that seven consultations on revised standards will commence and that six sets of revised standards will be formally published over the course of the year. The timetable is kept under regular review to ensure that there is sufficient time to scrutinise each set of standards prior to and after public consultation.
- 3.8 The review is planned to conclude in 2014-2015.

## **Review of the standards of conduct, performance and ethics**

- 3.9 In 2012-2013, the Council agreed an outline work plan for the review of the standards of conduct, performance and ethics.
- 3.10 The timescale for the review has changed in light of the anticipated restructure of the Council in January 2014. However, this provides further opportunity to seek the views of stakeholders to inform the work of a PLG to be established from early 2014-2015, including engaging with different groups of service users and carers.



3.11 The following activities are anticipated in 2013-2014.

- Completion of commissioned market research with service users and registrants.
- Stakeholder events in London and Scotland to discuss the findings of the review to date.
- Further research / engagement with service users with acquired cognitive impairments and service users and carers in social care.
- Online surveys of fitness to practise panel chairs, case managers and hearings officers.
- A workshop at the October 2013 Council away day.
- Possible further engagement with registrants at a 'Meet the HCPC event'.
- Desk research and preparation of other papers and documents, including a work plan for the planned Professional Liaison Group (PLG).

#### **Review of CPD – standards, audits and process**

3.12 This was a low priority project in 2012-2013 but will now commence in 2013-2014.

3.13 The Executive plans to produce a paper for the Education and Training Committee to begin the process of reviewing the HCPC's approach.

3.14 The Executive plans to commission research in late 2013-2014, to engage with registrants who have been audited, other registrants and key stakeholders in order to gather information about individuals' and organisations' experiences and perspectives of the CPD standards and audit process.

#### **Review of the standards of education and training**

3.15 The standards of education and training and supporting guidance were last reviewed and re-published in 2009.

3.16 In the coming year, the Department will, with the Education Department, begin to plan for the review of this set of standards. This will include identifying key issues for, and reaching conclusions about the format of, any review. Given the other standards reviews that the Department is undertaking, this planning will need to take account of available resources.

3.17 It is planned that any substantive activities to begin to review the standards will take place from 2014-2015.

### **Guidance for disabled people wanting to become health and care professionals**

3.18 In 2006 we published 'A disabled person's guide to becoming a health professional'. This guidance document provides guidance to disabled people thinking about training in one of the professions we regulate, and to admissions staff making decisions about applications from disabled applicants.

3.19 In late 2012-2013, we issued an invitation for proposals for research which will inform the review and revision of this guidance. The research will include focus groups and/or interviews with disabled students, as well as with other groups such as admissions staff, educators, practice placement educators and staff working in disability services.

3.20 The activities in this area in the coming year will include the following.

- Exploring ways in which we might engage with other audiences not addressed in the research – for example, disabled registrants.
- Desk research looking at other relevant sources including guidance produced by the equalities organisations and the other regulators.
- Completion of the commissioned research.
- Revising / rewriting the guidance in preparation for public consultation in 2014-2015.

### **Annotation of qualifications in podiatric surgery**

3.21 In 2012-2013, the Council agreed to annotate on the Register qualifications linked to the practice of podiatric surgery.

3.22 The activities in this area in the coming year include the following.

- Continued participation in the internal project to make changes to the 'Netregulate' registration system and other systems necessary to annotate the Register.
- Development of and public consultation on standards for approving qualifications in podiatric surgery.
- Continued engagement with stakeholders.

### **Continuing Professional Development (CPD) sample profiles**

- 3.23 The Department will continue to work with the professional bodies to produce further sample profiles for the website. We have now published at least one sample profile for all 16 parts of the Register.

### **Guidance for employers on making fitness to practise referrals**

- 3.24 In the coming year the Department will work with the Fitness to Practise Department to begin to develop guidance for employers on when they should refer fitness to practise matters to the HCPC. This will complement existing guidance which outlines the fitness to practise process.
- 3.25 In 2013-2014, we will begin to scope the content of this guidance which may include activities such as: a survey of case managers; engagement with employers; and a review of other similar guidance. This work will complete in 2014-2015.

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## **4. External policy changes**

- 4.1 This section outlines projects which are a result of, or closely related to, external policy developments including legislation or Government policy.

### **Regulation of new professions or occupations**

#### **A. Adult social care workers in England**

- 4.2 In 2012-2013, the Council agreed a policy statement on the regulation of adult social care workers in England. This included proposals for the regulation of CQC registered managers and the establishment of a 'negative registration scheme'.
- 4.3 The extent of work required in this area in the coming year will depend upon decisions reached by Ministers.

#### **B. Herbal practitioners**

- 4.4 In 2012-2013, the Executive participated as part of a Department of Health project board looking at the regulation of practitioners who use unlicensed herbal medicines. A Department of Health consultation (on behalf of the other four country Governments) was anticipated during the year but has not been published.
- 4.5 The work required in this area in the coming year will depend upon Government policy and may include the following.
- Continued participation as part of the Department of Health project board.
  - Responding to the joint administrations' consultation (when published).
  - Participating in a cross-department project to bring herbal practitioners into regulation.
  - Developing standards and processes as may be required.
  - Meeting with stakeholders.

#### **C. Non-Medical public health specialists**

- 4.6 In February 2012, the Government announced that public health specialists from non-medical backgrounds would become regulated by the HCPC.

- 4.7 The Director of Policy and Standards represents the HCPC on the Public Health Workforce Advisory Group, Taskforce on regulation, convened by the Faculty of Public Health.
- 4.8 There is no timetable currently attached to the regulation of this group.

### **Mid Staffordshire NHS Foundation Trust Public Inquiry**

- 4.9 In February 2013, the Public Inquiry into the role of the commissioning, supervisory and regulatory organisations in relation to standards of care at Mid Staffordshire NHS Foundation Trust reported its findings.
- 4.10 A number of the recommendations are likely to be relevant to the work of the HCPC. At the time of writing this work plan, the Council was due to consider the outcomes of the inquiry at its March 2013 meeting.
- 4.11 Activities in this area over the coming year are likely to include.
- Preparing papers and reports for the Council and its Committees.
  - Delivering any additional actions agreed by the Council related to the work of the Department.
  - Engaging with stakeholders including participation in any working groups.

### **Care Quality Commission (CQC) guidance**

- 4.12 The HCPC is currently working with the CQC to produce guidance ('supporting information') in two areas identified in the Winterbourne View Hospital Serious Case Review.
- Clinical supervision.
  - Qualifications and CPD for Registered Managers and the staff they supervise.
- 4.13 The CQC is leading this work with input from the HCPC. This work is expected to conclude in early 2013-2014.

### **Professional indemnity insurance**

- 4.14 It is current Government policy that as part of meeting its obligations under the European Directive on Cross Border Healthcare (2011/24/EU) it will introduce legislation to make holding indemnity insurance a compulsory condition of registration as a health professional.

- 4.15 This would mean that a registrant would be required to demonstrate that they were either covered by their employer's vicarious liability or held their own indemnity cover. It is anticipated that this requirement will be satisfied via a declaration at admission and renewal to the Register.
- 4.16 In February 2013, the Department of Health published a consultation on its proposals. (Please note: the proposals do not extend to social workers in England.)
- 4.17 The Secretary to Council will lead this work and undertake some of the policy tasks as part of this. However, it is anticipated that the Department will be involved in the following activities during the course of the year.
- Providing input as may be required into papers for the Education and Training Committee and the Council, including the HCPC response to the consultation.
  - Providing input into the development of draft guidance for registrants to explain the requirements and what is expected of them.
  - Writing a consultation document and managing the consultation process including analysing the responses.
  - Participation in the internal project team to deliver this work.

### **Approved Mental Health Professionals**

- 4.18 In 2013-2014, a consultation was launched on criteria for approving Approved Mental Health Professional (AMHP) training in England.
- 4.19 The activities in this area in the coming year will include the following.
- Analysis of responses to the consultation.
  - Publication of the revised criteria.
  - Communication with stakeholders.

### **Standards for prescribing**

- 4.20 In 2012-2013, Ministers decided to progress legislation so that chiropodists / podiatrists and physiotherapists will be able to train to become annotated on the Register as independent prescribers.
- 4.21 In the last year the Executive has developed and consulted on standards for prescribing. The consultation analysis and revised standards were due to be considered by the Council for final sign-off at its meeting in March 2013.

4.22 In 2013-2014 this project will complete. The following activities are anticipated.

- Publication of the finalised standards for prescribing.
- Participation in the internal project to update IT systems to ensure that the Register can be annotated.
- Internal and external communications, including assisting in the training of Registration Advisors if required.

### **Revalidation**

4.23 This work continues from 2012-2013.

4.24 In October 2012, the Professional Standards Authority for Health and Social Care (PSA) published a paper looking at 'continuing fitness to practise based on right-touch principles'.

4.25 The following projects have completed to date.

- Review of existing revalidation processes that have been implemented by international regulators.
- Review of existing revalidation processes that have been implemented or are being developed by other UK regulators.
- Professionalism in healthcare professions (qualitative study undertaken by Durham University informing the on-going professionalism tool study).
- Service user feedback tools (literature review and Delphi consultation exercise undertaken by the Picker Institute Europe).
- Multi-variant analysis of fitness to practise data.

4.26 The following projects are currently on-going.

- Professionalism tool (quantitative study undertaken by Durham University to measure professionalism and track students after graduation); on-going to 2014-2015.

4.27 In early 2013-2014, the Council will be invited to discuss the PSA's report and the findings to date of the HCPC's work in this area. The only outstanding project originally planned is to undertake a similar multi-variant analysis of CPD audit data and the Executive anticipates commissioning new research to do this.

## **European policy**

- 4.28 In 2012-2013, the Professional Qualifications Directive which affects movement of professionals between member states (and therefore the HCPC's international registration process) will continue its passage through the European Parliament.
- 4.29 It is anticipated that during the course of the year the changes that the HCPC may need to make to its operational processes will become clearer.
- 4.30 In 2013-2014 activities will include the following.
- Continued membership of the Alliance of UK Health Regulators in Europe (AURE).
  - Attendance at meetings and events in the UK and in Europe as appropriate.
  - Producing papers and briefings as may be required.
  - Participating in internal discussion to ensure that the operational implications of any changes are captured.

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## **5. On-going activities**

- 5.1 This section records regular or routine activities which are on-going from year-to-year, and also outlines any specific activities which are about improving the way the Department functions.

### **Core activities**

- 5.2 In 2013-2014 the Department will continue to perform the following core activities.
- Responding to emails into the policy inbox and consultation inboxes and to hard copy correspondence.
  - Producing internal briefings and reports as required.
  - Responding to consultations from other organisations (where appropriate).
  - Producing articles for the HCPC In Focus newsletter, for Education Update, for the HCPC blog, and for the HCPC intranet.
  - Working closely with the Communications Department including undertaking planned speaking commitments, participating at HCPC events and assisting with press enquiries.
  - Stakeholder liaison on regulatory / policy matters including undertaking both reactive and proactive meetings with stakeholders (including working group participation).

### **Professional Standards Authority performance review**

- 5.3 The Professional Standards Authority for Health and Social Care (PSA) reviews the performance of the HCPC and the other regulators within its remit against its standards of good regulation.
- 5.4 The Department is responsible for co-ordinating the HCPC's submission including writing some of the content and reviewing content from colleagues across the organisation. This process involves submitting a report to the PSA, attending meetings, providing additional information as required, approving the final report and writing a paper for the Council on the outcomes.

## **Review of final hearing fitness to practise decisions**

- 5.5 The review of final hearing decisions is aimed at providing a systematic way through which the Executive can review the decision making quality of final hearing panels, including checking adherence to the applicable law and to HCPC policy.
- 5.6 The review involves completing an audit form for each decision. The audit forms are then reviewed and a report written for the Fitness to Practise Committee. The emerging recommendations are then discussed with the Fitness to Practise Department who identify action points.

## **Welsh language scheme**

- 5.7 The HCPC has published a Welsh Language Scheme to set out how it will treat the Welsh language on an equal basis in the conduct of business in Wales.
- 5.8 In late 2012-2013, the Department responded to a request from the Welsh Language Commissioner for more information about progress in delivering the actions outlined in the scheme.
- 5.9 In the coming year, activities are likely to include the following.
- Writing the annual implementation report (setting out the steps we have taken to implement our Scheme).
  - Writing papers for the Executive Management Team.
  - Reviewing the Scheme once the Welsh Language Commissioner has published new standards in this area.

## **Consultation review**

- 5.10 The Department continues to implement the outcomes of a review of the consultation process. In the coming year this will include the following.
- Continuing to review and revise our use of the 'survey monkey' online tool for consultations.
  - Developing a standard template and/or style guide for consultation documents.
  - Developing a standard template and/or style guide for consultation analysis documents.

## **6. Projects for 2014-2015 to 2015-2016**

6.1 The following project areas are likely to be priorities over the following two financial years.

- Completion of the review of the standards of proficiency – 15 new sets of standards will be published by 2014-2015.
- Review of the standards of conduct, performance and ethics – a PLG will take place in 2014-2015, followed by public consultation on revised standards.
- Review of the standards of education and training.
- Completion of research into the CPD standards, audit and process - identification and delivery of any actions for further work.
- Work on regulation of further professions or occupations – it is Government policy that herbal practitioners, public health specialists from non-medical backgrounds and adult social care workers in England should be registered or regulated by the HCPC.

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## 7. Risk management

7.1 The main risks that are owned by, or most directly relevant to, the Department as set out in the HCPC's Risk Register are outlined below, together with the mitigations for each risk.

### **14.1 Incorrect process followed to establish standards / guidance/ policy e.g. no relevant Council decision**

- Legal advice and sign off sought on processes.
- Appropriately experienced and trained members of Policy team.
- Quality management system and processes.

### **14.2 Inappropriate standards/guidance published e.g. standards are set at inappropriate level, are too confusing or are conflicting**

- Use of Professional Liaison Groups, and Council and committees, including members with appropriate expertise.
- Appropriately experienced and trained members of the Policy team.
- Consultation with stakeholders and legal advice sought.

### **14.3 Changing / evolving legal advice rendering previous work inappropriate**

- Use of well qualified legal professionals. Regular reviews.
- Legal advice obtained in writing.
- Appropriately experienced and trained members of Policy team and others, e.g. HR.

### **14.4 Inadequate preparation for a change in legislation (Health and Social Work Professions Order 2001, or other legislation affecting HCPC)**

- EMT responsible for remaining up to date relationships with government departments and agencies.
- HCPC's 5 year planning process.
- Legal advice sought.

### **14.5 PLG member recruitment without requisite skills and knowledge**

- Skills and knowledge identified in work plan.
- Recruitment policy.
- Council scrutiny of PLG result.

### **14.6 Loss of corporate memory**

- Maintain appropriate records of project decisions.
- Appropriate hand over and succession planning.
- Department training.

## Appendix 1 - Projects summary 2013-2014

Ref	Project area	Objectives / description	Key deliverables / milestones	Timescale(s)	Strategic intent
	<b>Developing and maintaining the existing business</b>				
3.2 to 3.4	Service user and carer involvement in education and training programmes	To agree and implement a new standard to make service user and carer involvement in approved programmes a requirement.	New standard and guidance agreed.	March 2014	To be proactive in influencing the wider regulatory policy agenda. To ensure that the organisation's work is evidence based.
3.5 to 3.8	Review of the standards of proficiency*	To continue to review, consult on and roll-out revised standards of proficiency.	Reviews, consultations and re-publication of new standards.	On-going 2013-2014 to 2014-2015	To maintain, review and develop efficient business processes throughout the organisation.
3.9 to 3.11	Review of the standards of conduct performance and ethics*	To review the standards of conduct, performance and ethics.	Completion of commissioned market research.  Completion of all other research and engagement activities in preparation for PLG.	June 2013  End of 2013	To maintain, review and develop efficient business processes throughout the organisation.
3.12 to 3.14	Review of CPD – standards, audit and process	To begin to review the CPD standards, audits and process.	Research commissioned and on-going.	January 2014	To maintain, review and develop efficient business processes throughout the organisation. To ensure that the organisation's work is evidence based.

## Appendix 1 - Projects summary 2013-2014

Ref	Project area	Objectives / description	Key deliverables / milestones	Timescale(s)	Strategic intent
3.15 to 3.17	Review of standards of education and training	To plan for the review of the standards of education and training.	Plan for review developed including identification of key issues.	End of 2013	To maintain, review and develop efficient business processes throughout the organisation.
3.18 to 3.20	Guidance for disabled people wanting to become health and care professionals*	To revise and rewrite the guidance: 'A disabled person's guide to becoming a health professional.'	Externally commissioned research completed.	November 2013	To maintain, review and develop efficient business processes throughout the organisation. To ensure that the organisation's work is evidence based.
3.21 to 3.22	Annotation of qualifications in podiatric surgery*	To develop standards for the annotation of qualifications in podiatric surgery.	Consultation on standards. Final standards agreed.	Summer 2013 March 2014	To maintain, review and develop efficient business processes throughout the organisation.
3.23	CPD sample profiles	To produce joint-badged sample profiles for the website.	Publish sample profiles.	On-going 2013-2014	To maintain, review and develop efficient business processes throughout the organisation.
3.24 to 3.25	Guidance for employers on making FTP referrals	To develop guidance for employers on what to refer information to the Fitness to Practise Department.	Scope guidance.	On-going 2013-2014 (timetable TBC).	To maintain, review and develop efficient business processes throughout the organisation.

## Appendix 1 - Projects summary 2013-2014

Ref	Project area	Objectives / description	Key deliverables / milestones	Timescale(s)	Strategic intent
	<b>External policy changes</b>				
4.3 to 4.8	Regulation of new professions or occupations	Regulation of adult social care workers in England, herbal practitioners and non-medical public health specialists.	Activities related to the (potential) regulation of these groups.	On-going 2013-2014	To be proactive in influencing the wider regulatory policy agenda.
4.9 to 4.11	Mid Staffordshire NHS Foundation Trust Public inquiry*	To assist in delivering the HCPC's actions as a result of the public inquiry.	Development of papers and reports. Stakeholder engagement.	On-going 2013-2014	To maintain, review and develop efficient business processes throughout the organisation.
4.12 to 4.13	Care Quality Commission guidance	To work with the CQC on supporting information for clinical supervision and qualifications and CPD.	Publication of support information.	Expected summer 2013	To be proactive in influencing the wider regulatory policy agenda.
4.14 to 4.17	Professional indemnity insurance*	To participate in work to introduce a statutory requirement for registrants to hold insurance.	Consultation on guidance. Analysis of consultation responses.	Summer 2013 Autumn 2013	To maintain, review and develop efficient business processes throughout the organisation.
4.18 to 4.19	Approved Mental Health Professionals	To develop criteria for approving AMHP qualifications.	Analysis of Consultation responses. Sign-off of final criteria.	May 2013 July 2013	To maintain, review and develop efficient business processes throughout the organisation.

## Appendix 1 - Projects summary 2013-2014

Ref	Project area	Objectives / description	Key deliverables / milestones	Timescale(s)	Strategic intent
4.20 to 4.22	Standards for prescribing	To develop standards for supplementary and independent prescribing.	Publication of standards. Completion of project to allow annotation of independent prescribing.	May 2013 September 2013	To maintain, review and develop efficient business processes throughout the organisation.
4.23 to 4.27	Revalidation	A series of research projects to explore revalidation for the HCPC.	CPD multi-variant analysis. Professionalism tool (Durham University research).	TBC On-going 2014-2015	To be proactive in influencing the wider regulatory policy agenda.
4.28 to 4.30	European policy	To ensure that the HCPC understands the implications of changes to the professional qualifications directive.	Attendance at meetings and papers as may be required.	On-going 2012-2013	To be proactive in influencing the wider regulatory policy agenda.



## Appendix 1 - Projects summary 2013-2014

Ref	Project area	Objectives / description	Key deliverables / milestones	Timescale(s)	Strategic intent
	<b>On-going activities</b>				
5.3 to 5.4	PSA performance review	To co-ordinate HCPC's performance review submission.	Submit performance review for 2013-2014.	November / December 2013	To maintain, review and develop efficient business processes throughout the organisation.
5.5 to 5.6	Review of final hearing fitness to practise decisions	Review of final hearing decisions.	Audits undertaken with papers to the Fitness to Practise Committee.	On-going 2013-2014	To maintain, review and develop efficient business processes throughout the organisation.
5.7 to 5.9	Welsh language scheme	To monitor the implementation of the scheme and produce an annual progress report.	Annual progress report.	On-going 2013-2014	To maintain, review and develop efficient business processes throughout the organisation.
5.10	Consultation review	To implement recommendation of review of approach to consultations.	On-going activities to improve consultation process.	On-going 2013-2014	To maintain, review and develop efficient business processes throughout the organisation.

### Notes

\*denotes a priority project

Some projects may arguably map to a number of strategic objectives. Those most directly relevant are referenced here.

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## 1. Developing standards

- 1.1 The following sections set out general principles around how we approach consultations and how we review our standards (including a timetable setting out when we next expect to review our standards).

## 2. Approach to consultation

- 2.1 Under The Health and Social Work Professions Order 2001, we must consult with appropriate stakeholders before setting standards or guidance. Article 3 (14) states:

*“Before establishing any standards or giving any guidance under this Order the Council shall consult representatives of any group of persons it considers appropriate”.*

- 2.2 However, we do not only consult on standards and guidance. We have also consulted on policies we developed, such as our approach to annotation of the Register or to ensuring student fitness to practise.

- 2.3 In the past, we have followed the Civil Service’s Code of Practice on Consultations, as the code set out good practice around running public consultations. The code was abolished last July and replaced with a set of consultation principles which is owned by the Cabinet Office.<sup>1</sup>

- 2.4 The principles are aimed more widely than public consultation and instead look more broadly at issues of appropriate stakeholder engagement. However, the key principles relevant to our approach to formal public consultation are that:

- consultations must be proportionate to the potential impact of the proposal or decision;
- engagement with stakeholders should begin early on in the development process and should use different models of engagement as appropriate;
- timeframes for consultations should be proportionate and realistic; and
- consultations should have clear objectives and be accessible and easy to understand.

- 2.5 Drawing on the Cabinet Office principles, the following principles will underpin our approach to consultations:

- we will consult when we are developing standards, guidance or in other situations as appropriate;
- we will continue to consult for twelve weeks unless absolutely necessary;
- we will use new systems, such as survey monkey, to make it easier for stakeholders to respond to consultations; and

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<sup>1</sup> <http://www.cabinetoffice.gov.uk/sites/default/files/resources/Consultation-Principles.pdf>

- we will continue to highlight consultations through press and news releases and other resources.

### **3. On-going and periodic review**

- 3.1 On-going and periodic review ensures that the standards continue to be fit for purpose and that stakeholders understand their content.
- 3.2 On-going review should focus on ensuring that the standards continue to be fit for purpose. 'On-going review' is the 'day-to-day' reviewing of the standards by the Council, its Committees and the Executive. This will ensure that the standards do not limit effective ways of working for registrants and education providers.
- 3.3 A periodic review should be more thorough and comprehensive. The purpose of periodic review is to:
- ensure that the standards remain fit for purpose – in making decisions about education programmes and in making fitness to practise decisions, for example;
  - ensure that they are well understood by our stakeholders including registrants, service users, education providers and the public; and
  - ensure that they take account of change including changes in practice, legislation, technology, guidelines and wider society.
- 3.4 The following principles underpin our approach to periodic review of the standards:
- periodic reviews should take place no more than once every five years<sup>2</sup>, unless it is considered necessary to bring forward the review;
  - ideally, there should be no more than one periodic review in any financial year to manage the resource implications;
  - stakeholders should be engaged early on in the review in the most appropriate way (which could be through a Professional Liaison Group or other appropriate mechanism for engagement);
  - any periodic review should have a clear work plan, setting out the timescales for the work; and
  - feedback on the relevant standards received outside the periodic review process should be recorded for consideration during the next review.

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<sup>2</sup> This five year period will normally be from the date of the republication of the standards following the last review.

#### 4. Timetable for periodic review of standards

The following timetable sets out an indicative plan of work for reviewing the standards, subject to the commitments set out in the workplan.

<b>Standards</b>	<b>Date of last publication</b>	<b>Date of next periodic review</b>
Standards of proficiency	2007	2010-2011 (ongoing)
Standards of conduct, performance and ethics	2008	2012-2013 (work to review the SCPE has begun)
Standards for continuing professional development	2006	2013-2014
Standards of education and training	2009	2014-2015 (scoping in 2013-2014)