

Response to Occupational Health: Working Better

11 October 2023

1. Introduction

1.1 This document sets out the Professional Standards Authority (PSA)'s response to the Government's public consultation *Occupational Health: Working Better*¹.

About the PSA and Accredited Registers

1.2 The PSA is an independent body, accountable to UK Parliament. It has three main functions, as reflected in our Strategic Plan 2023-26:

- To protect the public by delivering highly effective oversight of regulation and registration
- To make regulation fairer and better
- To promote and support safer care for all.

1.3 The PSA works closely with the four UK health departments to ensure that oversight of professional regulation of healthcare professionals is aligned with national health policy objectives. Its functions are set out in the Health and Social Care Act 2012 (as amended)².

1.4 Within the UK, some healthcare roles such as doctors, dentists and nurses are required by law to be registered with one of the ten health and care statutory regulators to practise. Part of the PSA's role is to check that these regulators are performing effectively. However, health delivery relies on a much broader range of roles, some who work in the NHS and some who work for other public bodies, businesses or who are self-employed.

1.5 In 2012, the PSA was granted new powers to accredit organisations holding voluntary registers of health and care roles. The PSA delivers on this statutory function through its Accredited Registers programme.

1.6 To be accredited, organisations must demonstrate that they meet high standards of governance including in relation to registration, education and training, and complaints handling. These [Standards for Accredited Registers](#) ("the Standards") are based on our [Standards of Good Regulation](#) for the statutory regulators.

1.7 The Accredited Registers programme is backed by the UK Government. Use of Accredited Registers as best practice is endorsed by the Care Quality Commission and NHS Employers. The General Medical Council (GMC)'s

¹ <https://www.gov.uk/government/consultations/occupational-health-working-better>

² <https://www.legislation.gov.uk/ukpga/2012/7/part/7/crossheading/the-professional-standards-authority-for-health-and-social-care/enacted>

guidance on *Delegation and referral*³ states when referring to services not provided by a healthcare professional registered with a statutory regulatory body, doctors ‘must be satisfied that systems are in place to assure the safety and quality of care provided – for example...the practitioner is on a register accredited by the PSA’.

- 1.8 Accredited Register practitioners are therefore a valued and recognised part of the healthcare landscape and have a distinct identity within the wider group of unregulated roles. A statement from the Minister of State for Health and Secondary Care Will Quince MP (July 2023) sets out that:
- “There are many health and social care roles which can be carried out without statutory regulation. The Accredited Registers programme, run by the PSA, ensures that people receiving care from professionals working in unregulated roles are better protected. The PSA quality mark demonstrates a register’s commitment to high standards of care and provides assurance around professional standards and ethical behaviours.”⁴
- 1.9 As at the end of September 2023, there were 26 Accredited Registers, with approximately 116,000 registrants overall. Over 60 roles are represented, including sonographers, counsellors, psychotherapists, complementary therapists, healthcare scientists, and sports rehabilitators.
- 1.10 Our response to this consultation focuses on how embedding use of Accredited Registers as good practice can help give employers confidence about the skills, competencies and professional behaviours of people delivering occupational health and wider workforce health services. We have answered the questions which are most relevant to our role and to Accredited Registers.

Q6. a) What should such a national health at work standard for employers, embedding a baseline for quality OH provision, include, especially given the requirement to accommodate different employer needs?

- 1.11 We would recommend that consideration is given to the appropriate level of professional registration of individuals providing occupational health and wider work and health services. For roles not required by law to be registered with a statutory body, the PSA’s Accredited Registers scheme provides assurance for employers that an independently verified body has checked practitioners have appropriate level of skills and competencies and are bound by professional codes of conduct.
- 1.12 In June 2023, we introduced new requirements for Equality, Diversity and Inclusion to our Standards. This will help make sure that Accredited Registers are providing appropriate guidance to registrants and are working to better understand and reduce barriers to both accessing professional registration, and care.
- 1.13 When we undertook a strategic review of the Accredited Registers programme in 2020-21, we found that key to effective voluntary schemes is embedding as part of wider policy initiatives. On this note, we are also working to raise

³ <https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/delegation-and-referral>

⁴ <https://www.professionalstandards.org.uk/news-and-blog/latest-news/detail/2023/07/07/professional-standards-authority-accredits-the-cbt-register-uk>

awareness and use of Accredited Registers with health insurers (in conjunction with the Association of British Insurers) and Employee Assistance Programme schemes. This would support a joined-up approach with the Government on embedding a new workforce health standard for employers, by making sure there is a consistent approach to selecting appropriate levels of professional registration.

Q15. What more can be done to build the multidisciplinary clinical and nonclinical workforce equipped with the skills needed to deliver occupational health and wider work and health services? Please include any examples of creative solutions.

- 1.14 Use of Accredited Register practitioners could help make sure that workforces are equipped with the skills needed to deliver occupational health and wider work and health services. As part of registration requirements, practitioners will have demonstrated the necessary competencies in a range of areas, and some will be working in directly relevant roles currently. The consultation document highlights that Musculoskeletal (MSK) and mental health conditions are the two biggest drivers of economic inactivity when looking at main or secondary conditions⁵. Relevant Accredited Register roles include sports rehabilitators, and more than 75,000 people working as mental health professionals such as counsellors and psychotherapists.
- 1.15 Use by the NHS of these roles to help deliver mainstream care highlights the value of Accredited Register practitioners. Examples of this are sports rehabilitators being used by the NHS to supplement physiotherapy to help meet the increased need for treatment for MSK conditions. Considering use of Accredited Registers within the consultations proposal to expand MSK care, for example through the establishment of MSK hubs, could provide an effective way to expand multidisciplinary teams. In addition, NHS England now requires registration with an Accredited Register for some talking therapies roles⁶.
- 1.16 The wider pool of Accredited Register practitioners could provide a useful group for the Government to engage in when looking to grow and develop the occupational health workforce. A recent joint survey with NHS Professionals showed that many practitioners are interested in additional employment opportunities. The Government may wish to consider approaching Accredited Registers that have a clear alignment to its goals for occupational health, such as our counselling and psychotherapy Registers and the British Association of Sport Rehabilitators, when designing new career pathways aimed at expanding the wider occupational health workforce.

Q22. What further action can the Government take to support multidisciplinary teams to deliver work and health conversations in other settings (for example NHS or community settings), to improve health outcomes and address health disparities?

- 1.17 Currently, only healthcare services of statutory professionals are exempt from VAT. This means that services provided by Accredited Register practitioners,

⁵ [The employment of disabled people 2022 - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/612222/the-employment-of-disabled-people-2022.pdf)

⁶ The British Psychological Society's Wider Psychological Wellbeing Register, and CBT Register UK.

even for patients who have been referred by their GP, are not exempt. We believe that this current tax treatment acts as a potential barrier to accessing healthcare.

- 1.18 For example, as set out above both physiotherapists, and Accredited Register sports rehabilitators can receive referrals by doctors to treat MSK conditions. However, the current tax treatment only exempts the services of physiotherapists, even if they work side by side with sports rehabilitators within the same clinic. This means that the sports rehabilitator may need to pass on higher costs to patients because of this.
- 1.19 We believe this approach creates a financial disincentive to use Accredited Register practitioners to help address workforce shortages. It may also breach the principle of fiscal neutrality, by distorting economic decisions about comparable services.
- 1.20 We will be highlighting these points to HM Treasury later this year. Given that the consultation emphasises the need to work with the private sector to develop a longer-term sustainable, multidisciplinary workforce pipeline, we hope this is an issue that both the DHSC and the Department of Work and Pensions would support.

2. Further information

- 2.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact Melanie Venables, Head of Accreditation at: melanie.venables@professionalstandards.org.uk.

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