

# Summary of Responses for the Consultation on the recommendations from the education and training review for the Accredited Registers programme

## 1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care<sup>1</sup> promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and registration of people working in health and care. We are an independent body, accountable to the UK Parliament.
- 1.2 We oversee the work of nine statutory bodies that regulate health professionals in the UK and social workers in England. We review the regulators' performance and audit and scrutinise their decisions about whether people on their registers are fit to practise.
- 1.3 We also set standards for organisations holding voluntary registers for people in unregulated health and care occupations and accredit those organisations that meet our standards.
- 1.4 The Accredited Registers programme aims to enhance public protection and promote public confidence in health and social care occupations that are not statutorily regulated.
- 1.5 In order to be accredited, organisations holding these registers must prove that they meet our [Standards for Accredited Registers](#) in areas such as education and training, registration and governance. In addition, the organisation needs to demonstrate its commitment to public protection.
- 1.6 Accreditation provides assurance to the public that the registers are well run and that the organisation requires its registrants to meet high standards of personal behaviour, technical competence and, where relevant, business practice.
- 1.7 We commissioned a review of our approach to assessing Standard 9 (education and training). Following that review, we put a series of recommendations before our Board for consideration. The minutes of the Board meeting where the recommendations were discussed are available on our [website](#).
- 1.8 The Board agreed that the Accredited Registers' education and training standards should be explicit to the public and that the wording of Standard 9 should be changed to make this requirement clearer. We issued a consultation to obtain the views of the public about the proposed changes to Standard 9. The proposed changes can be found at the annex. We proposed to:

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<sup>1</sup> The Professional Standards Authority for Health and Social Care was previously known as the Council for Healthcare Regulatory Excellence

- amend the wording of Standard 9 to make the education and training requirements of an Accredited Register clear to the public
- amend the assessment process to take into account the changes made to Standard 9.

1.9 The consultation ran for two months, from April to end of June 2015. We received 25 responses, 21 of whom completed the whole survey and eight of which were identical. Twenty-three of the respondents also provided additional comments. The respondents were from a number of backgrounds, we received five responses from educational establishments, of which three were related to acupuncture, nine responses from Accredited Registers, one response from a statutory regulator, eight responses from acupuncture practitioners or clinics, one response from a Government department and one response from an advocacy group.

## 2. Summary of Responses

2.1 Below is a summary of the responses received to each question in the consultation paper.

### **Are you in agreement that there should be an additional sub-section 9e added to standard 9?**

- 23 respondents answered this question
- 22 (96%) respondents agreed

#### Summary of the comments

2.2 We received two comments. One of the respondents agreed that the addition of standard 9e was required to protect the public and ensure that the 'public can understand and easily interpret the standards of education and training required for entry to an Accredited Register'.

2.3 One of the respondents did not agree with the addition of standard 9e stating that 'Accredited Registers should continue to be allowed to set and review their own training and education standards' as they are the experts in their field. The respondent agreed that Accredited Registers should explain their training standards clearly to the public but that they should be able to choose their own format for doing this. Conversely, whilst agreeing that organisations should make their education and training standards explicit, another general comment, stated that we should 'prescribe and proscribe the information' provided by Accredited Registers, their members and the training providers.

2.4 The respondent that did not agree also believed that the proposal is excessive due to the lack of 'substantiated evidence to suggest that the risk to the public is decreased' and that the changes required may result in increased financial and personnel costs for Accredited Registers. The potential increase in cost was also raised by another respondent as a general comment.

### **Is the proposed wording of standard 9e clear?**

- 22 respondents answered this question
- 16 (73%) respondents agreed

#### **Summary of comments**

- 2.5 We received 16 comments: 13 discussed acupuncture training standards which raised similar points, eight of which were identical. Twelve of the 13 stated that although the wording is clear it does not go far enough and that where available current professional standards should be used. For example, the World Health Organisation guidelines for acupuncture which sets education standards at degree level or equivalent. The responses stated that not recognising this level 'would have considerable impact on the international credibility of UK standards and might have implications for the protection of the public.' Another response based on acupuncture training standards stated that making the 'educational standards explicit and accessible to the public provides transparency, it does not provide assurance that acupuncture professionals in the UK are educated to this internationally respected standard.'
- 2.6 Other comments included that it is not clear if the Accredited Register would have to provide evidence of all the examples provided in parts a and b and that assessing the quality could be 'daunting'. A final comment stated that if the intention is to identify a minimum level using a recognised UK educational framework then this should be stated and that the last part of the clause 'to make informed decisions' could be clearer.

### **Do you think the decision tree (diagram 1) is a logical and fair process to use in assessing the education standard?**

- 21 respondents answered this question
- 6 (29%) respondents agreed

#### **Summary of responses**

- 2.7 We received 17 comments, 12 provided similar responses, with eight being identical. These related specifically to acupuncture and stated that where independent expertise exists, for example, the British Acupuncture Accreditation Board (BAAB) for acupuncture, then 'it would be prudent to incorporate this explicitly into the process of adjudication.'
- 2.8 Other comments included that the decision tree only assesses the availability of information about unspecified educational standards, rather than the standards themselves. The decision tree was described as being logical and fair but that the organisation's statement of educational standards should also reference the number of clinical hours and, if required, the level of supervision. Other responses included that where there are no regulated qualifications, recognition should be given to organisations which have expertise in course accreditation within the sector and to international standards where they exist.

- 2.9 One respondent stated that although the decision tree would be a useful tool it would benefit from further refinement, for example, we should consider if a website is the only way the information can be communicated. Respondents suggested that the use of an expert to interpret the information provided indicates that it is not clear and transparent and that several points on the decision tree needed further clarification.

**Are there any other comments you would like to us to consider that you have not mentioned above?**

- 2.10 We received 20 comments, 12 argued that National Occupational Standards (NOS) may be seen as being appropriate for acupuncture and that educational experts within BAAB and the British Acupuncture Council (BAcC) believe that these are inadequate. Eight of these comments were identical. They stated that this could result in practitioners losing confidence in the Accredited Register programme.
- 2.11 One comment stated that ‘given the Accredited Registers programme covers different professions and different organisations within the same profession, sub-section 9e gives the scope for the Authority to make a fair assessment.’ However another comment noted that the generic approach would not be enough to maintain standards in some disciplines such as acupuncture.
- 2.12 Two comments raised concerns about the potential for increased costs for the Accredited Register, particularly if independent expert advice is sought.
- 2.13 One comment noted that, it might be better practice to use lay reviewers to assess compliance with Standard 9e. The respondent argued that the Accreditation team, although not education experts, work in a regulatory environment and are therefore more familiar with the terminology used than the general public.
- 2.14 Another respondent which welcomed proposals that organisations should be required to make their education and training standards explicit and accessible to the public so that they can make informed decisions, had some concerns. They stated that unless there is clear evidence of the effectiveness of a therapy, it is difficult to set good practice requirements for education and training. In order for a member of the public to make an informed decision the information provided on an Accredited Register’s website must be accurate and must not mislead and that this should be extended to practitioners and training providers. They noted that the term accessibility refers not only to the information being easy to find but also easy to understand. The respondent stated that in order for this to happen the Authority must ‘prescribe and proscribe the information’ provided by an Accredited Register and that we must verify that the Accredited Register meets Standard 9e and that the register has processes in place to ensure that it is met by its members and the training providers.
- 2.15 A final comment stated that although in theory the addition of Standard 9e seemed like a good idea, they were unable to see how the requirement for sub-section 9e would be implemented, given the large number of training courses they would need to provide information for.

### 3. Our response to consultation comments and final changes

- 3.1 As a result of the consultation we will add Standard 9e to the Accreditation Standards as follows:

*9e) Makes its education and training standards explicit and easily accessible to the public to enable all those using the register to make informed decisions.*

- 3.2 This new Standard will require Accredited Registers to make their education and training standards explicit and accessible to the public. The assessment of this additional Standard will start from April 2016 for both new applicants and existing Accredited Registers submitting their annual review of accreditation. Therefore, existing Accredited Registers submitting annual review forms from April 2016 will be required to include evidence demonstrating compliance with Standard 9e.
- 3.3 One respondent suggested that the term '*to make informed decisions*' was not clear but in the absence of further concerns we are not convinced that it needs to be changed. We considered comments stating that it was not clear whether or not we expected to see all aspects of parts 'a' and 'b' (see Annex below) as evidence of compliance with Standard 9e. In addition, it was noted that assessing the quality of a course as required by part 'b' could be a 'daunting' task. After carefully considering the comments and seeking expert advice we decided that parts 'a' and 'b' will be used to assess Standard 9 overall rather than just 9e. We decided to use these points 'as assessment prompts' for the Accreditation team (see below) rather than a decision tree (proposed in the consultation document). The Accreditation team will use these prompts during their assessments for initial accreditation and for annual reviews. Answers to these questions will be highlighted in the report reviewed by the Accreditation Panel. The Panel will decide whether or not the Standards are met.

#### Assessment prompts for Standard 9 (education and training)

1. Does the organisation make clear the relationship between the education and training standards it requires for entry to its register and its professional standards / National Occupational Standards (NOS) / Codes of Conduct?
2. Is the content of education and training programmes clear? For example, is it expressed in the form of the learning outcomes for the end of the training programme or staged points through the programme, QAA subject benchmark statements or core curriculum?
3. Does the organisation describe the minimum qualification level required for entry to its register using a recognised UK Educational Framework (such as the framework on the [Government's website](#))?
4. If a register accredits or approves education and training courses does the organisation explain how they assess the quality of the courses?
5. If a register does not accredit education and training courses do they explain how they assure themselves about the quality of education and training? Do they explain how they check that patient and client safety is promoted,

- students' development is facilitated and that students are enabled to become fit to practise?
6. Does the organisation's education and training standards fit within the usual range for that or similar occupations? If not, has the organisation provided a reasonable justification?
  7. Are there existing national or international standards for the occupation? Are the organisation's standards in line with these? If not, has the organisation provided an adequate explanation?
  8. Can the public access information about education and training easily and can the public reasonably be expected to understand the information provided?
- 3.4 We noted that some comments recommended that we should set minimum standards or qualification levels for specific occupations. The Authority's Board had already considered this issue and decided that it was not our role to decide what minimum level of education and training is required to join a register for any particular occupation. We do however require that any organisation whose standards differ markedly to provide a reasonable justification for that variation. They must also demonstrate that risks are well controlled and patient and service user outcomes are maintained.
- 3.5 One of the responses queried whether information provided by Accredited Registers, was sufficiently easy to find and understandable to the public. The respondent suggested that the information provided by Accredited Registers should be standardised to enable the public to make comparisons. We agree that in order to make an informed decision, a member of the public needs to not only be able to find the information but also to understand it. However, we do not agree that we should proscribe that information. We carry out an assessment of information - a 'patient journey' - as part of our assessment and will continue to do so. We will invite members of the public to participate in those assessments in future. We will add general information about education and training to our own website to help the public.
- 3.6 We note that some of the consultation responses questioned the need for an educational expert, with one stating that 'if an educational expert is required then the information is not explicit'. We agree and have decided that an education expert will not be routinely used in the assessment of Standard 9. We already reserve the right to seek advice from an expert during our assessment of an Accredited Register for any of the Standards, if we believe it is necessary. It remains open to us therefore to seek advice in relation to Standard 9, on an exceptional basis.
- 3.7 We will also update our published self-assessment tool, Standards and Accreditation Guide to reflect these changes.

# Annex - Education and training standard original consultation on proposed changes

## 1) Re-wording of Standard 9

It is proposed that an additional sub-section (9e) be added to Standard 9 to make it clear that we will expect an Accredited Register to make the education and training standards required for a registrant to be on their register explicit to the public.

The proposed wording for the new Standard 9e is that the organisation:

*Makes its education and training standards explicit and easily accessible to the public to enable all those using the register to make informed decisions.*

We will use the following aspects to assess compliance with this standard:

- a) what it is that individuals need to achieve to gain entry to the register including:
  - i. the relationship of education and training standards to professional standards / National Occupational Standards (NOS) / Codes of Conduct
  - ii. the content of education and training programmes (for example expressed in the form of learning outcomes for the end of the programme or staged points through the programme, the use of QAA subject benchmark statements, core curriculum)
  - iii. the minimum qualification level for (the different) registrant groups described using a recognised UK Educational Framework (We suggest using the framework on the Government's website<sup>2</sup>)
- b) the quality of the educational programme and institution and how these promote patient and client safety, facilitate students' development and help to ensure they are fit to practise (for example, requirements for teaching and learning approaches, assessment, patient and client safety, programme planning and management, resourcing, quality assurance).

This evidence can be provided by:

- i. registers setting their own educational standards
- ii. showing how they have used the standards available in programmes and qualifications already regulated within educational frameworks (such as QAA, Ofqual or their equivalents).

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<sup>2</sup> <https://www.gov.uk/what-different-qualification-levelsmean/compare-different-qualification-levels>

## 2) **Assessment of Standard 9**

It is proposed that the Accreditation team will use the decision tree (diagram 1) to assess the information provided by the organisation on Standard 9.

In step 1, the Accreditation team will undertake a review of the organisation's website to assess the accessibility of the education standards to the public. The Accreditation team are not educational experts. However, we believe that this will be a good reflection of the process an educated member of the public would take to understand the education and training requirements of practitioners on a register. The team will also engage with the Authority's patient and service user group and with the general public through the call for information process and an online survey.

## Diagram 1: Proposed decision tree for the assessment of education and training

### Step 1: Review Applicant/Accredited Register submission

- a) Has the organisation set out its educational standard for all the aspects identified in Standard 9e?
  - If yes, recommend acceptance
  - If no, go to step 2.



### Step 2: Request further information and evidence

- a) On receipt of further information and evidence (including possible changes to a register's website), is it possible to identify clearly all of the different aspects of Standard 9e?
  - If yes, recommend acceptance
  - If no, go to part b.
- b) Does the organisation make use of qualifications regulated by the educational regulators and consider patient safety?
  - If yes, is the use of regulated qualifications explicit and available? If yes, recommend acceptance
  - If the organisation does not use regulated qualifications or their use is unclear, go to step 3.



### Step 3: Seek expert advice

- a) Can an expert (that is someone who understands educational frameworks) identify the different aspects of Standard 9e from the organisation's educational standards?
  - If yes, recommend acceptance subject to the organisation producing clearer information for the public
  - If no, then recommend that standard not met.
- b) Can an expert confirm that the standards required of qualifications not covered by the education regulators are sufficient in terms of quality?
  - If yes, recommend acceptance subject to the organisation producing clearer information for the public
  - If no, then recommend that standard not met.