

Accredited Registers Impact Assessment

Accredited Register: APSP – Accredited Register of Foot Health Practitioners ('the Alliance')

Type of Review: Full renewal assessment

Period under review: 2023-2024

Date Approved for Panel: 12 March 2024

Introduction

Before we make a decision about accreditation, we undertake an impact assessment to understand likely effects on different groups, and the wider health system. We begin to gather the information required for the impact assessment when a Register first applies for accreditation. We consider any changes to impacts when we renew accreditation, and when taking other decisions that affect accreditation status such as imposing Conditions or suspension.

A key part of the impact assessment is consideration of equalities. The Equality Act 2010 imposes a legal duty, the Public Sector Equality Duty on all public bodies to consider the equality impact of its policies and decision making. The duty is known as the Equality Duty and it requires a public authority, in the discharge of its function to consider the following three aspects which form the basis of the duty:

- Consider the impact and eliminate unlawful (direct or indirect) discrimination and any other conduct prohibited under the Equality Act 2010.
- Advance equality of opportunity between people with protected characteristics and those who do not share these characteristics
- Foster good relations between people with protected characteristics and those who do not share these characteristics.

This means that public bodies must consider equality impact on individuals protected under the Equality Act 2010 in carrying out their work. The Authority, therefore, needs to be always mindful of the public duty when carrying out its oversight role which includes the approving of registers. It needs to have 'due regard' to the needs to balance the three aspects which make up the Equality Duty when achieving its goals.

The Equality Impact Assessment is an important tool/mechanism for demonstrating 'due regard' through the consideration of evidence and analysis, actual and potential to identify positive and/or adverse impacts. The key groups we need to consider when making our decisions are, sex, age, ethnicity, disability, religion and belief, sexual orientation, gender reassignment, marriage and civil partnership, pregnancy, and maternity.

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Impacts

Equalities impacts - summary

Foot Health Practitioners offer services not readily available through the NHS or primary care, providing early and individualised attention to patients. Known risks include working conditions that may be sub-optimal in terms of lighting and hygiene, but practitioners are educated to work safely and use appropriate equipment and materials.

The Alliance has 860 UK-based registrants who are Foot Health Practitioners or HCPC-registered podiatrists. The services provided by these practitioners include a range of non-invasive treatments to improve comfort and well-being. The Alliance emphasises education and preventive care.

The Alliance does not collect data on the protected characteristics of its registrants or their patients/service users: They told us their focus is on treating conditions of the foot and leg irrespective of these characteristics. However, they are developing their understanding of dementia to better understand the needs of their patients. The accreditation of the register is anticipated to assure individuals and carers, particularly those with disabilities, that all members are trained to work effectively and mitigate any potential harm or other negative impact.

The Alliance withdrew from the Accredited Registers programme as of 31 March 2024. The impact of the Alliance's withdrawal was considered by the Authority. The Accreditation Panel noted that matters considered within the assessment would be considered should the Alliance re-apply.

We noted wider issues within our assessment of Standards 2-8 that might have an overall impact:

1. **Trust:** Inadequate complaints handling could impact on trust and confidence in the Alliance's register, deterring individuals from using its services.
2. **Accountability:** Poor complaints management might allow substandard practices to persist, compromising patient safety and care quality.

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3. **Conflict of Interests:** Ineffective separation between public protection and professional interests could lead to prioritising member benefits over patient safety, impacting complaint resolution and preventive measures.
4. **Equalities Impact:** These issues could disproportionately affect vulnerable groups, potentially leading to poor treatment or access to effective complaints resolution.
5. **Reputation:** These issues might harm the Alliance's reputation among healthcare providers and stakeholders, affecting its ability to attract competent practitioners and maintain quality.

Impacts on groups with protected characteristics

Age

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	Elderly service users	The majority of service users are over 65 years of age. Accreditation could provide confidence to GPs and other referrers, ensuring elderly patients receive appropriate care. Potential for increased service user charges to offset costs of		December 2023

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Negative		Accreditation by the Alliance may disadvantage those not able to afford treatment.	No indication of such costs at this time.	December 2023
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Disability

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Positive	Service users with dementia and other age-related disabilities	Alliance members are trained to work with service users with disabilities such as dementia. The Alliance stated its focus on learning more about working with people who have dementia.		December 2023

Gender reassignment

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

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Marriage and civil partnership

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

Pregnancy and maternity

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

Race

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

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Religion or belief

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

Sex

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

Sexual orientation

Type of impact (positive/neutral/negative)	Group(s) affected	Description	Actions required	Date identified
Neutral	None noted			

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Cost and market impacts – summary

The last registration fee reported was £105.00 per annum, which includes membership of the Alliance and entry onto the Accredited Public Register. There was no intention to increase the registration fee post-accreditation at that time. Domiciliary practitioners typically see 40 clients/patients per week, with an average cost of £30-35 per session. The costs of accreditation were not expected to lead to increased costs for registrants or patients.

Social and environmental impacts – summary

Most Foot Health Practitioners are self-employed and do not cause environmental concerns. Their waste is non-toxic, and sharp blades are disposed of through designated clinical waste disposal routes. Accreditation is expected to have a positive impact, providing assurance to employers and elevating the status of registrants.

Decision

The Accreditation Panel determined that overall, it was within the public interest to renew accreditation of the Alliance, with Conditions. The Panel considered the impact of the Alliance's withdrawal from the Accredited Registers programme and noted that the assessment decision would be published on the Authority's website.