



RCCP Registrant Body Survey

1. Do you have any comments on the rationale of our proposal to transfer the Register and its functions to the AHCS?

We agree with the RCCP that transferring its functions will provide a “simpler way of identifying clinical physiologists and understanding their roles”.

We agree that creating a single register for the clinical physiology professions, which are not regulated by law, is sensible.

2. Do you have any comments on our proposals about registration?

Please see our response to question seven.

3. Do you have any comments on our proposals about M-level/CSci registrants?

No

4. Do you have any comments on our proposals about fitness to practise?

It is not clear how the transfer of live fitness to practise (FtP) matters will work without causing significant challenges. It would be helpful if, as part of the commitment to a transparent process set out in the consultation document, the RCCP could publish the number of outstanding FtP cases. It might also, depending on the case volume, be sensible to have a runoff process where existing FtP matters are closed before transferring them to the AHCS.

Registrants might also need time to ensure insurance policies and other legal defence support are updated to reflect the AHCS taking over FtP matters.

5. Do you have any comments on our proposal about CPD?

RCCP registrants need to be updated on changing CPD audits from a biennial to annual process (see our response to question seven)

6. Do you have any comments on our proposals about accreditation?

No

7. Do you have any other comments?

The RCCP launched the consultation on 22 December during a pandemic and will close on 21 January. The consultation also states that “it is anticipated that a

decision will be made in January 2021". This relatively short window might mean that many RCCP registrants will be unaware of the change and, more importantly, how it might impact them.

So, although we support the proposal, it would be helpful if the RCCP could do more to raise awareness and engagement about foreseeable changes. For example, making sure those with legal defence insurance inform their insurer about any changes and have time to ensure that their cover remains valid.