**Accreditation renewal report**

**Standards 1-9**

Rehabilitation Workers Professional Network (RWPN)

July 2025

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# About accreditation

The Professional Standards Authority (PSA) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial and full renewal accreditation decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

* **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
* **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our Standards for Accredited Registers[[1]](#footnote-1) (“the Standards”) and our minimum requirements for the Standards as set out in our Evidence framework[[2]](#footnote-2). More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One[[3]](#footnote-3).

We used the following in our assessment of the RWPN:

* Documentary review of evidence supplied by the RWPN and gathered from public sources such as its website
* Due diligence checks
* Share your experience responses
* Assessment of RWPN's complaints procedures.

# The Outcome

The Accreditation Panel met on 19 May 2025 to consider the Rehabilitation Workers Professional Network (RWPN). The Panel was satisfied that the RWPN met or could meet with Conditions all the Standards for Accredited Registers.

**We therefore decided to accredit the RWPN with Conditions.**

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| --- |
| We noted the following **positive findings**:* The RWPN's register benefits users by enabling access to qualified professionals who help visually impaired people gain independence through mobility training and other specialist skills.
* The RWPN has systems in place to ensure that only appropriately qualified practitioners are listed on its register. When issues were identified, it acted promptly to address them and strengthen its processes.
* The RWPN provides appropriate routes to raise concerns about registrants through comprehensive complaints procedures that include lay involvement.
* The RWPN demonstrates commitment to equality, diversity and inclusion by collecting and analysing data about its registrant base and making appropriate adjustments to its processes.
* The RWPN works closely with major sight loss charities including RNIB and Guide Dogs, and includes people with visual impairments in decisions about professional standards.
* The RWPN has established clear governance structures, with separate committees for management and professional standards, supporting public protection.
 |

We issued the following Conditions to be implemented by the deadline given:

| **Standard** | **Conditions** | **Deadline** |
| --- | --- | --- |
| **2** | 1. The RWPN must review and correct its public register to ensure: * Only practitioners with fully verified qualifications appear on the public register
* All published entries include complete information on register type (rehabilitation/habilitation), verification status, and sanction status
* Any entries that cannot be fully completed with all required information are removed from public view until such information is available
* Consistent terminology is used throughout the register for verification status
 | **1 month** |
| **2** | 2. The RWPN must:* Review and revise its register management policies and procedures to prevent recurrence of these issues
* Implement quality assurance mechanisms to ensure ongoing compliance with the Standards for Accredited Registers and its own published policies
* Develop clear internal guidance on the handling of practitioners with pending verification
* Submit evidence of these improved processes
 | **3 months** |
| **2** | 3. The RWPN must:* Implement a clear and effective process for recognising proceedings and decisions made by regulatory bodies and other Accredited Registers.
* This process must include mechanisms to collect information from registrants about other registrations and relevant matters (including criminal convictions/cautions) at the point of application and renewal.
 | **3 months** |
| **2** | 4. The RWPN must:* Ensure that restrictions on practice are displayed prominently on the main register page or clearly "flagged" with a marker so that people know to check individual profiles for details of restrictions in place.
 | **3 months** |
| **3** | 5. The RWPN must:* Implement a mechanism to confirm that freelance registrants hold appropriate indemnity cover, such as a declaration at registration and renewal, in line with the expectations set out in the Code of Ethics.
 | **3 months** |
| **3** | 6. The RWPN must:* implement clear requirements for registrants to have procedures for considering complaints and escalating to the register where necessary.
* This should especially address freelance practitioners who do not have access to employer policies.
 | **3 months** |
| **5** | 7. The RWPN must:* implement its quality assurance process for decision-making and be able to demonstrate how it supports consistency, learning, and improvements in practice.
 | **3 months** |
| **5** | 8. The RWPN must:* Implement its reporting policy and make clear the circumstances in which the police, social services, employers, or other parties may need to be contacted at any stage of the process—even in cases where no formal sanction has been applied.
 | **6 months** |
| **6** | 9. The RWPN must:* Finalise and implement its business continuity arrangements.
 | **3 months** |
| **6** | 10. The RWPN must:* Develop and implement its organisational risk management tool.
 | **3 months** |
| **9** | 11. The RWPN must:* Develop internal policies for whistleblowing, anti-bullying, and recruitment applicable to all those involved in its governance and operations, including directors, committee members, and volunteers.
 | **3 months** |

We issued the following Recommendations to be considered by the next review:

| **Standard** | **Recommendations** |
| --- | --- |
| **2** | 1. The RWPN should revise its appeals policy to provide greater clarity for applicants, for example by providing grounds for appeal, expected timeframes, and potential outcomes. |
| **3** | 2. The RWPN should reference UK data protection legislation in its guidance or Code, particularly for the benefit of freelance registrants. |
| **3** | 3. The RWPN should produce guidance to support registrants in managing complaints, explaining how both freelance practitioners and those in employment should handle concerns and under what circumstances these should be escalated to the register. |
| **3** | 4. The RWPN should add a brief note to the Code of Ethics or create guidance for freelance registrants to clarify that advertising should reflect relevant good practice. |
| **3** | 5. The RWPN should signpost the relevant qualification standards within its Code of Ethics or professional guidance, to ensure responsibilities relating to safe equipment use are clearly communicated. |
| **4** | 6. RWPN should consider expanding its course monitoring activity to develop its understanding of how EDI is addressed and then work with training providers to strengthen EDI competencies. |
| **5** | 7. The RWPN should publish the planned easy-read or accessible summary version of its Concerns and Complaints Policy. |
| **5** | 8. The RWPN should ensure that its interim order process includes the ability for registrants to appeal decisions and for orders to be reviewed at appropriate intervals. |
| **5** | 9. The RWPN should make clear that appeals panels will also include lay membership. |
| **6** | 10. RWPN may wish to enhance transparency by considering the inclusion of a 'Directors' Responsibilities' section in either the Constitution or a separate Governance document. |
| **6** | 11. The RWPN should introduce a basic induction process for new Board and RPSC members. |
| **8** | 12. The RWPN should consider strengthening its website by publishing an accessibility statement, reviewing the accessibility of its documents, and introducing regular checks to identify and resolve broken links or unavailable materials. |
| **8** | 13. The RWPN should display the Accredited Registers quality mark more prominently on its website, such as in the footer or on relevant public-facing pages, and include a short explanation of what the mark signifies to support public understanding of its accredited status. |
| **9** | 14. The RWPN should ensure all decision-makers undertake training on reducing unconscious bias in its decision making. |

# About the Register

## This section provides an overview of the RWPN and its register.

|  |  |
| --- | --- |
| **Name of Organisation** | Rehabilitation Workers Professional Network (RWPN) |
| **Website** | <https://www.rwpn.org.uk/>  |
| **Type of Organisation** | Registered Company: no. 9179719 |
| **Role(s) covered** | * Visual Impairment Rehabilitators,
* Rehabilitation Workers and Habilitation Specialists,
* Vision Rehabilitation Specialists,
* Senior Specialists and Sensory Assistants
 |
| **Number of registrants** | 426 (1 Jan 2025) |
| **Overview of Governance** |  A Management Committee of 13 members provides oversight and makes decisions regarding RWPN operations on behalf of its members and in accordance with RWPN's constitution. |
| **Overview of the aims of the register** | The Management Committee leads the register by:* Deciding policy and direction, in consultation with membership where appropriate
* Planning and executing activities that further RWPN's aims
* Making policy and setting procedures for day-to-day operations
* Providing financial oversight and governance
 |

### Inherent risks of the practice

This section uses the criteria developed as part of the Authority’s *Right Touch Assurance tool*[[4]](#footnote-4) to give an overview of the work of Vision Rehabilitation and Habilitation Specialists.

|  |  |
| --- | --- |
| **Risk criteria**  |  |
| 1. **Scale of risk associated with Vision Rehabilitation**

*a. What do RWPN registrants do?* *b. How many RWPN registrants are there?* *c. Where do RWPN registrants work?* *d. Size of actual/potential service user group* | Vision Rehabilitation Workers work with adults who have sight loss to teach core orientation and mobility skills, communication skills, braille, and the use of assistive technology. Vision Habilitation Specialists work with those under 25 years old to develop similar skills.They carry out vision impairment assessments and refer to other services when needed. Their aim is to help individuals develop the skills they need to be independent.There are 426 registrants (as of January 2025). Most work in England and Wales.Practitioners work mainly in clinical and private practice settings. Some specialists work in particular contexts, such as with people who have learning disabilities or with veterans.All those who may need vision rehabilitation treatment, including many with learning disabilities and veterans, are potential service users. |
| 1. **Means of assurance**
 | The RWPN Register provides assurance by requiring specific qualifications and training. Education routes include a Level 5 Rehabilitation Worker Apprenticeship and university qualifications. |
| **3. About the sector in which Vision Rehabilitation and Habilitation Specialists operate** | Vision rehabilitation and habilitation is provided through a mix of local authority services, charitable organisations, and some private practice. |
| **4. Risk perception***• Need for public confidence in Vision Rehabilitation and Habilitation Specialists?* *• Need for assurance for employers or other stakeholders?* | Public confidence is important as these specialists work with vulnerable people who have visual impairments.Employers need assurance that practitioners have appropriate qualifications and skills to support people with visual impairments safely and effectively. |

# Assessment against the Standards

Standard One: Eligibility and ‘public interest test’

### Summary

* 1. Standard One examines whether a register is eligible for accreditation within our powers[[5]](#footnote-5) and whether accrediting it would benefit the public. We check that the roles covered by the register involve providing health or social care services that are not already regulated by law, and we assess whether the activities carried out by people on the register are beneficial and any risks are properly managed
	2. The RWPN registers vision rehabilitation workers and vision habilitation specialists in the UK. Vision rehabilitation workers support adults with sight loss to develop skills in orientation, mobility, communication, and assistive technology use. Vision habilitation specialists provide similar support to those under 25 years of age. These professionals work to help individuals with visual impairments develop practical skills for daily living and navigate their environments more confidently.
	3. We completed our Standard One assessment in March 2022 when the RWPN was initially accredited. We found that the RWPN's register falls within the scope of the Accredited Registers programme. We considered that the work of vision rehabilitation and habilitation specialists can be beneficial to individuals with sight loss and the wider health and care system.
	4. The initial assessment identified that the RWPN had considered risks associated with practice, such as physical risks during mobility training, and had appropriate mitigations in place through training requirements, professional standards, and codes of practice.
	5. During our renewal assessment we considered risks related to freelance practitioners, who will not be overseen by an employer. The RWPN has confirmed that most listed freelance practitioners work through specialist agencies rather than independently, with appropriate safeguards in place. The RWPN's guidance for the public includes recommendations to verify practitioners' insurance, Disclosure and Barring Service (DBS) checks, and references.
	6. The RWPN had previously addressed concerns identified during its initial assessment, by clarifying the UK scope of its register and improving information about the roles of vision rehabilitation and habilitation practitioners.
	7. During this renewal assessment, we did not identify any new information that would affect Standard One being met. We found it continues to be in the public interest to have a register of vision rehabilitation and habilitation practitioners who meet appropriate standards of competence, conduct, and business practice, as required by the RWPN.
	8. The Accreditation Panel found that Standard One is met.

Standard 2: Management of the register

### Summary

* 1. Standard Two looks at how well a register is maintained and managed for public use. This includes checking that the registration process is fair and accessible, that the published register contains accurate and complete information about who is registered, that any restrictions on practice are clearly shown, and that there are proper processes for keeping the register up-to-date.
	2. The Accreditation Panel found that Standard Two was met. It issued the following Conditions and Recommendation:

**Conditions:**

1. RWPN must review and correct its public register within one month to ensure:
	* Only practitioners with fully verified qualifications appear on the public register
	* All published entries include complete information on register type (rehabilitation/habilitation), verification status, and sanction status
	* Any entries that cannot be fully completed with all required information are removed from public view until such information is available
	* Consistent terminology is used throughout the register for verification status

The RWPN must report back to us on the effectiveness of its new measures so we can review and conduct our own register check.

1. Within three months, the RWPN must:
	* Review and revise its register management policies and procedures to prevent recurrence of these issues
	* Implement quality assurance mechanisms to ensure ongoing compliance with the Standards for Accredited Registers and its own published policies
	* Develop clear internal guidance on the handling of practitioners with pending verification
	* Submit evidence of these improved processes
2. RWPN must implement a clear and effective process for recognising proceedings and decisions made by regulatory bodies and other Accredited Registers. This process must include mechanisms to collect information from registrants about other registrations and relevant matters (including criminal convictions/cautions) at the point of application and renewal, so appropriate registration decisions may be made when proceedings begin or final decisions are reached.
3. The RWPN must ensure that restrictions on practice are displayed prominently on the main register page (as previously implemented) or clearly "flagged" with a marker so that people know to check individual profiles for details of restrictions in place.

**Recommendation:**

1. The RWPN should revise its appeals policy to provide greater clarity for applicants, for example by providing grounds for appeal, expected timeframes, and potential outcomes.

### Accreditation Panel findings

* 1. The RWPN maintains a publicly accessible register of qualified vision rehabilitation workers, vision habilitation specialists, and dual-qualified workers. The register serves as an important public protection tool, enabling employers, service users, and commissioners to verify practitioners' qualifications and professional standing. The register is designed to be user-friendly and easily searchable, with clear information about each practitioner's credentials and status.
	2. The RWPN operates transparent and accessible registration processes. Clear eligibility requirements and procedures are published on its website, including recognised qualifications, routes to registration, proof requirements, and the standards registrants must meet. The organisation requires applicants to submit evidence of qualification and confirm agreement to the Code of Ethics and Professional Conduct and continuing professional development requirements, both at initial registration and annual renewal.
	3. The register maintains robust continuing professional development arrangements through a structured scheme requiring all registrants to complete a minimum of 20 CPD credits annually across five defined activity categories. This scheme promotes reflective practice and balanced learning, with annual compliance declarations and random audits of 10% of registrants to ensure adherence. The RWPN also has clear processes for managing cases where qualification evidence is pending, with such individuals retained as members but not appearing on the public register until verification is complete.
	4. The public register includes appropriate information fields for each practitioner: full name, registration type, verification of qualification evidence, and sanction status. Individual profiles provide additional details including unique identification numbers, specific qualifications used for registration, country of practice, and confirmation of evidence received. The RWPN is a signatory to the Accredited Registers Information Sharing Protocol, enabling coordination with other registers on disciplinary matters.
	5. However, our detailed audit of the register identified significant inconsistencies in how information was presented to the public. Despite the RWPN's clear policy stating that only practitioners with verified qualifications should appear on the public register, we found multiple entries that contradicted this policy. These included practitioners marked "NO" for evidence provided still appearing publicly, entries showing "PENDING" verification status, and some entries with completely blank verification fields. Additionally, multiple entries were missing essential information such as register type (rehabilitation or habilitation specialist) or sanction status information.
	6. These inconsistencies could create significant problems for register users. The public would not reliably determine whether a practitioner had verified qualifications, and the presentation of unverified practitioners alongside verified ones could mislead service users about practitioners' credentials. The varying terminology used across different entries further added to confusion about what different statuses meant.
	7. Following our assessment, the RWPN developed and began implementing a comprehensive action plan to address these issues. The organisation contacted all registrants with incomplete information, set clear deadlines for corrections, and began removing non-compliant entries from public view. However, the Panel's subsequent check confirmed that some issues remained at the time of our review, indicating that while the response was prompt and appropriate, the corrective work needed completion and verification.
	8. The Panel also identified that the RWPN's process for recognising decisions from other regulators needed strengthening. The organisation had limited mechanisms to identify registrants who might also be registered with statutory regulators or other Accredited Registers, which could prevent appropriate action if proceedings were initiated against such practitioners elsewhere. This gap could undermine the register's ability to respond effectively to disciplinary matters involving dual-registered practitioners.
	9. Additionally, while the RWPN has an appeals process for registration decisions, the Panel found this could be made clearer for applicants. The current process, though functional, would benefit from more detailed explanation of grounds for appeal, expected timescales, and potential outcomes to enhance transparency and support applicants' understanding of their rights.
	10. We set Conditions requiring the RWPN to complete its register corrections, implement improved policies and quality assurance mechanisms, develop effective processes for recognising decisions from other regulators, and ensure restrictions on practice are clearly displayed. We made a Recommendation that the RWPN should enhance its appeals process to provide greater clarity for applicants.

Standard 3: Standards for registrants

### Summary

* 1. Standard Three examines the professional standards that people on the register must meet. This covers the competency requirements, ethical guidelines, and business practice standards that registrants must follow, including how they should behave professionally, handle confidential information, and conduct their practice safely and appropriately.
	2. The Accreditation Panel found that Standard Three was met. It issued the following Conditions and Recommendations:

**Conditions:**

1. The RWPN must implement a mechanism to confirm that freelance registrants hold appropriate indemnity cover, such as a declaration at registration and renewal, in line with the expectations set out in the Code of Ethics.
2. The RWPN must implement clear requirements for registrants to have procedures for considering complaints and escalating to the register where necessary. This should especially address freelance practitioners who do not have access to employer policies.

**Recommendations:**

1. The RWPN should reference UK data protection legislation in its guidance or Code, particularly for the benefit of freelance registrants.
2. The RWPN should produce guidance to support registrants in managing complaints, explaining how both freelance practitioners and those in employment should handle concerns and under what circumstances these should be escalated to the register.
3. The RWPN should add a brief note to the Code of Ethics or create guidance for freelance registrants to clarify that advertising should reflect relevant good practice.
4. The RWPN should signpost the relevant qualification standards within its Code of Ethics or professional guidance, to ensure responsibilities relating to safe equipment use are clearly communicated.

### Accreditation Panel findings

* 1. The RWPN sets professional standards through its published Code of Ethics and Professional Conduct, which covers competence, professional behaviour, and business practice requirements. All registrants must agree to abide by these standards both at initial registration and annually at renewal, ensuring ongoing commitment to professional requirements.
	2. The competence standards define what registrants can do and must not do within their scope of practice. These standards are based on knowledge, skills and behaviours taught through recognised qualifications, which derive from the 2008 Sensory Services National Occupational Standards. The Code requires registrants to recognise their professional limits and work within their area of competence.
	3. The RWPN has established safeguarding arrangements through its Safeguarding Policy, updated in February 2025, which is supported by expectations in the Code of Ethics. Registrants are required to report safeguarding concerns in accordance with UK law, including raising them with organisational leads or local authorities as appropriate. The RWPN has designated a safeguarding lead and maintains procedures for managing safeguarding concerns that may arise through its own activities.
	4. The Code includes specific expectations about assistive equipment, requiring registrants to "identify where compensatory skills development remains functionally limiting and therefore where assistive equipment should be incorporated into the rehabilitation plan to assist individual service users remain independent." This ensures registrants understand their responsibilities for recommending and supporting the safe use of equipment.
	5. The ethical framework addresses core principles expected of health and social care professionals. The Code of Ethics and Professional Conduct outlines expectations for personal integrity, professional responsibility, and conduct, with the values of accountability, honesty, openness, integrity, and respect covered throughout multiple sections. The Code sets expectations for professional judgement, safeguarding, equality, and maintaining appropriate professional boundaries.
	6. A separate Duty of Candour policy, published in 2022 and revised in 2024, supplements the Code by requiring registrants to be open and honest when things go wrong, including admitting mistakes and taking action to put them right. Both documents are publicly available and accessible to registrants and the public.
	7. The Code includes provisions for confidentiality and data management, setting out expectations for the handling, storage, sharing, and recording of personal information. It addresses principles including informed consent, secure data management, lawful and proportionate disclosure, and access rights, with protections against unauthorised access and expectations for accurate record-keeping. These provisions align with core principles of UK data protection legislation, though they do not explicitly reference the UK GDPR and Data Protection Act 2018.
	8. The Code requires registrants to "provide service users with information about their right to complain and ensure that they have any support they may require in making complaints." It also includes expectations for advertising, requiring registrants to "be accurate in advertising, avoiding misleading and sensational sales methods." For freelance registrants, the Code states they must "maintain adequate professional indemnity and public liability insurance cover as appropriate to practice and provide evidence of insurance to employers."
	9. However, the Panel identified areas where the standards needed strengthening, particularly for freelance practitioners. While the Code requires freelance registrants to hold appropriate insurance, the RWPN does not currently verify compliance with this requirement, creating a risk that expectations may not be consistently upheld. The Code requires registrants to inform service users about complaints procedures, but there is no specific guidance for freelance practitioners on maintaining their own complaints procedures or knowing when to escalate concerns to the register.
	10. The Panel also noted that explicit reference to UK data protection legislation would enhance clarity, particularly for freelance registrants who may not have access to employer-led data governance frameworks. While advertising requirements are appropriate, brief clarification about compliance with relevant good practice standards would strengthen the guidance. Additionally, while equipment safety responsibilities are addressed through qualification requirements, signposting these more prominently in the Code would improve clarity.
	11. We set Conditions requiring the RWPN to implement mechanisms to verify that freelance registrants hold appropriate indemnity cover and to establish clear requirements for complaints procedures that address the specific needs of freelance practitioners. We made Recommendations that the RWPN should reference relevant data protection legislation, provide clearer guidance on complaints management, clarify advertising expectations, and signpost equipment safety responsibilities more prominently.

Standard 4: Education and training

### Summary

* 1. Standard Four assesses whether the register sets appropriate education and training requirements for people who want to join it. This includes checking that training programmes adequately prepare registrants to work safely and competently, and that registrants know when they should refer people to other health or social care professionals.
	2. The Accreditation Panel found that Standard Four is met. It issued the following Recommendations:

**Recommendations:**

1. The RWPN should consider expanding its course monitoring activity to develop its understanding of how EDI is addressed and then work with training providers to strengthen EDI competencies.

### Accreditation Panel findings

* 1. The RWPN sets education and training requirements for vision rehabilitation and habilitation specialists at a minimum UK Quality Assurance Agency Level 5 (foundation degree or apprenticeship standard), which are aligned to the National Occupational Standards published by Skills for Care. This ensures that all registrants have achieved a recognised professional qualification that covers the essential knowledge, skills and behaviours needed for safe and effective practice.
	2. The RWPN recognises specific training providers, including Birmingham City University and Vision Rehabilitation Training Ltd, whose programmes cover core competencies such as specialist assessments, orientation and mobility training, communication skills, independent living support, and appropriate referrals to other health and social care professionals. Most students and apprentices qualify through placements or employment in settings embedded within the wider health and social care system, providing direct experience of health and care systems, referral pathways, and professional collaboration.
	3. The Level 5 apprenticeship standard for Vision Rehabilitation Specialists explicitly includes knowledge of "referral services available to support individuals with vision impairment; social care, health, employment, welfare and education services." This ensures that registrants understand how to work effectively within the broader health and social care landscape and know when and how to refer clients to other professionals.
	4. While the RWPN does not approve or accredit training courses, it has developed a monitoring process. In January 2023, the Registration and Professional Standards Committee published "Monitoring the Quality of Programmes of Vision Rehabilitation/Habilitation Training in the UK," which sets out how the organisation monitors whether courses meet expectations aligned to the National Occupational Standards and sector frameworks. This monitoring process focuses on practical concerns raised by registrants, such as the quality of mentor support arrangements.
	5. In 2024, the RWPN conducted an audit of how students and apprentices are supported through mentoring, with both recognised providers responding to requests for information. University-based qualifications are subject to their institutions' internal validation and governance processes, while the apprenticeship pathway is subject to Ofsted inspection. The RWPN supplements these external systems with its own targeted monitoring to address sector-specific expectations and risks.
	6. However, the Panel noted limited explicit focus on ensuring that education and training equips registrants to care for a diverse population. The RWPN acknowledged this limitation, noting that the Knowledge, Skills and Behaviours in the apprenticeship standard "make no explicit reference to EDI issues and were not required to be considered by IfATE." While the RWPN indicated that both qualification routes cover relevant aspects of diversity through exposure to diverse service users and case studies, there was no formal process by which the RWPN verifies that its registrants are consistently trained to understand and meet the needs of a diverse population.
	7. We made a Recommendation that the RWPN should expand its course monitoring activity to develop its understanding of how EDI is addressed and then work with training bodies to strengthen what's being taught. While RWPN does not formally approve qualifications, it could use its existing engagement with education and training providers to gather information on how EDI is addressed in course design, delivery, and student support, and use this to collaborate with training bodies to achieve appropriate competency requirements and inform registration policy or public reporting.

Standard 5: Complaints and concerns about registrations

### Summary

* 1. Standard Five examines how the register handles complaints and concerns about people on its register. This includes checking that there are fair and robust processes for investigating concerns, that all parties receive appropriate support, that decisions are made transparently, and that outcomes are published to help protect the public.
	2. The Accreditation Panel found that Standard Five is met. It issued the following Conditions and Recommendations:

**Conditions:**

1. The RWPN must implement its quality assurance process for decision-making and be able to demonstrate how it supports consistency, learning, and improvements in practice.
2. The RWPN must implement its reporting policy and make clear the circumstances in which the police, social services, employers, or other parties may need to be contacted at any stage of the process, even in cases where no formal sanction has been applied.

**Recommendations:**

1. The RWPN should publish the planned easy-read or accessible summary version of its Concerns and Complaints Policy.
2. The RWPN should ensure that its interim order process includes the ability for registrants to appeal decisions and for orders to be reviewed at appropriate intervals.
3. The RWPN should make clear that appeals panels will also include lay membership.

### Accreditation Panel findings

* 1. The RWPN maintains a published Concerns and Complaints policy that outlines procedures for handling concerns about registrants. The process includes several stages depending on the nature and seriousness of the complaint. The Initial Investigating Panel consists of three people, including a lay member, and gathers information to determine whether a complaint should proceed. If a case is referred forward, the Professional Conduct Panel, also including a lay member and someone with management experience in health or social care, determines whether there has been a breach of the Code of Ethics and Professional Conduct.
	2. The Registration and Professional Standards Committee independently manages complaints, ensuring that decision-makers at different stages are separate and free from prior involvement. The process allows for interim suspension of registration where necessary to protect the public during investigations. Both parties may appeal outcomes, with appeals considered by individuals not previously involved in the matter.
	3. The policy requires that accessibility requests are considered for all relevant information and meeting arrangements. It outlines adjustments for vulnerable witnesses, including allowing evidence to be submitted in alternative formats and considering age, mental health, learning disability, or trauma-related vulnerability. The website invites potential complainants to discuss support needs.
	4. The RWPN publishes decisions about sanctions on its website, including interim suspension orders, cautions, suspensions, or removals from the register. The organisation is a signatory to the Accredited Registers Information Sharing Protocol and participates in the mutual recognition process, sharing disciplinary outcomes with other Accredited Registers where appropriate.
	5. The RWPN uses published Indicative Complaints Resolutions and Sanctions Guidance to support consistency in decision-making. This guidance sets out the range of possible outcomes at each stage, factors influencing decisions such as seriousness and risk to the public, and examples of outcomes and resolutions. The guidance has been revised to include examples of when additional training might be appropriate, showing that the RWPN actively reviews and refines its approach.
	6. However, the RWPN had proposed but not yet implemented an annual quality assurance mechanism for reviewing complaints decision-making. This process would identify learning from cases and assess whether decision-making processes remain fit for purpose. The Panel found that without this process in place, there was insufficient assurance of consistency and learning from complaints outcomes.
	7. The organisation's safeguarding policy allows for reporting concerns to external bodies in serious cases where suspension is applied, but the circumstances requiring reporting in other situations were not clearly defined. This could include cases where concerns do not meet the threshold for interim suspension but still present safeguarding risks, or where patterns of behaviour emerge that do not yet amount to professional misconduct.
	8. The Panel also identified areas where the complaints process could be enhanced. The RWPN had recognised the need for an easy-read version of its complaints policy, but this had not yet been developed. The interim order process did not include explicit provisions for registrants to appeal decisions or for periodic reviews of ongoing suspensions. Additionally, while the appeals process included lay membership at earlier stages, it did not specify that lay members would be included in appeals panels.
	9. We set Conditions requiring the RWPN to implement its quality assurance process and clarify circumstances for external reporting. We made Recommendations that the RWPN should publish an accessible complaints policy, ensure interim order appeal processes, and clarify lay membership requirements for appeals panels.

Standard 6: Governance

### Summary

* 1. Standard Six looks at how the register is governed and managed as an organisation. This includes examining the leadership structures, financial management, transparency measures, and decision-making processes to ensure they support the register's public protection role and promote accountability and integrity.
	2. The Accreditation Panel found that Standard Six could be met with Conditions. It issued the following Conditions and Recommendations:

**Conditions:**

1. RWPN must finalise and implement its business continuity arrangements.
2. RWPN must develop and implement its organisational risk management tool.

**Recommendations:**

1. RWPN may wish to enhance transparency by considering the inclusion of a 'Directors' Responsibilities' section in either the Constitution or a separate Governance document.
2. The RWPN should introduce a basic induction process for new Board and RPSC members.

### Accreditation Panel findings

* 1. The RWPN operates through defined governance structures with appropriate separation of functions. A Management Committee of 13 members provides overall oversight and strategic direction, while a separate Registration and Professional Standards Committee independently manages all matters relating to professional registration and standards. This separation ensures that registration decisions and disciplinary matters are handled independently from general organisational management, preventing conflicts of interest.
	2. The RWPN publishes governance information on its website, including its constitution, committee terms of reference, meeting minutes, financial records, and key policies. The organisation maintains processes for managing conflicts of interest, with declarations recorded in committee minutes, and provides accessible routes for anyone to raise concerns or complaints about how the register operates.
	3. Financial management arrangements are documented in the RWPN's Financial Controls and Procedures Policy. The policy requires Management Committee approval of fully costed budgets before each financial year begins, with regular financial reports to committee meetings that include actual income and expenditure, comparisons with budgeted figures, year-on-year analysis, and calculations of free reserves. The organisation maintains reserves equal to three months' trading revenue to ensure orderly operations.
	4. The RWPN has appropriate legal protections in place, including liability insurance, and maintains current data protection arrangements. Its Data Protection and Privacy Policy sets out lawful bases for processing personal data, consent procedures, data retention periods, and data subjects' rights under UK GDPR, with particular attention to handling equality, diversity and inclusion data collected voluntarily from registrants.
	5. The governance arrangements include diverse perspectives and expertise. The Registration and Professional Standards Committee includes lay members with lived experience of visual impairment alongside professional members with relevant experience in service provision and disciplinary processes. The Management Committee consists of elected practising registrants representing local groups nationally, with the Treasurer role open to non-practitioners due to the financial expertise required.
	6. However, the Panel identified that the RWPN's business continuity arrangements remained in development, with no published procedures in place to maintain access to the register, handle complaints, or ensure continued governance functions in the event of unexpected vacancies or operational disruption. The RWPN explained that a recent decision to recruit to a leadership post had resulted in a need to rework their draft organisational risk management tool and business continuity policy. While the organisation requested additional time to complete this work properly, the Panel found that these arrangements remained incomplete at the time of assessment, meaning there was no documented approach to systematically identify, manage, and review risks to governance arrangements.
	7. The Panel also identified opportunities to enhance transparency and member support. While the RWPN publishes extensive governance information, it could consider including a Directors' Responsibilities section in its constitution or governance documents to clarify legal duties under the Companies Act 2006. The organisation also lacks a structured induction process for new Board and Registration and Professional Standards Committee members.
	8. We set Conditions requiring the RWPN to finalise and implement its business continuity arrangements and develop and implement its organisational risk management tool. We made Recommendations that the RWPN should consider enhancing transparency through clearer documentation of directors' responsibilities and should introduce a basic induction process for new committee members.

Standard 7: Management of the risks arising from the activities of registrants

### Summary

* 1. Standard Seven assesses how well the register understands and manages the risks that could arise from the activities of people on its register. This includes checking that potential risks to service users and the public are identified, monitored, and properly addressed through appropriate safeguards and controls.
	2. The Accreditation Panel found that Standard Seven is met.

### Accreditation Panel findings

* 1. The RWPN demonstrates a comprehensive understanding of the risks associated with vision rehabilitation and habilitation practice. The organisation maintains a detailed risk matrix that identifies key risks including physical harm during mobility or cooking training, emotional risks such as undetected depression, boundary violations, and harm from poorly managed equipment or inadequate training for working with children.
	2. The risk matrix assesses each risk against likelihood and impact, assigns responsibility for mitigation, and outlines control measures including adherence to National Occupational Standards, professional codes of conduct, mandatory continuing professional development, and supervision requirements. Both the Management Committee and Registration and Professional Standards Committee regularly review the risk register, ensuring ongoing monitoring and management of identified risks.
	3. The RWPN's website and materials provide clear information about the benefits and limitations of registrants' services, presenting vision rehabilitation and habilitation work accurately as practical skill development rather than clinical treatment. For freelance practitioners, the RWPN provides appropriate guidance about verifying qualifications, insurance, and references.
	4. The Panel was satisfied that the RWPN has a thorough understanding of the risks arising from registrants' activities and takes appropriate action to mitigate them effectively.

Standard 8: Communications and engagement

### Summary

* 1. Standard Eight examines how the register communicates with the public and engages with relevant stakeholders. This includes checking that the register's website and other materials provide clear and accessible information, and that the register works collaboratively with other organisations to strengthen public protection.
	2. The Accreditation Panel found that Standard Eight is met. It issued the following Recommendations:

**Recommendations:**

1. The RWPN should consider strengthening its website by publishing an accessibility statement, reviewing the accessibility of its documents, and introducing regular checks to identify and resolve broken links or unavailable materials.
2. The RWPN should display the Accredited Registers quality mark more prominently on its website, such as in the footer or on relevant public-facing pages, and include a short explanation of what the mark signifies to support public understanding of its accredited status.

### Accreditation Panel findings

* 1. The RWPN provides information through its website, which includes its public register, details on joining requirements and training, information about continuing professional development, and a complaints section with clear policies and submission forms. The site is structured with separate sections for current registrants, prospective members, employers, service providers, and members of the public.
	2. The website includes accessibility features that are relevant given the RWPN's work with visually impaired people. It uses a simple layout with high-contrast text and clear headings, offers text size and colour adjustment features, avoids distracting elements such as pop-ups or animations, and can be navigated using keyboard controls or screen readers. Key processes including registration, complaints, and sanctions are published and accessible from the main navigation.
	3. The RWPN collaborates with other Accredited Registers and relevant stakeholders. It is a signatory to the Accredited Registers Information Sharing Protocol, enabling mutual recognition of decisions and cross-notification of disciplinary outcomes. The organisation is an active member of the Accredited Registers Collaborative and has participated in PSA Accredited Registers events.
	4. The RWPN engages with stakeholders including registrants, employers, service users, and partner organisations such as the Royal National Institute of Blind People (RNIB) and the Guide Dogs for the Blind Association. The RWPN gathers feedback from its registrants and uses this to make changes, such as revising how continuing professional development is recorded and submitted based on input from both registrants and assessors. While the RWPN does not have regular direct contact with service users, it includes people with lived experience of sight loss through lay members on its Registration and Professional Standards Committee.
	5. The RWPN engages with local authority employers but has identified challenges in this area. The organisation reports good relations with local authorities where managers understand the complexity of sensory needs work, particularly where there is overlap with social work in mental health, learning disability and dementia cases. However, the RWPN has identified that many registrants work in settings where there is limited understanding of the professional role or the need for a professional register. The organisation regularly receives enquiries from managers questioning whether the profession is regulated and why continuing professional development is required, indicating a need for greater awareness of the register's role in public protection.
	6. The RWPN provides information about its accredited status, explaining on its website that its professional registration is formally accredited by the Professional Standards Authority and that registrants are entitled to use the quality mark. However, the Panel noted that the quality mark itself could be displayed more prominently, such as in the website footer or on key public-facing pages, along with an explanation of what it signifies.
	7. The Panel also identified opportunities to strengthen the website's accessibility features. While the site includes accessibility features, publishing an accessibility statement would help explain the design features, and ensuring all documents are fully accessible to screen readers would enhance usability. Regular checks to identify and resolve any broken links or unavailable materials would help maintain the site's functionality.
	8. We made Recommendations that the RWPN should consider these website improvements and display the Accredited Registers quality mark more prominently to support public understanding of its accredited status.

Standard 9: Equality, Diversity and Inclusion

### Summary

* 1. Standard Nine assesses the register's commitment to equality, diversity and inclusion. This includes checking that the register's processes are fair and free from discrimination, that it understands the diversity of its registrants and service users, and that it works actively to promote equality and remove unnecessary barriers to access.
	2. The Accreditation Panel found that Standard Nine is met. It issued the following Condition and Recommendations:

**Conditions**

1. The RWPN must develop its internal policies for whistleblowing, anti-bullying, and recruitment applicable to all those involved in its governance and operations, including directors, committee members, and volunteers.

**Recommendations:**

1. The RWPN should ensure all decision-makers undertake training on reducing unconscious bias in its decision making.

### Accreditation Panel findings

* 1. The RWPN has published an EDI Policy Statement that commits to equality, fairness, and respect, explicitly referencing protected characteristics outlined in the Equality Act 2010. The organisation collects voluntary demographic data from registrants, achieving a 70% response rate in 2024. This data showed an ageing registrant population and that 10% of registrants had a visual impairment. The Management Committee reviews demographic results to identify trends.
	2. The RWPN has made adjustments to its continuing professional development process to assist people with visual impairments, accepting alternative submission formats such as video or audio rather than requiring only written documents. The organisation has provided CPD courses addressing barriers, including accessible build environments, domestic violence and visually impaired people, and providing advice on genetic screening.
	3. The Registration and Professional Standards Committee includes lay members with lived experience of visual impairment or sight loss. The Management Committee has a designated EDI lead member. When recruiting committee members, the RWPN uses a formal application process that includes voluntary EDI monitoring.
	4. The RWPN collaborates with organisations such as BAME Vision to promote equality and inclusion. When monitoring training providers, it checks how they support apprentices and students with disabilities.
	5. However, the Panel found that the RWPN lacked specific internal policies for whistleblowing, anti-bullying, and recruitment applicable to its committee members, directors, and volunteers. The RWPN had sought to source unconscious bias training for decision-makers but no recent update was provided. The Registration and Professional Standards Committee noted in January 2025 a lack of diversity beyond disability within its membership.
	6. We set a Condition requiring the RWPN to develop internal policies for whistleblowing, anti-bullying, and recruitment. We made a Recommendation that the RWPN should source training on reducing unconscious bias. We also made Recommendations under Standard Five regarding the accessibility of the complaints procedure and ensuring equal support for complainants and witnesses, which relate to equality and inclusion considerations under this Standard.

# Share your experience

* 1. We invite anyone with experience of a register to share their views with us during our assessment process. This helps us understand how the register works in practice and whether there are any concerns about its registrants or processes. We consider all feedback we receive as part of our decision-making; alongside the evidence we gather directly from the register itself.
	2. We received no responses to the invitation to share experience of the RWPN.

# Impact assessment(including Equalities impact)

* 1. We are required by law to assess the likely impact of our decision to accredit a register. This means considering how accreditation might affect different groups of people, including registrants, employers, service users, and those with protected characteristics under equality legislation. We examine both the potential benefits and any possible negative effects to ensure our decision serves the public interest.
	2. We carried out an impact assessment as part of our decision to renew the RWPN's accreditation. This included an equalities impact assessment to meet our duties under the Equality Act 2010.
	3. We found that renewing accreditation is likely to have largely positive effects, particularly for equality, diversity and inclusion. Accreditation helps raise the profile of vision rehabilitation work, which should encourage more referrals from healthcare professionals and support workforce growth. This will improve access to services, especially for older adults and people from marginalised communities who are more likely to experience sight loss.
	4. The RWPN's own equality and diversity data shows modest but growing diversity among its registrants. Notably, the profession includes practitioners with visual impairments themselves, who benefit from targeted mentorship and workplace adjustments. The RWPN has made its continuing professional development processes more accessible and provides training on topics such as accessible environments and supporting people from different backgrounds.
	5. We noted some areas where the RWPN could continue to improve. Some registrants prefer not to share information about their protected characteristics, which makes it harder to identify potential barriers. The RWPN is working to encourage more people to share this information voluntarily.
	6. We also noted that the RWPN expects an increase in freelance practitioners, including those from underrepresented groups. While this supports workforce diversity, it may create some additional administrative tasks for the register, such as checking insurance arrangements.
	7. The RWPN's efforts to promote equality, diversity and inclusion—including its published EDI policy, accessible training content, and ongoing monitoring of workforce diversity—support a more inclusive profession. No significant negative impacts were identified, and no environmental impacts were noted.
1. <https://www.professionalstandards.org.uk/publications/standards-accredited-registers> [↑](#footnote-ref-1)
2. <https://www.professionalstandards.org.uk/organisations-we-oversee/our-work-accredited-registers/accredited-registers-resources> [↑](#footnote-ref-2)
3. <https://www.professionalstandards.org.uk/organisations-we-oversee/our-work-accredited-registers/accredited-registers-resources> [↑](#footnote-ref-3)
4. <https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14>. [↑](#footnote-ref-4)
5. <https://www.legislation.gov.uk/ukpga/2002/17/part/2/crossheading/the-council-for-the-regulation-of-health-care-professionals> [↑](#footnote-ref-5)