

# Federation for Healthcare Science

## Response to consultation on the Structure of the HPC Register

The Federation for Healthcare Science consists of 46 member professional bodies, associations and societies that represent the 50,000 workforce that covers healthcare science in the health service.

Its current membership includes the two scientist groups already within HPC regulation (Biomedical and Clinical Scientists), aspirant professions and those to be included within the proposed regulation framework for assistant and associate practitioners.

The major role of the Federation is to articulate the collective views of its member organisations on matters that are significant for the practice of healthcare science in all its many and diverse forms within the health service.

The Federation's response focuses on generic principles that have the support of all member organisations. Issues that may be relevant to specific professional groups will be dealt with as appropriate within responses from individual societies.

As requested, the Federation's response is grouped around the four key questions asked.

1	<b>What are your views on the Council's conclusion that regulation of a new profession by the HPC should not always result in the number of Council members increasing by two?</b>
	<p>Given the relatively large number of potential applicant professions for inclusion within HPC regulation, it would clearly not be practical or feasible to continue the model that the Council should increase by two for each additional profession. The challenge for any replacement system is that the HPC Council should continue to have the representation it needs to allow informed decision making. It would be imperative that any amalgamations or regroupings should be based on robust, credible professional overlap or commonality, rather than perceived similarity promoted in order to achieve an idealised structure.</p> <p>Stake holder involvement and ownership of any modified or new structure is an essential requirement in order for the HPC to remain relevant and have credence within the regulated workforce.</p>

<b>2</b>	<p><b>What are your views on the Council’s conclusion that ending the link between the number of Council members and the number of parts of the register would be impractical?</b></p>
	<p>The Federation supports this view. For the HPC to function correctly and with the confidence of the professions it regulates, each part of the register should have equal representation at Council level.</p>

<b>3</b>	<p><b>What are your views on the Council’s conclusion that the structure of the register and the number of members of Council should evolve as new professions become regulated by the HPC?</b></p>
	<p>The Federation would like to draw attention to an anomaly that appears to be promulgated by recent developments and discussions. There appears to be an acceptance that there should be significant variation between the levels of ‘therapy’ and ‘science’ representation at Council level.</p> <p>The Health Professions Council seems resolved to group the healthcare science professions as ‘Healthcare Scientists’. As regulation continues to extend within the science sector, there is the opportunity to make comparisons between the Federation for Healthcare Science and the Federation for Allied Health Professions.</p> <p>Both sectors of the workforce are comparable in size and spread of professional practice, yet future proposals would give a far greater representation for the therapy professions at Council level.</p> <p>The professions from the Healthcare Science sector have science principles underpinning practice however the discipline of practice can be very different in practical terms. There are an approximate equal number of professions that bear the descriptor ‘therapist’ within their title. It is evident that common principles of therapeutic practice apply. However the differing practical applications of therapy are reflected in the existing parts of the register. The Federation is concerned that the structures proposed would continue with a system in which two comparable sectors of the workforce have very inequitable representation at Health Professions Council level.</p> <p>The Federation believes that it is well placed to assist the HPC in understanding the significant differences between the science professions many of whom have been relatively recently established as the result of advancement in science and technology, in order to ensure appropriate and equitable representation at Council level.</p>

4	<b>Assuming that the Council adopts the option of gradual evolution, what principles or criteria do you believe the Council should use to structure the register?</b>
	<p>The Federation would support the following principles to guide the future evolution of the register.</p> <ul style="list-style-type: none"><li>• Use existing practice grouping whenever practical (eg Healthcare Science, Allied Health Professions)</li><li>• Maintain a reasonable balance at Council level between the major practice groupings</li><li>• Involve key stakeholders</li><li>• Ensure that any future groupings are robust and practical, rather than idealised</li><li>• Consult widely with those groups that will be directly affected by future changes at the proposal stage</li></ul>

<b>Any other comments:</b>