

Accredited Registers

Condition Review: UK Public Health Register (UKPHR)

May 2025

1. Outcome

- Following the UK Public Health Register (UKPHR)'s 2024 renewal of accreditation, we issued two Conditions of Accreditation. Condition Two was due by October 2024, with the Condition One to be met by the UKPHR's next annual assessment due in March 2025. Both Conditions and the reasons for setting them were published on our website¹.
- This report evaluates the UKPHR's progress in meeting Condition One and Two. Our assessment found that both Conditions have been met, and we have issued a Recommendation to support the UKPHR in further improving its policy:

Recommendations		Deadline
Standard 5	Recommendation One: The UKPHR should incorporate the following points into its Interim Orders policy:	Next assessment
	 Include references to the interim orders policy within its Fitness to Practise Rules, including how orders will be published Specify how interim orders will be displayed on its website and register Consider providing public-facing information to explain that interim orders are protective measures rather than findings of fault, and to help the public understand how the policy works to protect them Clarify whether interim orders can be applied during appeal periods before final sanctions take effect Address how health-related interim orders will be applied and communicated Set out clear procedures for running interim order 	
	panels and appeal hearings, including managing	

¹ <u>https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/ukphr-accreditation-renewal-report-2024.pdf</u>

appearances by registrants and their	
representatives	

2. Background

• We assess registers against our *Standards for Accredited Registers* ('the Standards')². Where a Register has not met a Standard, we can issue Conditions. A Condition sets out the requirements and the timeframe that a Register must meet. Information on how Conditions are assessed can be found in our *Renewals*, *Targeted Reviews and Outcomes* guidance³.

The Condition to be addressed was:

Condition One: The UKPHR should make clearer how people who have gained qualifications and/or experience overseas can demonstrate equivalence with the requirements for registration.

Condition Two: The UKPHR should document its interim suspension order process, so it is clear how interim orders are issued, reviewed, and lifted.

• The UKPHR submitted its Condition One response within timelines and Condition two which is draft Interim Orders policy after the required deadline. We accepted the reasons given for this, noting that the short delay did not present a significant risk to public safety or have other negative impacts. We reviewed the draft policy alongside information published on the UKPHR's website: https://ukphr.org/. This report presents a consolidated review of the two sets of Conditions, which were assessed individually.

3. Condition One

 The Specialist Registration by Portfolio Assessment (SRbPA) route was an equivalence pathway. However, as per the UKPHR's specialist registration guidance this was only available to individuals with prior UK experience, which may exclude overseas-trained professionals.

 UKPHR have now removed this requirement for applicants to have gained competencies in the UK, to make the SRbPA route accessible to international applicants.

² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-(2021).pdf

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/guidance-documents/annual-review-process-guide.pdf

- UKPHR informed that the Board has approved it, and guidance regarding the
 portfolio assessment route to the register has been revised accordingly. We have
 noted that the updates have been made to the FAQs, Registration Quiz, and other
 guidance materials to reflect these changes.
- We came across older policies online, such as those from dating from <u>2018</u> and <u>2019</u>) which might not accurately reflect the updated equivalence process. It is suggested that all the published policies may be reviewed to avoid any confusion.

4. Condition Two

- Interim Orders (IOs) are used by the health and care professional regulators and Accredited Registers to protect the public by restricting their registrants' practice, if necessary, while an investigation takes place. They may also be applied after an adjudication hearing to restrict practice during an appeals process before a final sanction takes effect.
- We did not see evidence of the UKPHR's IO policy during its most recent assessment. This meant the register was not compliant with the minimum requirement set out in the Accredited Registers Evidence Framework⁴ for registers to have a "process for ensuring that actions are taken to restrict practice where there are serious safety concerns".
- Our assessment noted that the UKPHR's draft policy:
 - Clearly states that interim orders are imposed to protect the public or when in the public interest
 - Establishes separate Interim Order Panels with appropriate decision-making powers
 - Allows panels to consider and impose interim orders at any stage of the complaints process
 - Permits both suspension and conditions of practice orders
 - Includes robust review mechanisms with appropriate timeframes (including an 18-month maximum duration)
 - Gives registrants the right to make representations and appeal decisions
- The draft policy contains an appropriate level of detail to meet its objectives.
 Although not yet finalised, the risk of needing to implement the policy before completion is low. Approval has been obtained for its use, if required.

⁴ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf

- This Condition has been met as the policy establishes the core requirements for interim orders. However, we identified several areas where additional detail would enhance its effectiveness. To support the UKPHR in developing these aspects, we issued the following Recommendation:
- Recommendation One: The UKPHR should incorporate the following points into its final Interim Orders policy:
 - Include references to the interim orders policy within its Fitness to Practise Rules, including how orders will be published
 - Specify how interim orders will be displayed on its website and register
 - Consider providing public-facing information to explain that interim orders are protective measures rather than findings of fault, and to help the public understand how the policy works to protect them
 - Clarify whether interim orders can be applied during appeal periods before final sanctions take effect
 - Address how health-related interim orders will be applied and communicated
 - Set out clear procedures for running interim order panels and appeal hearings, including managing appearances by registrants and their representatives
- During the Condition One review, steps taken to address recommendation part 1 and 5 were reported. We will review the actions taken in response to all recommendations during the next annual assessment.

5. Conclusion

 The UKPHR has met Conditions and our minimum requirements. Our Recommendation will help the UKPHR develop a more robust interim orders policy that better serves both the public and its registrants.