

Response to the Public Health Wales consultation on developing a scheme for recognising advanced practice in public health

January 2015

1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care¹ promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and voluntary registration of people working in health and care.² We are an independent body, accountable to the UK Parliament, and report annually to the National Assembly for Wales.
- 1.2 As part of our work we:
- Conduct research and can advise Health Ministers in the UK on improvements in professional regulation
 - Promote Right-touch regulation and publish papers on regulatory policy and practice
 - Oversee nine health and care professional regulators³ and provide annual reports on their performance to the UK and Scottish Parliaments and the Northern Ireland and Wales Assemblies
 - Accredit voluntary health and care occupational registers to improve consumer protection and raise standards.
- 1.3 More information about our work and the approach we take is available at www.professionalstandards.org.uk.
- 1.4 We welcome the opportunity to respond to this Public Health Wales (PHW) consultation on its proposed scheme for recognising public health practitioners who work at an advanced level of public health practice.⁴ We have no views on the matters covered by the questions posed in the consultation document. However we wish to make the following observations which we hope will assist.

2. General Comments

- 2.1 Our interest in this consultation stems from the proposal's connection to the UK Public Health Register (UKPHR) which is one of the organisations we have

¹ The Professional Standards Authority for Health and Social Care was previously known as the Council for Healthcare Regulatory Excellence (CHRE)

² Our statutory remit is UK wide in respect of patients and people who work in health. In relation to users of social care and social work services and people who work in the care sector our statutory remit extends to England only (*National Health Service Reform and Health Care Professions Act 2002* (as amended), section 25).

³ General Chiropractic Council, General Dental Council, General Medical Council, General Optical Council, General Osteopathic Council, General Pharmaceutical Council, Health and Care Professions Council, Nursing and Midwifery Council, Pharmaceutical Society of Northern Ireland.

⁴ Available at <http://www.wales.nhs.uk/sitesplus/888/news/35099>

accredited under our Accredited Register programme for organisations which register health or care practitioners who are not subject to statutory professional regulation.

- 2.2 In order to be accredited by us a register has to meet demanding standards in the following areas: governance, setting standards, education and training, managing the register, providing information and complaints. Organisations holding voluntary registers have to provide evidence and demonstrate to the Authority that they meet our Accreditation Standards⁵. To ensure that these standards continue to be met, accreditation is reviewed annually. We accredited the UKPHR in March 2014⁶ and are currently processing their annual review.
- 2.3 We are therefore pleased to see the proposed scheme for accrediting advanced public health practitioners in Wales will promote use of the UKPHR register for public health practitioners by making practitioner registration with the UKPHR a pre-requisite for advance practice accreditation.
- 2.4 We are unsure if and how PHW intends to communicate who it has accredited as an 'advanced practitioner (public health)'. From the use of the word accreditation (rather than, say, certificate or recognition), and the statement in section 2.3 that accreditation would be lost if the practitioner were to be removed from the UKPHR register, it would appear that the intention may be to publish a list or register or distribute such a list to employers. We would be concerned that this could cause confusion between registration with the UKPHR and PHW accreditation.
- 2.5 If PHW is considering introducing a list or register of accredited advanced practitioners our report *Health professional regulators' registers - Maximising their contribution to public protection and patient safety*⁷ contains information that may help PHW evaluate this option. Alternatively if the intention is for UKPHR to annotate its register with details of PHW accreditation our report on *Advanced Practice: Report to the four UK Health Department*⁸ may assist.

3. Reference to the Professional Standards Authority

- 3.1 We note that paragraph 1.3.1 of the consultation paper states 'Guidance from the former Council for Healthcare Regulatory Excellence (CHRE), now the Professional Standards Authority for Health and Social Care, which provides advice to regulators, suggested that there is not sufficient difference in the risk to the public to justify a third level of regulation. Since regulation was not being pursued, some scoping work was carried out to consider the different options for the professional recognition of 'advanced practitioners'.

⁵ Available at <http://www.professionalstandards.org.uk/accredited-registers/about-accredited-registers/our-standards>

⁶ Professional Standards Authority. March 2014. *Accredited Voluntary Register Panel Decision on the application from UKPHR* <http://www.professionalstandards.org.uk/docs/default-source/voluntary-registers/uk-public-health-register-avr-panel-decision.pdf?sfvrsn=2>

⁷ CHRE 2009. <http://www.professionalstandards.org.uk/library/document-detail?id=6375dd8e-8636-4e60-bab7-05a516c572ae>

⁸ CHRE 2009. <http://www.professionalstandards.org.uk/library/document-detail?id=c3c2f87e-f167-4e18-a2fa-284fc931132f>

3.2 We do not know quite where this drawn from, as we do not recognise this statement as guidance we have provided. We do however certainly recommend that regulation is not the right solution in all cases. We would also like to clarify that whilst we do set standards for and promote best practice to the regulators we oversee and the registers we accredit we do not advise them. We do, however, regularly provide advice on matters relating to health and care professions to the Secretary of State for Health and Ministers on a UK wide basis through a joint commissioning arrangement led by the Department of Health.

4. Further information

4.1 Please do not hesitate to contact us if you would like to discuss any aspect of this response in further detail. You can contact us at:

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