

**Health Professions Council**  
**Policy & Standards department workplan, 31<sup>st</sup> May 2007**

**Executive Summary and Recommendations**

**Introduction**

Last financial year the Council agreed a workplan for the Policy & Standards department, setting out projects and priorities for the year ahead. The attached document, for the financial year 2007 – 2008 provides an update on projects that have been completed, or are ongoing, and also provides details of new projects that are proposed to be tackled this year.

**Decision**

The Council is asked to:

- discuss the workplan attached to this paper;
- agree the priorities, projects, and principles outlined; and
- agree to keep the document under review, and request that the Executive amend the workplan as appropriate and bring it back in six months time.

**Background information**

This document is intended to supplement and build on the HPC strategy, and sits alongside other departmental workplans, for example the Education workplan, the Human Resources workplan, and the Communications workplan.

**Resource implications**

The resource implications are discussed as part of the document.

**Financial implications**

The workplan's assumptions form part of the agreed budget for the Policy department for 2007 – 2008.

**Background papers**

None

**Appendices**

None

**Date of paper**

21<sup>st</sup> May 2007

# **Policy & Standards Department**

## **2007 – 2008 Work Plan**

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**May 2007**

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## Introduction

### ***This document***

This document has been drafted to set out work priorities for the financial year 2007 - 2008, and to provide a basis against which the work of the Policy & Standards department can be planned and measured. This document is underpinned by the Council's strategy, and details how the Policy department will continue to develop, to build on its work in embedding itself within HPC and in the wider policy arena, and assist the Council in preparing for the changes ahead in the regulation of healthcare professionals.

The nature of the issues that Policy & Standards deal with are such that work undertaken will comprise both planned projects, and also work which arises as a result of external factors, such as changes in legislation, changes to the professions, and other developments that are often unpredictable. Hence, in allocating resources, maintaining the ability to respond to the external environment is an important factor. To this end, the following projects are highlighted as those which could potentially be moved into next financial year, depending on external pressures, and particularly on the priorities identified by the White Paper implementation plan:

- The consultation review project;
- The experience of lay complainants;
- The Partners Code of Conduct; and
- Drawing on best practice from education providers.

A further opportunity to re-schedule work is that the workplan for the review of the Standards of Education and Training could be adjusted to allow for further White Paper work during the review period.

In order to keep the Council updated on any changes, the work plan will be updated in six months and will be brought back to the Council in December 2007.

### ***The Policy & Standards department***

This represents the department's second full financial year of activity, and sees Policy moving forward in a number of areas, particularly in the light of the numerous developments in the regulatory arena.

The Policy & Standards department's main responsibilities are:

- assisting the Council in developing strategy and policy;
- assisting the Council in setting and reviewing standards;
- assisting the Council in drafting guidance;
- supporting professional liaison groups;
- running consultations;
- managing the new professions, or 'aspirant groups' process;

- liaising with the Council for Healthcare Regulatory Excellence on their annual performance review, and other cross-regulatory projects; and
- ensuring consistency of approach across all HPC departments.

### **Resourcing**

The Policy department currently consists of four employees. The 2007-08 budget further allows for an administrator to support the team (this position will be recruited for once desk space allows).

## **Aims**

The HPC, through the work of its Policy & Standards department, aims:

### **Improve:**

- To respond to the recommendations of the White Paper, including, where appropriate, sharing information about best practice and participating in working groups, and also engaging with the issues raised in order to implement improvements to regulation.
- To review its standards, guidance and policies, including engaging with and consulting stakeholders, to gain feedback, and to make improvements to ensure that these continue to reflect the Council's purpose and principles.
- To collect information gathered and to analyse this information, and act upon it appropriately. This could include, for example, making the information available publicly, including to other potentially interested stakeholders, feeding this information into the Communications strategy, and / or making changes to processes where appropriate.
- To engage with and consult with stakeholders, and take account of their input in its work, to ensure that HPC's work is informed by the wider healthcare and regulatory landscape, and that our knowledge of multi-professional regulation can be shared.
- To continue to improve the way that healthcare professionals are regulated, by developing new guidance, new processes, or new requirements where appropriate.

### **Influence and promote:**

- To build on its growing reputation as a respected voice within the policy arena of the regulation of healthcare professionals and other healthcare workers, and to use this reputation to pro-actively influence the external agenda, in the interests of protecting the public.

# **Trust, assurance and safety: the regulation of health professionals in the 21<sup>st</sup> century**

## ***Introduction***

The government published the above White Paper, on February 21<sup>st</sup> 2007. This paper was the result of Chief Medical Officer's review of medical regulation, the parallel review of non-medical regulation (sometimes also called the 'Foster review') and the resulting consultation. The paper sets out the government's vision and priorities for how the regulation of health care professionals should work in the future, in order to respond to increasing expectations of the public and other stakeholders.

A vital part of the work of the Policy & Standards department is therefore to respond to the issues raised in the White Paper, and to respond appropriately in a way which reflects the government's, and also the Council's, priorities. It is anticipated that the Department of Health may publish its implementation plan in June 2007, and this part of the workplan will need to be revised in the light of this.

In order to facilitate discussion, the immediate issues raised in the White Paper are here placed in an approximate order of priority. (The topics below are those which have been initially identified as those likely to require some kind of work during this financial year.)

## **1. Revalidation**

The White Paper, 'Trust, Assurance and Safety: The regulation of health care professionals in the 21<sup>st</sup> century' says on page 6 that there will be, 'new arrangements to ensure that ... [non-medical health professionals] also have the opportunity to demonstrate their continuing fitness to practise through appropriate revalidation arrangements. The Department will discuss with each profession and its regulator the most appropriate arrangements.'

The Council raised a number of concerns and issues about revalidation in its response to the 'Foster review'. The Council may therefore wish to initiate a piece of work to look into revalidation, or perhaps more appropriately to look into the broader issue of ongoing fitness to practise, or ongoing competence. It may be appropriate to set up a PLG to look at the context, both nationally and internationally, to make recommendations to the Council. The timetable for this potential project will be determined by the implementation plan.

## **2. Post-registration qualifications**

The Council currently approves post-registration qualifications in local analgesia and prescription-only medicine for chiropodists and podiatrists, and also approves courses in supplementary prescribing for chiropodists and podiatrists, physiotherapists and radiographers.

The Education and Training committee has agreed that in future those prescription-only medicine modules which are already form part of an HPC approved programme, can be approved by a paper-exercise run in a similar way to our Annual monitoring process.

The Education and Training committee will need to further consider how to approach other post-registration qualifications, particularly since the White Paper recommends that regulators should mark the Register to show specialisms where appropriate. (Article 19 (6) of the Health Professions Order already allows the Council to annotate additional qualifications.)

It may be appropriate to set up a discussion meeting with the professional bodies and other stakeholders, to look at the initial work on criteria that the Council suggested as part of its response to the Foster review. The results of this discussion meeting, plus further research, could form the basis of a consultation document on post-registration qualifications. This may also be an appropriate time for the Council to review further how it currently approves all post-registration qualifications, including supplementary prescribing.

This piece of work will need to have close links with any work the Council undertakes around revalidation, and any decisions to annotate the Register any further will directly impact this work. Work on post-registration qualifications is also related to the Council's thoughts about the future shape of the work-force, with increased numbers of associate level, and advanced level practitioners, and how regulation may need to change to take account of this.

### **Timetable**

A paper on this topic will be presented to the Education and Training committee in September 2007.

### **3. Equality and diversity**

The Council has agreed a workplan for this project, which details, amongst other areas, how it will go about:

- reviewing its processes;
- taking action based on these reviews;
- establishing an employee diversity group;
- collecting data on registrants; and
- publishing its equality scheme.

The Policy & Standards department is providing the project lead for this important part of the Council's work. This involves working with the employee working group, liaising with departments about their work and their processes, and writing the Equality Scheme. This project was already identified as a priority for this year, and this is now confirmed by the fact that the White Paper, on page 68, recommends that regulators should report annually to Parliament on, 'equality issues relevant to regulation within its profession; analyses of any trends in ethnicity in its fitness to practise proceedings; and



an account of action taken to ensure fairness in the way that regulatory action is conducted.'

#### **4. Health and character**

The White Paper discusses the need for regulators to look at the good character of applicants, and suggests work to be carried out by CHRE on a common definition of good character.

In order to feed useful information into this project, and also in order to improve our processes, the Policy & Standards department will work with Fitness to Practise (FTP) on their review of the first two years of operating the health and character declarations process. Depending on the outcome of this review, it is planned that Policy could then work with FTP on drafting adapted processes, and particularly on producing guidance for interested stakeholders in this area, which could include education providers, who often contact HPC with queries, for example, about students with convictions.

##### **Timetable**

The FTP review of health and character cases is planned to begin in June 2007. Any work coming out of that review could then be brought to the Education and Training committee in December 2007.

#### **5. Registration of students**

The White Paper says, 'The Government believes that each regulator should consider this issue on the basis of the risk presented to patients by trainees and students in particular professions. The Department will ask the regulators to report back with proposals by January 2008.'

The Education and Training committee has already discussed a paper which presented the context, and has agreed that based on current information, it believes the registration of students would be a disproportionate reaction to the risk to the public. Policy will do further work on this topic, which could include holding a discussion meeting with stakeholders (including education providers, visitors and students), gathering information from education providers and other regulators, and/or analysis of fitness to practise cases.

##### **Timetable**

The nature of any work required will be informed by the publication of the Department of Health's implementation plan for the White Paper.

#### **6. Complementary and Alternative Medicine**

The White Paper also mentions the Steering Group which is looking at the statutory regulation of acupuncture, herbal medicine, and traditional Chinese medicine. The Director of Policy & Standards is a member of this working group, and other members of the Executive have been invited to attend meetings in order to present on various issues, including multi-professional regulation, and the relationship between the regulator and professional bodies. The Steering Group is expected to report this year, with recommendations on regulation for these groups.

## **7. The regulation of support workers**

Page 86 of the White Paper discusses the regulation of healthcare support workers, and in particular the Scottish pilot project to implement employer-led regulation. The HPC Director of Operations is part of the Steering Group on this project, and the Council will wish to stay informed on the outcomes of this project.

The White Paper also says that the government, 'will consider whether there is sufficient demand for the introduction of statutory regulation for any assistant practitioner roles at levels 3 and 4 on the Skills for Health Career Framework.'

This is in accordance with the Council's view that some form of statutory regulation is necessary for these groups, in the interests of public safety. Further work on this topic may be necessary, the timing of which will depend on the implementation plan.

## **8. Working groups**

The Council will wish to be involved in the various pieces of work to implement the recommendations from the White Paper, particularly the various working groups that will be set up, including groups on new professions, and revalidation. As with the other areas from the White Paper, more detail on this area will be forthcoming once the implementation plan has been published.

# HPC strategy: Improve

## ***Introduction***

The HPC operates within a constantly changing environment. How we register health professionals continues to develop as a result of external factors (including changes to the Health Professions Order, or to other legislation, changes to the professions, to best practice, or to stakeholders' evolving needs and expectations) or internal factors (including internal reviews, audits and other quality improvement measures).

An important part of the Council's work in this area is therefore to keep its standards, guidance and policies under regular review, ensuring that we react proportionately and appropriately to feedback, and take account of the views of those who are using the standards. In addition to this area of review and improvement, the Council will also wish to consider entirely new pieces of work, where these may contribute to effective regulation, in line with its guiding principles.

## ***Projects for 2007 – 2008***

### **1. Standards**

The Council's standards workplan sets out the standards that the Council determines, the legal background for each, and the Council's aim in setting standards. It then goes on to detail a timetable for standards review, and scope for further work and development of the standards function.

The full standards workplan can be found on the Council website here:  
[www.hpc-uk.org/assets/documents/100017D6council\\_meeting\\_20061214\\_enclosure06.pdf](http://www.hpc-uk.org/assets/documents/100017D6council_meeting_20061214_enclosure06.pdf)

The main items of work which come under the area of standards are detailed below:

#### **1. a) Standards of Education and Training review**

As part of this workplan, the Council has agreed that it will review the Standards of Education and Training during this financial year. This review will be led by a professional liaison group (PLG) which may have representation from education providers, professional bodies, and other relevant stakeholders.

#### **Timetable**

A workplan for this review was agreed by the Education and Training committee in March 2007. The first meeting of the PLG is planned for September 2007.

#### **1. b) Standards of conduct, performance and ethics supplementary information**

The standards workplan also says that in order to improve understanding of the standards, we will develop the standards section of the HPC website. This could include producing an online 'bank' of information on a small number of topics. Such information could be produced where a topic is not substantive enough to merit formal guidance being produced (see the consultation on confidentiality guidance, below). This would also recognise the important role of professional bodies and other organisations in publishing guidance and information to assist registrants in meeting the standards, and could signpost this information where available.

### **Timetable**

This approach was agreed by the Conduct and Competence committee in January 2007, and the following topics were agreed as those which could be covered initially:

- conflicts of interest (including gifts);
- medicines and prescribing;
- reporting concerns;
- child protection; and
- consent.

The Executive will work on collating this information with a view to publication online by September 2007.

## **2. New professions**

The White Paper places an emphasis on the regulation of new groups which is in line with the Council's commitment to extend regulation to currently unregulated groups, in order to better protect the public.

The Council's new professions process has been in place since 2003, and to date the Council has recommended that nine additional groups should be regulated. The progress of these groups onto the Register has been delayed by the slow progress of the legislative and parliamentary process, in part because of the review and the White Paper, which included looking at the regulation of currently unregulated professions.

Given the current emphasis on this topic, this financial year is an appropriate time for the Council to review its process. This review could include:

- taking a more proactive approach to groups that have not approached the Council to make an application;
- considering issues around 'distributed regulation', including liaising with other regulators;
- considering issues around 'emerging roles' (for example surgical care practitioners), which may present different regulatory issues for the Council;
- reviewing the application form and guidance notes;
- reviewing the new professions criteria;

- actively following up previous contacts with aspirant groups, to determine whether they are planning an application, or whether they wish to explore other queries regarding regulation in more detail.

### **Timetable**

A paper on new professions will be taken to the Council in December 2007.

### **3. Standards of Proficiency for new professions**

If further professions are brought onto the Register, then the HPC will need to establish Standards of Proficiency for these new groups, and consult on them. Careful liaison and work with stakeholders in all four home countries will be particularly important to ensure that any standards determined are appropriate across the UK.

The White Paper identifies psychologists, psychotherapists and counsellors, and healthcare scientists as the professions that are the highest priority for regulation. In addition, the Hearing Aid Council (HAC) is due to be abolished by the Department of Trade and Industry, and it is probable that the hearing aid dispensers they regulate would then become part of HPC. We are working with the Department of Health and the HAC to plan for this transfer, which seems likely to take place in the financial year 2008 – 2009.

### **Timetable**

This will be determined by the legislative timetable for the regulation of any new groups, which is expected to be published on June 5<sup>th</sup> 2007. However, in order to facilitate good resource planning, a professional liaison group to establish Standards of Proficiency for one new group is planned for this financial year.

### **4. The experience of lay complainants**

The public are a crucial stakeholder for all regulators. The main ways in which members of the public may interact with us is when they check our online register, or if they make a complaint to us about their health professional. This second group are potentially an important source of information about HPC, about how we work, and also a source of ideas about how we could improve.

We will run a project to investigate whether we can learn from the perceptions of members of the public who have complained to us (including those whose complaint reached a public hearing, and those whose complaints were determined to have ‘no case to answer’) to ask for their feedback and ideas about the HPC, about their expectations of us, how they heard of us, their experiences of being part of the fitness to practise process, and how they feel we could improve in the future. This piece of work will be undertaken in partnership with the Fitness to Practise department, and in conjunction with the work planned by FTP on reviewing the witness support programme.

### **Timetable**

Once the Communications department has undertaken its audit of PPI activities, a scoping paper for this piece of work will go to the practice

committees in September 2007. Depending on the input of the practice committees, it could then be presented to the Council in December 2007.

## **5. Consultation**

Since its first public consultation in 2002, the HPC has consulted on nearly 20 issues, from rule changes, to standards reviews, to guidance documents.

This project is to review how we consult with our stakeholders, including reviewing our consultation list, the use of consultation events, responses received, and whether there is best practice in this area that we could learn from.

### **Timetable**

A paper reviewing our consultation process, with recommendations on any necessary changes, will be taken to the Communications committee in October 2007.

## **6. Continuing professional development operational project**

Policy & Standards will continue to feed into the operational project to prepare for CPD audits, providing information to the Project Manager, and working with other members of the Executive (particularly Operations and Communications) on further processes and work needed to support the audits.

### **Timetable**

The first CPD audits will begin in July 2008.

## **7. Complaints process for approved courses**

The Policy & Standards team plans to work in conjunction with the Education department to establish a process to assist the Education and Training committee in dealing with complaints about approved courses. Such a system would need to balance the requirement that the Committee only approve those programmes which meet the HPC's standards, with an opportunity for the education provider to respond to information received, and also with a process so that complaints which do not call into question a programme's approved status can be properly dismissed.

### **Timetable**

An initial paper outlining options to establish a process will be brought to the Education and Training Committee in June 2007.

## **8. Registrant numbers and forecasting**

Forecasting how future registrant numbers may change has historically been undertaken by the finance department, as part of the budget planning process. In order to recognise the increasing complexity of assumptions effecting future registrant numbers, the Policy & Standards team will work with colleagues in Registration, Finance, Fitness to Practise and other departments to produce a piece of work which pulls together information about all the areas that affect the number of registrants. This will be combined

in order to make more robust predictions of how the numbers of registered health professionals may change in the future. These figures can then be used internally, used for comparisons with data held by the Department of Health and the National Audit Office, and also circulated externally where other stakeholders may find them useful.

### **Timetable**

This project will be brought to the Finance and Resources committee in July 2007, so that the results can form part of the budget-planning process for the financial year 2008 – 2009.

## **9. Partners' Code of Conduct**

The Policy & Standards department will work with the Human Resources department to establish a code of conduct for partners. It is likely that this will draw on the information already developed for the Council members' Code of Conduct. This would then have the potential to feed into the Partners recruitment process, and performance management process.

### **Timetable**

A paper on the code of conduct will go to the practice committees and the Education and Training committee for discussion in September, and is then expected to be brought to Council in December 2007.

## **10. CHRE performance review**

Every year, the Council for Healthcare Regulatory Excellence reviews the performance of all nine health regulators. This process involves submitting a report to CHRE, attending initial meetings, and follow-up meetings, providing additional information as required, and approving the final report(s).

### **Timetable**

The performance review for the financial year 2007 – 2008, if similar to that of last year, will involve submitting the initial report to CHRE in January 2008, with the results of the review being published in April 2008.

## ***Ongoing projects***

Many projects undertaken in Policy & Standards will run over more than one financial year. Below is an update of projects which are ongoing from last financial year:

### **1. Review of the Standards of Proficiency**

The Council has completed its review of the Standards of Proficiency for the original 12 professions. The results of this review were agreed for consultation at the Council meeting of 6<sup>th</sup> July 2006.

Suggested changes to the generic and profession-specific standards went out for consultation from October 2006 until early February 2007. An analysis of the results of the consultation, together with final recommendations for necessary amendments or changes, will be brought to the Council in May 2007.

If the changes are agreed by Council, Policy will then work with colleagues in those departments that use the standards, and also with Communications, on communicating the changes to the standards, and how the revised standards can be implemented while still ensuring the smooth running of the operational processes that depend on them.

### **2. Standards of proficiency for operating department practitioners**

The standards of proficiency for operating department practitioners (ODPs) were published in July 2004. The standards stayed the same during the two year grandparenting period which ended on 17<sup>th</sup> October 2006. (The views of ODP stakeholders, including the Association of Operating Department Practitioners were taken into account during the recent review in considering whether changes were necessary to the generic standards.)

The Education and Training committee agreed a workplan for reviewing the Operating Department Practitioners' standards at their meeting in September 2006. In line with this, a meeting was scheduled for February to review the profession-specific elements of the ODPs standards of proficiency. Unfortunately this meeting had to be cancelled, and an alternative date will now be found for this.

### **Timetable**

This meeting has now been re-scheduled for June 2007, and a paper on the ODPs profession-specific standards will then go to Education and Training committee in September 2007.

### **3. Review of the standards of conduct, performance and ethics**

The Council has now completed its review of the standards of conduct, performance and ethics, which included an initial 'mini consultation' period, discussion meetings with professional bodies and patient groups, several rounds of discussion with the Practice Committees, and discussion at the



Council awayday. The results of the review were agreed by the Council in March 2007. This will now be the subject of a consultation.

#### **Timetable**

This consultation will take place from May – July 2007. The results will be analysed and brought to Council in September 2007.

#### **4. Guidance on the standards of conduct, performance and ethics**

The issue of developing further guidance on the standards of conduct, performance and ethics has been considered by the practice committees, who recommended that HPC should draft guidance on confidentiality. This guidance has been agreed by the Council and will be consulted on with the suggested revisions for the standards of conduct, performance and ethics.

#### **Timetable**

This consultation will take place from May – July 2007. The results will be analysed and brought to Council in September 2007.

#### **5. Health, disability and registration**

The Council has published two documents which deal with the subject of health, disability and registration:

- a disabled person's guide to becoming a health professional; and
- information about the health reference.

These documents are currently available online, and the lay-out is being co-ordinated by the Communications department. The Policy & Standards department will continue to be involved in other activities to implement the guidance in the documents, including briefing other departments and working with external stakeholders to increase awareness of our work in this area. To support the latter, Policy & Standards are planning to work with the Events Manager on a stakeholder event around the Council's guidance, to be held in 2007.

#### **6. Continuing Professional Development (CPD)**

Further information about the Council's CPD standards has been published online, and sent out to all registrants.

Sample profiles for nine professions have been published online, and work on other professions' draft profiles (in partnership with the professional bodies) is ongoing. The Council remains committed to publishing example profiles for every profession on the Register, and will continue to work with the professional bodies to ensure that this is achieved as soon as possible.

#### **7. Grandparenting review**

The review of the grandparenting process for the original twelve professions has been drafted, and a first draft has been seen by the Education and Training committee. This review will be in a paper to the Council in May 2007, and if approved, could be published thereafter.

## **8. The Council's requirement for external examiners**

In 2006, the Council consulted on a change to its requirement for external examiners. The Education and Training committee agreed in March, in line with feedback received from the consultation, to recommend to the Council that the new standard 6.7.5 should require assessment regulations to 'clearly specify requirements for the appointment of at least one external examiner from the relevant part of the Register, unless other arrangements are agreed.'

### **Timetable**

The Education and Training Committee has recommended to the Council that this standard should be changed. If the Council agree this decision at their meeting in May 2007, then Policy will assist the Education team in rolling out this change.

### **2008 – 2010**

The Policy department will continue to be involved in the final planning stages for the first CPD audits in July 2008.

### **CPD analysis**

After these audits have been completed, it is expected that Policy will work with colleagues in Operations to analyse the results of the audits, to assist in refining processes and information as appropriate, and to bring to the Council's attention any early emerging trends.

### **The White Paper**

It is expected that the work of Policy & Standards from 2008 – 2010 will be heavily influenced by the publication of the implementation plan from the White Paper. In particular, the Council may wish to undertake further work on the area of revalidation (see the separate section on the White Paper, on page 4 of this document).

Another important factor that will have a bearing on the Council's future work is the changing nature of the workforce. As changes are made to workforce numbers, roles, and how healthcare is delivered, the Council will need to consider how regulation can adapt to ensure that the public is protected, and that regulation continues to be sufficiently flexible so as not to impede local developments in service delivery. In particular, planned increases to the number of associate level practitioners, to the number of advanced level practitioners, and the increase in team-based healthcare delivery could effect how healthcare professionals are regulated in the future.

# HPC strategy: Influence and promote

## ***Introduction***

In July 2007, the Council will have been operating under its new legislation for four years, in addition to its experience in operating in shadow form during 2002.

The Council wishes to continue to use this experience of regulation in order to positively influence the policy agenda in the regulation of healthcare professionals, in line with its objective of protecting the public, and its guiding principles.

This part of the document details the specific work that will be done over the coming financial year towards meeting this aim, and shows how this work will be built upon thereafter.

## ***Projects for 2006 - 2007***

### **1. Drawing on best practice from education providers**

The Policy department will work with the Education department to draw out elements of best practice from pre-registration education. The precise nature of these will be determined by analysis of information obtained from visits, but could include issues such as:

- patient public involvement in curriculum design or delivery;
- inter-professional learning;
- teaching of professional ethics and regulation; or
- e-learning.

### **2. Government, including four UK departments of health**

The Council took a decision in December 2006 not to establish a separate Scottish Office for the HPC at this time, but instead to work on improving links between HPC and various stakeholder organisations in the home countries: Northern Ireland, Scotland and Wales.

The Policy & Standards department will continue to work with the Chief Executive, and the Communications department (and particularly the Public Affairs Manager, when appointed) to ensure a consistent, and strategic approach to stakeholder relationships. In particular, HPC will continue to meet regularly with government representatives from the four home countries, benefiting from Council members' contacts and expertise where appropriate.

### **3. European Union**

2007 is the year in which the Professional Qualifications Directive will be passed into UK law. This will affect the legal framework for how HPC assesses EEA applicants to the Register, and in particular provides for temporary registration, and the possibility of the establishment of 'Common Platforms'.

In order to meet the challenges and opportunities presented by European developments, the Policy & Standards team will:

- continue membership of the Alliance of UK Health Regulators in Europe (AURE), as an effective way of making shared UK regulatory issues heard in Europe;
- liaise with colleagues in Operations, including Registration and Project Management, regarding setting up systems for temporary registration by October 2007;
- continue to implement and review the recommendations from the European conference on Healthcare Professionals Crossing Borders, October 2005. This includes working with colleagues in European competent authorities around implementing the next steps of the consensus, which includes a possible Memorandum of Understanding between regulators ; and
- continue ongoing updating and development of [www.healthregulation.org](http://www.healthregulation.org) as a worldwide resource for all regulators to enable effective sharing of information, particularly around fitness to practise.

#### **4. Consultation responses**

The Policy department will continue to build on its work in responding to other organisation's consultation responses, including ensuring that HPC is on more consultation lists, and widening its scope in responding not only to consultations that are directly concerned with health professionals' regulation, but also bringing this expertise to consultations on issues related to health, consumer issues, and regulation more broadly.

#### **2008 - 2010**

As outlined in the previous workplan, 2006 - 2007 was primarily a year of ground-work: making contacts - particularly within the wider policy arena, building knowledge, continuing to gain input and ideas from stakeholders and feeding these into the appropriate parts of the organisation.

Following the important work undertaken by the Council in establishing its detailed response to the Foster review, the Council can now begin to build on the position it established through further work on some of the key issues identified:

- devolution and UK-wide regulation;
- the future development of pre-registration education;
- revalidation;
- post-registration qualifications;
- regulation of aspirant groups, potentially including complementary and alternative medicine, counsellors and psychotherapists, and further healthcare scientists; and
- the regulation of healthcare support workers.

In addition, last year's workplan determined that the financial year 2008 – 2009 would be an appropriate time to review the Council's activities in this area, to establish what has worked well, and what areas could be improved.

## **Risk management**

Managing risks is also a vital part of the Policy & Standards work over the coming year. The main risks that are owned by the department are:

12.1 Incorrect process followed to establish standards/guidance/policy (ie: no relevant Council decision)

12.2 Inappropriate standards/guidance published eg: standards are set at inappropriate level, are too confusing or are conflicting

12.3 Changing/evolving legal advice rendering previous work inappropriate.

12.4 Inadequate preparation for a change in legislation (Health Professions Order, or other legislation affecting HPC)

In summary, however, it should be noted that although it's separately dealt with here, risk management is in fact embedded into much of the workplan for this coming year. For example:

### ***Resourcing***

Increasing the number of employees, particularly those with good previous experience, increases the capacity of the department, and also helps to manage all the relevant risks in Policy, but particularly risks 12.3 and 12.4

### ***Networking and engagement***

Making good contacts with external organisations not only feeds into the Council's overall aim to influence and promote, but also helps to manage risk 12.4

### ***Quality management***

Working with the Quality Manager, particularly around internal audits, not only links with the Council's aim to improve, by keeping ISO registration, but also helps to manage risk 12.1