

Policy and Standards Department
Health Professions Council
Park House
184 Kennington Park Road
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7 September 2007

Dear Health Professions Council

Standards of Conduct, Performance & Ethics

Thank you for the opportunity to comment on this document. I have set out our comments below and hope you find them helpful. Please feel free to contact me if you would like to discuss these issues in more detail.

Standard 1 'You must act in the best interests of service users'

We would suggest amending the last sentence of the last paragraph. We do not believe that it is enough to 'discuss the matter with a senior colleague' when the safety of a service user is at risk. The registrant should be required to take appropriate action to ensure that the safety of the service user is protected. This may mean reporting directly to another body such as the police or the Health Professions Council, (particularly when the 'senior colleague' is the potential risk).

Standard 9 Informed Consent

We do not think that registrants should be required to try to 'persuade' service users to undergo treatment. Rather, we think the responsibility should be to ensure that the service user is made fully aware of the risks of refusing treatment and is able to make an informed decision.

Standard 13 Integrity and Honesty

We recommend that more explanation is added to what is expected of registrants here. We particularly recommend that it is a responsibility to be fully open and honest with patients about any errors, accidents or omissions which potentially affect a service user.

A related point is that we believe the standards should make it clear that a registrant has a duty to co-operate with any investigation of complaints, be it through their employing organisation's procedures, the NHS, or the HPC itself. It should also be a requirement not to let the fact that a service user has made a complaint or claim against the registrant affect the treatment which is required by a service user. In exceptional circumstances where it is not considered in the best interests of the service user to be

treated by the registrant, the registrant has a duty to take reasonable steps to ensure the service user receives the treatment from another suitably qualified registrant.

Whether in this section or elsewhere or as a stand-alone standard we also believe that there needs to be a standard dealing with appropriate boundaries in professional/service user relationships, in order to protect service users from potential abuse.

Yours sincerely

Peter Walsh
Chief Executive