

# Accredited Registers

## Notification of Change

Academy for Healthcare Science (the Academy)

June 2019

# Contents

Background .....	3
Outcome.....	6
Assessment against the Standards for Accredited Registers .....	7
Share your experience .....	11
Impact assessment.....	12
Equality duty under the Equality Act 2010 .....	12

## About Academy for Healthcare Science

The Academy for Healthcare Science (the Academy) registers:

- Healthcare Science Practitioners
- Higher Specialist Scientists
- Clinical Physiologists
- Medical Illustrators

The Academy also holds a credentialing register for the Life Science Industry (LSI), admitting company representatives who trade with and provide services to the National Health Service (NHS).

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 up their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of October 2018, there were 1,170 registrants on the Academy's registers. The Academy was first accredited on 18 December 2014.

## 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 twelve months.

Once accreditation has been granted, significant changes to an Accredited Register need to be assessed by the Authority to ensure ongoing compliance with the Accreditation Standards. These are submitted to the Authority as a notification of change.

Changes can be approved by a Moderator in cases where compliance with the Standards are not affected by the change. 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 approve the change or approve the change with conditions. 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.

## Notification of Change

The [Academy](#) is an overarching body for the healthcare science profession, working alongside specialist professional bodies and societies to promote healthcare science and the healthcare science profession. The Academy operates Accredited Registers for healthcare science practitioners, higher specialist scientists, medical illustrators, clinical physiologists and a credentialing register for the life sciences industry.

The [Genetic Counsellor Registration Board](#) (GCRB) is a separate organisation holding an Accredited Register for genetic counsellors. Genetic counselling is a service that provides information and advice about genetic conditions, conducted by healthcare professionals who have been specially trained in the science of human genetics and psychosocial counselling.

The Academy and the GCRB are proposing to transfer the Genetic Counsellor Register to the Academy. The new register will be available from the Academy's website and the GCRB register will cease to function as a stand-alone register. The Academy reported that this change demonstrates a step towards 'an NHS-commissioned register for all levels of the Healthcare Science workforce not covered by statutory regulation. Ultimately this will provide patients and the public with a greater level of protection and accountability'.

The Academy would assume overall responsibility for all aspects of the GCRB register, including the management of risks which have previously been identified by the GCRB and the handling of complaints. The GCRB will continue to be responsible for assessing applications to the register using its [existing process](#). The Academy will have oversight of this process, including the submission of intentions to apply to the register and the allocation of portfolios to assessors. The Academy will also send a representative to the GCRB's annual marking day. Renewal of registration will also be monitored by the Academy. A representative from the GCRB will attend the Academy's Regulation Board and the Professional Council.

Currently the renewals for the two registers are different, with the GCRB requiring the submission of evidence every five years and the Academy requiring registrants to renew every year. The Academy has indicated that a pathway aligning the two processes will be formulated by the end of 2019. This will include reviewing the GCRB annual declaration process and the continuing professional development requirements. The Academy has noted that the alignment will be carried out in a co-ordinated way to ensure that registrants are fully updated at every stage.

The education and training entry level to the register will remain at Masters level. There are currently two routes of entry to the register as detailed on the [GCRB website](#). The Academy has confirmed that these will remain unchanged. As with other modalities on the Academy's register, all genetic counsellors will be expected to follow the AHCS Standards of Proficiency.

The Academy has indicated that information about genetic counsellors will be posted on the Academy's website with a link to the GCRB website for further information.

---

Once the change has been approved all current Registered Genetic Counsellors who have been assessed as meeting GCRB's requirements for registration will be transferred to the Academy's register.

## Outcome

The Authority decided that the changes would not negatively impact on the Academy's compliance with the Accreditation Standards so approved the change.

The change was approved by a Panel following a targeted review of Standards 9 and 11. The Moderator determined that all other Standards would continue to be met but that insufficient evidence had been provided to demonstrate continuing compliance with Standards 9 and 11

The following Recommendations were issued to be implemented by the next annual renewal:

1. The Academy should consider reviewing its risk matrices to ensure that they include all relevant risks and mitigations. (Paragraphs 3.1 to 3.6)
2. The Academy should ensure that both its and the GCRB's policies and procedures are clear about the registration appeals route. (Paragraph 10.7)

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 The Academy plans to add Genetic Counsellors to its registers. The Academy will take over the current Genetic Counsellor Registration Board's (GCRB) register.
- 1.2 As the GCRB was an Accredited Register, the Authority has previously decided that the occupation of Genetic Counsellor satisfies the definition of healthcare, as laid down in the National Health Service Reform and Health Care Professions Act 2002, section 25E (8) - 'Health care' includes: all forms of health care for individuals, whether relating to physical or mental health; and procedures that are similar to forms of medical or surgical care but are not provided in connection with a medical condition.'
- 1.3 The Authority found that this Standard continued 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 This Standard is impacted by other Standards, see Standard 7 for the changes to governance.
- 2.2 The Authority found that this Standard continued to be met.

## Standard 3: risk management

- 3.1 The Academy noted that it will be responsible for managing the risks associated with the practice of genetic counselling, previously identified within the GCRB's risk matrix. The Academy has confirmed that it will be maintaining a separate risk matrix covering those risks that are specific to Genetic Counselling.
- 3.2 The Academy submitted a risk matrix covering the risks associated with Genetic Counselling, the team compared this to the one received from the GCRB at its last annual review and noted that there appeared to be some differences. The Academy noted that some risks are covered within its own risk matrix and therefore do not appear within the Genetic Counselling specific risk matrix. The Authority considered both risk matrices when deciding about this Standard.
- 3.3 The Academy noted that it will work closely with the GCRB who will continue to monitor and review the risks associated with Genetic Counselling. As with other occupations, these risks will be discussed at the Academy's Regulation Board.
- 3.4 The Authority noted that the Academy was not included as a risk owner within any of the risks noted within the Genetic Counsellor specific matrix and that adherence to its *Standards of Proficiency* had not been included as a relevant mitigation.

- 3.5 The Authority also noted that one of the Business Practice risks, private practice including direct to consumer testing companies is described as unsupervised, unregulated and isolated practitioners. It is noted that there are no controls or mitigation for this as it relies on ethical business practice and informed patient choice. The Authority asked whether this risk would include those working within private practice and whether there were any specific risks associated with Genetic Counsellors working outside the NHS setting. The Academy noted that ‘the annual declaration process will require all GCRB registrants to declare all employers and obtain references for annual renewal. This will aid in mitigating risks around unregulated/unsupervised practice.’
- 3.6 The Authority decided to issue a Recommendation: The Academy should consider reviewing its risk matrices to ensure that they include all relevant risks and mitigations. (Recommendation 1)
- 3.7 The Authority found that this Standard continued 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 The Academy confirmed that Genetic Counsellors will be required to pay their fees directly to the GCRB following the GCRB [fee structure](#). Registrants will not be required to pay additional fees to the Academy. The GCRB will pay the Academy a fee to cover registration costs.
- 4.2 The Authority found that this Standard continued 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 This Standard is impacted by other Standards, see Standard 7 for the changes in governance.
- 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 The Academy reported that information about Genetic Counselling will be hosted on the Academy’s website with a link to the GCRB’s website, see Standard 7.
- 6.2 The Authority requests that the Academy inform the Accreditation team when these changes have been made. The Authority found that this Standard continues to be met.

**Standard 7: governance**

- 7.1 The Academy ensures that the governance of its register is aimed at protecting the public and promoting confidence in the register through the separation of its Board of Directors and its Regulation Board and Registration Council. The Regulation Board is responsible and accountable for the

establishment and maintenance of the Academy's registers. The Registration Council oversees the operation and governance of the Academy's registers. The Academy reported that the GCRB Chair will sit on the [Academy's Regulation Board](#) and that the GCRB will nominate a representative to sit on the [Academy's Registration Council](#).

- 7.2 As noted above the Academy reported that it will include information about Genetic Counselling on its website. The Academy noted that following a transition period the GCRB website will appear as a sub-section within the Academy's website. The Academy will be responsible for providing information to the public. The Authority will review the updates as part of its on-going assessments.
- 7.3 The Authority found that this Standard continues to be met.

### **Standard 8: setting standards for registrants**

- 8.1 The Academy noted that as with other occupations on its register, Genetic Counsellor registrants will be expected to abide by its practitioner [Standards of Proficiency](#) which cover three main areas:
1. Professional Autonomy and accountability
  2. Skills required for practise
  3. Knowledge of healthcare science
- 8.2 All registered Genetic Counsellors will also be expected to meet the Standards set by the GCRB and abide by the [GCRB's Code of Conduct](#).
- 8.3 The Authority found that this Standard continues to be met.

### **Standard 9: education and training**

- 9.1 The Academy has confirmed that there will be no changes to the education and training standards required to join the register. The GCRB have set this at Masters level.
- 9.2 The GCRB currently accredit courses in the UK which provide students with the skills and knowledge to become a registered Genetic Counsellor. The accredited courses are listed on the GCRB's [website](#). The GCRB will continue to accredit courses supported by the Academy.
- 9.3 The Moderator noted that it was not clear from the information provided what assurance the Academy will receive regarding the GCRB's accreditation of courses and requested a targeted review.
- 9.4 From the Academy's initial accreditation, the Authority understood that the Academy has a role in assuring the accreditation process undertaken by the National School of Healthcare Science of Higher Education Institutes. We understood that the aim of this role is to ensure that the courses meet the Academy's standards for registration. From the notification of change the Authority noted that the GCRB will continue to accredit courses with support from the Academy. The Authority asked the Academy what quality assurance it has or will undertake to ensure that courses that are accredited by the GCRB meet the standards for the register.

- 9.5 The Academy noted that it currently accredits genomic counselling courses that are funded and delivered through the Scientist Training Programme (STP) route only. The GCRB has been accrediting MSc Genetic Counselling programmes in the UK since before the STP route was developed. To maintain all routes of entry onto the GCRB register, the Academy reported that these courses will need to continue to be accredited to meet workforce needs. Going forward, courses looking for renewal of accreditation and any new MSc programmes requesting accreditation will be assessed jointly by the GCRB and the Academy. The Academy reported that future accreditations will be carried out in line with its existing quality assurance processes.
- 9.6 The Authority noted that the GCRB accredited three courses all of which are due for renewal within the next 18 months and that the Academy had stated that any further course accreditations will be done jointly between the GCRB and the Academy using the Academy's existing quality assurance framework. The Authority also noted that the standards for entry to the register had not changed and that the courses had been accredited by the GCRB which used to be an Accredited Register. The Authority has previously taken the position that regulators should avoid duplication of work when overseeing education programmes and considers that this would also apply to the Accredited Registers. The Authority noted that this appeared to be a reasonable arrangement for the transition period.
- 9.7 The Authority found that this Standard continues to be met.

#### **Standard 10: management of the register**

- 10.1 The Academy confirmed that if approved, all current registered Genetic Counsellors who have been assessed as meeting the GCRB's registration standards will be transferred to the new register.
- 10.2 The Academy reported that there will be no changes to the current pathways that are available to join the register. These are detailed on the GCRB [website](#). Briefly, prospective registrants will need to submit a notification of intention to register. If eligibility is confirmed, applicants will be allowed to apply for registration by submitting a portfolio. The portfolio will be assessed by two assessors. If there are no concerns an agreed report is completed. If there are concerns, then the assessors must attend the assessment day where the applications and the concerns are discussed, and a decision made.
- 10.3 There are four possible outcomes:
- 1) Pass - the applicant can be entered onto the register
  - 2) Interview - the GCRB wish to carry out a viva voce examination
  - 3) Deferred - competence is not fully demonstrated, applicant is required to resubmit. Advice is provided by the GCRB
  - 4) Fail - competence not demonstrated and a new portfolio will be required.
- 10.4 Once the GCRB has made the decision that an applicant is suitable to join the register, it will inform the Academy's registrar who will be responsible for adding the applicant to the register. Once added, the Academy will inform the GCRB to ensure that the records of both organisations are up to date. The applicant will then be informed of the registration decision.

- 10.5 The Academy clarified the process in an addendum to its MoU with the GCRB. The Academy stated that it 'will have oversight of the registration process, including access to all existing processes. The Head of Registration services for GCRB (the current GCRB registrar) will continue to be involved in the registration process and will continue to have a deputy (the current GCRB vice chair, Caroline Kirwan). The Academy registrar will have oversight of this and website access to monitor the electronic process of submission of intentions to register, the anonymised allocation of portfolios to trained assessors as well as having a representative of the Academy present on the GCRB marking day, it will have oversight of the registration process.' The Academy reported that it will not need to carry out any additional checks in view of the MOU.
- 10.6 The Academy noted that Genetic Counsellors on its register will not be required to sign up to the Academy's declarations in view of the MOU.
- If an applicant's portfolio is failed through the GCRB's assessment, the applicant can appeal to the Academy's Regulation Board. The Authority noted that this has not yet been documented within the Academy's or the GCRB's procedures and decided to issue a Recommendation: The Academy should ensure that both its and the GCRB's policies and procedures are clear about the registration appeals route. (Recommendation 2)
- 10.7 Currently, in order to maintain registration with the GCRB, registrants are required to pay an annual subscription fee and then every five years submit evidence to support the renewal of registration including demonstrating Continuing Professional Development (CPD), reflective writing on CPD and two references. The Academy requires an annual re-registration to maintain registration which includes CPD. When asked the Academy indicated that the GCRB will be moving to an annual renewal process and that 'by December 2019 the Academy and GCRB will have completed the alignment of their existing renewal requirements for registered genetic counsellors.'
- 10.8 The current CPD requirement for registered Genetic Counsellors is 30 hours of learning activity in a year, at least 50% of which must be external to the registrant's department. The Academy requires its registrants to complete CPD but does not stipulate a minimum number of hours. Genetic Counsellors will be expected to meet the requirements set by the GCRB. Once the two processes are aligned the Academy notes that it will have the right to audit Genetic Counsellors CPD.
- 10.9 The Authority found that this Standard continues to be met.

### **Standard 11: complaints and concerns handling**

- 11.1 Genetic Counsellors on the Academy's register would be expected to comply with the Academy's complaints procedure.
- 11.2 The Moderator felt there was insufficient evidence to decide whether compliance with Standard 11 would be affected by the change and requested a targeted review.
- 11.3 The Academy confirmed that there are no concerns currently being reviewed by the GCRB and that any new concerns that are received will be handled under the Academy's complaints processes which are published on the

Academy's [website](#). The Academy report that the GCRB's complaints documentation and website will be updated to reflect this change and that this will be communicated to all registrants, patient and public representatives as well as to all medical and charity representatives.

- 11.4 The Authority noted that there were some differences between the two complaints processes and that it was important that registrants be informed of the changes so that they were fully aware of the new rules. The Academy confirmed that it will be notifying all current GCRB registrants of the Academy's complaints policy and registrants will be given the opportunity of speaking to the GCRB if there are any concerns. The Authority noted that the team will review communications of the change, including information presented on both websites as part of its ongoing checks.
- 11.5 The Authority found that this Standard continued to be met.

### Share your experience

- 12.1 This Authority did not receive any responses to the invitation to share experience.

### Impact assessment

- 13.1 The Authority noted that the change will not add a financial impact to Genetic Counsellors.
- 13.2 The Authority noted the potential impact on patients and employers of the change and noted the Academy's plans to ensure that information about complaints handling is communicated to all parties.
- 13.3 The Authority noted and took account of the impact of the decision to approve the change.

### Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the notification of change.