

Education and Training Committee 27 September 2007

Amendments to the Standards of proficiency for chiropodists and podiatrists: consultation

Executive Summary and Recommendations

Introduction

At its meeting on 28 March 2007 the Education and Training Committee made a recommendation that a consultation should be held on whether the standards of proficiency for chiropodists and podiatrists which relate to prescription only medicines and local anaesthetics entitlements should cease to be optional. An extract of this paper is appended.

This recommendation was ratified by the Council on 31 May 2007. The Council were further advised that the Committee would agree a document outlining the issues for consultation. A consultation would then be held between November 2007 and January 2008.

A consultation document is attached which outlines the issues in this area and seeks the views of the Council's stakeholders.

Decision

The Committee is invited to agree the text of the attached consultation document.

Background information

The paper considered by the Council on 31 May 2007 can be found here:
http://www.hpc-uk.org/assets/documents/10001AF8council_meeting_20070531_enclosure06.pdf

Resource implications

- Mail out to appropriate stakeholders on consultation list
- Writing-up consultation responses

Financial implications

- Mail out to appropriate stakeholders on consultation list

These implications are accounted for in the Policy and Standards budget for 2007/08.

Appendices

Appendix 1: Extract from paper considered by the Education and Training Committee on 28 March 2007/ Council on 31 May 2007.

Date of paper

17th September 2007

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2007-09-07	a	POL	PPR	Amendments to the CH/POD standards of proficiency - 27.09.2007	Final DD: None	Public RD: None

Consultation on amendments to the standards of proficiency for chiropodists and podiatrists

Introduction

We are consulting on proposals that the standards of proficiency for chiropodists and podiatrists relating to prescription only medicines and local anaesthetics should cease to be optional.

The Prescription Only Medicines (Human Use) Order 1997 is a piece of legislation under the Medicines Act 1968 which establishes classes of medicines and specifies appropriate practitioners for sale, administration and supply.

Chiropodists and podiatrists who are appropriately qualified and who have their names annotated on our Register are able to administer certain local anaesthetics and supply certain prescription only medicines.

Standards of proficiency

The standards of proficiency are threshold competence standards for safe and effective practice of each of the professions we regulate. Their primary role is as standards for entry to the Register – they describe the minimum skills and knowledge that it is necessary to possess in order to become registered.

We visit education providers to ensure that they meet our standards of education and training, including ensuring that programmes allow their students to meet the standards of proficiency. Once a programme is approved, someone successfully completing that programme is eligible for registration.

There are two standards which relate to the local anaesthetics and prescription only medicines entitlements:

- administer relevant prescription only medicines, interpret any relevant pharmacological history and recognise potential consequences for patient treatment. This standard applies to registrants who wish to be certified as competent under the Medicines Act 1968 by the HPC (Standard 2b.4).
- apply local anaesthesia techniques. This standard applies only to registrants who wish to be certified as competent under the Medicines Act 1968 by the HPC (Standard 2b.4).

The existing standards are currently optional. This means that someone applying to us under the international route can be registered even if they do not possess the necessary qualifications or experience in these areas. It also means that it is possible we could approve a pre-registration UK education and training programme which did not include these components.

Background and rationale

During the recent review of the standards of proficiency, the issue of the optional status of these standards was raised. In particular, it was argued that as grandparenting has now closed for chiropodists and podiatrists, and because all pre-registration education programmes now include both the local anaesthetic and prescription only medicines entitlements, it was no longer necessary for the standards to be optional. It was argued that these components were now an essential part of safe and effective practice.

Our Education and Training Committee and Council recently discussed the issue of approval of courses in local anaesthetics and prescription only medicines. We decided that as local anaesthetics and prescription only medicines are now an integral part of the practise of chiropody and podiatry, and all pre-registration programmes include these subjects as standard, it would be appropriate at this stage to seek the views of stakeholders on proposals that the standards should cease to be optional.

Existing registrants

A small but significant number of chiropodists and podiatrists are registered without either the prescription only medicines or local anaesthetics entitlements. This is because they become registered prior to these entitlements becoming a standard part of pre-registration education and training, because they registered under the grandparenting route to registration which closed on 9th July 2005, or they registered via the international route.

If the standards were to cease being optional, this group of registrants would be unaffected. All registrants are required to meet those standards which apply to their scope of practice.

We approve a small number of courses which allow registrants who do not have these entitlements to gain them.

International applicants

Applications from chiropody and podiatry applicants who have qualified outside of the UK are assessed by two registration assessors from their profession against the standards of proficiency. The assessors make a recommendation about whether the applicant has met the standards, including whether they should be registered with both entitlements, one of them or neither.

From July 2003 to March 2007, 165 applicants were Registered as chiropodists and podiatrists via the international route:

- 14 were registered with both entitlements
- 112 were registered with the local anaesthetics entitlement only
- No applicants were registered with the prescription only medicines entitlement only
- 39 applicants were registered without either entitlements

The consequence of removing the 'optional' part of the standards would be that only international applicants who met both of the standards could be registered.

UK approved programmes

If the standards' optional status was removed, this would also mean that we could only approve pre-registration education and training programmes which included both entitlements.

All currently approved pre-registration chiropody and podiatry programmes include both entitlements.

Your comments

We would welcome your views about the proposed changes.

This consultation will put our proposals before a wide range of stakeholders including professional bodies, higher education institutions and others with an interest in our work. The consultation will run for three months until xx/xx/xxxx.

If you would like to respond to this consultation, please send this response to:

Standard of proficiency consultation – Chiropodists and Podiatrists
Policy and Standards department
Health Professions Council
Park House
184 Kennington Park Road
London
SE11 4BU

Email: consultation@hpc-uk.org

Website: www.hpc-uk.org/aboutus/consultations

At the end of the consultation period, we will produce a document summarising the responses we receive. Where a response is received from an organisation it will be attributed; where a response is received from an individual it will not. If you were prefer your response not be made public, please indicate this when you response.

We look forward to received your comments

Yours sincerely

Eileen Thornton
Chair of the Education and Training Committee

Appendix 1: Extract from Education and Training Committee paper – 28 March 2007

Introduction

In addition to entitlements for local anaesthetics and prescription only medicines, the Council currently approves post-registration programmes in supplementary prescribing and annotates the Register to indicate where the entitlement is held. The professions who are able to undertake supplementary prescribing are chiropodists and podiatrists, physiotherapists and radiographers.

Standards of proficiency

Standard of education and training 4.1 says that:

“The learning outcomes must ensure that those who successfully complete the programmes meet the standards of proficiency for their part of the Register.”

- Local Anaesthetics and prescription only medicines

There are two standards in the existing standards of proficiency for chiropodists and podiatrists that relate to prescription only medicines and local anaesthetic entitlements. They are:

- *administer relevant prescription only medicines, interpret any relevant pharmacological history and recognise potential consequences for patient treatment. This standard applies to registrants who wish to be certified as competent under the Medicines Act 1968 by the HPC (Standard 2b.4).*
- *apply local anaesthesia techniques. This standard applies only to registrants who wish to be certified as competent under the Medicines Act 1968 by the HPC (Standard 2b.4).*

The optional status reflects that a significant minority of registrants will have trained prior to LA and POM becoming a standard part of pre-registration education and training. It also reflects that applicants applying to the Council under the grandparenting arrangements which ended in July 2005 would not have been able to meet these standards.

During the recent review of the standards of proficiency, the Society of Chiropodists and Podiatrists suggested that as local anaesthetics and prescription only medicines are now a standard part of pre-registration education and training it was no longer necessary for these standards to be optional. At that time we sought legal advice which suggested that the standards should continue to remain optional at this time. One particular issue

was how we would be able to deal with applications from applicants who had trained overseas if the standards were no longer optional.

Overseas applicants are assessed by two assessors against the full standards of proficiency for chiropody and podiatry. The annotations for local anaesthetics and prescription only medicines are awarded on recommendation of the assessors following scrutiny of the application. However, for some applicants these areas do not form a standard part of podiatry practice in their home countries and therefore they are not able to meet the standards in these areas.

Since the opening date of the register in 2003 the following international applicants have been registered:

- 112 have been registered with LA only
- 14 have been registered with both entitlements
- 0 applicants have been registered with POM and not LA
- 39 applicants have been registered without either entitlement

The Executive has discussed the issues with the Council's legal advisor who has advised that should the Committee agree that these areas are an integral part of the safe practice of chiropody and podiatry, it would be reasonable to remove the standards' optional status. The consequences of the existing standard and the suggested removal of the optional status is shown below.

The existing situation:

- Applicants via the international route can be registered with both entitlements, with one of the entitlements, or no entitlements, following assessment and recommendation by registration assessors
- All pre-registration chiropody and podiatry programmes include both entitlements. However, as the standards are optional, it is possible that an education provider could approach us to deliver their programme without them.

If the 'optional' part was removed:

- Applicants via the international route would not be registered unless they could demonstrate that they met all of the standards of proficiency, including the standards relating to POM and LA.
- All pre-registration programmes would need to include both entitlements, otherwise they would not meet SET 4.1 and therefore could not be approved.