

Annual review of accreditation 2020/21

UK Public Health Register (UKPHR)

March 2021

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About UK Public Health Register

The UK Public Health Register (UKPHR) registers:

- Public Health Practitioners
- Public Health Specialists
- Specialty Registrars.

Its work includes:

- Setting and maintaining standards of practice 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 January 2021, there were 1137 registrants on UKPHR's register.

UKPHR was first accredited on 3 April 2013. This is its seventh annual review and this report covers 3 April 2020 to 3 April 2021.

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 2021 to 3 April 2022.

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 Recommendations were issued to be implemented by the submission of the next annual renewal documentation:

1. UKPHR should review its website to look at (a) whether there can be greater transparency about its governance and operations, and (b) to provide clearer sign-posting to the information that currently exists, particularly to information about its complaints process. (See Paragraph 5.2 to 5.6)
2. UKPHR should consider seeking feedback from registrants about how helpful they find the safeguarding, whistleblowing and Duty of candour guidance in practice. (See Paragraph 8.1 to 8.7)
3. UKPHR should consider whether the Covid-19 pandemic has exposed any matters that ought to be addressed within UKPHR's Codes, guidance and education and training requirements. (See Paragraph 8.8 and 9.2)

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. 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 The Authority noted the work UKPHR has undertaken to address public protection around the Covid-19 pandemic including the development of a temporary register and guidance for its registrants. The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 UKPHR provided an updated risk register to the Authority. UKPHR has updated the mitigations recorded within the register to include references where applicable to Covid-19 and that it has added two new risks related to the pandemic.
- 3.2 At last year's annual review, the Authority reviewed UKPHR's risk matrix and its policies on safeguarding and decided to issue the following Recommendation: UKPHR should consider adding working with children and vulnerable groups as a separate risk to its risk register.
- 3.3 UKPHR updated its risk register to include the risks related to working with children and vulnerable service users. Mitigations noted include adherence to the *Code of Conduct* and *Good Public Health Practice*, as well as employer controls (where appropriate), such as NHS or local authority safeguarding policies and guidance.
- 3.4 The Authority found that the Recommendation had been considered and that the Standard continues to be met. The Authority is recommending (at Recommendation 3) that UKPHR should look in detail at any learning that the pandemic may have for its registrants. Following this review, UKPHR may wish to review and update its risk register in the light of any findings.

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 year. As part of its due diligence, the Authority reviewed records from Companies House and considered that there was evidence 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 At last year's annual review, the Authority reviewed UKPHR's new website and noted that UKPHR no longer published its Board meeting minutes. UKPHR reported that 'during last year's refresh of our website, we removed web pages where google analytics showed us that no-one was visiting them. We understand the need to be open and transparent and anyone may request a copy of the minutes of a Board meeting or a meeting of a committee of the Board and we will supply the minutes.' The Authority noted that Board meeting minutes were available on request, however, found that this was not clear on UKPHR's website. The Authority decided to issue a Recommendation: UKPHR should consider adding a statement to its website to ensure that it is clear that people can request Board meeting minutes from UKPHR.
- 5.2 UKPHR has added a statement to its website and reported that one person in the previous year has requested a copy of the minutes which were supplied.
- 5.3 UKPHR reported on changes to its leadership team, it has recruited a new [Registrar](#). UKPHR has recruited a new [Chief Executive](#) who is started at the beginning of March following the retirement of the previous Chief Executive.
- 5.4 The Authority noted that UKPHR has an impressive Board and clearly has processes to register, assess qualifications and for dealing with complaints. While the Recommendation from last year had been considered, the Authority noted that its governance arrangements were not always clear – there is little information about its committees and their membership, agendas of Board meetings or papers and nothing about its current work or projects. The Authority noted that while UKPHR has a number of publications on its website it is not obvious to the casual visitor that they exist and that this was particularly the case with respect to its complaints processes where the links were not clearly marked. It also noted the reasons given for not publishing its Board minutes.
- 5.5 The Authority noted that an Accredited Register should make it easy for people to understand what it is doing and its governance structures and should make its documentation obvious. The Authority decided to issue a Recommendation: UKPHR should review its website to look at (a) whether there can be greater transparency about its governance and operations, and (b) to provide clearer sign-posting to the information that currently exists, particularly to information about its complaints process. (Recommendation 1)
- 5.6 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 At last year's annual review, the team reviewed how UKPHR made its knowledge base clear to the public. UKPHR highlighted its published

registration standards, published mapping to other recognised standards, and its guidance and advice to applicants and assessors. The Authority noted that Standard 6 requires the knowledge base (or its development) that underpins the occupations practiced on the registers is explicit to the public. This Standard is intended to enable a member of the public to assess the extent to which a therapy or practice is based on research and development of the knowledge base/evidence. The Authority decided to issue a Recommendation: UKPHR should consider improving the provision of information about the knowledge base or its development to the public.

- 6.3 UKPHR reported that it 'started work on improving the provision of information about the knowledge base to the public in 2020. For example, we began a campaign to reach employers of public health practitioners and within this we provided information about the knowledge base. We engaged with other organisations, too. For example, HEE has published (on 11 January 2021) an online training directory for practitioners in a format which follows the knowledge requirements of our standards for practitioner registration. We are also working on a guide to graduates and other students about the knowledge required to be able to apply to register with us as practitioners.'
- 6.4 The Authority found that the Recommendation had been considered and that the Standard continues to be met.

Standard 7: governance

- 7.1 UKPHR reported that in November it decided to carry out a review of UKPHR's rules and processes to ascertain its compliance with law on equality, diversity and inclusion. The first meeting of the working party was in January 2021. The working party aims to provide an interim report to the Board by July 2021. The Authority welcomed the work UKPHR is doing around equality, diversity and inclusion and noted that it would be useful to understand how UKPHR builds equality, diversity and inclusion into its processes, particularly in the light of the recent Covid-19 pandemic which has had a serious impact on the BAME community.
- 7.2 When considering Standard 7c (the organisation demonstrates that it seeks, understands and uses the views and experiences of service users and the public to inform key decisions about its voluntary register functions) and Standard 7e (the organisation ensures that in carrying out its voluntary register functions it is fair, effective, proportionate and transparent so that it is respected and trusted), the Authority noted that in normal times UKPHR has consultative panels and stakeholder meetings. The Authority considered the difficulties that the pandemic has created and noted that there is little evidence that these meetings have occurred since the pandemic began. The Authority would hope to see further information about them next year.
- 7.3 The Authority noted the changes in governance and considered its concerns about transparency reported under Standard 5 when considering this Standard.
- 7.4 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 At last year's annual review, the Authority reviewed UKPHR's approach to safeguarding and decided to issue the following Recommendation: UKPHR to consider developing guidance for its registrants and for its staff/Board about handling safeguarding issues.
- 8.2 UKPHR reported that it published new guidance in 2020 for registrants and UKPHR's staff and Board about handling safeguarding issues. The guidance highlights the responsibilities of UKPHR's registrants, noting the relevant sections of the Codes and Standards. UKPHR has also provided links to other useful resources on safeguarding within the four nations. Within the guidance UKPHR has noted that 'As the regulator, UKPHR accepts that it has the same obligations as its registrants in this regard.
- 8.3 UKPHR will ensure that its employees, Board members and others who work for UKPHR whether for payment or on a voluntary basis also take seriously their own duty to safeguard all vulnerable people.'
- 8.4 UKPHR has also developed guidance on safeguarding and whistleblowing for its staff and Board.
- 8.5 Also, at last year's annual review, the Authority considered UKPHR's approach to whistle blowing and the professional Duty of Candour. UKPHR confirmed that it has a whistleblowing policy for staff, contractors, and volunteers. UKPHR highlighted relevant sections within the UKPHR Code of Conduct that relate to both whistleblowing and Duty of Candour, for example paragraph 1.3 which states 'take swift action and speak with candour if you become aware that your health, behaviour or professional performance, or those of a colleague, or the policy or practice of an organisation, may pose a risk to the health of the public, or of particular individuals or groups' and paragraph 3.3 which states 'maintain your integrity and justify the trust the public, employers and colleagues have in you and your profession.' UKPHR confirmed that it does not have any additional guidance for its registrants. The Authority decided to issue a Recommendation: UKPHR should consider developing guidance for its registrants about whistle blowing and the professional Duty of Candour.
- 8.6 UKPHR reported that it has published its guidance on whistleblowing and the professional Duty of candour. The guidance sets out UKPHR's expectations in terms of the *Code of Conduct* and *the Good Public health Practice Framework*. The document also provides links to additional published guidance.
- 8.7 The Authority considered the guidance and noted that it tends to repeat the provisions of the Code rather than to elaborate on how this should be managed in practice or how or borderline situations should be approached. The Authority found that the recommendation had been considered but decided to issue a further Recommendation: UKPHR should consider seeking feedback from registrants about how helpful they find the safeguarding, whistleblowing and Duty of candour guidance in practice. (Recommendation 2)

- 8.8 When considering Standard 8h - the organisation keeps under review and evaluates its standards, considering whether they are achieving the outcomes it intends for service users and the public, the Authority considered that UKPHR's practitioners are likely to have had a significant role during the pandemic. The Authority noted that it would be important for UKPHR to reflect on the impact of Covid-19 to the practices of its registrants. The Authority decided to issue a Recommendation: UKPHR should consider whether the Covid-19 pandemic has exposed any matters that ought to be addressed within UKPHR's Codes, guidance and education and training requirements. (Recommendation 3)
- 8.9 The Authority found that this Standard continued to be met.

Standard 9: education and training

- 9.1 There were no significant changes reported or noted in the past year. Again, the Authority considered the role that UKPHR's practitioners have had during the pandemic and noted that it would be important for UKPHR to reflect on the impact of Covid-19 to its education and training requirements. (See Recommendation 3)
- 9.2 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 UKPHR reported that it has made some temporary changes to its registration requirements, including revalidation, re-registration and continuing professional development (CPD), in recognition of the extra work pressure that many of its registrants are under. UKPHR reported that all changes made were in line with those made by the relevant regulators such as the General Medical Council.
- 10.2 UKPHR stated that 'In line with statutory regulators, revalidation, re-registration and CPD requirements were postponed for a year. In February 2021 the Board decided to begin reapplying these requirements from April 2021, but CPD requirements will not be fully restored until April 2022. A temporary register was also established for returners who were helping in jobs related to the pandemic response. The Audit, Remuneration & Risk Committee has monitored the application of these postponements and annual renewal has continued to operate fully, including the annual questions on matters such as criminal convictions, professional proceedings and health.'
- 10.3 The Authority considered the temporary register and noted that there were appropriate safeguards to ensure that appropriate people were added to the register and that UKPHR was able to deal with concerns appropriately. The changes to CPD appear to be proportionate and appropriate.
- 10.4 UKPHR's practitioner registration is managed through local registration schemes, UKPHR has reported that some of these schemes are finding it challenging to recruit and retain assessors and verifiers. The implementation group is however looking into how to address this issue. UKPHR reported that the risk register has been reviewed to ensure that the Board has awareness of the issues.

- 10.5 UKPHR reported that it has made minor changes to its processes and forms for its new portfolio assessment route for specialists following an evaluation of the first year of the of operation. UKPHR reported that it has implemented eight of the recommendations noting that 'Recommendation 6 requires system support and UKPHR is pressing for the change recommended. Recommendation 10 is prospective (a further evaluation at a later date) and the Board has accepted this.'
- 10.6 At last year's annual review, UKPHR reported on the first year of its revalidation process for specialists. UKPHR reported that it has now carried out an evaluation of the 360-degree multi-source feedback (MSF) tools being used by specialists in this process. Two reports were considered by the Board as a result of this review, one made seven recommendations for slight changes to process, forms and guidance, all of which have been implemented and the other recommended that 'UKPHR should develop questions for inclusion in MSF tools that are more relevant to public health practice.' UKPHR reported that this work is underway. UKPHR noted that 'Longer term, the Board has an ambition to produce a new MSF tool that is suitable for use by all registrants. There is rich detail in the evaluation report about existing MSF tools which we think will be of interest to wider public health audiences.'
- 10.7 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 reported that it has received one complaint against a registrant which was dismissed by the Registrar following investigation. UKPHR reported that it received one complaint against the organisation about the length of time taken to allocate a defined specialist portfolio to two assessors. This was resolved informally.
- 11.3 The Authority noted the provision of information to the public and found that links to helpful documentation were not always clear. It deals with this in Recommendation 1.
- 11.4 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. The Authority took account of the impact of its decision to renew accreditation.

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.

