Professional accountability arrangements for qualified health science professions policy

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Summary of document:
This policy confirms the minimum professional and operational accountability arrangements that should be in place for any qualified Health Science Professional employed within Hywel Dda University Health Board (the Health Board). It recognises the evolving nature of the Health Board's operating model and provides guidance to professional and operational managers on the process for managing professional concerns of qualified Health Science Professional

Scope:
This policy applies to all qualified Health Science Professionals employed within the Health Board including bank and agency registrants and those working in services where care is commissioned by the Health Board.
This policy applies to all **registered** Health Science Professionals employed within the Health Board including bank and agency registrants and those working in services where care is commissioned by the Health Board.
It also applies to Health Board services who are considering or who have already employed qualified Health Science Professionals.

Qualified Health Science Professional staff includes those Health Science Professionals who have statutory registration with the regulator Health and Care Professions Council (HCPC) and those who have Health Board-mandated registration with Professional Standards Authority (PSA) accredited registers such as The Academy for Healthcare Science (AHCS) and the Register for Clinical Technologists (RCT).

To be read in conjunction with:

- 894 'Putting things Right' Management and Resolution of Concerns Policy (Incident, Complaints and Claims) (opens in a new tab)
- 246 Managing Safeguarding Allegations and Professional Concerns raised against Hywel Dda University Health Board Staff Policy (opens in new tab)
- 203 All Wales Capability Policy (opens in a new tab)
- 201 All Wales Disciplinary Policy & Procedure (opens in a new tab)
- 299 Registration and Re-Registration of Health Professionals Policy (opens in a new tab)
- 948C – Disclosure and Barring Service Policy (opens in a new tab)

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Glossary of terms
AHCS = Academy for Healthcare Science
EDAHPHS – Executive Director for Allied Health Professions and Health Science
PSA – Professional Standards Authority
RCT – Register for Clinical Technologists

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Introduction

The NHS and its workforce is changing. Current transformational change across the NHS is described within A Healthier Wales (2018); the person-centred symptom-based approach in the National Clinical Framework (2021), and the seven themes of the Workforce Strategy for Health & Social Care (2020), amongst other key documents. This transformation offers opportunities for healthcare professionals to develop and apply their skills within increasingly diverse roles in an expanding context of multi-professional and skills-based practice - including prevention, public health, mental health and primary care settings - where they can help to deliver the NHS' vision of enabling people to live healthier, more independent lives.

To ensure the public is protected some organisations hold 'registers' (lists) of people in those roles which can be checked by patients, service users and employers. Some Health Science professionals have a legal requirement to be registered such as operating department practitioners, radiographers, clinical scientists, hearing aid dispensers and biomedical Scientists. These are regulated occupations and professionals must be trained and qualified to the regulators standards to be added to the register. The Professional Standards Authority (PSA) oversees the registers of those professions working in occupations that Parliament has said must be regulated.

Within the Health Board, the Executive Director of Allied Health Professions and Health Science (EDAHPHS) holds responsibility and accountability for all health science professions regulated by the HCPC, The AHCS and The RCT. The role includes providing assurance that Health Science Professionals work within a clearly defined professional and clinical governance framework. Health Science Professions support workers are also accountable to the Executive Director in line with the All-Wales Delegation Policy.

Throughout this document, the Executive Director for Allied Health Professions and Health Science is referred to as 'EDAHPHS', which is a recognised abbreviation used throughout Wales, based on their statutory title.

Currently, other Health Science Professionals are not legally required to be on a register for example cardiac physiologists and clinical technologists. They can apply to join a register for example the Academy for Healthcare Science (AHCS) and the Register for Clinical Technologists (RCT) respectively. These organisations are accredited by the PSA. This accreditation demonstrates a commitment to maintaining high standards in their profession and to protecting the public.

The PSA oversees the registers of those professions working in occupations that Parliament has said must be regulated. Additionally, it has legal powers to award Accredited register status when a non-statutory health and care register

meets their standards for Accredited Registers. The functions in relation to accreditation are set out in Section 25(2) of the National Health Service Reform and Health Care Professions Act (2002). The Accredited Registers programme ensures that non-statutory registers meet standards that prioritise the safety of patients and the public. An Accredited Register ensures that those who work in roles not regulated by law will be held to high standards.

The Health Science workforce in Wales is comprised of over 50 disciplines across the broad divisions of:

- Life sciences
- Physiological sciences
- Physical sciences and biomedical engineering
- Clinical bioinformatics
- Imaging Sciences

Health Science professionals working within the NHS that are registered with HCPC hold the protected professional titles (Appendix 1) of:

- Biomedical Scientists
- Clinical Scientists
- Radiographers (diagnostic and therapeutic)
- Operating Department Practitioners
- Hearing aid dispensers

Some Health Science disciplines are not regulated by the HCPC and from 2nd January 2026 employees/workers in these disciplines employed in the Health Board must be registered with a Professional Standards Authority (PSA) accredited regulatory body (Appendix 2). Some Health Science professions have their own professional bodies in addition to HCPC regulation or Academy for Healthcare Science – for example the College of Radiographers and the Institute of Physics and Engineering in Medicine (Appendix 3).

The Health Board recognises that PSA accredited regulatory bodies apply an equally robust process for the management of concerns as compared to statutory regulators such as the HCPC, and as such PSA accredited registers is now the preferred name of registers applicable to Health Science professions and those registered with non-statutory registers.

Within the Health Board, the Executive Director of Allied Health Professions and Health Science (EDAHPHS) holds responsibility and accountability for all professions regulated by the Health and Care Professions Council (HCPC), together with health science professionals on non-statutory professional standards authority (PSA) registers across the Health Board; The Academy for Health Care Science (AHCS) and The Register for Clinical Technologists (RCT). The role includes providing assurance that Health Science registrants and practitioners work within a clearly defined professional and clinical governance framework. Health Science support workers are also accountable to the Executive Director in line with the All-Wales Delegation Policy.

Across Wales and the Health Board, there are now many examples where professionals from the Health Science Professionals workforce are recruited into both uni-professional roles that are managed outside of traditional professional structures and multi-professional practitioner roles with a scope potentially beyond that defined by their regulated profession. This creates significant opportunity for professional development, which requires robust professional oversight.

The EDAHPHS retains ultimate professional responsibility for Health Science Professionals registrants in all work contexts, but the chain of professional accountability to them can be less clear in these broader roles and working contexts.

Throughout this document, the Executive Director for Allied Health Professions and Health Science is referred to as 'EDAHPHS', which is a recognised abbreviation used throughout Wales, based on their statutory title.

The EDAHPHS office defines 4 groups of registrant occupation, all of which exist across Hywel Dda University Health Board as described in Table 1.

Table 1: Description of Registrant Occupation and Operational Arrangements

Group	Description of Registrant Occupation and Operational Arrangements
1	The registrant occupies a role and title related to their specific professional registration and is employed within the same professional department. • Profession-specific job role and job title. • Operationally and professionally managed within a structure led by a Head of Service of the same profession. *Example (1): An Audiologist working as an Audiologist within the Audiology service in the Planned and Specialist Care Clinical Care Group* *Example (2): A Radiographer working as a Radiographer within the Radiology service in the AHP and HS Clinical Care Group*
2	The registrant occupies a role and title related to their specific professional registration but is employed within a department that

Group	Description of Registrant Occupation and Operational Arrangements
	may be multi-professional or different to their professional background. • Operationally managed by a colleague from a different profession/service. • Professionally accountability within a structure clearly linked to their Professional Head of Service *Example (1): A Medical Photographer who is operationally responsible to the Head of Radiology but professionally accountable to the Head of Medical Photography* *Example (2): A cardiac physiologist who is working as a cardiac physiologist, who is operationally responsible to Service Delivery Manager but is professionally accountable to the Lead Cardiac Physiologist*
3	The registrant holds a clinical or patient-facing position that necessitates professional registration; however, this requirement is not limited to any particular professional group. • Job role open to applicants from a range of backgrounds • Job role requires direct clinical care to patients • Job role requires professional registration (more than one potential regulator/accredited body) • Operationally managed with varying arrangements, likely to be by a colleague from a different profession/service. • Professional management arrangements are least defined. • Category carrying greatest risk to assurance of professional governance. *Example (1): A Registered Clinical Engineer working as a Head of Innovation, operationally managed by Director of Research & Innovation, professional accountability arrangements require defining in individual case*
4	The registrant holds a leadership or management position that necessitates professional registration; however, this requirement is not limited to any particular professional group. • Job role open to applicants from a range of clinical/professional backgrounds

Group	Description of Registrant Occupation and Operational Arrangements
	• Job role requires professional registration (one or more potential regulators/accredited body) • Operationally managed with varying arrangements, likely to be by a colleague from a different profession/service. • Professional management arrangements need to be agreed and defined with the EDAHPHS Office Example (1): A Registered Biomedical Scientist working as Assistant Director of Quality, Safety and Experience, operationally managed within a Clinical Care Group structure, professional accountability arrangements require defining in individual case. Example (2): A Registered Clinical Scientist working as a Deputy Director of Health Science, operationally managed by Executive Director of Allied Health Professions and Health Science, professional accountability arrangements require defining in individual case
5	The registrant holds a role that does not mandate professional registration; however, they have elected to retain their registration status. • Often managerial, research/innovation or education/training role, often but not exclusively non-patient facing. • Job role does not require ongoing professional registration, but postholder chooses to maintain their registration for personal development. • Operationally managed with varying arrangements. Registrant needs to make own arrangements for maintaining Professional standards and ensure registration status is recorded on ESR seeking guidance from the EDAHPHS Office as necessary Example (1): A Registered Biomedical Scientist working as Chief Operating Officer, operationally managed by Chief Executive Officer, professional accountability not in place as registration not required for the job role and professional accountability arrangements require defining in individual cases.

Policy Statement

This policy confirms the minimum professional and operational accountability arrangements that should be in place for any qualified Health Science professional employed within the Health Board. It recognises the evolving nature of the Health Board's operating model and identifies key Health Science professional lead roles across the organisation as it operates currently.

Scope

This policy applies to all qualified Health Science Professionals employed within the Health Board including bank and agency registrants and those working in services where care is commissioned by the Health Board. It applies to Health Board services who are considering or who have already employed qualified health science professionals. It also applies to students or trainees on accredited training programmes undertaking practice placements in the Health Board.

'Registered' staff includes those Health Science Professionals who hold statutory registration with the regulator HCPC, and those who have Health Board mandated registration with PSA accredited registers.

Aim

The aim of this document is to ensure that all services within the Health Board employing Health Science Professions and those commissioned to provide professional supervision for them, understand the minimum accountability arrangements that must be in place to appropriately recruit, support, develop and monitor their practices and enhance collaborative working across traditional service boundaries of the health science professionals employed by these services.

Purpose

The purpose of this policy is to protect the public and safeguard patients by ensuring:

- Professional registration of Health Science Professionals is monitored and maintained
- Health Science Professionals maintain and uphold their professional standards
- Fair and consistent professional support to Health Science Professionals
- The Health Board meets the requirements of HCPC registers and other PSA accredited registers powers to impose sanctions where there are concerns about a Health Science Professionals fitness to practice

- There are clear processes in place to manage and monitor concerns relating to Health Science practice
- Operational and professional leaders within the Health Board are clear about their responsibilities in relation to the employment of registrant Health Science Professionals

Objectives

This policy defines the contexts that Health Science Professionals operate within the Health Board. It clearly defines professional and operational accountability, and the interactions needed between the two to support the Health Science workforce at each stage of employment, including:

- Use of HCPC-protected titles
- Professional registration and oversight
- Management of Regulator and Professional concerns
- Professional/clinical supervision
- Staff management and appraisal
- Workforce planning and role design
- Recruitment and selection

Principles of Professional Accountability

Principle 1: Workforce Planning and Role Design

Health Science Professional leads are accountable for representing the workforce demands for their professional group/s in a range of contexts within and beyond the organisation. To do this effectively, it is vital they understand where those professions are needed across the full range of services provided by the Health Board.

Where opportunities present to develop roles that require or could attract qualified Health Science Professionals outside of their core service areas, operational managers should link with the relevant professional lead (see appendix 4) and the workforce planning team. These leads will understand current professional structures for those staff groups across the Health Board and will be able to delegate enquiries to relevant service leads where appropriate. The EDAHPHS office can also be contacted on the following email HDD_AHP_and_HS_Support@wales.nhs.uk. (opens in a new tab)

Principle 2: Job Descriptions and Person Specification

Job descriptions for roles with an HCPC-regulated or health board mandated title must only be developed by professional leads and their service delegates. Whilst job descriptions for profession-specific roles for registrants may be available via the Health Board Job Evaluation Team's Job Description Library or the All Wales job descriptions, operational managers outside of Health Science direct professional structures must contact the relevant professional leads for consideration of the right job description, to ensure consistency and fairness

across the Health Board. This is critical for HCPC-Registered roles with regulated protected titles and roles where registration with other PSA accredited register is an essential requirement.

All Health Board job descriptions must use the agreed Agenda for Change template which includes a post summary, outlining professional AND operational accountability arrangements. The operational manager appointing staff to the service is responsible for confirming both in conjunction with the professional lead.

For all qualified and registered staff, professional accountability must be recorded as being to their registered profession's Professional Lead for the Health Board. Where there is no current uni-Professional Lead, queries should be directed to the EDAHPHS office HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab).The name/service area of the Professional Lead for each post should be agreed at the stage of recruitment and confirmed with the postholder on appointment.

At the point of recruitment operational and professional leads need to carefully consider the application of this statement relating to performance management through the Agenda for Change gateways and/or the Annex 21 process.

All qualified health science professions and registrant posts must be considered through the Clinical Education Governance Group (CEGG) process to ensure that professional oversight and consideration is given to the development, skill mix and continuation of qualified and registrant posts.

Principle 3: Recruitment and Selection

ESR Position Numbers and Registration with the HCPC, AHCS or RCT

An ESR Position Number links together critical workforce and pay related information, including:

- **Position Title** - *The Job Title on the Job Description being appointed to.*
- **Occupation Code** - *Chosen from a national data set,* ***not*** *linked to professional registration*
- **DBS check requirements**
- **Staff Group** - *Chosen from a national data set, linked to the Position Title* ***not*** *professional registration*
- **Job Role** - *Chosen from a national data set, linked to the Staff Group*
- **Professional Registration requirements** - *Linked to the essential requirements of the post* ***OR*** *the registration of the postholder ultimately recruited.*
- **Financial cost centre**
- **Subjective code**
- **Pay Grade information**

Position numbers must therefore accurately reflect the specific job role the person will be undertaking within the Health Board. Recruiting managers should

request a new position number for all new roles by job title, to ensure the Health Board is able to accurately monitor the make-up of its workforce, and that correct checks for all employees/workers are established.

Where registration is a requirement for a post, this must be stated when generating a position number, to ensure registration is recorded and tracked on ESR. Where applicants to posts are registered with any statutory regulator or other PSA accredited register, recruiting managers must ensure the confirmed named register is recorded for the postholder at the time of recruitment.

Selection Process

Health Science Professional leads or an appropriate delegate must be engaged in the selection process for all qualified Health Science Professionals across the Health Board. Depending on the scope of the job role involved, the level of engagement needed will be different. Consideration should be given to professional involvement at post advertisement, shortlisting, interviewing and selection. For Group 2 roles (see table 1) which are posts that carry protected professional titles or registration with PSA accredited register, operating outside of core services, the appropriate professional lead or their delegate **must** be actively involved in the full selection process including a member of the formal interview panel. This ensures their expertise in understanding the professional competencies of candidates is utilised to support safe recruitment, and that agreements can be set from the outset for how professional support will be provided to the successful candidate once in post.

Principle 4: Use of Registered Professional Titles

Protected Titles

All Health Board employees must only use the job title for the role/job description that they have been recruited to within the Health Board. This will be confirmed in their contract of employment. Being a registered professional does not provide authority to use that professional title when employed in a different job role.

Where professional registration is required for a practitioner-based job role, this is particularly important as job titles inform expectations of the role and duty of care a person holds. However, it is also recognised that in many cases, a practitioner's professional registration directly informs their approach to clinical practice within that role. The Health Board encourages the use of the registrant's profession as bracketed confirmation of their professional status below their job title in a signature strip. For example:

John Jones Rheolwr Cyffredinol Theatrau Ymarferydd Adran Gwaith Cofrestredig (HCPC12345)	John Jones General Manager Registered Operating Department Practitioner (HCPC12345)

Principle 5: Professional Registration

Registration Oversight

The EDAHPHS office will have its own mechanism in place to monitor profession registration (Appendix 4 and appendix 5), but this is not to replace the responsibility of operational managers.

Operational managers are responsible for monitoring the registration status of their staff, as per the Health Board's 299 Registration and Registration of Health Professionals Policy (opens in a new tab). Where professional registration is mandatory for staff, managers must understand the registration cycle and processes for those specific staff and understand how to check the relevant register/s to confirm their staff remain appropriately registered.

The Health Board's EDAHPHS office must be notified of any lapses in Health Science workforce registration (where registration is essential to the person's job role). These notifications must be sent to: HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab) within 48 hours of the lapse being identified.

ESR interfaces with the HCPC register to keep staff records up to date. This assists the operational manager, who will receive ESR notifications of re-registration dates and confirmation when this is updated by each Registrant. It does not interface with other PSA accredited registers, or example, AHCS and RCT.

Operational managers are responsible for establishing their own systems of review and validation of HCPC-registered/ health board mandated registered staff within their services and may be asked at any time to confirm their status by the EDAHPHS office.

HCPC Registration

HCPC registrants are autonomous professionals. They have a personal responsibility to maintain the HCPC's Standards of performance, conduct and ethics. On applying to join the register, and at two yearly intervals thereafter, they must declare that they continue to meet the standards and that their health and character are such that they remain fit to practise.

HCPC provide individual profession-specific Standards of Proficiency. Employing teams and structures must support Continued Professional Development (CPD) activities and other possible practice-based activities to enable maintenance of registration. Where an employing manager is of a different professional background, the appropriateness of proposed CPD activity should be agreed with the Professional Lead or their delegate.

Registrants are required to make a personal declaration that they continue to meet these profession-specific standards during their annual appraisal, that they are maintaining appropriate records of their continuing professional development, and that they remain fit for practice. Registrants are required to

inform their manager of any issues that may impact on their fitness to practice or where there may be a breach of professional standards.

Other PSA Accredited Registration

There are some Professional Standards Authority (PSA)-accredited professional registers relevant to the Health Science workforce, for example the Academy for Healthcare Science (AHCS) and the Register for Clinical Technologists (RCT). Registration will be mandatory within the Health Board for Health Science roles from 2nd January 2026. Each will have their own systems for professional declaration, re-registration and performance monitoring arrangements for registrants.

Job descriptions for non HCPC registered Health Science professions have been updated accordingly to account for this change in policy relating to registration requirements. These requirements can be seen in the text below. All current and future non HCPC registered posts at band 5 and higher must contain these descriptions in the person specification.

Essential criteria (for person specification)

1a **Accredited degree relevant to the role** (e.g., B.Sc in Audiology, Cardiac Physiology, Clinical Engineering, Neurophysiology, Medical Physics, Respiratory Physiology)

- 1b. **Registration** with AHCS or RCT within **3 months** of appointment.

OR

2a **Equivalent knowledge and experience at B.Sc level** (with or without a related degree)

- 2b. Progression through AHCS/RCT Practitioner Training Programme equivalence scheme (PTPE).
- 2c. **Registration** within **24 months** of appointment.

OR

3a. **Annex 21 contract** (with or without a related degree)

- 3b. Progression through AHCS/RCT Practitioner Training Programme equivalence scheme (PTPE).
- 3c. **Registration** within **24 months** of appointment.

Principle 6: HCPC Regulatory or Professional Registration Concerns

Where concerns are raised regarding a registrant's competence, fitness to practise or professional conduct, operational managers must follow usual Health Board policies and procedures, and seek support from the following teams accordingly:

- workforce and organisational development
- patient safety
- safeguarding

In addition, they must notify the EDAHPHS office, which holds ultimate professional accountability for registrants across the Health Board and will ensure appropriate professional engagement in the process based on the individual circumstances of each case. They should contact: HDD_AHP_and_HS_Support@wales.nhs.uk

Principle 7: Professional Supervision

All Registered and qualified health science professionals are required to regularly reflect on their clinical practice and demonstrate learning from their experiences. Demonstrating reflective practice is a critical component of HCPC's Standards of Proficiency for each registered professional group. In addition, PSA accredited registers provide explicit standards and expectations for each individual profession in relation to the structured process of professional supervision, including in some circumstances mandating regular professional supervision to maintain registration.

Specific staff groups within the Health Board may have published standards and guidance for their employees/workers to support their professional supervision obligations and support arrangements. These are often determined by the professions professional body (for example, Society for Radiographers). Appropriate arrangements will vary between Group 1 – 4 roles (in table 1).

Operational managers who employ qualified health science professionals or registrants must be aware of individual requirements for professional supervision and have appropriate procedures in place to meet those requirements. They must negotiate how this will be supported in the context of the job role that each person has been employed to undertake, seeking support from the qualified health science professional or registrant's professional lead within the Health Board to ensure this complies with professional standards. This may require additional resource to support professional supervision – either from within the Health Board or outside of the organisation for very specialist roles: this may incur additional non-pay cost to the employing service. The EDAHPHS office can provide support or guidance as required and can be contacted at : HDD_AHP_and_HS_Support@wales.nhs.uk. (opens in a new tab)

Principle 8: Staff Management and Appraisal

Operational managers are responsible for establishing appropriate systems for staff management, and for ensuring appraisal through the Health Board's PADR system. Consideration should be given for employees/workers who have been appointed to practitioner roles that require ongoing HCPC registration or other PSA accredited registration, but that do not involve exposure to traditional uni-professional duties (Table 1). It is important for operational managers to work collaboratively with relevant professional leads to consider the appropriate

professional oversight in each individual case. It is expected that there should be a suitable professional representative as part of a Health Science PADR where the line manager is of a different profession, as outlined within the job description and agreed during the recruitment and selection process.

At induction, a clear job plan must be agreed with the postholder outlining who they will interact with for all operational and professional matters. Services may also develop a memorandum of understanding (MOU) or service level agreement (SLA) to record all arrangements agreed in any situation.

As part of the appraisal process, registrants are required to record how they have met their professional standards over the last year and what actions they intend to undertake to ensure continued compliance for the upcoming year. This can be completed on the Health Board PADR documentation (Appendix 6).

The EDAHPHS office can provide support or guidance as required and can be contacted at HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab).

Principle 9: Professional Forum and Networks

Professional leads are expected to represent their profession within the Health Boards Health Science Professional Forum. Where, they are unable to attend, they may send a delegated representative. There must be established lines of communication between this forum and their own professional forum/ governance structures.

Professional leads must be members of their national professional peer networks and ensure that there are established lines of communication with both their professional group and the EDAHPHS office where appropriate.

Operational managers are responsible for ensuring that professional leaders across the Health Board are actively supported and encouraged to attend these professional meetings. The EDAHPHS office can provide additional information about the professional fora as required and can be contacted at HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab)

Principle 10: Scope of Practice

Working within a registrant's scope of practice is essential for maintaining patient safety, professional integrity, and public trust. Registrants are accountable for delivering care that aligns with their education, training, and competence, ensuring interventions are evidence-based and in line with their job description and contract of employment.

The principle of scope of practice is important at all stages of a registrant's career but those who are employed in a role which has either a narrower scope of practice (e.g. registrant in a non-registrant role) or a broader scope of practice (e.g. advanced or consultant practitioners) must be particularly mindful of how they adhere to the specific requirements of the role they are employed to do. For further guidance on this contact HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab)

Principle 11: Student and Trainees

Whilst student and trainee Health Science Professionals are not registered, they must adhere to the HCPC Standards of Conduct, Performance and Ethics and the standards of Proficiency relevant to their profession, the RCT Code of Professional Conduct or the AHCS fitness to practise procedure and associated policies and guidance.

During practice placements, students must work under the supervision of a registered practitioner or suitably qualified professional as appropriate to their level of training. They must only undertake tasks for which they have been appropriately trained and assessed as competent and must seek guidance when unsure.

Supervisors are accountable for providing appropriate oversight, while students remain accountable for following guidance and recognising the limits of their competence.

Where there are concerns about the conduct of a student, the supervisor should report this promptly to the practice educator, academic tutor and designated safeguarding officer (if appropriate) following local and university reporting procedures. The EDAHPHS Office should be notified of any professional conduct concerns relating to a student or trainee by email HDD_AHP_and_HS_Support@wales.nhs.uk.

Summary of Accountability Requirements

The table below summarises the professional accountability requirements for each group of registrants as described (see table 2)

Table 2, Professional accountability requirements

Group	Summary Accountability Requirements
1 The registrant occupies a role and title related to their specific professional registration and is employed within the same professional department.	• Postholder works within the parameters of a professionally titled job description. • Professional registration must be recorded on ESR • Professional job title is used as per the job description. • Professional Lead has clear accountability arrangements through to EDAHPHS office and is responsible for all aspects of workforce design and staff management.
2 The registrant occupies a role and title related to their specific professional registration but is employed within a department that may be multi-professional or different to their professional background.	• Postholder works within the parameters of a professionally titled job description. • Professional registration must be recorded on ESR • Professional job title is used as per the job description • Operational manager must ensure professional oversight is established within a structure clearly linked to the Registrant's Professional Head of Service/Lead or delegated representative • Professional lead or delegated representative must be present within PADR • Role design and recruitment is managed jointly by operational manager and professional lead or delegated representative, and includes consideration of professional competence, support/supervision needs for each postholder. • Professional head of service/lead is responsible for oversight of professional/regulatory matters.
3 The registrant holds a clinical or patient-facing position that necessitates professional registration; however, this requirement is not limited to any particular professional group.	• Postholder works to a Practitioner job description, requiring professional registration, may be any regulator or professional body. • Job title used must be the post recruited to, as per the job description and unique ESR position number, NOT the professional title. • Operational manager should engage with professional Health Science leads in role design and recruitment where they anticipate recruitment of Health Science Registered staff to those roles. • Professional registration must be recorded on ESR. • Operational manager must ensure professional oversight is established within a structure clearly linked to the Registrant's Professional Lead within the Health Board and recorded in the postholder's job plan.

Group	Summary Accountability Requirements
	• Professional lead or delegated representative must be present for PADR • Operational manager is responsible for monitoring compliance with registration/regulation for all staff.
4. The registrant holds a leadership or management position that necessitates professional registration; however, this requirement is not limited to any particular professional group.	Postholder works to a leadership/management job description, requiring professional registration, which may be with any regulator or professional body. The job title used must correspond to the post recruited for, as specified in the job description and unique ESR position number, rather than the professional title. The operational manager should liaise with professional health science leads during role design and recruitment where recruitment of health science staff to these roles is anticipated. Professional registration must be recorded on ESR. The operational manager must ensure that professional oversight is established within a structure clearly linked to the Registrant's Professional Lead within the Health Board, and this should be documented in the postholder's job plan. • Professional lead or delegated representative must be present for PADR • Operational manager is responsible for monitoring compliance with registration/regulation for all staff.
5 The registrant holds a role that does not mandate professional registration; however, they have elected to retain their registration status.	• Professional registration is not required for job role, but postholder wishes to retain this. • Professional title is not used during the course of employment with the Health Board. • Recruiting managers/postholders should ensure Registration is included in ESR record to support tracking of Registrants within the Health Board. • Recruiting managers and postholders should engage with the Professional Lead for their profession to consider individual arrangements to support maintenance of registration. • If issues arise in relation to regulatory matters, advice should be sought from the professional regulatory lead.

Responsibilities

Chief Executive

The Chief Executive has overall responsibility for safe and effective work practice across the Health Board, which for health science professionals is delegated to the Executive Director of Allied Health Professions and Health Science.

Executive Director of Allied Health Professions and Health Science Office

The Office of the Executive Director of Allied and Health Professions and Health Science refers to the Executive Director of Allied and Health Professions and Health Science and those delegates that support the professional portfolio.

- Holds professional accountability for Allied Health Professionals and Health Science Professionals across the Health Board.
- They must ensure a systematic approach to the governance of core professional responsibilities including regulatory oversight, workforce planning, recruitment, career development, scope of practice, clinical/professional supervision and contemporary practice.
- Ensure professional standards for Health Science Professionals across the Health Board are set, implemented and monitored through a corporate governance structure
- Provide professional advice, guidance and scrutiny for all Health Science Professionals, and services operating across the Health Board.
- Provide professional guidance to support staff who may hold dual registration with a different regulator in addition to HCPC.
- Provide advice and guidance to operational managers of Health Science Professionals who sit outside a direct professional structure

Professional Leads

Staff may work in environments with a direct link to a Head of Service of the same profession who holds combined operational and professional accountability for that service. Increasingly, they also work in environments where these two functions are organised separately.

Professional leads hold professional accountability:

- For their discrete services where they may also be operationally responsible
- To those professionals of the same discipline operationally managed with another operational structure
- For the associated staff groups and support workers within their professional remit. On occasions non-registrant workforce may be professionally accountable to more than one professional leader where their role supports more than one profession.

Operational Service Managers/Line Managers

Operational managers hold responsibility (delegated according to their service's structures and hierarchies) for making best use of the resources available to

them to deliver a service consistent with the Health Board's objectives. They are responsible for coordinating and managing their resources (including people, finance, estates, equipment, processes and procedures), in line with Health Board policy, to enable the service to operate safely, effectively and efficiently.

They must understand the nature of their workforce, including its regulatory and professional requirements, and ensure these requirements are supported and monitored accordingly. To so do they must liaise with/collaborate with the relevant professional leads.

Where there are resource implications (workforce, estate, finance) that may impact on the delivery of health science services, operational managers are responsible for ensuring professional leads are aware so the professional impact of any issues (long or short term) can be considered.

Individual staff (Qualified Health Science Professionals)

Registrants of HCPC and other PSA accredited registers hold personal responsibility to:

- Understand their professional registration requirements as per their job role for the Health Board (person specification and job description).
- Maintain continuous registration following procedures laid down by HCPC or other PSA accredited register
- Work to the standards set by HCPC or other PSA Accredited register and/or specific professional body and the job role they are employed to undertake within the Health Board
- Engage with the relevant PSA accredited registers procedures in relation to any professional concerns raised about them
- Declare any concerns they may have about their own fitness to practise.

Workforce

Workforce teams provide advice and guidance for managers, and support in the application of workforce policies and procedures. They also support with planning and development of the workforce.

Where relevant they will inform the Executive Director of AHPs and Health Science (and delegated officers) of any sanctions or dismissals for Health Science employees because of the disciplinary, capability or managing attendance processes, and any resignations prior to the completion of formal procedures.

Quality Assurance and Safety Team

The Quality Assurance and Safety team are responsible for supporting clinical services and clinical care groups to continuously monitor patient safety and experience. Where there are concerns about a registrant's fitness to practice, consideration should be given to whether there are any implications for patient safety, and these should be reported via the appropriate process such as Datix incident management process.

Safeguarding Team

The Safeguarding team provide advice to managers and professional leads relating to potential safeguarding issues associated with concerns about a registrant's fitness to practise. They will support the safeguarding referral process where indicated in relation to such concerns.

Follow appropriate safeguarding and information governance procedures to share information with professional and service managers where concerns about fitness to practise or conduct are raised directly via a safeguarding route.

Resources

There are no specific resource implications for the implementation of this policy.

Training

There are no direct training implications for this policy. All services employing or commissioned to provide services employing Health Science registrants should be familiar with and implement this policy. The EDAHPHS office is available to provide advice and support: HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab)

Implementation

This guidance is for immediate and ongoing implementation across all services employing Health Science across the Health Board. This policy is mandated.

Further Information

Where necessary, advice can be sought from the Executive Director of AHP and Health Sciences office: HDD_AHP_and_HS_Support@wales.nhs.uk (opens in a new tab)

Audit

Implementation of this guidance will be regularly reviewed by the Executive Director of AHP and Health Sciences office in collaboration with professional and operational leads responsible for Health Science.

Review

This policy will be reviewed formally every 3 years. Recognising the evolving nature of the Health Board's operating model, it will be updated within this timeframe should significant differences arise within the professional chain of accountability for Health Science

Appendix 1: Health Science Professionals Protected Titles and HCPC Register Annotations

Profession	Roles	Register Annotations
Biomedical Scientist	Biomedical Scientist	
Clinical Scientist	Clinical Scientist	
Hearing Aid Dispenser	Hearing Aid Dispenser	
Operating Department Practitioners	Operating Department Practitioners	
Prosthetist	Prosthetist	
Radiographer	Radiographer Diagnostic radiographer Therapeutic radiographer	Independent Prescribing (IP) Supplementary Prescribing (SP)

Appendix 2: Health Science PSA Accredited Registers

PSA Accredited Register	Profession(s)	Frequency of audit/revalidation
The Academy of Health Care Science	Audiologist Bioinformatics Scientist Biomechanical Engineer Biomedical Scientist Cardiac Physiologist Clinical Physiologist Educational Audiologist Gastroenterology Physiologist Haematologist Health Informatics Scientist Healthcare Scientist Life Scientist Medical Illustrator Microbiologist Neurophysiologist Nuclear Medicine Scientist Physical Scientist Physiological Scientist Physiologist Respiratory Physiologist Sleep Physiologist	Annually
The Register of Clinical Technologists	Medical Physicists Clinical Engineering	2 yearly

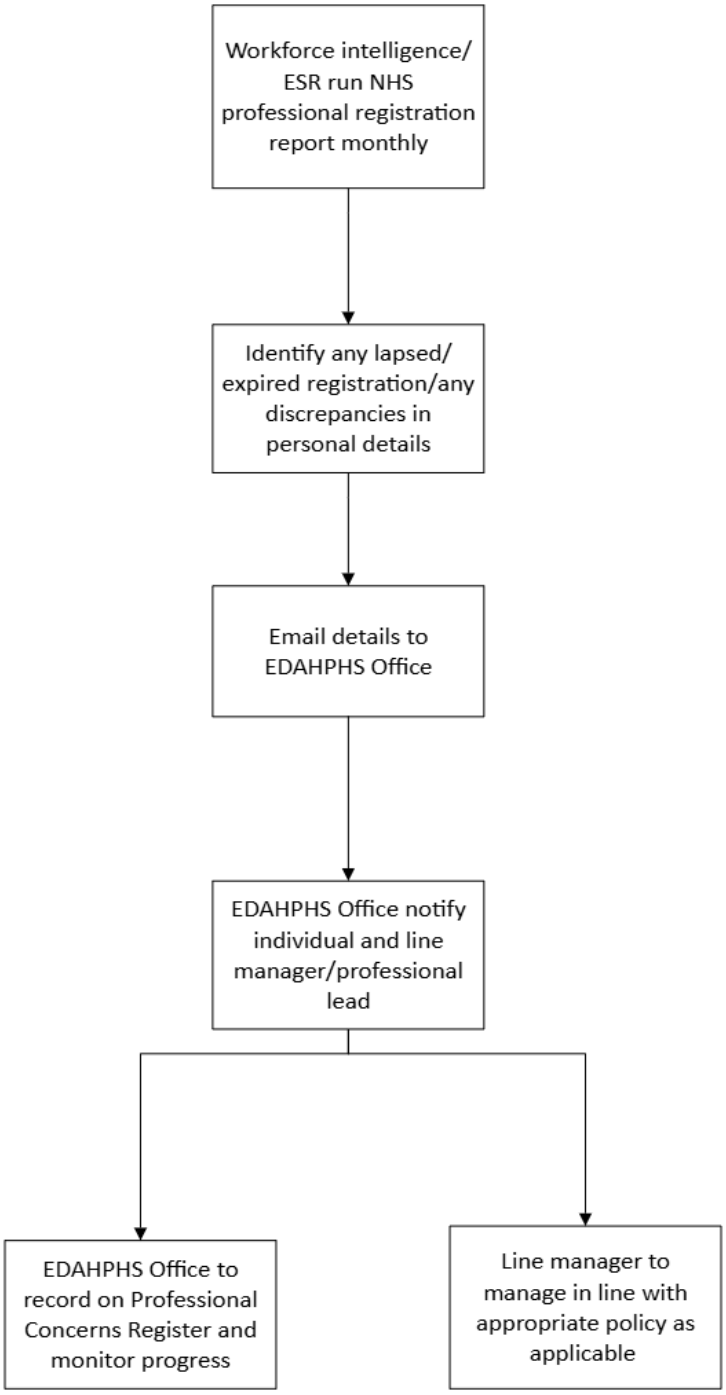
Appendix 3: Health Science Professional Bodies with Non-Regulatory Responsibilities

Profession	Professional Body
Anatomical Pathology Tecnology	Association of Anatomical Pathology Technology
Audiology	British Academy of Audiology (BAA), British Society of Audiology (BSA)
Cardiac Physiology	British Society for Echocardiography (BSEcho), Society for Cardiological Science and Technology (SCST)
Clinical Biochemistry	Association for Clinical Biochemistry and Laboratory Medicine (ACB)
Clinical Engineering	Institute of Physics and Engineering in Medicine (IPEM)
Clinical Genetics	Association for Clinical Genomic Science (ACGS), Association of Genetic Nurses and Counsellors (AGNC)
Clinical Immunology	British Society for Histocompatibility and Immunogenetics (BSHI)
Gastrointestinal Physiology	Association of Gastrointestinal Physiologists
Haematology	British Society for Haematology
Medical Illustration	Institute of Medical Illustrators (IMI)
Neurophysiology	Association of Neurophysiological Scientists (ANS)
Nuclear Medicine	British Nuclear Medicine Society (BNMS)
Operating Department Practice	College of Operating Department Practitioners (CODP)
Pathology	Royal College of Pathologists (RCPath)
Radiography	Society of Radiography
Respiratory Physiology	Association for Respiratory Technology and Physiology (ARTP)
Vascular Science	Society for Vascular Technology of Great Britain and Ireland (SVTGBI)

Appendix 4: Professional leads in HDdUHB

Profession	Professional Lead
Audiology	Head of Audiology
Cardiac, Respiratory and Sleep Physiology	Respective Site Heads of Cardiac, Respiratory Physiology
Clinical Engineering	Head of Clinical Engineering
Medical Photography	Head of Radiology
Neurophysiology	Head of Neurophysiology
Operating Department Practice	Theatre lead for each acute site
Pathology	Head of Pathology
Radiography	Head of Radiology

Appendix 5: Process for EDAHPHS Office to monitor compliance with HCPC registration



Appendix 6: Process for EDAHPHS Office to monitor compliance with registrations other than HCPC

