

Council, 22 March 2016

Outcomes of the consultation on revised draft Guidance on conduct and ethics for students

Executive summary and recommendations

Introduction

We published revised standards of conduct, performance and ethics for registrants in January 2016. These standards apply to both registrants and those applying to be registered with us. As a result of changes to these standards, we have amended our Guidance on conduct and ethics for students (the guidance) to ensure that it continues to be fit for purpose, up-to-date and well understood by students, education providers, practice placement providers and others.

We have written this guidance in order to make students more familiar with how the standards of conduct, performance and ethics apply to them whilst studying on their approved programme. We publicly consulted on the revised draft guidance between 19 October 2015 and 29 January 2016. Prior to the consultation we undertook a number of engagement activities in order to gather feedback on the draft guidance from students.

Overall there was strong support among respondents for the revised draft guidance. The attached consultation response analysis document and revised draft guidance (appendix one) was considered and recommended to Council by the Education and Training Committee at its meeting in March 2016. We have made some minor amendments to the consultation response analysis document post the Education and Training Committee's meeting. These include a commitment to reaffirming the status of the guidance in the final published version's introduction and clarifying why we do not consider it appropriate to include specific examples or case studies within the guidance document itself.

The consultation response analysis document and revised draft guidance (appendix one) is attached for the Council's consideration and approval for publication.

Decision

The Council is invited to:

- discuss the attached paper;
- agree the revised draft Guidance on conduct and ethics for students as set out in appendix one (subject to minor editing amendments and formal legal scrutiny); and

- agree the text of the consultation response analysis document (subject to minor editing amendments and formal legal scrutiny).

Background information

- Paper for Education and Training Committee, 10 September 2015, (enclosure 4 at www.hcpc-uk.org/aboutus/committees/educationandtraining/index.asp?id=767)
- Paper agreed by Council, 14-15 October 2015, (enclosure 3 at www.hcpc-uk.org/aboutus/council/councilmeetings/index.asp?id=720)
- Paper for Education and Training Committee, 3 March 2016, (enclosure 7 at www.hcpc-uk.co.uk/aboutus/committees/educationandtraining/index.asp?id=735)

Resource implications

Resource implications for the review and publication of the revised Guidance on conduct and ethics for students have been taken into account in planning for the financial year 2016-17.

Financial implications

Financial implications for the review and publication of the revised Guidance on conduct and ethics for students have been taken into account in planning for the financial year 2016-17.

Appendices

- Appendix one: Revised draft Guidance on conduct and ethics for students

Date of paper

10 March 2016

Consultation on revised draft Guidance on conduct and ethics for students

Analysis of responses to the consultation and our decisions as a result.

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1. Introduction

About the consultation

- 1.1 We consulted between 19 October 2015 and 29 January 2016 on revised draft Guidance on conduct and ethics for students (the guidance).
- 1.2 We informed a range of stakeholders about the consultation including professional bodies, employers and education and training providers, advertised the consultation on our website and issued a press release.
- 1.3 We also carried out a number of engagement activities with students both prior to and during the consultation in order to get feedback on the draft guidance and how we might improve it. This involved conducting a session with students at a professional conference and organising a dedicated student event at a university. We have incorporated this feedback into this document.
- 1.4 We would like to thank all those who took the time to respond to the consultation document. You can download the consultation document and a copy of this responses document from our website: **[Insert URL]**.

About us

- 1.5 We are a regulator and were set up to protect the public. To do this, we keep a Register of health and care professionals who meet our standards for their professional skills and behaviour. Individuals on our register are called 'registrants'.
- 1.6 We currently regulate 16 health and care professions:
 - Arts therapists
 - Biomedical scientists
 - Chiropodists / podiatrists
 - Clinical scientists
 - Dietitians
 - Hearing aid dispensers
 - Occupational therapists
 - Operating department practitioners
 - Orthoptists
 - Paramedics
 - Physiotherapists
 - Practitioner psychologists
 - Prosthetists / orthotists
 - Radiographers
 - Social workers in England
 - Speech and language therapists

About the guidance on conduct and ethics for students

- 1.7 We recently published revised standards of conduct, performance and ethics (the standards). These standards are the high level ethical standards we set for all the professionals we register. They describe what behaviour we expect of our registrants and provide a framework to guide registrants in making ethical decisions.
- 1.8 The standards apply to both registrants and applicants for registration. Students on approved education and training programmes will learn about these standards and the behaviour that we expect of them as professionals.
- 1.9 We have written the Guidance on conduct and ethics for students (the guidance) in order to make students more familiar with how these standards apply to them whilst studying on their approved programme.
- 1.10 As a result of changes to the standards of conduct, performance and ethics, we have amended our guidance document to ensure that it continues to be fit for purpose, up-to-date and well understood by students, education providers, practice placement educators and others.
- 1.11. The ten generic headings or expectations used in the revised guidance have been taken from our revised standards of conduct, performance and ethics with bullet points provided under each heading to give guidance on how the particular expectation relates to students.
- 1.12 Once it has been published, students should follow the revised Guidance on conduct and ethics for students in conjunction with the policies and procedures set by their education provider and / or practice placement provider.
- 1.13 We intend that the revised guidance will be published and in place for the start of the academic year 2016/17.

About this document

- 1.14 This document summarises the responses we received to the consultation and sets out our decisions as a result.
- 1.15 It is divided into the following sections.
 - **Section two** explains how we handled and analysed the responses we received, providing some overall statistics from the responses.
 - **Section three** provides an executive summary of responses received for the consultation.
 - **Section four** adopts a thematic approach and outlines the general comments we received on the revised draft guidance.

- **Section five** outlines our response to the comments received and any changes we are making as a result.
- **Section six** lists the organisations which responded to the consultation.

1.16 In this document, 'you' or 'your' is a reference to respondents to the consultation, 'we', 'us' and 'our' are references to the HCPC.

2. Analysing your responses

- 2.1 Now that the consultation has ended, we have analysed all the responses we received.

Method of recording and analysis

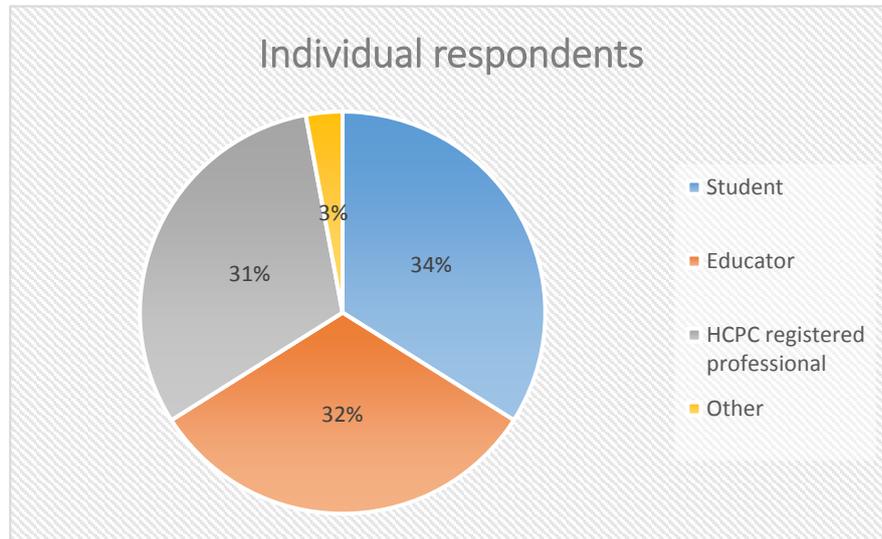
- 2.2 The majority of respondents used our online survey tool to respond to the consultation. They self-selected whether their response was an individual or an organisational response, and, where answered, selected their response to each question (e.g. yes; no; partly; don't know). Respondents were also able to provide additional comments in their response. Where we received responses by email or by letter, we recorded each response in a similar manner.
- 2.3 When deciding what information to include in this document, we assessed the frequency of the comments made and identified themes. This document summarises the common themes across all responses, and indicates the frequency of arguments and comments made by respondents.

Statistical analysis

- 2.4 We received 151 responses to the consultation document. 103 responses (68%) were made by individuals, of which 32 (31%) were HCPC registered professionals, 33 (32%) were educators and 35 (34%) were students. 48 responses (32%) were made on behalf of organisations. 10 (21%) of these were professional bodies, 23 (48%) were education providers, and 5 (10%) were public bodies.
- 2.5 The breakdown of respondents and responses we received to each question are shown in the graphs and tables that follow.

Graph 1 – Breakdown of individual respondents

Respondents were asked to select the category that best described them. The respondents who selected 'other' identified themselves as team managers; and registrants working in combined roles including those working in higher education and / or practising their profession.



Graph 2 – Breakdown of organisational respondents

Respondents were asked to select the category that best described their organisation. Those organisations who selected 'other' identified themselves as trade unions; national representative bodies; professional bodies; and charities.

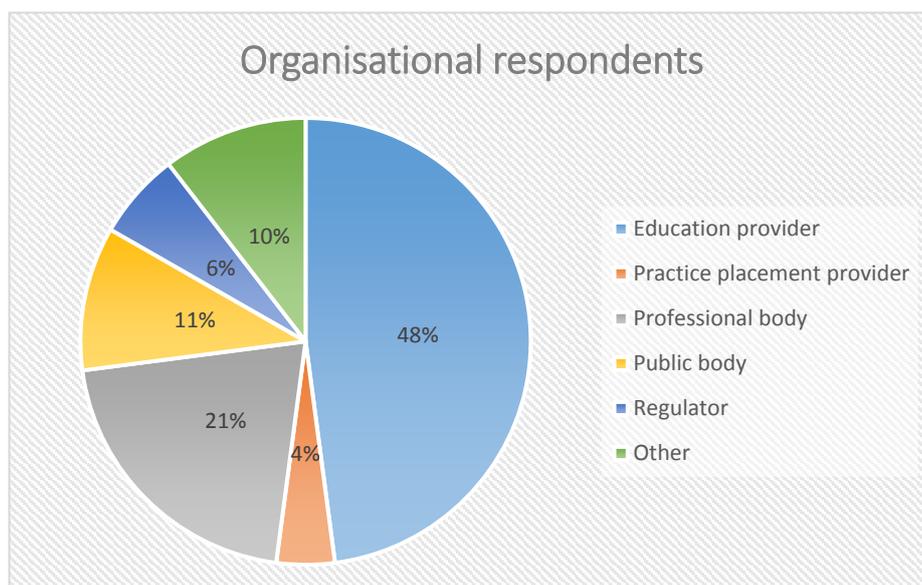


Table 1 – Breakdown of responses to each question

Questions	Yes	No	Partly	Don't know
Question 1: Do you agree with the structure of the guidance? If not, how could we improve it?	130 (87%)	5 (3%)	12 (8%)	2 (1%)
Question 2: Do you think that any additional information or guidance should be included in the Guidance on conduct and ethics for students?	59 (40%)	67 (45%)	15 (10%)	7 (5%)
Question 3: Do you think there are any parts of the guidance which should be reworded or removed?	36 (25%)	89 (62%)	11 (8%)	8 (6%)
Question 4: 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?	97 (69%)	9 (6%)	28 (20%)	7 (5%)
Question 5: Do you have any comments about the language used in the guidance?	43 (30%)	99 (70%)	-	-
Question 6: Do you have any other comments on the guidance?	32 (23%)	110 (77%)	-	-

Table 2 – Breakdown of responses by respondent type

	Individuals				Organisations			
	Yes	No	Partly	Don't Know	Yes	No	Partly	Don't Know
Question 1	91 (89%)	2 (2%)	7 (7%)	2 (2%)	39 (83%)	3 (6%)	5 (11%)	0 (0%)
Question 2	38 (38%)	51 (51%)	7 (7%)	4 (4%)	21 (44%)	16 (33%)	8 (17%)	3 (6%)
Question 3	17 (17%)	71 (72%)	4 (4%)	6 (6%)	19 (41%)	18 (39%)	7 (15%)	2 (4%)
Question 4	68 (69%)	7 (7%)	18 (18%)	5 (5%)	29 (67%)	2 (5%)	10 (23%)	2 (5%)
Question 5	25 (26%)	72 (74%)	-	-	18 (40%)	27 (60%)	-	-
Question 6	14 (14%)	83 (86%)	-	-	18 (40%)	27 (60%)	-	-

- Percentages in the tables above have been rounded to the nearest whole number and therefore may not add to 100 per cent.

3. Summary of responses

- 3.1 The vast majority of respondents expressed support for the draft guidance or qualified this by suggesting some relatively minor additions or amendments. There was slightly more support for the structure of the draft guidance among individual compared with organisational respondents.
- 3.2 Many respondents suggested that the draft guidance marked an improvement on the existing guidance which was first published in 2010. Some respondents were particularly supportive that the draft guidance had closely followed the format of the new published revised standards of conduct, performance and ethics.
- 3.3 However, there was very little agreement among respondents about whether or not additional information or guidance should be included in the draft guidance.
- 3.4 Organisational respondents were slightly more in support of further additions than their individual counterparts. Some frequent suggestions for expanding the scope of the guidance included:
- utilising case studies and providing further examples to aid understanding and comprehension; and
 - providing further guidance and advice to students in a number of areas such as raising, handling and reporting concerns; and managing their learning needs appropriately.
- 3.5 A majority of respondents (62%) did not think that any parts of the guidance should be reworded or removed. Respondents who suggested further amendments focused on relatively few areas including: consent; supervision; the ability to carry out unsupervised tasks; dealing with and responding to feedback; and handling health concerns appropriately.
- 3.6 The delegation of tasks by students was the subject of debate among many respondents. A significant majority of respondents indicated their support for the addition of guidance in this area with no significant differences in support evident between individual and organisational respondents.
- 3.7 However, a number of respondents who although being supportive overall with the addition of guidance on delegation for students also proposed further minor amendments or voiced some caution or concern in this area.
- 3.8 Key issues identified by respondents with regard to delegation included: working with support staff; questioning the ability of students to decide who they should delegate tasks to; and clarifying oversight and accountability arrangements. These issues will be discussed in more detail in section four.
- 3.9 Other issues which generated significant debate and comment among respondents included appropriate use of social media and networking websites and being open when things go wrong among other areas.

4. Responses to consultation questions

4.1 This section contains comments made in response to the questions within the consultation document.

Question 1: Do you agree with the structure of the guidance? If not, how could we improve it?

4.2 The vast majority of respondents (87%) agreed with the structure and layout of the revised draft guidance and did not specify any areas for improvement. These respondents described the guidance as clear, logical, readable and user friendly.

4.3 Some respondents supported the inclusion of expectations on being open when things go wrong and reporting concerns. Other respondents said that while they supported the structure of the guidance they did not consider it to be comprehensive and / or pointed to potential duplication.

4.4 A minority of respondents either did not (3%) or only partly (8%) agreed with the structure of the guidance. These respondents identified or specified a number of areas for improvement. These included:

- reordering some of the generic headings / expectations and accompanying bullet points;
- moving the list of generic headings / expectations further into the guidance;
- limiting the separation of the guidance section from the introduction;
- amending the introduction to refer to students being supported and encouraged to meet the guidance;
- strengthening the reference to students also needing to adhere to local policies and procedures;
- providing a contents page; and
- numbering the generic headings / expectations on the title page.

4.5 The use of bullet points under the generic headings / expectations generated significant comment among some respondents. Some respondents supported the use of bullet points to make the guidance more readable and to aid understanding. Whereas other respondents supported numbering all the expectations for referencing purposes.

4.6 Finally, two other respondents supported a stronger linking in the guidance to the other standards, documents and resources we produce.

Question 2: Do you think that any additional information or guidance should be included in the Guidance on conduct and ethics for students?

4.7 Respondents were divided in their support for including additional information or guidance. For example, a significant minority of respondents (45%) did not think that additional information or guidance was necessary.

- 4.8 There was a significant difference between individual and organisational respondents to this issue with a slight majority of individual respondents (51%) not supporting further additions; however, only a minority of organisational respondents (33%) were in agreement with this.
- 4.9 Those respondents who did not support further information or guidance considered the existing draft to be appropriate, sufficient and specific enough. If further information was required they suggested the inclusion of additional links under the 'other useful documents' section.
- 4.10 However, a significant number of respondents (40%) did not agree with this view. There was greater support among organisational as opposed to individual respondents for additional information or guidance, with (44%) of organisational respondents answering 'yes' to this question compared with only (38%) of individual respondents.
- 4.11 Several respondents sought additional information or guidance on students raising, handling and reporting concerns appropriately whilst on their practice placement. These suggestions included:
- acknowledging the difficult situation a student would be in if they had to raise a concern;
 - ensuring that the needs of service users remained the paramount consideration;
 - expressing their concerns anonymously;
 - requiring effective communication in this area;
 - reporting concerns around wider ethical and conduct related issues;
 - supporting their peers and / or requiring registrants to support students and others in this area; and
 - following up on a reported concern which has not been acted upon.
- 4.12 A few respondents sought additional information or guidance for students managing their learning needs appropriately. Some areas for further consideration included:
- minimising the impact on staff and service users when a student needs additional help or support; and
 - disclosing their learning needs or difficulties.
- 4.13 A few respondents sought additional information or guidance for students on the purpose of this guidance and the impact of not meeting its expectations. One respondent suggested including additional information or guidance on what a student could do if their education provider behaved in a way which meant that they could not meet these expectations. Whereas another respondent pointed out that the guidance reflects similar requirements for registrants and should provide a level of continuity to moving from a student to a registrant's role.
- 4.14 Several respondents suggested the inclusion of case studies and / or examples as a means of providing further guidance in a number of areas. These included:

- using social media;
- delegating tasks;
- managing risk;
- obtaining consent;
- defining fitness to practise; and
- handling sick leave appropriately.

4.15 Respondents were generally supportive of including an expectation on social media and networking for students, but still supported strengthening and / or refining it further. Some suggested additions included:

- an expectation that students adhere to local policies including Trust policies in this area;
- pointing to the subjective nature of what can be considered 'appropriate' use;
- specifying that students should not write any identifiable information about their practice placement;
- using anonymous social media and networking websites appropriately;
- enabling students to develop appropriate practices in this area for when they become qualified;
- ensuring that a student's use of social media did not damage their professionalism or public trust; and
- applying this expectation to the totality of a student's use of social media and networking.

4.16 Finally, some other respondents identified a number of additional areas where they sought further information or guidance. These included:

- referring to compassionate care and strengthening the promotion of service user and carer wellbeing;
- providing additional profession-specific detail on time management and managing the expectations of service users; and
- providing additional information on research integrity.

Question 3: Do you think there are any parts of the guidance which should be reworded or removed?

4.17 The majority of respondents (62%) did not think that any parts of the guidance needed to be reworded or removed. There was a noticeable discrepancy between individual and organisational responses to this question, with a majority of individual respondents (71%) agreeing that further amendments were not necessary whereas only a minority of organisational respondents (39%) held a similar view.

4.18 A significant minority of respondents (25%) identified parts of the guidance which required rewording or removal.

4.19 Some key areas in the guidance which respondents said required rewording included:

- clarifying and strengthening our expectations on obtaining consent and responsibility for this in a particular setting or context;

- treating everyone equally and not discriminating;
 - working in partnership with service users; and
 - dealing with and responding to feedback.
- 4.20 With regard to ensuring that students are appropriately supervised for any tasks they are asked to carry out, some respondents suggested rewording this expectation to take account of the different types of supervision and possible power imbalances. Whereas other respondents supported its removal due to the difficulties of students meeting it and highlighting registrants' responsibilities in this area.
- 4.21 In relation to students appropriately handling any issues related to their physical or mental health, the views of respondents were mixed. For example, one respondent queried whether performance or judgement was in fact affected by these factors. Whereas another respondent highlighted the importance of a student showing 'insight' in order to meet this expectation.

Question 4: 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?

- 4.22 Overall, the majority of respondents (69%) approved of the addition of guidance on delegation for students which they considered appropriate and clear. However, a minority of respondents did not agree (6%) with this, or only partly agreed with it (20%) or did not know (5%). There was no noticeable discrepancy between organisational and individual responses to this question.
- 4.23 Some of the respondents who approved of this guidance considered it appropriate, clear, easy to understand and relevant. Other benefits identified included the potential for developing a safe and consistent approach for students to develop their delegation skills leading to improved outcomes.
- 4.24 The issue of working with support staff generated a significant number of comments on the wider delegation issue. Views varied from pointing to the need to acknowledge the level of experience of some support staff to questioning whether a student would be able to adequately assess their skills, knowledge and experience.
- 4.25 Two other respondents supported the addition of this guidance as it reflected the work being increasingly undertaken by assistants and identified it as a potential issue on practice placement.
- 4.26 However, some respondents, although being overall supportive of the guidance sought to strengthen it further. For example, a few respondents highlighted the importance of students discussing the delegation of tasks with an appropriate staff member routinely or when a doubt arose. One respondent suggested the guidance should refer to an 'accountable or registered member of staff'.
- 4.27 However, as referred to above a significant minority of respondents did not support the addition of this guidance for students. A few respondents were

particularly concerned with the appropriateness of students formally delegating tasks as opposed to this remaining the preserve of a fully qualified professional or the student's supervisor. For example, one respondent supported students being aware of the principles of delegation but not actually being formally responsible for it, or accountable for its implications, as the student remains supervised themselves. Further clarity was also sought on whether the student would be delegating tasks to other professionals or students.

- 4.28 A key issue identified among responses was the need to provide appropriate oversight of the delegated task and where accountability for this rested, i.e. with the student, their supervisor or both.
- 4.29 Finally, one respondent supported clarifying the difference between referring a service user to a professional (where the student felt that the required care was outside of their particular scope) and delegating a particular task to another member of staff i.e. support worker.
- 4.30 Some other more general concerns voiced by respondents in the area of delegation included:
- arguing that delegation was only applicable to a minority of students and / or was confusing and could be misused;
 - needing to explain the various options for delegation;
 - specifying the scope of delegation for students;
 - pointing to the need for appropriate communication and interpretation of the guidance;
 - failing to consider various restrictions to a student delegating some tasks until they are fully qualified and registered with us (including legislative restrictions);
 - needing to adhere to local policies;
 - defining 'promptly' in this context; and
 - checking and / or following up on the delegated task.
- 4.31 The feedback received as part of the student engagement activities was mixed. The majority of students indicated that this guidance was inappropriate for them. For example, some students sought additional advice for them taking on delegated tasks for developmental purposes.
- 4.32 However, this view was not unanimous with other attendees acknowledging that during the latter stages of their programme this issue does become more relevant.

Question 5: Do you have any comments about the language used in the guidance?

- 4.33 The vast majority of respondents (70%) who answered this question did not have any comments about the language used in the guidance. Organisational respondents were more likely to have further comments compared to their individual counterparts, with a significant minority of organisational

respondents (40%) commenting on this issue whereas far fewer individual respondents (26%) did so.

- 4.34 Those respondents who commented were generally supportive of the language used in the guidance which they considered appropriate, clear, concise and consistent. One respondent who was supportive of the language used, was nonetheless concerned about possible over-simplification, for example, in the areas of consent and delegation.
- 4.35 Other areas highlighted for improvement included:
- specifying the difference between ‘multidisciplinary’ and ‘interdisciplinary’ teams and working with these;
 - substituting ‘should’ with ‘must’;
 - clarifying statements such as ‘take all reasonable steps’;
 - referring to ‘transparency’;
 - referring to ‘practice educator’;
 - broadening the definitions for ‘service user’ and ‘student’;
 - substituting the phrase ‘think about’ with ‘reflect’;
 - referring to the importance of ‘values’ and ‘attributes’;
 - making the guidance more accessible to a lay readership;
 - replacing the term ‘professional’ with ‘practitioner in a regulated profession’; and
 - differentiating further between our requirements for registrants and our expectations for students.

Question 6: Do you have any other comments on the guidance?

- 4.36 Several respondents indicated that they had other comments to make regarding the draft guidance. To avoid duplication, some of those comments have not been included here if the same issue has already been addressed elsewhere in this document.
- 4.37 Some of these respondents highlighted a number of areas for improvement in the draft guidance. These included:
- referring to professional bodies’ codes of ethics;
 - using trainee professional titles;
 - referring to additional frameworks and legislation including the NHS Constitution, Mental Capacity Act 2005, Human Rights Act, Data Protection Act, and code of conduct for healthcare support workers;
 - referring to indemnity arrangements for students;
 - providing a more explicit reference to the duty of candour and its implications;
 - using service users’ personal data and their rights in this area;
 - handling safeguarding issues and / or recognising a possible tension with data protection in this area;
 - cross-referencing our guidance to that produced by other regulators; and
 - referring to the value of teamwork, and its interaction and cooperation across various professions and occupations and more particularly to

the Centre for the Advancement of Inter-professional Education's work.

- 4.38 One respondent highlighted the importance of selecting suitable candidates to train in our regulated professions and differentiating between fitness to train and fitness to practise.
- 4.39 Finally, a few respondents supported increasing the visibility of this guidance amongst our stakeholders. One respondent suggested that education providers should provide this guidance to all students prior to undertaking their practice placement. Whereas other respondents supported making the guidance more visible on our website or promoting it via our social media channels.

5. Our comments and decisions

5.1 We have considered carefully all the comments we received to the consultation and have used them to revise the draft Guidance on conduct and ethics for students. We are pleased that, overall, the guidance was very well received by respondents.

5.2 The following explains our decisions in some key areas.

Delegation

5.3 We recognise that the issue of delegation remains a potentially contested area including some unease among respondents about the ability or suitability for students to delegate tasks, as they remain supervised themselves throughout their programme and are not practising as autonomous professionals in this context.

5.4 However, the majority of respondents did support the inclusion of additional guidance on delegation. Some respondents caveated their support or remained concerned about some key issues including working with support staff; and accountability and oversight arrangements.

5.5 We consider that the issue of delegation will be more relevant to some students than others particularly those that are reaching the end of their programme. These students will have developed their skills and knowledge over an extended period which may enable them to delegate certain tasks under certain conditions. We also recognise that there are some restrictions (including legislative restrictions) to students carrying out particular activities until they have completed their programme and successfully registered with us. Therefore the guidance now refers to students being aware of any restrictions in this area and adhering to relevant policies under generic expectation three.

5.6 We have strengthened the delegation expectations for students to ensure that it is clear that education providers or practice placement providers support a student's decision-making in this area. We will also include a specific section in the introduction to the guidance on the issue of delegation which would include specifying that a registrant remains ultimately responsible for tasks which have been delegated by a student under their supervision. This would reflect the supervision requirement for registrants in the revised standards of conduct, performance and ethics (standard 4.2).

Social media

5.7 The vast majority of respondents supported the inclusion of a specific expectation for students on the appropriate use of social media and networking websites. Whilst we acknowledge that there was significant support for being more prescriptive in this area, we consider that the above expectation adequately addresses this point. We also believe that our guidance in this area should be used in conjunction with the policies and

procedures produced by education providers and practice placement providers.

- 5.8 We will also be producing separate social media guidance for registrants during 2016-17 which students may also find useful in this context.

Structure, formatting and language

- 5.9 We recognise that the use of bullet points as opposed to numbered statements under the ten generic headings/expectations generated significant debate among respondents. However, it is important to note the status of this document as a guidance document rather than statutory standards. Therefore we consider it more appropriate to use bullet points instead of numbering in this instance with the existing guidance also following this format. We will also further highlight the status of this document in the introduction section.
- 5.10 We recognise that respondents made a number of suggestions for improving the introductory section of the guidance. Therefore we will amend the introductory sections to state that education providers and practice placement providers should support students in meeting this guidance. We will also review the 'other useful documents' section to ensure that students can find further information, where they require it, on a variety of issues.
- 5.11 In relation to language, we recognise that many respondents supported strengthening the language used in the guidance including a substitution of 'should' with 'must'. However, given the status of this document, as guidance rather than standards (as outlined above), we consider that 'should' is more appropriate in this instance. We will also work to ensure that the guidance is as accessible as possible for a lay readership including ensuring that the Plain English Campaign review it prior to publication.
- 5.12 We recognise that a number of respondents supported the inclusion of specific case studies or examples in the guidance to aid understanding and comprehension. We consider it important to keep the guidance as succinct as possible. Furthermore the format of the guidance does not lend itself to the inclusion of case studies or examples. However, we will consider if we should develop specific examples or case studies for our website once the revised guidance is published. We have previously undertaken similar work as part of the publication of our revised Health, disability and becoming a health and care professional guidance.
- 5.13 Finally, we will investigate how we can make the guidance more visible to students and our other stakeholders including promoting it via our social media channels.

Being open when things go wrong and reporting concerns

- 5.14 We recognise that a number of respondents suggested strengthening our expectations for students in both these areas. However, we consider that the existing guidance places appropriate expectations for students in this area.

5.15 For example, we consider that registrants would be better placed to follow up and aid others in reporting and escalating concerns, where necessary. We also believe that it is necessary to recognise the potential power imbalance between a student and registrant. Therefore we do not consider it appropriate to place additional expectations on students supporting others – including qualified professionals – to raise concerns.

Other changes

5.16 We have made a small number of other changes in light of the responses to the consultation. In considering what changes to make, we have been mindful of the role and purpose of the guidance which is to provide high level guidance to students on a number of issues which may affect them as they complete their programme including the different settings where they undertake their practice placements.

- We have strengthened the expectations for students to manage their learning needs or any resultant difficulties appropriately including when to consider disclosing these.
- We have clarified that students should recognise that opportunities for carrying out any unsupervised tasks will vary whilst they complete their programme and should be handled appropriately.
- We have amended the expectation for students to be more proactive in both seeking and following up on feedback.
- We have strengthened the expectation for students to seek support if their performance or judgement is affected by their health.
- We recognise that students may need to seek the advice of a doctor, occupational health professional or other professional to manage changes in their health.
- We have clarified the timelines for students meeting a number of the expectations by including a reference to ‘promptly’ or ‘as soon as possible’.
- We have included a specific expectation for students to understand and adhere to any relevant record keeping policies.
- Finally we have made a number of other relatively minor changes to the draft guidance including for consistency and clarity purposes.

6. List of respondents

Below is a list of all the organisations that responded to the consultation.

Allied Health Professions (AHP) Directors Scotland Group
Aneurin Bevan University Health Board
Association for Clinical Biochemistry and Laboratory Medicine & Federation of Clinical Scientists
British Chiropody and Podiatry Association
Chartered Society of Physiotherapy (CSP)
Chartered Society of Physiotherapy (Students)
College of Occupational Therapists
Council of Deans of Health
Cumbria Partnership NHS Foundation Trust
Educational Institute of Scotland
Glasgow Caledonian University (DPsych Counselling Psychology Programme)
Heads of University Centres of Biomedical Sciences (National Executive Committee)
Health Education England
Institute of Biomedical Science
Leeds Beckett University
Middlesex University (New School of Psychotherapy and Counselling)
National Association of Professional Ambulance Services
Newcastle University
NHS Education for Scotland
Open University
Professional Standards Authority for Health and Social Care (PSA)
Royal College of Speech and Language Therapists (University College London response)
Scottish Government
Society and College of Radiographers
Society of Chiropractors and Podiatrists and the College of Podiatry
Staffordshire University (Biology and Biomedical Sciences Academic Group)
Staffordshire University (Professional Practice for Biomedical Scientists' students)
St. George's, University of London
Tavistock and Portman Mental Health Trust
Unite the Union (Health Sector)
University Campus Suffolk
University College London
University of Brighton (School of Podiatry)
University of Cumbria
University of Derby
University of Glasgow (Institute of Health and Wellbeing)
University of Hertfordshire (on behalf of the allied health professions)
University of Hull
University of Manchester
University of Salford (Diagnostic Radiography Department)
University of West London

Appendix 1: Draft Guidance on conduct and ethics for students

New expectations and amendments to guidance are shown in **bold**. Deletions are shown in ~~strikethrough~~. The guidance in this section is subject to legal scrutiny and may be subject to minor editing amendments prior to publication.

No.	Expectation
1	Promote and safeguard protect the interests of service users and carers
	<ul style="list-style-type: none"> – You should treat service users and carers as individuals, respecting their privacy and dignity.
	<ul style="list-style-type: none"> – You should make sure that you have the consent of service users or other appropriate authority before you provide care, treatment or other services.
	<ul style="list-style-type: none"> – You should follow your education provider’s or practice placement provider’s policy on consent.
	<ul style="list-style-type: none"> – You should make sure that before you provide any care, treatment or other services, the service user is aware that you are a student.
	<ul style="list-style-type: none"> – You should respect a person’s right to have their care, treatment or other services carried out by a professional and not a student.
	<ul style="list-style-type: none"> – You should treat everyone equally and not discriminate against anyone because of your personal views.
	<ul style="list-style-type: none"> – You should keep relationships with service users and carers professional.
2	Communicate appropriately and effectively
	<ul style="list-style-type: none"> – You should be polite and considerate to service users, other students, and staff at your education provider and practice placement provider.
	<ul style="list-style-type: none"> – You should listen to service users and carers and take account of their needs and wishes when carrying out any care, treatment or other services.

	<ul style="list-style-type: none"> – You should take all reasonable steps to make sure that you can communicate appropriately and effectively with service users and carers.
	<ul style="list-style-type: none"> – You should communicate effectively and cooperate with members of staff at your education provider and practice placement provider to benefit service users and carers.
	<ul style="list-style-type: none"> – If you are experiencing any difficulties or other issues which may impact on your learning or ability to successfully complete your programme, you should tell your education provider and practice placement provider.
	<ul style="list-style-type: none"> – You should use all forms of communication appropriately and responsibly, including social media and networking websites.
3	Work within the limits of your knowledge and skills
	<ul style="list-style-type: none"> – You should make sure that you are appropriately supervised for any task that you are asked to carry out.
	<ul style="list-style-type: none"> – 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.
	<ul style="list-style-type: none"> – You should ask for help when you need it.
	<ul style="list-style-type: none"> – You should be aware of any restrictions in carrying out certain tasks and follow any relevant policies produced by your education provider or practice placement provider.
	<ul style="list-style-type: none"> – You should make sure that before you carry out any care, treatment or other services, the service user is aware that you are a student.
	<ul style="list-style-type: none"> – You should recognise that opportunities for carrying out any unsupervised tasks will vary during your programme depending upon your knowledge, understanding, skills and experience.
	<ul style="list-style-type: none"> – 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.
	<ul style="list-style-type: none"> – You should take responsibility for your own learning.

	<ul style="list-style-type: none"> – You should be aware of and follow any guidance issued by your education provider or practice placement provider for working with service users and carers. – You should seek, listen to, think about; and respond positively proactively to feedback you are given.
4	Delegate tasks appropriately
	<ul style="list-style-type: none"> – You should recognise that the opportunities for delegation will vary during your programme depending upon your knowledge, understanding, skills and experience.
	<ul style="list-style-type: none"> – You should discuss the delegation of tasks with an appropriate member of staff at your education provider or practice placement provider prior to taking any action.
	<ul style="list-style-type: none"> – You should follow local policies or guidelines on delegation and working with others produced by your education provider or practice placement provider.
	<ul style="list-style-type: none"> – If you give tasks to another person to carry out on your behalf, you should ensure that they have the knowledge, skills and experience to carry out the tasks safely and effectively and that the education provider or practice placement provider supports your decision-making in this area.
	<ul style="list-style-type: none"> – If you give tasks to another person to carry out on your behalf, you should ensure that they have the appropriate information to carry out the tasks safely and effectively.
	<ul style="list-style-type: none"> – You should explain to service users and carers when you have asked another person to provide care, treatment or other services.
5	Respect confidentiality
	<ul style="list-style-type: none"> – You should keep information about service users and carers confidential, and only use it for the purpose for which it was given.

	<ul style="list-style-type: none"> – You should not knowingly give any personal or confidential information to anyone who is not entitled to access it.
	<ul style="list-style-type: none"> – You should follow local policies or guidelines on confidentiality produced by your education provider or practice placement provider.
	<ul style="list-style-type: none"> – You should remove anything that could be used to identify a service user or carer from information which you use in your assessments or other academic work related to your programme.
	<ul style="list-style-type: none"> – If any confidential information raises concerns about the safety or wellbeing of someone, you should discuss this with an appropriate member of staff at your education provider or practice placement provider promptly.
6	Manage risk
	<ul style="list-style-type: none"> – You should make sure that you take all appropriate steps to limit the risk of harm to service users, carers and others.
	<ul style="list-style-type: none"> – You should not do anything that you think will put someone in danger or at unacceptable risk.
	<ul style="list-style-type: none"> – You should follow your education provider’s or practice placement provider’s policy on managing risk.
	<ul style="list-style-type: none"> – You should be aware that you may put your service users or yourself at risk if your performance or judgement is affected by your physical or mental health.
	<ul style="list-style-type: none"> – You should seek appropriate support and 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.
	<ul style="list-style-type: none"> – You should seek advice from a doctor, or an occupational health or other appropriate health professional if you are worried about your physical or mental health.

7	Report concerns about safety
	<ul style="list-style-type: none"> – If you are worried about the safety or wellbeing of service users, or carers or others, you should speak to an appropriate member of staff at your education provider or practice placement provider promptly.
	<ul style="list-style-type: none"> – You should put the safety and wellbeing of service users before any personal concerns, for example, about assessments, marks, other work related to your programme, employment prospects or other personal gain.
8	Be open when things go wrong
	<ul style="list-style-type: none"> – You should tell an appropriate member of staff at your education provider or practice placement provider if something has gone wrong in any care, treatment or other services you have carried out involving a service user.
	<ul style="list-style-type: none"> – You should co-operate with members of staff at your education provider and practice placement provider to learn from when something has gone wrong in the care, treatment or other services you have carried out involving a service user.
	<ul style="list-style-type: none"> – You should tell an appropriate member of staff at your education provider or practice placement provider if a service user or carer wants to raise concerns about the care, treatment or other services they have received.
9	Be honest and trustworthy
	<ul style="list-style-type: none"> – You should make sure that your conduct and behaviour does not damage public trust and confidence in your profession.
	<ul style="list-style-type: none"> – You should be aware that conduct outside of your programme may affect whether or not you are allowed to complete your programme or register with us.
	<ul style="list-style-type: none"> – You should not claim that you have knowledge, skills, qualifications and experience which you do not.
	<ul style="list-style-type: none"> – You should be honest about your role with service users, carers and others.

	– You should make sure that your personal appearance is appropriate for your practice placement environment.
	– You should follow your education provider’s or practice placement provider’s policy on attendance.
	– You should follow your education provider’s policies on ethics when carrying out research.
	– You should make sure that all attendance, achievement and assessment records are completed accurately and truthfully.
	– You should reference other people’s work appropriately and not pass it off as your own.
	– You should provide constructive feedback on the quality of your teaching and learning experience in both the education and practice practice placement setting.
	– You should provide, as soon as possible , any important information about your conduct, competence or health to your education provider and practice placement provider.
	– You should tell your education provider, as soon as possible , if you are cautioned for, or convicted of, any offence.
	– You should co-operate with any investigation into your conduct or competence.
10	Keep records of your work with service users and carers
	– You should make sure that the records you keep are accurate and clear.
	– You should help to protect records from being lost, damaged, or accessed by someone without permission.
	– You should follow your education provider’s or practice placement provider’s policy on record keeping.