

Response to the Health and Care Professions Council consultation on revised guidance on returning to practice

October 2016

1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and voluntary registration of people working in health and care. We are an independent body, accountable to the UK Parliament. More information about our work and the approach we take is available at www.professionalstandards.org.uk
- 1.2 As part of our work we:
- Oversee the nine health and care professional regulators and report annually to Parliament on their performance
 - Conduct research and advise the four UK governments on improvements in regulation
 - Promote right-touch regulation and publish papers on regulatory policy and practice.

2. Comments on guidance

- 2.1 We welcome the opportunity to comment on the Health and Care Professions Council revised guidance on returning to practice. We support the need to ensure that individuals who have been out of practice are up to date on relevant skills and knowledge before they return to ensure that risks to the public are minimised. In general the guidance seems to clearly lay out this process.
- 2.2 It may be beneficial give a little more background at the beginning of the guidance on why it is important for those returning after a period out of practice to refresh their knowledge and skills. This could include examples of how skills required may change or move on during a period out of practice and/or the consequences to patients if skills and knowledge become out of date.
- 2.3 It would also be useful to have clarity on the meaning of the term 'updating' earlier in the document before it is used in the guidance. We would also suggest adding links to the HCPC standards and the forms referred to which those returning to practice are required to complete.
- 2.4 The guidance currently does not appear to cover a situation where a registrant ceases practising for more than two years where the return to practice falls between renewals, part way through the registration cycle. For example, a

practising professional could renew their HCPC registration in October 2016, practise for 6 months and then stop practising. At the time of their registration renewal, in October 2018 they would be able to confirm that they had practised in the last two years and so would not be required to complete any updating. However, if they were to remain non-practising for at least another six months until April 2019, they would then have not practised for more than two years. In this situation, there would be no mechanism for them to declare this and complete the relevant updating if they wanted to return to practise before the next renewal in October 2020. We would suggest that the guidance may need reviewing to ensure that the requirement to update is not lost when someone reaches two years out of practice part way through a renewal cycle.

3. Further information

- 3.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact us at:

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