
Professionalism and prevention framework

Executive Summary

There is an expectation and desire to change the way we regulate, adopting an upstream approach that supports registrants to achieve high standards and prevent harm. To enable this change, we are developing a vision and framework for our upstream professionalism and prevention work.

In July 2020, Council discussed and contributed to the development of a vision and framework. The vision is now framed as:

Professionalism and prevention represents our move away from the traditional thinking and approach to regulation to one that provides greater influence of, collaboration with and support for our stakeholders.

By promoting professionalism, ethical behaviours and enabling current and future registrants to embed and achieve high professional standards, we aim to prevent things from going wrong and protect service users from harm.

Drafting of the framework itself has commenced and an early draft is now provided at Appendix A. The framework will identify the developments we plan to achieve in the next two years. Clear objectives, deliverables and timeline will be provided in an action plan appended to the Framework. An early draft action plan is provided at Appendix B.

Council is asked to discuss the current draft Framework and action plan. These discussions will inform the development of both documents. The Education and Training Committee will have the opportunity to consider more advanced drafts in November, and Council will be invited to approve a final version in December 2020.

Previous consideration	Professionalism and prevention framework , Council paper July 2020
Decision	Council is asked to discuss the draft framework at appendix A and action plan at appendix B.
Next steps	The draft documents will be developed further and taken to SMT and Education and Training Committee for discussion before being finalised and brought back to Council for approval in December 2020.
Strategic priority	The strategic priorities set in 2018 are no longer current. We are developing a new strategy that we aim to confirm at the end of 2020.

Risk Adopting an upstream approach to regulation is new. There is, however, a growing body of evidence to support the effectiveness of this approach to achieve public protection. There is also government and Professional Standards Authority support for the development of such an approach.

The developments outlined in the professionalism and prevention framework aim to support the effectiveness of our existing regulatory functions and enable us to meet the change in emphasis to regulation that can be anticipated by regulatory reforms. It will increase our engagements with stakeholders, enabling us to better understand and meet their expectations. The developments are proportionate and phased in over a period of time to enable controlled financial investment and evaluation of impact.

Whilst this is a new approach, the level of risk is considered to be low.

Financial and resource implications As the framework develops and we identify the work required to deliver the vision, the financial and resource implications will be identified and outlined.

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Appendix A

Professionalism and prevention framework

Introduction

1. Professionalism and prevention represents our move away from the traditional thinking and approach to regulation to one that provides greater influence of, collaboration with and support for our stakeholders.
2. By promoting professionalism, ethical behaviours and enabling current and future registrants to embed and achieve high professional standards, we aim to prevent things from going wrong and protect service users from harm.
3. This framework identifies how we will support professionalism and help to prevent harm. It outlines the developments we plan to take in the next two years to support our shift away from the traditional thinking and approach to regulation.

Insights and knowledge

4. Our work enables us to collect a wealth of information about our professions: the effectiveness of their education; their diversity and demographics; their working locations and approach to practise; and the risks that they present. The ability to identify, capture, extract, analyse and share our learning from this information is crucial to our public protection role.

What we have done

5. Our research history is strong and includes research into professionalism, preventing small problems from becoming big problems, the prevalence of fitness to practise concerns about paramedics and social workers and effective clinical and peer supervision in the workplace. Data from our registration, fitness to practise and education work is constantly used to inform our and others' work.
6. We have previously committed to make better use of data, intelligence and research evidence to drive engagement and inform our work in preventing problems arising in professional practice. Research into registrants' experiences of fitness to practise and supporting health and wellbeing has been completed in 2020, and this will be followed by further research into professionalism and prevention. A new classification system to capture and record greater details of the concerns that we receive about registrants was implemented in 2019. In time this data will provide useful insights and develop our understanding of the nature of fitness to practise and trends and risks for different professions.

What we will do next

7. We are developing our next research strategy for 2021-2025, which will ensure that we continue to commission and undertake research that develops our and others' understanding of the root causes of professional behaviours, risk of harm

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and how these can be managed and prevented. This strategy will be fully developed by Q4 2020/21 and the research identified within it will commence in 2021/22.

8. We will also continue to develop our knowledge and insights through improvements in our ability to identify, collect and analyse the wealth of information and intelligence we own that relates to the practice of our professions. This will include the development of our systems to enable the collection of data and intelligence, the creation of a new insights and intelligence function, and development of an insights and intelligence strategy. The new insights and intelligence function will be fully resourced by Q1 2021/22 and the strategy will be developed by Q3 2021/22.
9. We will develop a coherent way of assessing the risks that arise from the different kinds of professional practice we regulate, to enhance our understanding of the risks we are seeking to manage and harms we are seeking to prevent and to improve our ability to measure how well we are protecting the public. The new insights and intelligence strategy will support and enable this.

Professional liaison

10. As our knowledge and insights grow, we will use it to influence our stakeholders to create cultures and working environments that promote and support our registrants' professionalism.

What we have done

11. A Professional Liaison Service was established in 2020/21. This enables us to increase our engagements with stakeholders. Through education and influence the Service aims to empower employers, registrants and other stakeholders to create working environments and practices that enable registrants to embed and achieve high professional standards.
12. We introduced and have published three editions of the employer e-newsletter to increase our engagements with and support for employers. The first e-newsletter promoted the launch of our Employer hub, a dedicated area on our website providing updates, learning and guidance for employers.
13. We developed and delivered the #MyHCPCstandards workshop programme for registrants, and a range of resources to support registrant to understand and meet the Standards. Workshops exploring the CPD Standards and audits have also continued to be delivered.

What we will do next

14. The Professional Liaison Service will be developed in a phased approach. Learning from its first year will inform its future development and it is anticipated that it will grow in size and capacity in 2021/22 and 2022/23.
15. We will increase our support for and engagements with employers. From Q2 2020/21 we will begin working in collaboration with identified employers to support and complement the development of supportive cultures, wellbeing and professionalism. To extend our reach to and support for all employers, we will

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develop further the Employer hub section of our website and our employer e-newsletter. This work will commence in Q3 2020/21 and continue into 2021/22.

16. Our engagements with and support for registrants will also increase, allowing us to use and raise awareness of existing and new guidance and other practical learning tools to empower, educate and support our registrants to meet their Standards. We begin a new programme of #MyHCPCstandards webinars from Q3 2020/21, building on those already delivered and achieving our aim of bringing the Standards to life.
17. The Professional Liaison Service will also collaborate with other regulators on upstream regulation activities, sharing our knowledge and insights, and seeking opportunities to share platforms and lead discussions about upstream regulation and professionalism and prevention. Strong working relationships already exist and these will be built upon during 2021/22.

Standards, guidance and tools

18. Our Standards form the foundation for how we regulate, explaining what we expect of our registrants and education and training programmes. We set and publish four sets of Standards:
 - Standards of conduct, performance and ethics, which provides the ethical framework within which our registrants must work
 - Standards of proficiency for each profession, which sets the professional standards all registrants must meet in order to become registered and remain on the register
 - Standards of continuing professional development, which outlines our expectations for registrants to demonstrate continuing learning and development
 - Standards of education and training, which are the standards we use to assess education and training programmes.

What we have done

19. We have an established programme of review and development for all our Standards. Registrants are supported by a range of guidance, information and tools enabling them to meet the Standards. This includes guidance and regular workshops on continuing professional development. Guidance and information on the more challenging areas of practice, including guidance on the use of social media, record keeping and scope of practice. To support our aim of bringing the standards to life, a series of videos and blogs have also been published.
20. During the COVID-19 pandemic, information sheets supporting registrants to meet the Standards in those particularly challenging times were published. A special edition of the #MyHCPCStandards webinar was delivered to explore those areas presenting most challenge, which included scope of practice, managing risk and adapting practice. The content of this webinar was informed

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by the nature and volume of registrant requests for advice received, and responded to, by our Policy team.

21. Much of this work is publicised through our regular communications with registrations, including on our main website and registrant hub, as well as in the registrant quarterly e-newsletter.

What we will do next

22. We are revising our Standards of proficiency, which set the professional standards necessary for safe and effective practice. Registrants must meet the Standards of proficiency for their profession and pre-registration education is designed to equip them with the necessary skills and knowledge.
23. Stakeholder engagement, surveys, workshops and meetings held in 2019 have identified changes to the Standards of proficiency that will bring them up to date, reflect modern practice and the development of the professions. Changes proposed and being consulted on include the role of equality, diversity and inclusion, the central role of the service-user, the importance of maintaining fitness to practise, the role and importance of leadership and the need to keep up to date with digital skills and new technologies. The intention is to place a greater focus across the generic Standards of proficiency to improve consistency across multidisciplinary teams.
24. The consultation on the revised Standards of proficiency commenced in Q2 2020/21. Council will be invited to approve new Standards of proficiency in Q1 2021/22. Publication and implementation will follow throughout 2021/22.
25. A review of the Standards of conduct, performance and ethics will commence in 2021/22.
26. We will continue to develop tools and resources to support registrants to understand and meeting the Standards. Work to develop toolkits and resources exploring effective supervision and professionalism will commence in Q3 2020/21. The Professional Liaison Service will use and promote these and other resources through its engagements and work.

Education

27. We have a statutory duty to approve UK based education and training programmes, which professionals must complete in order to register with us. To become approved, a programme must demonstrate that it meets our Standards of education and training (SETs).
28. The SETs ensure learners are prepared for safe and effective practice. A programme which meets the SETs allows a learner who completes that programme to meet the Standards of proficiency, which set out the knowledge, skills and understanding needed for safe and effective practice. The SETs also make sure that learners are able to meet our Standards of conduct, performance and ethics, the ethical principles and expectations of a professional's behaviour.

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29. Research into the role of the SETs in ensuring that newly qualified professionals were fit to practise was published in 2016. This identified that generally newly qualified professionals were regarded as adequately prepared for practice, albeit with some concerns about the ability of some to relate to service users and carers. The current SETs were published in 2017 and were informed by this research.
30. Our People like us? Research explored the reasons for the disproportionately high number of fitness to practise concerns about paramedics and social workers. This identified some inconsistent or inadequate education outside of clinical practice. These areas included professionalism, the role of the regulator, self-care and fitness to practise and ethics. To address this, it was recommended that the HCPC work with education providers to develop learning and teaching materials for use with students on pre-registration programmes. The development of learning resources for students commence in early 2020.

What we will do next

31. We are changing our quality assurance of education model. Following a review of the current model and engagement and consultation with relevant stakeholders, we are developing a new model that will be piloted in 2021 with the aim of implementing a new model by Q1 2222/23. This new model aims to provide a flexible, intelligent approach that is data led and risk based.
32. We aim to increase our ability to gather and use data and insights to inform our decision and understanding of risk within the provision of education, and also to gain greater understanding of the preparedness for practice of those completing their education and becoming registrants. Creating healthy dialogue with providers will be at the heart of the new model enabling conversations about identified risks and issues and increased support.
33. The development of learning resources for students commenced in early 2020. The materials being developed will support learning for those areas identified in the research, and will be made available through a dedicate student website hub that will be developed in 2020/21 and launched in Q4 2020/21.
34. We will increase our engagement with education providers and support them with tools and materials to aid learning on pre-registration programmes around professionalism and the embedding of professional values and behaviours. We will also continually share our developing knowledge and insights with providers enabling the use of the information to inform and develop their programmes. Engagement with a targeted group of education providers commenced in Q1 2020/21 and development of learning materials will commence in Q3 2020/21. We aim to trial the developed learning materials with a targeted group of education providers from Q4 2020/21.
35. Development of the education provider website hub to house the new materials and tools and data and insights will commence in Q1 2021/22, which will enable all providers to access and use the information and tools.

Registration

36. We currently hold a register of 15 different professions and we enter onto the Register those health and care professionals who can demonstrate that they meet our Standards and who are fit to practise.
37. Initial applications for registration can be made through the UK application route or an international application route. Both routes require applicants to demonstrate that they meet the Standards of proficiency for their profession and that they are of good character and health.
38. Once registered, registrants are required to renew their registration every two years, which includes the making of a professional declaration, which includes confirming that they continue to meet the Standards of proficiency for their profession and the Standards for continuing professional development.
39. Continuing professional development (CPD) is a requirement for all registrants. To meet the CPD Standards, a registrant needs to carry out regular CPD activities of different kinds that might improve their practice and benefit their service users. Registrants need to keep a continuous record of the activities carried out, and which may be subject to an audit when they renew their registration.

What we have done

40. Research exploring the evidence for assuring continuing fitness to practise of HCPC registrants, based on the continuing professional development and audit system was published in 2017. This identified that the CPD and audit system had driven professionalism and produced changes in practice and benefits for service users. Identified strengths in the approach included development of a culture whereby CPD was considered part of regular practice, driving up standards of practice and that it demanded a deeper engagement with CPD compare with other models. Recommendations to improve the CPD and audits system were made, which included steps to improve or streamline the process of accessing and recording CPD and encouraging employers to provide protected CPD time. These recommendations led to improved guidance on CPD.

What we will do next

41. We wish to ensure that our continuing professional development requirements continue to encourage self-reflection, drive professionalism, embed Standards and advance prevention. In 2021/22, we will use our growing knowledge and insights to inform further research into the effectiveness of CPD to achieve these desired aims. This research, and our work on advanced practice, will inform a review of our existing CPD Standards in 2022/23.

Fitness to practise

42. Fitness to practise is the process that is used to receive, investigate and determine concerns that are raised about our registrants' fitness to practise. A very small percentage of registrants are subject to a concern and even less

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subject to a sanction. For those that are, however, the process can be very stressful and traumatic.

What we have done

43. Our research into registrants' experiences of the fitness to practise process allows us to better understand the experiences and challenges of registrants being reported to the HCPC and attending fitness to practise hearings. It reveals that the process can be long and disproportionate, having a great impact on registrants' mental health, personal finances and careers. A number of recommendations are made for improvements.
44. A comprehensive programme to transform the way we deliver our fitness to practise work is already underway. This aims to deliver process as well as cultural improvements. Improvements to process, proactive case management and increased transparency and engagement with parties will enable us to adopt a more enquiring and resolution focused investigation approach, and proactively seek effective resolution of cases at an early stage through increased transparency and engagement with parties. This programme of work will conclude in Q4 2021/22.

What we will do next

45. A tone of voice review will commence in Q1 2021/22 to ensure that the language we use across all of our regulatory functions is clear, public-focused and avoids the use of technical language where possible. This will include a review of correspondence and written communications, as well as embedding a change of language with our staff and partners.
46. Our engagements and work with employers will allow us to encourage early local resolution of registrant mistakes, and help to ensure that our fitness to practise process is only engaged for those cases that require regulatory action. We will develop our support service for employers providing fitness to practise advice and supporting their decisions about what and when to refer a concern to us. Workshops on understanding fitness to practise will be delivered to both registrants and employers from Q4 2020/21.
47. The process and approach taken to fitness to practise is heavily governed by legislation and case law. Whilst we aim to do everything we can to improve our performance and registrants' experiences of fitness to practise within our existing legislative framework, it is legislative reform that will enable us to achieve a modern, risk based approach. We will, therefore, continue to be a strong advocate for and push for legislative reform.

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Appendix B

Action plan

Deliverable	Owner	Objective	Milestones
Insights and knowledge			
Research strategy 2021-25	Head of Policy and Standards	To ensure the research we commission and undertake develops our and others' understanding of the root causes of professional behavior, risk of harm and how these can be managed and prevented.	Strategy developed by Q4 2020-21 Research to commence Q1 2021/22
Insights and Intelligence function	Head of Policy and Standards	Improve our ability to identify, collect and analyse the information and intelligence we own that relates to the practice of our professions.	Insight and intelligence function fully resourced by Q1 2021/22
Insights and intelligence strategy	Head of Policy and Standards	Improve our ability to identify, collect and analyse the information and intelligence we own that relates to the practice of our professions. Develop a coherent way of assessing the risks that rise from the different kinds of professional practice we regulate.	Strategy developed by Q3 2021/22
Professional liaison			
Professional Liaison Service	Professionalism and Upstream Regulation Lead	Increase our engagements with and, through education and influence, empower employers, registrants and other stakeholders to create working environments and	Evaluation of initial year completed by Q1 2021/22

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		practices that enable registrants to embed and achieve high professional standards.	Service developed from Q1 2021/22
Partnership support for employers	Professionalism and Upstream Regulation Lead	Work in collaboration with identified employers to support and complement the development of supportive cultures, wellbeing and professionalism.	Begin working in collaboration with two identified employers from Q4 2020/21
Employer e-news	Professionalism and Upstream Regulation Lead	Increase engagements with and support for employers by provision of an e-newsletter providing updates, learning and guidance for employers.	Develop the e-newsletter and content plan in Q3 2020/21 Promote and distribute e-newsletter throughout 2021/22
Employer hub	Professionalism and Upstream Regulation Lead	Develop the Employer hub to ensure that it contains up-to-date	Development of content for the Employer hub to commence in Q4 2020/21
#MyHCPCstandards	Professionalism and Upstream Regulation Lead	Empower, educate and support our registrants to understand and meet their Standards	Deliver a new programme of workshops from Q3 2020/21
Standards guidance and tools			
Standards of proficiency	Head of Policy and Standards	Ensure that the Standards of proficiency for each provision remain up to date, reflect modern practice and the development of the professions.	Consultation on revised Standards concludes in Q3 2020/21

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			<p>Council invite to approve new Standards in Q1 2021/22</p> <p>Publication and promotion of new Standards to commence in Q1 2021/22</p>
Standards of conduct, performance and ethics	Head of Policy and Standards	Ensure the Standards of conduct, performance and ethics remain up-to-date, reflect modern practice support professionalism.	A review of the Standards will commence in 2021/22
Professionalism toolkit	Head of Policy and Standards	Empower, educate and support registrants' professionalism	Development of toolkit to commence in Q3 2020/21
Supervision toolkit	Head of Policy and Standards	To increase understanding and the use of effective supervision.	Development of toolkit to commence in Q3 2020/21
Education			
New approach to QA of education	Head of Education	<p>Embed flexibility within the QA model to enable bespoke, proportionate and effective regulatory engagement with education providers.</p> <p>Embed organisation, profession and programme specific level engagement mechanisms which enhance our ability to assess the impact of risks and issues on HCPC standards.</p>	<p>Development of new approach Q3 2020/21</p> <p>Piloting of the new approach to conclude Q2 2021/22</p>

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		Use data and intelligence within the QA model to enable more effective risk-based decision making.	Full implementation of new model Q4 2021/22
Learning materials for students	Head of Policy and Standards	<p>To deliver the recommendations made in the People like us? research</p> <p>To support students learning about professionalism, regulation and standards</p>	<p>Development of web based learning resources for students commenced in Q1 2020/21</p> <p>The Student hub will be developed in Q3 2020/21</p> <p>Launch Student hub and new learning materials Q4 2020/21</p> <p>Ongoing development of student hub and resources to commence Q1 2021/22</p>
Learning tools and materials for use by providers	Professionalism and Upstream Regulation Lead	To support and aid learning on pre-registration programmes around professionalism and the embedding of professional values and behaviours	<p>Engagement with a targeted group of education providers commenced in Q1 2020/21</p> <p>Development of learning materials to commence in Q3 2020/21</p>

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			<p>Trial developed learning materials with a targeted group from Q4 2020/21.</p> <p>Further development to commence in Q1 2021/22</p> <p>Wider role out to commence in Q2 2021/22</p>
Education providers hub	Professionalism and Upstream Regulation Lead	To support and aid learning on pre-registration programmes around professionalism and the embedding of professional values and behaviours	Development of hub to commence in Q1 2021/22
Registration			
Research into effectiveness of CPD	Head of Policy and Standards	To ensure our Continuing Professional Development Standards remain effective.	Research to commence in 2021/22
Continuing Professional Development Standards	Head of Policy and Standards	To ensure our Continuing Professional Development Standards remain effective.	Review to commence in 2222/23
Fitness to practise			
Tone of voice review	Heads of regulatory functions	To ensure that the language we use across all of our regulatory functions is clear, public-focused and avoids the use of technical language where possible	Review to commence in Q1 2021/22
Support service for employers	Head of Fitness to practise	To provide fitness to practise advice and support employers' decisions about what and when to refer a concern.	Workshops on understanding fitness

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			to practise delivered to employers from Q4 2020/21.
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