

November 2015

The Health and Care Professions Council response to the Welsh Government's green paper Our Health, Our Health Service.

1. Introduction

- 1.1 The Health and Care Professions Council (HCPC) welcomes this opportunity to respond to the green paper Our Health, Our Health Service published by the Welsh Government.
- 1.2 The HCPC is a UK wide statutory regulator of 16 health and care professions, set up to protect the public. To do this we maintain a register of professionals; set standards for entry to our register; approve education and training programmes for registration; and deal with concerns where a professional may not be fit to practise.
- 1.3 We have set out our comments on the green paper below.

2. Our comments

- 2.1 Overall, we welcome proposals to improve the systems in place that support health and care professionals to deliver services safely and effectively, in line with our standards.
- 2.2 We recently reviewed our standards of conduct, performance and ethics (SCPEs) and consulted with registrants, service users and carers, and other stakeholders on some issues related to those raised in this paper.

Meeting common standards

- 2.3 We would support a common framework covering both the NHS and independent sector. Service users and carers have the same expectations about the quality and safety of services they receive, regardless of whether they are provided by the NHS or independent sector.
- 2.4 Consistency of standards across public and private settings is important for maintaining public confidence in health and care services. Our standards framework applies to all registrants, regardless of the setting they work in. Standards for organisations should reflect this consistency to support registrants in meeting theirs.

Continuously engaging with citizens

- 2.5 We support proposals to require health boards and NHS Trusts to establish permanent engagement mechanisms to support continuous engagement with service users.
- 2.6 Service users and carers should be at the centre of health and care services. Our registrants are expected to work in partnership with service users and carers, and involve them wherever possible in decisions about the care, treatment and services they receive. Engaging with service users and carers is essential in order to achieve this and we would support continuous engagement by health boards and Trusts as a way to ensure service users remain at the centre of health and care services.

Clinical supervision

- 2.6 We are supportive of mechanisms which ensure that professionals have access to clinical supervision. We recognise the importance of clinical supervision in supporting our registrants to practise safely and effectively. Supervision can form an important part of continuing professional development (CPD) which is a requirement for all our registrants.
- 2.7 Clinical supervision should enable staff to proactively address issues and learn in order to prevent issues becoming a bigger problem that requires additional action and puts service users at risk of harm or receiving ineffective services.
- 2.8 Our registrants include NHS, private sector, and self-employed individuals. We expect all of our registrants to adhere to our standards and would welcome availability of supervision to all health and care professionals regardless of their work setting. Professional bodies and other membership organisations may be well placed to facilitate access to supervision for self-employed professionals.

Being open about performance and when things go wrong

- 2.9 We would welcome a duty of candour at organisational level to promote a culture of openness and bring about consistency with the duty in place in England. As our standards apply to registrants across the UK, we would also welcome an organisational culture of openness across the four nations.
- 2.10 Our recent consultation identified support across all stakeholder groups for standards on being open when things go wrong. Many of those who responded felt that this duty needed to permeate throughout health and care services, including governance level. Introducing a statutory duty of candour within the NHS in Wales may support individual staff to foster a more open approach ensuring consistency across the service.

Making it easier to raise concerns in an integrated system

- 2.11 Our stakeholders largely also supported new standards for professionals to raise concerns and support service users to do so. Legislation to improve the ability of health and care professionals to carry out this duty would be welcome.

Sharing information to provide a better service

2.12 We expect registrants to treat information about service users as confidential and, apart from exceptional circumstances, use it only for the purposes they have provided it for. Our recent consultation found that stakeholders mostly support requirements for registrants to appropriately share information in order to provide effective services. We receive queries and concerns from registrants about sharing information appropriately and effectively at their place of work, which leads us to believe that further support and guidance is needed. We would encourage employers to provide appropriate support and guidance on information sharing to support health and care professionals to meet regulatory standards in line with local policies.