Education and Training Committee, 10 June 2008

Guidance on ethical issues for students - workplan

Executive summary and recommendations

Introduction

This paper provides the Committee with a proposed timetable and workplan for the production of guidance on student fitness to practise for students.

Decision

The Committee is invited to agree the decisions within the attached paper.

Background information

The Committee has considered a number of papers on student fitness to practise. The most recent of these papers was that considered by the Committee on 26 March 2008:
http://www.hpc-uk.org/assets/documents/10002169education_and_training_committee_20080326_enclosure10.pdf

Resource implications

The Government has delayed the start of the vetting and barring scheme run through the Independent Safeguarding Authority. As a result of this, HPC's project established to meet the scheme's requirements has been postponed. Resources are therefore now available within the Policy department to undertake the work identified in this paper.

Financial implications

The financial implications identified in the paper are those involved in the public consultation on the guidance and its publication. The Policy and Standards budget incorporates the financial implications of the consultation and publication.

Appendices

- Student research undertaken by EdComs

Date of paper

2 May 2008

Guidance on ethical issues for students - workplan

Introduction

On 4 December 2007, Education and Training Committee considered a paper from the Executive regarding student fitness to practise. The paper updated the Committee with the outcome of a student fitness to practise meeting and also identified further work in the area of student fitness to practise.

The Committee discussed whether HPC should produce ethical guidance for students. Some Committee members supported the production of this guidance as they believed that the guidance would be helpful to students and higher education institutions whilst others raised questions about how the guidance would be used. The Committee therefore asked that the Executive investigate further whether it might be possible to produce guidance for students on issues relating to fitness to practise, similar to the guidance produced by the General Medical Council.

On 26 March 2008, the Committee considered a paper from the Executive with the results of the investigation into the possibility of producing guidance on ethical issues for students. The Committee was asked whether it would be helpful to produce ethical guidance for students at present or whether it wanted to wait for the outcome of research undertaken on our behalf by EdComs into producing an information pack for prospective registrants.

The Committee discussed this issue and decided that the Executive should begin the process of drafting the guidance immediately as the guidance was considered to be extremely important, rather than awaiting the outcome of the research.

This paper outlines the draft workplan and proposed timetable for producing the guidance on ethical issues.

Guidance on ethical issues and fitness to practise

The Standards of Conduct, Performance and Ethics (SCPE) explain our expectations of the health professionals we register, in terms of their professional behaviour. We expect those who are applying to join our register to keep to those standards. When applicants complete an application form to join the Register they sign a declaration stating that they have read, understood and will comply with the SCPE.

HPC does not register students and therefore we do not have the power to act against prospective registrants, nor can we force them to comply with our standards. The guidance is therefore produced for information only. However, teaching students about conduct and professional behaviour is extremely important as it can improve student understanding of these issues. This teaching is extremely important to their professional lives, especially as the majority of fitness to practise cases are concerned with issues of conduct.

Research into students' awareness and understanding of HPC

The Communications department has recently commissioned research by EdComs into students' awareness and understanding of HPC. A copy of the research is appended to this paper.

The research suggests that most students are unaware of the Standards of Conduct, Performance and Ethics (SCPE) although most are aware that their conduct as students may impact on their employment. The research highlights that there is a need to communicate the SCPE in a way which is relevant and engaging. There are a number of ways in which this can be achieved. The communication of the SCPE can be achieved through an amendment to the current SETs requiring that education and teaching providers teach students about the SCPE. This amendment has been incorporated in the revised SETs which will be available for public consultation from August – November 2008. However, another way of achieving the communication of the SCPE is through the production of ethical guidance for students.

The research by EdComs suggests that leaflets and printed emails are unlikely to be read. Instead, it suggests that HPC sets up a student section on its website. Students could be clearly signposted to the ethical guidance and the SCPE. This could then be used by education providers as appropriate. Having a student section would also allow HPC to communicate other important messages to students as appropriate.

Proposed timetable

Under Article 14 of the Health Professions Order 2001, HPC must consult with the appropriate stakeholders before 'establishing any standards or giving any guidance'. Therefore, the timetable for the production of this guidance must allow sufficient time to consult on the proposed guidance and then consider the consultation responses and amend the document.

The proposed timetable therefore includes the twelve week consultation period considered best practice in the Cabinet Office guidelines. The consultation document could be sent to all approved course providers, as well as all professional bodies and other relevant stakeholders. It would also be possible to highlight the consultation as part of the delivery of student talks.

It is proposed that before undergoing public consultation, a copy of the draft guidance could be circulated to HPC visitors for their input. In addition, engagement with student members of the professional bodies would allow student input before the guidance is published.

The publication process also includes time for the document to undergo Plain English editing as this will ensure that the document is more accessible for the non-registrant audience. In addition, the guidance will need to undergo legal scrutiny.

The research undertaken by EdComs suggested that students would prefer information available online. Therefore, it is suggested that only a small number of copies of the guidance are printed. However, the guidance on the website

could be publicised through the newsletter, information in journals, student talks and the professional bodies.

Draft guidance and consultation document to ETC   2 December 2008

Draft guidance and consultation document to Council 11 December 2008

Public consultation   January – April 2009

Revised guidance to ETC   11 June 2009

Revised guidance to Council   6 July 2009

Publication process   August – October 2009

Launch of revised guidance   1 November 2009

Style of Guidance

The Committee had previously suggested that the guidance should be similar in style to the GMC's publication 'Medical Students: Professional Behaviour and Fitness to Practise'. The GMC's guidance relates to:

- The professional behaviour expected of medical students.
- Areas of misconduct and the sanctions available.
- The key elements in student fitness to practise arrangements.

The guidance was published in two parts, a larger booklet which was circulated to all medical schools and a two sided leaflet which was sent to all medical students. The larger booklet is divided into three main sections: advice to medical schools and students on what constitutes professional behaviour for medical students; guidance on the areas of misconduct and the sanctions available; guidance on formal fitness to practise procedures in schools (including make-up of committees and appeals processes).

The leaflet sent to current medical students provided several examples of the types of professional behaviour expected of medical students. The examples of professional behaviour are grouped under seven different headings which are taken from 'Good Medical Practice'. These headings include 'good clinical care', 'relationships with patients' and 'probity'.[1]

It is suggested that the guidance that HPC produces is based upon the Standards of Conduct, Performance and Ethics (SCPE). The guidance could take use headings taken from the first part of each standard, for example 'You must act in the best interests of your service users'. This could then be followed by statements which show how the standard is applicable to a student. An example is provided below to show the proposed structure of the guidance:

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[1] Copies of these publications can be downloaded from: http://www.gmc-uk.org/education/undergraduate/undergraduate_policy/professional_behaviour.asp

'**You must act in the best interests of your service users**
When you are on clinical placement you have responsibilities both to your education provider and those that you come into contact with when you are on placement. This means:

- You must respect the rights of your service users, including their right to be treated by a registrant if they want
- You must not do anything which you have good reason to believe will put the health or safety of a service user at risk'

Basing the guidance on the SCPE in this way has a number of advantages. It will improve student engagement with the regulator. This is important as increasing student engagement was identified as a priority in last year's White Paper 'Trust, Assurance and Safety: the Regulation of Healthcare Professionals in the 21st Century'. Using the SCPE will also improve understanding of the standards which is important as these standards apply to potential registrants and registrants. In addition, the guidance could also support the embedding of the SCPE within approved courses.

Recommendations

- The Executive recommends that the Policy department works with the Communications department to establish a section for students on HPC's website.

- The Committee is asked to agree the proposed timetable for the production of the guidance outlined above.

- The Committee is asked to agree that the ethical guidance should be based on HPC's Standards of Conduct, Performance and Ethics.

Debrief

Students' awareness and understanding of the Health Professions Council: qualitative research findings

March 2008

EdComs

hpc health professions council

Structure of presentation

- Background
- Research objectives
- Methodology
- Main findings
  - Final year student mindset
  - Awareness and understanding of HPC and its role
  - Awareness, knowledge and understanding of registration
  - Awareness and understanding of student responsibilities and SCPEs
  - Future communications and awareness raising
- Recommendations and Conclusions

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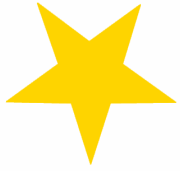
Background

- HPC was established in 2003 to regulate health professionals and by doing so protect those members of public who use their services

- It maintains a register of those who meet the standards it sets and regulates in education and training, behaviour, professional skills and health

- It approves and monitors those UK courses that allow professionals to become eligible for registration and takes action if any health professionals fails to meet the standards set. It also offers education for providers

- The HPC is now looking to use qualitative research to inform a communication plan with those who are nearing the end of their HPC approved courses and those who have just registered with the organisation

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Research objectives

- The research aimed to:
  - Inform a communication plan for raising awareness and understanding with students who are graduating from an HPC approved course and those who have recently registered with HPC for the first time
- Specifically it was to determine:
  - awareness and understanding of regulation, registration and the HPC
  - knowledge of the HPC registration process (e.g. when to apply) non-registrants *(and non-registrants)***
  - awareness of the responsibilities of students/ health professionals before and after registration
  - the best way and time to communicate with these audiences

  **NB: research with students has been completed and research with registrants is planned for the near future

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Methodology

- 6 x 1.5 hour group discussions with students in their last year of HPC approved courses
- 6 x 1 hour depth interviews with tutors of those on HPC approved courses
- Research conducted in Glasgow (Glasgow Caledonian University), Cardiff (Cardiff University) and London (South Bank University) between 11th – 18th March 2008
- Mix of those students on therapy, science and other health subject HPC approved courses and a mix of those from arts and science based subjects
- **NB: one further group discussion with registrants is planned for the near future**

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Respondent profile

Students
- Physiotherapy
- Occupational Therapy
- Podiatry
- Radiotherapy
- Operating Department Practitioners
- Dietician

Tutors
- Physiotherapy
- Occupational Therapy
- Podiatry
- Radiology

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Main findings

Final year students' mindset

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Final year students have a lot on their minds...

- Mainly focussed on final year dissertations and exams
- Thinking about job prospects/ placements in a general sense and some scanning industry publications for information
- Some industries (e.g. Physiotherapy and Occupational Therapy) have a severe lack of jobs available
- Because not focussed on detail of applying for jobs yet, HPC does not loom large

Students rely on their tutors to guide them through any practicalities they need to know – few are taking the initiative to delve deeper

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Main findings

Awareness and understanding of HPC and its role

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Generally low awareness of HPC amongst final year students

MAJORITY

Low/no awareness

MINORITY

High awareness

Awareness of HPC

Mature students

- Typically 2-3 in each group aware of HPC – dependent on course taken (mature students and occupational therapists in particular)
  - Learnt on the course or became aware before enrolling
- Those aware knew of HPC's ability to strike professionals off the register – took HPC seriously

I am a mature student so I had to have an interview and was asked about regulated bodies and professional bodies so I went on the website.

Student, Cardiff

EdComs

What students knew about HPC

> *If we get sued or if there's someone who complains about us, they'll investigate it. They've got their own little courtroom where there's members of the HPC, they decide whether you were in the wrong and whether they're going to strike you off or suspend you for a few weeks or whatever.*
>
> Student, Cardiff

> *You have to pay your annual membership for them to do their stuff.*
>
> Student, Glasgow

> *I think the main thing that has been pushed with us is the CPD and the fact that if you don't keep up with it you won't be registered and you won't be able to practice.*
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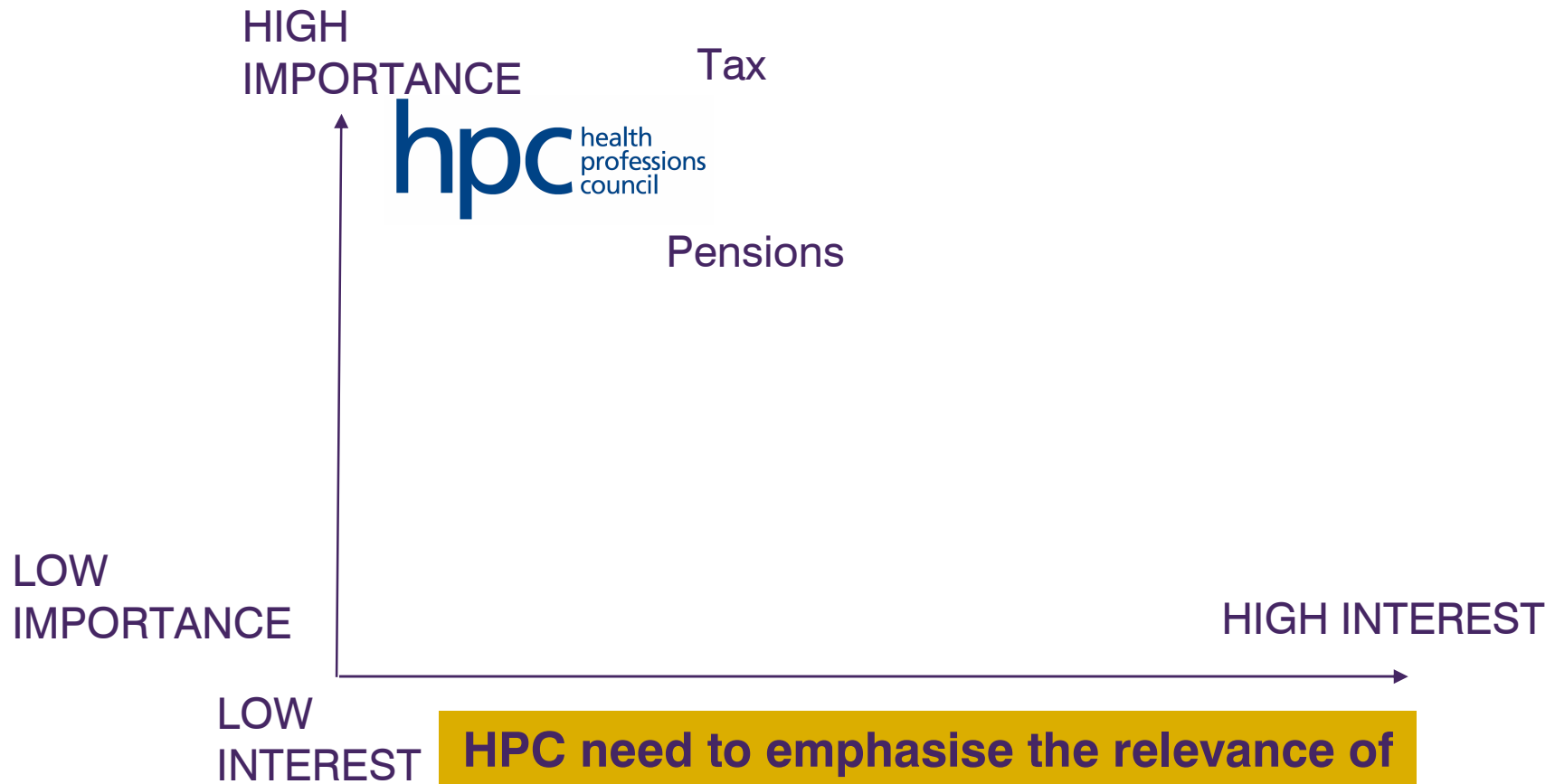> Student, Cardiff

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Barriers to awareness of HPC

- Tutors acknowledged the difficulty of engaging students in this topic early on their course
- Those unaware concerned that they had not been informed, given existing stress they felt they were already under
- Students' priorities during the course and perceived relevance of HPC to them
- Confusion between HPC and own professional bodies
- Variations in extent to which HPC is embedded in different University courses, even within the same discipline
- Tutors' own perceptions of HPC
- Existing links/ relationship with HPC and University

HPC need to consider the wider context in which their communications are likely to be received and work to address the barriers

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Those who are aware of HPC may still not take action without prompting

HIGH
IMPORTANCE

Tax

hpc health
professions
council

Pensions

LOW
IMPORTANCE

HIGH INTEREST

LOW
INTEREST

HPC need to emphasise the relevance of registration at the right time in students' course to make them take action

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Tutors' perceptions of HPC

- Tutors' own perceptions of the HPC can inform their attitude to communicating its existence to students
- Some tutors claim to have undergone an arduous validation process for their courses, which has informed their opinion of HPC as complex and bureaucratic
- Others have heard stories of foreign and UK students experiencing considerable delays in processing their registration applications
- Some tutors still question the fees that registrants have to pay to support the HPC

HPC should consider improving the perception and understanding of HPC amongst tutors in order to encourage them to communicate more effectively with students

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Main findings

Awareness, knowledge and understanding of registration

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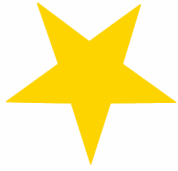
Awareness, knowledge and understanding of registration process

- Of those who were aware of HPC and its role, most knew that they had to register, although overall these were the minority across the sample

- Even those who knew they had to register had little understanding of how they would go about doing it or when they needed to register

- Aware they would have to pay 'a lot of money' and some concern anecdotally about slow registration process

- Some were concerned about their lack of knowledge, on prompting and others felt that they would look up what they needed as and when it became relevant (right towards the end of their course)

Most final year students are expecting to be told what they need to do next in relation to HPC registration

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Registration

I've heard that people have had to wait ages for their registration to come through – sometimes months
Student, London

I don't know how to register or when your supposed to do it.
Student, Glasgow

I know they [tutors] are going to go through it with us so we don't screw it up.
Student, Cardiff

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# Awareness and understanding of student responsibilities and SCPEs

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Students know they need to follow standards but whose?

- Most students aware they follow clinical standards as part of their course, but unaware of their connection with HPC – most assume these relate to their professional body
- Students are conscious that their conduct as a student can affect their chances of employment
  - Work placements prepare them for this
  - Most courses groom students to act as a qualified professional

There is a need for HPC to ensure that students relate the standards they already follow to the HPC and SCPEs

EdComs
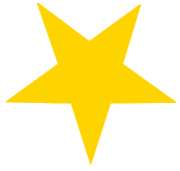
There is a need to communicate SCPEs in a relevant and engaging way

- Few had heard of 'standards of conduct, performance and ethics' and very few understand need to keep CPD files up to date for future employment or HPC audits
- Can feel overwhelmed by perceived dryness and amount of different codes of conduct and standards
  - Often put to one side to read 'at some point'
- Tutors claim it is difficult to communicate the importance of these standards

HPC should consider how best to communicate SCPEs and responsibilities in a motivating and engaging way

EdComs

Main findings

Communication and awareness raising

Internal communication about HPC varies currently

Talks at start of final year

Some had been directed to website (although few had visited it yet)

Embedded throughout courses – particularly in Occupational Therapy courses

Mentioned by tutors throughout course

Talks from HPC representatives

Part of inter-professional elements of courses

Tutor talks at start of course

Current communications organised on an ad hoc basis. Tutors would welcome more information and structure to aid their communications to students

EdComs

Communications about HPC

The only reason I am more informed about the registration process is because I happened to be in the pub when the postgrad tutor was telling her post grad students what to do. She had forgotten to tell them about it and only remembered when someone asked her about it.

Dietician, London

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✓ Suggested communications - students

- External talks from HPC representatives overwhelmingly popular – need to be interactive and engaging
- Developing a course-long relationship with students (along lines of professional bodies)
- Encouraging tutors to direct them to the HPC website so they can access information when they need it
- Creating dedicated students' area of the website including FAQs and relevant standards of practice documents for each profession

- Provide step-by-step guide to registration following HPC talks (with directions to website)
- Use student representatives to promote HPC
- Advertise themselves on professional literature they receive from other governing bodies

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Communications to avoid - students

- Leaflets and printed materials unlikely to be read
- Emails – unsolicited emails usually treated as junk

With information packs, you will just put it in the cupboard somewhere to gather dust. If you are really interested and you know it is going to be part of your scheme of things in life you are going to go on the website and actively look for it.

Student, Cardiff

EdComs

Suggested communications - tutors

- Talks from HPC representatives – most effective way of students taking it seriously and being able to ask questions 'from the horses mouth'
- PowerPoint slides from HPC that they could adapt and present to students
- Directing students to website particularly effective – where all students go for information
- Creation of a short video about HPC
- Important to clarify differences between HPC and professional bodies

I think it would be useful and if they had on their website maybe something where they could look at a small 10 minute talk/video on the role of HPC not a lecture but almost a role play type thing so it is different for the students.

Tutor, Cardiff

- Leaflets and printed materials unlikely to be read by students

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Suggested tone of communication

- Many students advocate using shock tactics
- Give illustrations of a breach of practice
- Be official yet informative

I think it is like a warning, if you are not fit to practice you will get struck off. It is a reminder of what you are doing it and why you are doing it and how you should obey the rules and regulations.

Student, Glasgow

There should be a happy medium between seeing HPC as a support and also that if they don't proximate to their professional responsibility then the HPC can also be a threat.

Tutor, Cardiff

We looked at case studies where one person got cautioned, the other struck off and the other suspended and it was the reasons behind it that made us think. It hammered home to us the importance of knowing the fitness of practice and the standards that you have to meet.

Student, Cardiff

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Response to FAQs

- The FAQs were said to be comprehensive and all of equal importance

Keeping up with your registration because of the job shortages in OT, if you went into the private sector or a non traditional OT role, you are not necessarily governed by HPC so it is how you keep up your registration and your name as an OT.

Student, Cardiff

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When is the best time for the HPC to communicate with students?

Start of course　　　　**Middle of course**　　　　**Final year**

Students suggest between September and January in their final year

Even though many students have been told about HPC at the start and during their course, the most effective time to target them is towards the beginning of their last year, when it is most relevant

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When is the best time for the HPC to communicate with students?

I think it would be better in fourth year, because if people tell me things that don't concern me at the time, I just forget about them. We used to have classes about IPL (InterProfessional Learning), but I just took nothing in because I was in first year and didn't think it applied. I'd feel the same if someone came to speak to me about the HPC in first year.

Student, Glasgow

With the HPC, it only becomes a reality to them when they're approaching qualification. If one is perfectly frank, they know there's this regulatory body, and HPC, it's only when it comes to this time in the course where the mechanics, 'where do I go if I want a job, what do I do, what do I need to know, what forms do I fill in'.

Tutor, Cardiff

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Recommendations and conclusions

Communicating with students

- A student area on the HPC website was welcomed by students which should include;
  - A FAQ section
  - A summary document of each profession's standard of practice documents with links to full versions
  - A step by step guide to the registration process
- HPC presentations given by HPC representatives were particularly encouraged by students and tutors
  - Should have an interactive element to it
  - Include examples of professional misconduct to emphasise importance of SCPEs in an engaging and relevant way
  - Make clear how long the registration process actually takes
- Resistance for HPC to communicate directly with students through too many paper based products such as leaflets or information packs

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Recommendations and conclusions

- Therefore, HPC should focus on supporting course tutors in informing students about HPC
  - Students expect course tutors to give them this information
  - Tutors would welcome the assistance, as long as not compulsory

Communicating with tutors
- Send HPC presentations for their use
- Provide suggestions of how information about HPC could be integrated into courses
  - These suggestions should be tailored to reflect the nuances between the different courses accredited by the HPC
- Use this as an opportunity to refresh tutors knowledge and understanding of the HPC and the registration process in particular

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