

Accredited Registers

Condition Review: Rehabilitation Workers Professional Network (RWPN)

1. Outcome

- 1.1 At the Rehabilitation Workers Professional Network (RWPN)'s initial accreditation, the Professional Standards Authority issued 12 Conditions on its accreditation, one of which was to be completed by 30 June 2022 (see paragraphs 11.21 to 11.26 of the published outcome.¹ The RWPN also provided evidence against Condition 6b. This was due for completion by the RWPN's first renewal in April 2023 (see paragraph 10.3 to 10.7 of the published outcome).
- 1.2 This report sets out our assessment of the actions taken by the RWPN to satisfy both of these Conditions
- 1.3 We found that the RWPN had met Conditions 6b and 11.

2. Background

- 2.1 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.
- 2.2 At RWPN's initial accreditation, completed in March 2022, we issued 12 Conditions (a full list is published on the RWPN's directory page³), Condition 11 had to be implemented by 30 June 2022:
Decision makers at different stages of the process including appeal should not have previously been involved in the complaint. The RWPN should review and update its procedures to ensure there is separation for appeals.
- 2.3 The RWPN also provided evidence against Condition 6b, which was due for completion by the RWPN's first renewal in April 2023:
The RWPN should develop quality assurance mechanisms to ensure that the information on the register remains accurate and up to date. This could include for example regular audit of the public register.
- 2.4 This report discusses the actions RWPN took to address the Condition, as well as our decision about whether the Condition is met. RWPN's responses to the remaining Conditions will be considered in due course.

¹ The RWPN initial accreditation outcome (April 2022). <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/read-our-assessments/panel-decisions> [accessed 18 August 2022]

² The RWPN were originally assessed against the *Standards for Accredited Registers* (April 2016). https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/standards-for-accredited-registers-2016.pdf?sfvrsn=cfae4820_4 [accessed 18 August 2022]

³ The RWPN's Directory page on the Authority's website. <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/find-a-register/detail/rehabilitation-workers-professional-network> [accessed 18 August 2022]

- 2.5 We reviewed the following evidence:
- a) RWPN's reported actions about what it had done to meet Conditions 6b and 11.
 - b) RWPN's published information about handling appeals following complaint decisions⁴
 - c) Register checks.

3. Condition 6b

Concerns leading to the Condition

- 3.1 As part of our initial assessment of the RWPN we carried out checks on its register. We found that there were gaps in the information presented for the register type (register of Rehabilitation Workers, Register of Habilitation Workers, Dual Registered Rehabilitation/Habilitation) and the country in 16 of the 288 registrants that were listed on the register at the time of the checks. The RWPN reported that this was due to registrants not completing their profiles and noted that they were sending out reminders to all registrants.
- 3.2 We also found that one registrant had 'other' listed under qualifications. The RWPN confirmed that the registrant with 'other' listed as their qualification had completed a recognised course, but it was not listed as an option on the list of qualifications that can be chosen by registrants. There were two additional registrants for whom 'other' was listed as their country of practice. During the site visit the RWPN informed us that this used to refer to overseas registrants. The RWPN has added the following statement to its register to make clear that overseas registrants do not fall under the remit of the Accredited Registers programme 'Our register is accredited by the Professional Standards Authority. (Please note that registrants who are listed as working overseas have met RWPN's requirements to be on our register, but are not covered by the accreditation from the Professional Standards Authority.)'
- 3.3 The Panel noted that it was important for the register to be accurate and up to date and for the information to be clear so the public can make informed decisions. The Panel issued two related Conditions. Condition 10 (The RWPN should review its register entries for consistency, accuracy and clarity of information) which was assessed as met in May 2022.⁵ And Condition 6b (The RWPN should develop quality assurance mechanisms to ensure that the information on the register remains accurate and up to date. This could include for example regular audit of the public register. This was due to be completed by April 2023).

Assessment of Condition

- 3.4 In July 2022, the RWPN provided a copy of the monitoring schedule for its register and the form it will use to record the results. The schedule provides details of the checks that will be carried out and when, along with who in the

⁴ RWPN Concerns and Complaints webpage. <https://www.rwpn.org.uk/Concerns-and-Complaints> [accessed 18 August 2022]

⁵ Condition 10 outcome report. https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/panel-decisions/220526-rwpn-condition-5-outcome.pdf?sfvrsn=3cb54b20_4 [accessed 18 August 2022]

RWPN is responsible for doing them. The RWPN reported that it has started to use these checklists to check its register, with checks being carried out by members of the Management Committee and the Registration and Professional Standard Committee (RPSC). We carried out register checks on approximately 5% of the register and did not highlight any issues.

4. Condition 11

Concerns leading to the Condition

4.1 At the initial Panel meeting we found that there were conflicts of interest caused by the arrangements the RWPN had in place to consider appeals following complaint decisions. There are two points at which an appeal can be made:

- 1) The complainant can appeal a decision made by the Initial Investigation Panel (IIP) where they have decided not to progress a complaint.
- 2) Both the complainant and the registrant can appeal a decision following a Professional Conduct Panel (PCP) decision.

4.2 Appeals against IIP decisions were heard by the original IIP. Appeals against PCP decisions were considered first by a member of the RPSC who decides if an appeal meets the criteria. If allowed the appeal was heard by three people who did not sit on the original PCP but who may have been involved in the IIP.

4.3 The panel found these posed significant conflicts of interest and issued Condition 11.

Assessment of the Condition

4.4 The RWPN provided its response to the team on 29 June 2022. This consisted of a flow diagram showing how different people will consider different parts of the process. The RWPN also provided its updated *Concerns and Complaints Policy* which states that following a PCP decision, 'An appeal panel will also consist of people who have not been on the Initial Investigating Panel or the Professional Conduct Panel.' The flow diagram and the updated process were published on the RWPN's website.

4.5 We found that different people will consider appeals following a PCP decision and that this removed the potential conflict of interest at this stage. However, we noted from the flow diagram didn't say who will consider appeals against IIP decisions. The RWPN confirmed that these will be considered by the original IIP. We advised the RWPN that the Panel had identified this as a potential conflict during the Panel meeting and extended the deadline to 1 August 2022 to allow the RWPN time to consider an alternative method.

4.6 In August 2022, the RWPN confirmed that appeals against decisions made by the IIP will now be considered by a single reviewer who has not been involved in the IIP decision. We found that this removes the conflict identified by the Panel. We noted that this change has not yet been made to the RWPN's procedures; they have however committed to publishing the updated versions by the end of August 2022.

5. Conclusion

- 5.1 We therefore found that Conditions 6b and 11 were met. We will review the effectiveness of the implementation of the register checks as part of the RWPN's next review. The RWPN has committed to publishing its updated appeals process by the end of August 2022 at which point we will review the published procedures.