

Annual review of accreditation 2019/20

UK Public Health Register (UKPHR)

March 2019

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About the UK Public Health Register

The UK Public Health Register (UKPHR) registers:

- Public Health Practitioners
- Public Health Specialists.

Its work includes:

- Setting and maintaining standards of practise and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of February 2019, there were 1003 registrants on UKPHR's register. UKPHR was first accredited on 3 April 2013. This is its fifth annual review and this report covers 3 April 2018 to 3 April 2019.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be initiated by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

Accreditation for UKPHR was renewed for the period of 3 April 2019 to 3 April 2020.

Accreditation was renewed by a Moderator following a review of evidence gathered by the Accreditation team and supplied by UKPHR.

No Conditions were issued.

The following Recommendation was issued to be implemented by the submission of annual renewal documentation:

1. UKPHR should review the impact of the changes made to the assessment process for specialist registration and the revalidation process to ensure that there have been no unintended consequences such as barriers that may discourage applications or continued registration. (See paragraph 10.13)

The following report provides detail supporting the outcome.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There were no significant changes reported or noted in the past year. UKPHR reported an increase in registrant numbers.
- 1.2 The Authority found that this Standard continues to be met.

Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 There were no significant changes reported or noted in the past year.
- 2.2 The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 At last year's annual review, the Authority had concerns that UKPHR's risk matrix had an organisational focus rather than a public protection focus. Following a targeted review, during which UKPHR provided further information about its risk management, the Authority noted that the risk matrix did not provide sufficient details about potential risks to the public from its registrants' practice. The Authority issued the following Condition: UKPHR must update its risk register as planned to address risk posed to the public from the practice of its registrants. This must be provided to the Authority by 1 December 2018.
- 3.2 UKPHR provided a copy of its updated risk matrix to the Authority by the deadline, confirming that it had been approved by its Board at its meeting in November 2018. The updated risk matrix contained risks related to registrant's practice and the Authority confirmed that the Condition had been met in December 2018.
- 3.3 UKPHR confirmed that no changes had been made to its risk matrix since it was submitted to the Authority in December.
- 3.4 The Authority found that this Standard continues to be met.

Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register

- 4.1 There were no significant changes reported or noted in the past. As part of its due diligence, the Accreditation team reviewed records from Companies House and the Charity Commission and noted UKPHR appears to be financially sustainable.
- 4.2 The Authority found that this Standard continues to be met.

Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively

- 5.1 There were no significant changes reported or noted in the past year.
- 5.2 The Authority found that this Standard continues to be met.

Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public

- 6.1 There were no significant changes reported or noted in the past year.
- 6.2 The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 UKPHR reported that the Board has developed a more formal succession plan for both the Board and for members of staff. UKPHR reported that a number of its Directors are coming to the end of their terms of office and that UKPHR will be recruiting at its AGM in September to ensure that its organisational memory and expertise will be preserved. Terms of appointment and re-appointment will be arranged so that there is a move towards one third of the Board members retiring in each year and that there will be a lay majority. UKPHR will also change its Articles of Association limiting Directors to a maximum of three consecutive terms of three years. UKPHR's Board is planning to adopt a succession plan for its whole workforce which will include actions for potential crisis situations. The will be considered by UKPHR's Board at its next meeting.
- 7.2 UKPHR developed a suite of quality assurance (QA) documents covering all aspects of its work with the aim of achieving 'more formal accountability for achievement of aims and delivering the QA standards'. As part of this work, UKPHR has developed a quality management framework, quality standards for each registration route and for UKPHR's administration and a method for measuring its quality outcomes. To ensure ongoing transparency, UKPHR intends to publish relevant information about how it is doing and will 'use all means of communication to promote a quality culture in [its] registration service and contacts with all audiences.'
- 7.3 The Authority noted that the Business plan provided on the website was for 2014 to 2017. UKPHR reported that its Board has approved a new Business Plan for 2019 to 2021 and that its action plan is due to be considered by the Board in the coming months. UKPHR confirmed that the new Business Plan will be published on its website in due course. The Authority will check this as part of its ongoing checks within the year.
- 7.4 UKPHR also reported that it is working on its new website which it expects to go live early in 2019. The Authority will review this as part of its ongoing checks within the year.
- 7.5 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 UKPHR registers [Public Health Practitioners](#) that 'have demonstrated their competence in public health practice'. To apply as a practitioner, applicants are required to apply through a quality assured local assessment scheme by providing a port-folio demonstrating knowledge, understanding and application of the UKPHR practitioner standards. The port-folios are assessed at the local level. A regional verification panel will then make recommendations on eligibility for registration to UKPHR.
- 8.2 UKPHR reported that it had carried out its first review of its operation of the practitioner register in 2018. The Task and Finish Group provided recommendations to UKPHR which were all accepted by the Board. One of the recommendations was for the practitioner registration standards to be amended. The amended standards will be introduced from 1 April 2019. Local schemes have discretion as to when they are introduced between then and 31 December 2019. Practitioners working towards registration using the original standards have been allowed until 31 March 2021 to complete their registration.
- 8.3 UKPHR provided a mapping document to the Authority for review. This document mapped the new standards against the old standards. The Authority noted that there were no changes to the standards UKPHR are requiring their practitioners to meet but that they have been re-written to remove duplication and provide clarity. The new standards reflect the 2016 *UK Public Health Skills and Knowledge Framework* and other changes that have occurred in public health since the standards were first written.
- 8.4 The draft amended standards were consulted on before being finalised. UKPHR reported that the responses to the consultation were very supportive of the changes.
- 8.5 The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 There were no significant changes reported or noted in the past year.
- 9.2 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 Previously there had been two routes to UKPHR's [Specialist Registration](#): the recognition of specialist status (RSS) and the defined specialist route. From 31st August 2019, UKPHR will no longer accept applications via these routes.
- 10.2 UKPHR implemented its updated procedure for assessing Public Health [Specialist registration](#) via its port-folio route in September 2018. There is no change in the standards specialist registrants are required to meet. Registrants are required to demonstrate how they meet the competencies within the [competency framework](#) which aligns to the 2015 *Faculty of Public Health Specialty Training Curriculum*.
- 10.3 UKPHR has changed the assessment of Specialist applications. The assessment is now split into two stages. The first stage, the pre-application

stage, is designed to determine the eligibility and readiness of the applicants to apply. The applicant is required to complete an application form and provide a reference, a 360-degree appraisal, a personal development plan, and a CV. UKPHR will then consider the application, responding to the applicant within six weeks. If UKPHR determines that the applicant is not eligible for this level of registration, it will provide its reasons for the decision. The applicant can appeal the decision. If the applicant has been granted permission to apply, then they must submit their port-folio to demonstrate their compliance with the standards within 18 months of the decision. Each portfolio will be assessed by two assessors and their recommendation submitted to the Registration Panel for a final decision. Where the two assessors do not agree on a recommendation, the assessors must discuss their assessments with the Moderator who will try to help them come to an agreed joint decision. If that is not possible then, both assessments are discussed by the Registration Panel. The final decision is determined by the Panel. UKPHR will notify the applicant of the decision. The applicant can appeal the decision.

- 10.4 UKPHR has produced a range of new documentation including guidance documents, application forms, template letters and FAQs for both parts of the application process. UKPHR reported that it carried out three public consultations at different stages of the development and has offered to provide speakers at information sessions to provide details about the new route.
- 10.5 UKPHR reported that it intends to reconvene the implementation group in 2019 to evaluate the new route and its impact. The first evaluation will take place in September once the route has been open for a year.
- 10.6 UKPHR produced its [Conditions of Registration](#) document which brings together all the terms and conditions that apply to registration in one place.
- 10.7 UKPHR is introducing revalidation for its registrants as a means of 'ensuring that registrants focus on maintaining and enhancing the quality of service they provide and improving their public health practice while registered.' UKPHR has published its policy and guidance on its [website](#). Registrants are required to carry out revalidation every five years, this replaces the five yearly re-registration process. This is an online process which notifies registrants every month in the six months leading up to their revalidation date until all elements of the revalidation have been uploaded. Matters that arise during the process are referred to the Registrar. Once all the items have been successfully completed, UKPHR's staff report the revalidation to the Registration Approvals Committee who decide about revalidation.
- 10.8 UKPHR highlighted two critical elements of the revalidation scheme, the annual professional appraisal and the requirement for a structured reference. The majority of the annual professional appraisal will be carried out by the public health agencies within the four nations free of charge to the registrants. Where an appraiser has any doubt or a query about a registrant because of carrying out the appraisal they will contact the Registrar. UKPHR note that self employed registrants will be unable to access this system and so will need to arrange for professional appraisals to be carried out by an appraiser who has been trained to an acceptable level for example by Public Health England or the Faculty of Public Health.

- 10.9 Registrants who do not complete their revalidation within three months of their revalidation date will be deferred for up to 12 months, this will be noted on the register. If the registrant does not complete the required actions to lift the deferment within 12 months, then the registrant may be removed from the register.
- 10.10 UKPHR's rules state that revalidations that are deemed to be unsatisfactory will be recorded as deferred on the register. In these cases, the Registrar may require the registrant to put right the unsatisfactory elements, invite the registrant to agree a statement of remedial action or a condition of registration or refer the matter to a fitness to practise panel. The outcome of any fitness to practise panel will be published in line with [UKPHR's publication policy](#).
- 10.11 For successful revalidations, a registrant's revalidation is valid for five years subject to the annual review checks.
- 10.12 UKPHR reported that its new revalidation process would apply to specialists from 1 April 2019, but that its introduction for practitioners had been postponed due to the difficulties in sourcing professional appraisals for practitioners. UKPHR confirmed that until the re-validation for practitioners has been implemented, five-year registration requirements remain in place.
- 10.13 The Authority noted the forward thinking of UKPHR and the actions it had taken to maintain and improve its standards. It considered that these were very positive steps and commended them. The Authority considered the potential impact of the addition of another step in the specialist registration assessment and the requirement for a professional appraisal in the revalidation process. The Authority noted that there could be an unforeseen consequence of the arrangements that they might discourage registrants inappropriately or place a barrier. It decided to issue the following recommendation: UKPHR should review the impact of the changes made to the assessment process for specialist registration and the revalidation process to ensure that there have been no unintended consequences such as barriers that may discourage applications or continued registration. (See Recommendation 1)
- 10.14 The Authority found that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 There were no significant changes reported or noted in the past year.
- 11.2 UKPHR have written an *Adjournment Policy*. This details the circumstances under which a fitness to practise and appeals panels can adjourn.
- 11.3 UKPHR reported that it had not received any complaints against its registrants within the accreditation year, however it had received two letters of complaint against an applicant for specialist registration purportedly from the Chief Executives of two authorities in England. UKPHR investigated and found that the letters were not written by the Chief Executives in question. The complaints were found to be unfounded.
- 11.4 UKPHR reported that it had received one complaint about it as an organisation. This complaint was about a decision made by UKPHR to vary the eligibility criteria in relation to verifiers. UKPHR noted that all verifiers must

be senior public health practitioners, until the change verifiers needed three years experience in senior posts. UKPHR changed this to two years experience in senior posts to help local schemes recruit sufficient numbers of verifiers. The complainant had thought that the decision had been made by the Moderators and UKPHR's Board. UKPHR reported that it provided an explanation to the complainant who was satisfied with the outcome.

11.5 The Authority found that this Standard continues to be met.

Share your experience

12.1 The Accreditation team did not receive any responses to the invitation to share experience and did not receive any concerns about UKPHR during the accreditation year.

Impact assessment

13.1 There were no significant changes reported or noted in the past year.

13.2 UKPHR reported that it raised registration fees by 2% following a consultation in 2018/19. UKPHR has not seen an impact on registrant numbers.

13.3 UKPHR noted that the cuts to local government funding in England may have a negative impact on registrant numbers and reported that it will continue to monitor the situation.

13.4 The Authority noted the potential impact to registration following the changes made to the specialist registration and revalidation and issued the recommendation noted above.

13.5 The Authority took account of the impact of its decision.

Equality duty under the Equality Act 2010

14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.