

Accredited Registers

Targeted Review – Academy of Healthcare Science (AHCS)

20 June 2023

1. Outcome

1.1 The Accreditation Panel renewed accreditation with a Condition for the Academy of Healthcare Science ([AHCS](#)) following a targeted review focusing on Standards Two, Four, Five and Seven.

1.2 We found that Standards One to Three and Five to Seven were met. Standard Four and therefore Standard Eight were met with the following Condition:

Condition One: The AHCS should ensure that there is sufficient clarity about the education and training requirements for the LSI register to provide assurance to the public and other stakeholders that registrants on the LSI register are meeting the standards. This should include information on the AHCS' role in setting the standards and the processes the AHCS has in place for ensuring that registrants meet them. The AHCS should ensure that the different Tiers on the LSI register, including Tier X are clearly explained. This is to be completed by 4 October 2023.

1.3 We also issued the following Recommendations:

- **Recommendation One:** The AHCS should review its risk matrix to ensure that it includes all the relevant risks and mitigations. This should include risks associated with safeguarding, boundary violations and registrants providing misleading information to the public.
- **Recommendation Two:** The AHCS should develop additional guidance for its registrants that work in private practice. This should include information on safeguarding, advertising and other factors that will impact this group of registrants.
- **Recommendation Three:** The AHCS should consider developing a system of checking the information provided by self-employed registrant websites as a further mitigation for the risks associated with registrants providing misleading information.
- **Recommendation Four:** The AHCS should review its risk register to ensure that it is capturing emerging risks, including workforce pressures, changes in the external environment following Covid-19 and new technology.
- **Recommendation Five:** The AHCS should consider strengthening Standard 7 of its Standards of Proficiency to ensure it is clear what registrants need to consider to meet the standard.

1.4 We will check how the AHCS has considered the Recommendations at its next assessment.

2. Background

The process

- 2.1 We conduct an annual check for each Accredited Register. This is used to monitor whether there have been any significant changes to key processes or significant concerns raised that could affect whether the *Standards for Accredited Registers* (the Standards)¹ continue to be met.
- 2.2 In some cases, where we need further information or where we have concerns, an annual check will be escalated to a targeted review of the Accredited Register. A targeted review consists of a more in-depth assessment of specific Standards.
- 2.3 Following a targeted review, an Accreditation Panel considers whether the Standard(s) continue to be met. The Accreditation Panel may issue Recommendations or Conditions. In serious cases, it may consider suspending or withdrawing accreditation.
- 2.4 More information about the annual check and targeted review assessment process for existing Accredited Registers is set out in our *Accredited Registers - guidance on renewing accreditation*.²

The AHCS

- 2.5 The AHCS is a private company limited by guarantee which was first accredited in December 2014. It is overseen by the [Management Board](#) which consists of nine people of which three are lay. The day to day running of the organisation comes under the remit of the [academy team](#). The registers are overseen by the [Regulation Board](#). It is responsible for the establishment and maintenance of the AHCS's Registers. The Education, Training and Standards Committee (ETSC) is a subcommittee of the Regulation Board, providing expert advice and guidance in support of the Scientific Training Programme (STP) equivalence process and oversees all the education and training and quality assurance.
- 2.6 There are 16,068 (as of 31 March 2023) registrants on the AHCS three registers:
 - [The Healthcare Science Register](#) (this includes the register currently held under the RCCP which is due to be integrated with the AHCS by September 2023)
 - [The Clinical Research Practitioner Register](#)
 - [The Life Science Industry Register](#).

The AHCS annual check

- 2.7 The annual check involved a:

¹ [Standards for Accredited Registers 2023 \(professionalstandards.org.uk\)](#)

² [annual-review-process-guide.pdf \(professionalstandards.org.uk\)](#)

- review of information provided to the team by AHCS in its annual check form, submitted on 20 March 2023.
- review of 'Share Your Experience' submissions received since the last review.
- check of AHCS's register.
- review of the actions taken to address Recommendations issued at the previous annual review.

2.8 We considered the actions the AHCS had taken in response to the Recommendation issued at the AHCS's last annual check, to consider whether its standards and expectations, relating to discrimination, EDI and related issues are made clear for its registrants. We considered the reference to Standard 7 of the *Standards of Proficiency* within the *Standards of Good Practice*³. We found that unlike the other standards there are no additional or explanatory points providing more details about how registrants can meet standard 7. We noted that the AHCS is planning to do additional work on its *Standards of Proficiency* and therefore suggested the following Recommendation:

Recommendation Five: The AHCS should consider strengthening Standard 7 of its Standards of Proficiency to ensure it is clear what registrants need to consider to meet the standard.

2.9 We found that we required additional information to decide about Standards Two, Four, Five and Seven. The rest of this report discusses our targeted review against these Standards.

3. Assessment against the Standards

Standard two – Management of the Register

Summary

3.1 The Accreditation Panel found that this Standard continued to be met. The Accreditation Panel considered the work the AHCS was doing to update its register and its website and noted that the Accreditation team will conduct a review of the new website as part of the AHCS next assessment.

Reasons for targeted review

3.2 During the annual check we carried out register checks and found several errors. We also noted that there are a lot of different specialisms and some terms used on the different registers that were not explained.

3.3 We reviewed the information on the website relating to sanctions and found that it was not clear that people should check the sanctions page to see if someone had been removed from the register and it wasn't clear how sanctions would be displayed on the register.

³ <https://www.ahcs.ac.uk/standards/>

The Accreditation Panel's findings

- 3.4 The Accreditation Panel noted that the AHCS updated the register entries we highlighted during our assessment and introduced new procedures to ensure these types of errors didn't happen again. The AHCS introduced additional training on the importance of checking and reporting inaccuracies on the register for its staff. The Head of Administration will also run weekly checks which will include a check on the validity of the data and ensure that there are no expired registrants showing on the register. The outcome of these checks will be reported to the Management Team and a highlight report will go to the Operational Governance Group and the Regulation Board for discussion. In addition, the AHCS sent reminders to all its registrants about the importance of keeping their information up to date and informing the AHCS of any changes.
- 3.5 The AHCS reported that it is introducing a new register platform this year, which should strengthen its controls and provide enhanced search tools such as a postcode finder making it easier for the public to use. This work will also include an update to the website. The AHCS confirmed it will review the information it provides on its website from the perspective of different stakeholders. For example, the AHCS plans to include more explanations on different terms used, that will be accessed directly from the register by hovering over a term or word. The AHCS highlighted that it this is also an opportunity to create a page dedicated to the definitions of terms and acronyms for the benefit of the patients and the public.
- 3.6 As this work is not due to be completed until September 2023, the AHCS made interim changes to the information on its website to make the information clearer to the public.
- 3.7 We considered the information that the AHCS provides to the public on sanctions. Sanctions are recorded on the 'Actions and Sanctions' page under the Patient and Public menu. This page is also linked to from the 'search the register' page for the Healthcare Science register, and from the search results page. If the registrant remains on the register a flag will appear on their register entry to indicate that the service user should check the sanctions page. The AHCS made interim changes to the information it provides on its website about sanctions to make this clearer and will consider this further as part of the website redevelopment work.
- 3.8 The Accreditation Panel was satisfied that the AHCS had taken action to address the errors identified on the register and to put more robust processes in place to prevent the issues reoccurring. The Accreditation Panel was satisfied with the interim changes made to the website and welcomed the AHCS plans to improve the provision of information to the public through its website development work. At the AHCS' next assessment, we will review the implementation of the new quality assurance processes and the changes to the register and website to check whether information provided to the public is accurate, easy to understand and allows for an informed decision to be made.

Standard Four – Education and Training

Summary

- 3.9 The Accreditation Panel found that this Standard was met with the following Condition:

Condition One: The AHCS should ensure that there is sufficient clarity about the education and training requirements for the LSI register to provide assurance to the public and other stakeholders that registrants on the LSI register are meeting the standards. This should include information on the AHCS' role in setting the standards and the processes the AHCS has in place for ensuring that registrants meet them. The AHCS should ensure that the different Tiers on the LSI register, including Tier X are clearly explained. This should be completed by 4 October 2023.

Reasons for targeted review

- 3.10 In May 2021, the Registration Council for Clinical Physiologists (RCCP) merged with the AHCS. The AHCS has been consolidating the processes of both organisations, this has included a review of education and training assessments. We requested further information about the changes that had occurred resulting from this merger.
- 3.11 We also asked for an update on the work the AHCS had been doing to improve the clarity of information provided about education and training on the LSI Register.

The Accreditation Panel's findings

- 3.12 The AHCS confirmed that the National School of Healthcare Science (NSHCS) which sits within NHS England, is responsible for the management of the educational framework for the training and development of healthcare scientists, which includes physiologists, across the NHS in England (this is also currently used in Wales, Northern Ireland, and Scotland as well). The NSHCS accredits higher education providers to deliver Practitioner Training Programmes and Higher Specialist Scientist Training Programmes on behalf of the AHCS. The AHCS oversees the quality assurance of these courses through annual monitoring either by attending a sample of accreditation visits or through a desk-based review of accreditation or annual monitoring documents. Outcomes of these reviews are reported to the Education, Training, and Standards Committee (ETSC). Courses that were previously accredited by the RCCP and the NSHCS now come under this framework.
- 3.13 Courses that sit outside the NSHCS framework can apply to the AHCS to be accredited. The *AHCS Guidelines for Accreditation*⁴ provides information for those seeking accreditation by the AHCS for courses. The ETSC makes decisions about accreditation, its purpose is to 'ensure that the Academy's standards and processes for programme accreditation are fairly, consistently, and rigorously applied.' Accreditation decisions are made based on a review of

⁴ [AHCS Guidelines for Accreditation \(Jan 2023\)](#)

relevant papers and a site visit to ensure that the provider is delivering training that meets the standards and is delivering the curricula. Education programmes are accredited on an open-ended basis providing they are subject to ongoing quality monitoring. If quality concerns are identified, then accreditation may be removed. Significant amendments to the programme need to be submitted to the ETSC for approval.

- 3.14 Trainees that successfully complete an accredited training programme either through the NSHCS or through an AHCS accredited course are eligible to apply for registration with the AHCS on the appropriate register.
- 3.15 The Accreditation Panel was satisfied that the AHCS had appropriate processes in place to assess the education and training requirements for its healthcare science register.
- 3.16 The Accreditation Panel also considered the AHCS' ongoing response to the third-party feedback we received in December 2021 which raised concerns about the LSI register. The concerns included the transparency of information provided about the education and training requirements, a perceived lack of quality assurance mechanisms for ensuring that registrants meet the required standards and lack of clarity about the different tiers on the register.
- 3.17 At last year's annual check, in response to the feedback the AHCS stated that it would form an Education and Standards Committee, develop an accreditation framework, review how Tier X is communicated and make clear the route of entry to the LSI register for non-medical industry accredited members. This year the AHCS reported on its progress highlighting the formation of the LSI Standards Committee which will report to the AHCS Regulation Board and the ESTC who are responsible for the education and training standards. The ESTC is due to discuss the LSI register at its next meeting. The AHCS also highlighted that it is working with organisations and Trade Associations to develop a direct route to the register.
- 3.18 The Accreditation Panel considered the information provided by the AHCS and reviewed the information provided on the AHCS's website about the LSI register. We found that the information presented on the LSI register could be confusing to a lay person. Information about the education and training requirements and how they fit with the standards for registration and the role of the AHCS in setting these standards could be made clearer. We also found further confusion around the Tier X and what this means. Although the AHCS noted that applicant numbers are dropping for this tier, it is still being used. The Accreditation Panel highlighted the importance of providing clear information to the public and other stakeholders about its requirements for the LSI register. We therefore issued Condition One.

Standard Five – Complaints against registrants

Summary

- 3.19 The Accreditation Panel found that this Standard continued to be met. The Accreditation Panel considered the work the AHCS was doing to consolidate the RCCP and AHCS complaints handling procedures into a single process. The Accreditation Panel noted that this work was ongoing and due to be implemented shortly. The Accreditation team will conduct a full review of the new procedure, including observing a hearing as part of the AHCS' next assessment.

Reasons for targeted review

- 3.20 The AHCS has been working to consolidate the RCCP and the AHCS complaints handling processes into a single process. We requested further information about the proposed changes.

The Accreditation Panel's findings

- 3.21 The AHCS confirmed that it had made changes to its complaints handling process and these were due to be introduced following legal advice. The two approaches taken by the AHCS and the RCCP to handling complaints were similar, and both processes had been previously assessed as meeting the *Standards for Accredited Registers*.
- 3.22 Key changes include allowing the Investigating Panel to issue letters of advice and warnings for cases that are not referred to a hearing. The addition of interim conditions as a possible outcome along with more clarity about the timings involved in issuing interim orders. It will include accepted outcomes, which will allow the AHCS to remove a registrant from the register without referring to a hearing if the case has already been considered by a statutory regulator overseen by the PSA. The new procedure will also include consensual disposals.
- 3.23 The Accreditation Panel considered the changes and noted that at the time of the assessment the processes were still in draft form as the AHCS was seeking legal advice on the new process. As a result, the Accreditation team had not done a full assessment on the change. We found however that the proposed changes seemed consistent with the Standard and that the AHCS had taken a reasonable approach to making the changes, including seeking legal advice. The Accreditation Panel found that this Standard was met, however noted that a full assessment with an observation at a hearing should be carried out as part of the AHCS next accreditation assessment.

Standard Seven – Risks

Summary

- 3.24 The Accreditation Panel found that this Standard continued to be met. The Accreditation Panel endorsed the Recommendations issued to the AHCS through its Standard One assessment.
- Recommendation One:** The AHCS should review its risk matrix to ensure that it includes all the relevant risks and mitigations. This should include risks associated with safeguarding, boundary violations and registrants providing misleading information to the public.

Recommendation Two: The AHCS should develop additional guidance for its registrants that work in private practice. This should include information on safeguarding, advertising and other factors that will impact this group of registrants.

Recommendation Three: The AHCS should consider developing a system of checking the information provided by self-employed registrant websites as a further mitigation for the risks associated with registrants providing misleading information.

- 3.25 The Accreditation Panel highlighted the importance of Accredited Registers being aware of emerging risks and decided to issue the following Recommendation:

Recommendation Four: The AHCS should review its risk register to ensure that it is capturing emerging risks, including workforce pressures, changes in the external environment following the Covid-19 and new technology.

Reasons for targeted review

- 3.26 We reviewed the risks as part of our Standard One assessment and noted that there were some gaps in the risk matrix. We asked the AHCS for further information on their approach to risks such as boundary violations, safeguarding and misleading information.

The Accreditation Panel's findings

- 3.27 The AHCS has a *Safeguarding policy* which includes working with children and other vulnerable groups. This document sets out the AHCS expectations of the AHCS staff and Board as well as registrants in terms of their safeguarding responsibilities. The policy includes information on how to make a disclosure to the AHCS and what the AHCS will do. There are also requirements under *Good Scientific Practice*⁵ which require registrants to 'adhere to safeguarding requirements and uphold the interests of vulnerable individuals in how you deliver care.'
- 3.28 The AHCS also noted the additional risks associated with different settings such as schools, which have been captured in the updated risk matrix.
- 3.29 The AHCS stated that 'boundary violations are a potential risk for all practitioners who interact with individual patients/clients on a one-to-one basis. It is acknowledged that the risk potentially increases with those that are self-employed and working alone or in a small practice of professionals. Those working alone are at the greatest risk due to the lack of interaction with other professionals who may become aware of safeguarding issues or boundary violations and are able to report them.' *Good Scientific Practice* references practicing within legal and ethical boundaries. Paragraph 1.3.6 states registrants must 'comply with relevant legal, ethical and professional requirements and codes, including those relating to advertising, presenting research data, and writing for publication.'

⁵ [AHCS-Good-Scientific-Practice-2021.pdf](#)

- 3.30 The AHCS reported that it will consider risks associated with registrants providing misleading information and the development of guidance for those working in private practice at its next ETSC meeting.
- 3.31 The AHCS also highlighted a report by the British Academy of Audiology which noted risks associated with the practice of audiology.⁶ The AHCS reported that it currently reviewing past and current fitness to practice cases considering this report to identify any risks.
- 3.32 The Accreditation Panel noted the Recommendations previously issued. In terms of boundary violations, the Accreditation Panel highlighted that the AHCS's response centred on boundary violations between service users and healthcare providers. Research has also shown that boundary violations between staff can also have a negative impact on service users and Accredited Registers should also be mindful of this aspect when considering risks associated with boundary violations.⁷
- 3.33 The Accreditation Panel considered the changes to the external environment that the AHCS 's registrants are working in and noted the importance of the AHCS being aware of emerging risks and recording these in its risk matrix. There have been a lot of changes within the healthcare system following covid-19. In addition, the healthcare system continues to be under increased pressure, caused by many external factors including continuing workforce shortages. There has also been an increase in new technology for example advances in the use of AI within the healthcare system that should be considered. These will all pose risks which should be considered by the AHCS. The Accreditation Panel therefore issued Recommendation Two.

4. Impact Assessment

- 4.1 We didn't identify any negative impacts. The work the AHCS is doing to consolidate its processes and integrate the RCCP's register into the healthcare science register should make this less confusing to members of the public and other stakeholder seeking the services of registrants. Additional work that the AHCS is completing to improve the clarity of the information it provides on its website as well as the condition we have issued should provide more transparency and better allow service users and other stakeholders to make informed decisions.

⁶ <https://www.baaudiology.org/nhs-lothian-full-baa-statement-and-reports/>

⁷ [sexual-behaviours-between-health-and-care-practitioners---where-does-the-boundary-lie.pdf](https://www.professionalstandards.org.uk/sexual-behaviours-between-health-and-care-practitioners---where-does-the-boundary-lie.pdf) ([professionalstandards.org.uk](https://www.professionalstandards.org.uk))