

# Annual review of accreditation 2018/19

Genetic Counsellor Registration Board (GCRB)

July 2018

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## About the Genetic Counsellor Registration Board

The Genetic Counsellor Registration Board (GCRB) registers:

- Genetic Counsellors.

Its work includes:

- Setting and maintaining standards of practise and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep up their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of April 2018, there were 208 registrants on GCRB's register. GCRB was first accredited on 10 May 2016. This is the second annual review and this report covers the period 10 May 2017 to 10 May 2018.

## Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every twelve months.

Accreditation can be renewed by a Moderator in cases where there are no concerns that a register is not meeting the Standards. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be recommended by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

## Outcome

Accreditation for GCRB was renewed for the period of 10 May 2018 to 10 May 2019.

Accreditation was renewed by a Panel on 9 July 2019 following a targeted review of Standards 3 and 10c. A Moderator had determined that all other Standards were met, but that insufficient evidence had been provided to demonstrate continuing compliance with Standards 3 and 10c.

No Conditions were issued.

The following Recommendation was issued to be implemented by the submission of annual renewal documentation:

1. GCRB should review its risk matrix and satisfy itself that it has considered all the mitigations it offers (see paragraphs 3.1-3.8).

The following report provides detail supporting the outcome.

# Assessment against the Standards for Accredited Registers

## Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There have been no significant changes reported or noted in the past year. Registrant numbers have remained stable with a small increase of seven taking the total number of registrants to 208.
- 1.2 The Authority found that this Standard continues to be met.

## Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 There have been no significant changes reported or noted in the past year.
- 2.2 The Authority found that this Standard continues to be met.

## Standard 3: risk management

- 3.1 There have been no significant changes reported or noted in the past year. GCRB confirmed that the risk matrix submitted in 2017 remains in place. The team reviewed the risk matrix and confirmed that no risks had been added or removed and that no changes had been made to the risk factors.
- 3.2 At last year's annual review GCRB reported that it was working with the Joint Committee for Genetic Counsellor Registration (JCGCR) on reviewing its risk matrix. GCRB noted that as part of this review, an email had been sent out to all Lead Genetic Counsellors to ask them about their perception of risk. The Panel reviewed the risk matrix that had been supplied and noted that some of the residual risk factors were increasing or remained static despite the controls put in place. The Panel noted that the risk matrix was being reviewed and suggested that this be included in the review.
- 3.3 GCRB reported that the JCGCR had not completed this review yet and provided the following update 'A review of risks within genetic counselling practice is being undertaken through the Lead Genetic Counsellors group currently, the findings of which are likely to be discussed at the annual joint lead Genetic Counsellor/Association of Genetic Nurses and Counsellor/GCRB meeting at the end of the year. The GCRB will engage actively in this and report any themes which may impact the risk matrix currently in place at the next renewal.'
- 3.4 The Moderator reviewed the risk matrix and noted that some risks remain high and are not always mitigated, and that the GCRB is not reflecting the impact of the mitigation of the register for some risks.
- 3.5 The Moderator raised concerns that the evidence provided by GCRB was insufficient to demonstrate that it 'has a thorough understanding of the risks presented by their occupation to service users and the public - and where appropriate, takes effective action to mitigate them' and that it is 'vigilant in

identifying, monitoring, reviewing and acting upon risks associated with the practise of its registrants’.

- 3.6 The Moderator requested that GCRB review and update its risk matrix and submit it to the Panel and provide further information to demonstrate ongoing compliance with Standard 3.
- 3.7 GCRB provided an updated risk matrix to the Panel. The Panel reviewed the risk matrix and determined that GCRB has a thorough understanding of risk. The Panel noted that some of the risk factors remain static and that whilst this may be true of some risks, the Panel considered that GCRB may not have fully taken into account all mitigations, including those involved its registration requirements, which might impact on the risk scores. The Panel decided to issue the following Recommendation: GCRB should review its risk matrix and satisfy itself that it has considered all the mitigations it offers.
- 3.8 GCRB confirmed that it will continuously monitor the risk matrix, and that it was discussed at the last Board meeting and will be a standing item in future.
- 3.9 The Authority found that this Standard was met.

**Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register**

- 4.1 There have been no significant changes reported or noted in the past year. The team reviewed the public documents available through Companies House and the latest draft accounts provided by GCRB and noted that GCRB appears to continue to be financially sustainable.
- 4.2 The Authority found that this Standard continues to be met.

**Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively**

- 5.1 There have been no significant changes reported or noted in the past year.
- 5.2 The Authority found that this Standard continues to be met.

**Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public**

- 6.1 There have been no significant changes reported or noted in the past year.
- 6.2 The Authority found that this Standard continues to be met.

**Standard 7: governance**

- 7.1 At last year’s annual review, the Panel discussed the Patient Interest and Participation Group (PIP), which was designed to be a lay group who would be responsible for reviewing the website, public facing literature and commenting on policy decisions. At initial accreditation the GCRB committed to reviewing the advice of the PIP group and providing clear published minutes of the decisions made. The initial Panel noted that with the PIP group

along with the lay membership on the Board, independent oversight was not required as this would not be proportionate to the size of GCRB. Last year the Panel noted that the group was being developed and that the GCRB aimed to have the PIP group in place by the end of 2017. The Panel decided to issue the following Learning Point: the GCRB should update the Accreditation team when the PIP group had been set up.

- 7.2 GCRB reported that four members had been appointed and that it was interviewing a fifth member within the next few months with the aim of the first meeting being held later this year. The PIP group will receive an induction from one of the Board members and the Patient Representative who sits on the Board will act as a liaison.
- 7.3 GCRB reported that it has appointed two new Board members and a new Educational Associate. GCRB noted that it is planning to change its Terms of Reference to allow it to increase the Board membership by another professional member, this will be raised at the AGM.
- 7.4 GCRB has provided examples of its stakeholder engagement over the past year, including hosting a stand at the UK and Eire Association of Genetic Counsellors Conference and producing a poster on the process of becoming an Accredited Register and what this means to counsellors, service users and employers to the European Society for Human Genetics in May 2017.
- 7.5 The Authority found that this Standard continues to be met.

#### **Standard 8: setting standards for registrants**

- 8.1 There have been no significant changes reported or noted in the past year.
- 8.2 At last year's annual review, GCRB reported an emerging area of employment was private testing laboratories which will require Genetic Counsellors to assess the quality of the tests being reported. GCRB noted that the Clinical Genetic Society was developing guidelines and that GCRB would link to these once they were published.
- 8.3 The GCRB noted that it is aware of issues around private testing laboratories and that the Clinical Genetics Society have not completed their guidelines yet. The GCRB stated that once these are complete the GCRB will ensure that the guidelines are linked through their website. They will also link to them on the GCRB Twitter account to raise awareness. The team noted that private practice is included within the risk matrix, however GCRB have not included any mitigations and as such the risk factors are static and remain at a catastrophic level.
- 8.4 The Authority discussed the risks surrounding private testing laboratories and noted that this should be specified within GCRB's risk matrix. This should be addressed as part of the targeted review.
- 8.5 The Authority found that this Standard continues to be met.

#### **Standard 9: education and training**

- 9.1 There have been no significant changes reported or noted in the past year.

- 9.2 GCRB noted that it has updated its reciprocity guidelines. GCRB has agreements with Boards in Australasia, South Africa and Europe that allow applicants from these areas who are registered with the relevant Board to apply for UK registration with a reduced portfolio. GCRB confirmed that the main change is that American and Canadian Genetic Counsellors are no longer able to submit a reduced portfolio for GCRB registration and must work for two years full time in the UK and submit a full portfolio, even if they are a Certified Genetic Counsellor with the American or Canadian Boards to be registered.
- 9.3 GCRB reported that all overseas candidates are also now required to request an Eligibility Certificate from the GCRB to confirm they are eligible to register. This is discussed further under Standard 10.
- 9.4 The Authority found that this Standard continues to be met.

### Standard 10: management of the register

- 10.1 GCRB has noted that overseas applicants will need an Eligibility Certificate to apply for GCRB Registration. To gain a certificate an applicant needs to submit an *Evaluation of eligibility form* accessed through the website along with the fee. The applicant must submit evidence of their academic and professional qualifications. If the criteria (published in the [Overseas Guidelines](#)) are met then the applicant is provided with an Eligibility Certificate and has three years to register.
- 10.2 The Moderator noted that the criteria set by GCRB could result in Genetic Counsellors working in the UK but being unregistered and that this was a potential risk to the public. The Moderator raised concerns that there was insufficient information about GCRB's selection of criteria and whether this risk had been considered.
- 10.3 The Moderator also raised concerns that there was insufficient information that GCRB had considered the potential impact on individuals, including under the Equality Act 2010 of its overseas guidelines.
- 10.4 The Moderator requested further information from GCRB about its criteria for registering overseas applicants and confirmation from GCRB that the impact of its overseas guidelines on individuals, including under the Equality Act 2010, had been considered.
- 10.5 GCRB noted that it has developed its overseas eligibility criteria to be consistent with those that UK qualified genetic counsellors are required to meet. Both UK qualified and overseas qualified genetic counsellors are required to gain two years clinical experience before they are eligible to register with GCRB.
- 10.6 GCRB reports that its equivalence process is designed to assure prospective employers that prospective registrants with overseas qualifications meet GCRB's standards of education and training and so support overseas qualified registrants when seeking employment in the UK. GCRB developed its eligibility certificate for this purpose, as the certificate indicates that the holder has the required education and training standard to join the register. Holders of the certificate then have three years to complete registration which includes gaining the required clinical experience.



- 10.7 The Panel considered the information provided by GCRB and noted no concerns about GCRB's compliance with Standard 10c.
- 10.8 GCRB has noted the development of a fully searchable online register as an Achievement. The team reviewed the search function and noted that the register page states that 'you can search using a variety of fields, but cannot search using the first name alone.' The team tried searching using the surname only and found that this produced an error message 'You cannot search with just last name'. The GCRB noted that it has contacted its website developer to have the search facility reinstated. The search function allows the service user to check that their genetic counsellor is registered if both first and last name are entered.
- 10.9 The Panel found that this Standard continues to be met.

### **Standard 11: complaints and concerns handling**

- 11.1 There have been no significant changes reported or noted in the past year. At last year's annual review, GCRB reported that it was reviewing its complaints procedures, including updates to its interim orders and appeals. GCRB noted that this work was ongoing and that it aims to complete the review once the hearing for the current Fitness to Practice case has been completed.
- 11.2 GCRB reported that it has received no new complaints against registrants or itself in the past accreditation year but that it has one complaint that continues from last year.
- 11.3 The Authority noted that it had not yet observed a hearing for the GCRB and that the team will request permission to observe. The Authority found that this Standard continues to be met.

### **Share your experience**

- 12.1 The Accreditation team did not receive any responses to the invitation to share experience and did not receive any concerns about GCRB during the accreditation year.

### **Impact assessment**

- 13.1 There have been no significant changes reported or noted in the past year.
- 13.2 The GCRB has reported that it has increased its fees for registering intention to renew from £200 to £220 and will be increasing its annual subscription fees from £100 to £120.
- 13.3 The Authority took account of the impact of its decision.

### **Equality duty under the Equality Act 2010**

- 14.1 The Authority noted the potential impact of the overseas eligibility criteria as discussed under Standard 10.
- 14.2 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.