

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Consultation on standards for the non-regulated foot health workforce



Deadline for responses: Midday, Monday 15 February 2021

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 1: Introduction

This consultation seeks the views of stakeholders on a draft set of standards for the foot health practitioner and podiatry support workforce developed by Health Education England (HEE) ('the Standards'). The overarching objective of this work is to improve access routes into podiatry training from the support workforce. We are also exploring how to expand the foot health support workforce to meet patient needs accessing NHS services. The needs and safety of patients is central in this work.

This document sets out the background to the work to develop the Standards. It then explains more about how the Standards have been developed and how it is proposed they will be used. The draft standards on which we are seeking your feedback have been published alongside this consultation document.

We welcome feedback from stakeholders to help further shape the Standards and ensure that they make an important contribution to education and training which supports the foot health workforce.

The deadline for responses to the consultation is **Midday 15 February 2021**.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 1: Introduction

1.1 About HEE

Health Education England (HEE) is the national leadership organisation for education, training and workforce development in the health sector in England. It exists to support the delivery of excellent healthcare and health improvement to the patients and public of England by ensuring that the workforce of today and tomorrow has the right numbers, skills, values and behaviours, at the right time and in the right place.



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 1: Introduction

1.2 Consultation questions

We welcome your response to this consultation. We have listed some consultation questions below.

We have structured the consultation questions around each of the different types of Standards. We have also asked a question seeking comments about implementation of the Standards.

Foot Care Assistant (Level 3) / Foot Health Practitioner (Level 3)

- Q1.** For each of the educational standards and clinical standards:
- a.** Are there any standards that should be added?
 - b.** Are there any standards that should be amended or removed?
 - c.** Do you have any other comments on these Standards?

Foot Health Practitioner (Level 4)

- Q2.** For each of the educational standards and clinical standards:
- a.** Are there any standards that should be added?
 - b.** Are there any standards that should be amended or removed?
 - c.** Do you have any other comments on these Standards?



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 1: Introduction

Assistant Practitioner (Level 5)

- Q3.** For each of the educational standards and clinical standards:
- a.** Are there any standards that should be added?
 - b.** Are there any standards that should be amended or removed?
 - c.** Do you have any other comments on these Standards?

Implementation

- Q4.** Do you have any comments on how the Standards, once finalised, might be used and implemented?
- Q5.** Do you have any other comments on this work?



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 1: Introduction

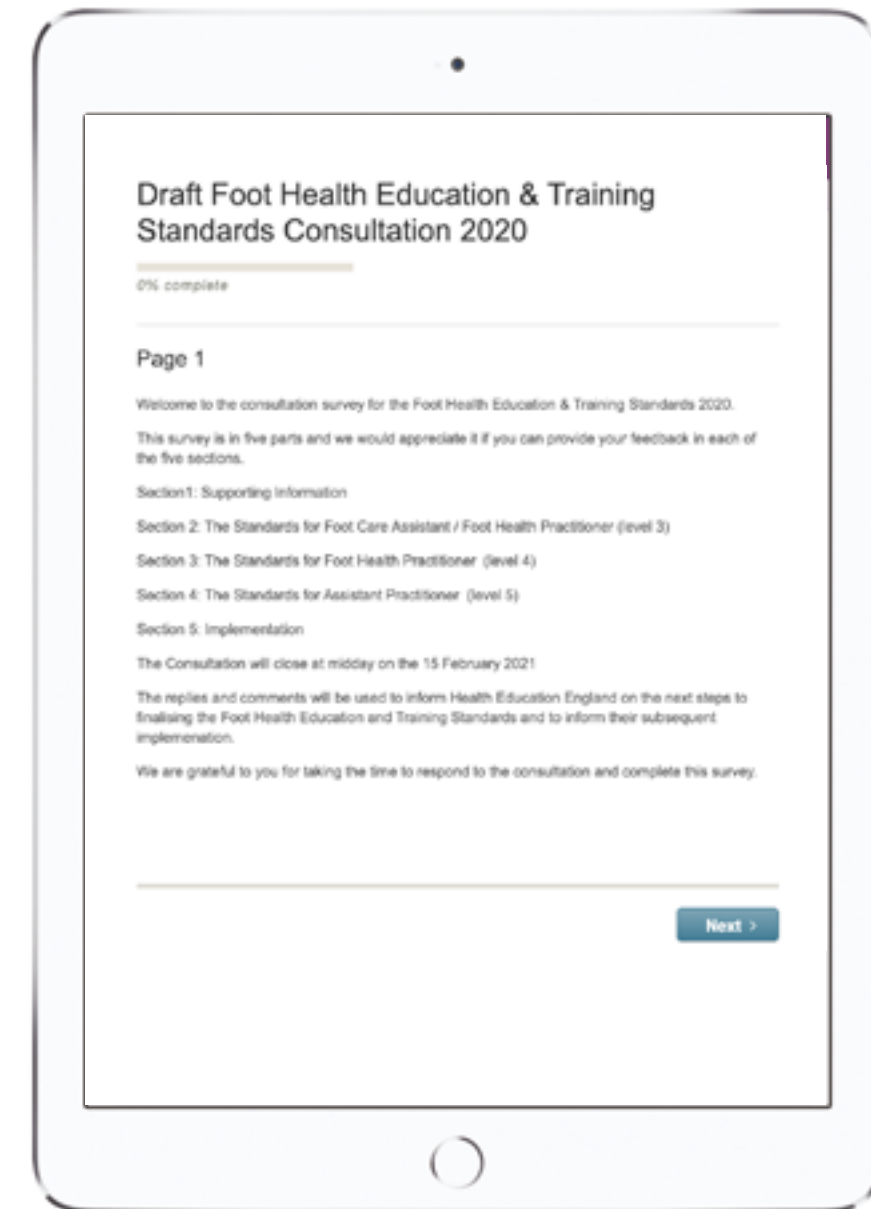
1.3 How to respond

Please respond by completing the online survey:

GO TO ONLINE SURVEY →

If you are unable to submit your response using the survey, please email your response to: sharon.kibble@hee.nhs.uk

Once the consultation has finished, we will analyse the responses we have received and consider carefully what changes we need to make to the Standards.



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

2.1 NHS recruitment and retention

Podiatry and foot health provision are a core NHS service, provided by Health and Care Professions Council (HCPC) registered podiatrists and a small support workforce. In recent years podiatry has faced numerous recruitment and retention challenges. Notably, recent data has confirmed a decline in NHS joiner rates for podiatry, without a corresponding decline in the numbers leaving the workforce.

Between 2014-15 and 2017-18 leaver rates increased to 7.7%. Since then this figure has reduced, albeit marginally. In 2018-19 the NHS leaver rate stood at 6.4%. UK joiner rates^{1,2} were as low as 5.2% in 2015-16; and stood at 6.8% in 2019-20. Additionally, the demographic of the profession highlights an ageing profile, which may further impact NHS leaver rates.

2.2 Higher Education recruitment and retention

Recruitment and retention figures in higher education have also shown a significant decline in the number of applications to BSc undergraduate podiatry programmes in England between 2016 and 2019. Data suggests that in some regions this figure is as much as 50%, with a national average of 40%. Universities and Colleges Admissions Service (UCAS) acceptances between 2016 and 2019 have reduced by 41% overall. Furthermore, data related to newly qualified podiatrists joining the NHS has flatlined in the period between 2016 and 2019. NHS workforce data in England indicates that should this trend continue by 2024 this would translate to a shortage within the NHS podiatry workforce of approximately 575 podiatry job vacancies or 1 in 5 NHS podiatry posts being vacant.^{1,2}



Section 2: Background to the Consultation

2.3 NHS workforce data

NHS workforce data suggests that the demand for podiatry services is increasing, and that the case load mix is becoming more complex and challenging to manage.³ Long term trend data over 7 years indicates that registrants applying to the HCPC register and numbers recruited to NHS posts has flatlined. This contrasts to other Allied Health Professions (AHPs) where, in both cases, numbers have increased significantly over the same time period.² This data indicates a worsening in the shortfall of the podiatry workforce in England while demand continues to increase.

In the absence of action, data suggests that NHS podiatry services will continue to face severe challenges. Referring to trend data, if no action is taken, vacancy rates within the NHS are likely to approach levels that would compromise service sustainability and patient safety. This indicates a worrying trend for the workforce pipeline. Undergraduate admissions dropped between 2017-19. This means that the NHS can expect fewer joiners to podiatry in the period 2020-23. An improving picture in 2020-21 would translate to an increase in NHS joiners but not until 2023-24.



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

2.3.1 The call to action

HEE is committed to making an effective contribution to tackling these challenges. The Foot Health Consortium has been established to bring experts from the foot health sector together to collaborate and find sustainable solutions to safeguard the future of NHS foot health services in England.

Other areas being used to address the workforce challenges that podiatry services are facing include:

- The introduction of a degree apprenticeship route into podiatry. This enables apprentices to 'earn while they learn', while studying for a BSc (Hons) degree in Podiatry. This approach is coupled with developing blended and remote study options.
- Promoting podiatry through collaboration with other programmes of work such as the Strategic Interventions in Health Education Disciplines (SIHED) programme⁴, have helped boost awareness surrounding podiatry as a career option by funding a number of Challenge fund projects and engaging in a widescale awareness and marketing campaign (see the Iseethedifference web pages⁵ and the Office for Students web pages⁴ for further details about the SIHED programme of work).

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

- This element of the effort is also linked to work that HEE has engaged with to open routes for armed forces personnel leaving the military to take up AHP training places.
- The World of Work (WOW) show has publicised AHP careers and HEE and the College of Podiatry have worked together to produce a podiatry career guide⁶. HEE have also invested in a return to work initiative designed to facilitate a smooth transition back into the work place for those who may have taken a career break and now wish to return to practice.

All this work is essential in promoting podiatry as a career and securing a sustainable future NHS podiatry workforce.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

2.4 Role diversification and skill mix mapping

2.4.1 Skill mix profiling

The example below and others across the UK suggest that service redesign involving better utilisation of the support workforce enables the NHS to continue to meet increasing service demand in a safe and effective way.

Service diversification in Torbay and South Devon NHS Foundation Trust has led to a reprofiling of NHS podiatry foot health services in this region. This has in part been possible due to the introduction of a foundation degree delivered as a level 5 apprenticeship.

The award has a specific route for podiatry, and this enables holders of the award to be employed within an NHS podiatry setting as assistant practitioners, making a significant contribution to the support workforce pipeline. The curriculum leading to the award offers employees the opportunity to work in a supervised role, recognising an extended scope of practice when compared to the traditional foot care assistant role.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

Support Workforce Case Study

The Podiatry Department at Torbay and South Devon NHS Foundation Trust

A lack of support staff at the Trust's Podiatry department had led to:

- Imbalances in the team**
- Increases in staff vacancies**
- Inabilities to deliver services in line with NICE guidance**
- 12 month waiting lists**

Adopting a new approach
To address these challenges, a foundation degree was developed for the role of Assistant Practitioners (AP):

18 months
to complete a level 5 apprenticeship

These APs have a level of knowledge and skill greater than healthcare assistants/support workers, able to:

- Work autonomously but under delegation with their own caseload
- Follow a treatment plan but work within a defined scope of practice.

20 credit modules
with Podiatry-specific competencies.

Introduction of Vascular test in line with NICE recommendation ABPI

Year	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Value	50	120	316	637	616	889

Diabetic Foot checks undertaken in line with NICE recommendation

Year	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Value	580	645	1884	2429	2313	1947

Increased capacity for MSK assessment by podiatrist

Year	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Value	989	2132	2436	2684	3130	2829

Shockwave

Year	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19
Value	0	0	0	100	289	202

Delivering results
The introduction of APs has created a more balanced team at the Trust:

60:40
split of Podiatrist and support staff.

That is able to deliver:

- Better patient experiences
- Reduced waiting times
- Improved capacity that frees up Podiatrists
- Greater support and retention of staff
- Closer adherence to NICE guidance
- Continued delivery of essential services during the pandemic

A more cost-efficient Podiatry department that delivers enhanced services for patients and deeper support for staff.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

With collaboration and creativity, Torbay and South Devon NHS Foundation Trust have been able to offer solutions to an immediate workforce challenge and have been proactive in offering a route into podiatry for those support staff wishing to train as a podiatrist. The current foundation degree allows those that have completed the programme to gain 240 credits at level 5 and to step onto year 2 of a podiatry degree programme. This enabling work has offered optimism for the future sustainability of NHS podiatry services in this geographical area.

Value chain analysis carried out for the HEE Foot Health Education and Training Standards Group¹ highlights the positive gains in addressing workforce demands, demonstrated where there has been a whole system service redesign.

The report argues that there is an urgent need to better utilise the support workforce. The added value demonstrated by examples where there has been whole service redesign brings into sharp focus the need to upskill the existing foot health support workforce (follow [the link](#) for access to the full report and further explanation surrounding value chain methodology).

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

2.5 The wider support workforce

The wider support workforce forms part of a huge group of non-regulated workers (estimated to be in the region of 79,000) who make a significant contribution to the health and care of patients. A report published in 2017⁷ by the Professional Standards Authority (PSA) appeals for stronger recognition for those occupations that are not regulated by law but belong to organisations who are assessed and accredited by the PSA instead. These individuals are known as accredited register (AR) practitioners. Some sections of the foot health practitioner community fall into this group of AR practitioners. The Alliance of Private Sector Practitioners maintains a PSA accredited register of 1,622-foot health practitioners.

This number represents a small proportion of the total number of foot health practitioners thought to be practising in the independent sector. Foot health practitioners are not regulated and there is a lack of reliable workforce data for the numbers in this workforce. However, based on membership data from one professional body and published data from the only PSA accredited register in the field, it is estimated that there may be around 5,000 foot health practitioners in practice if not significantly more⁸.

The work of the PSA advances a compelling argument that there is an underutilisation of the skills that this occupational group could provide. If utilised by the NHS, this workforce could make a significant contribution to managing demand for foot health services.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

Currently there is huge variation in the education and training of foot health practitioners, and this prevents the NHS recognising any contribution from this community towards NHS foot health services. For example, some foot health practitioners are educated to level 3 or level 4 (recognised as completing the equivalent of half of the first year of an undergraduate programme). Some training programmes have not been accredited to an educational level. Some of these training programmes include no practical training, others require two weeks of assessed practical training.

For the NHS to recognise the skills that foot health practitioners could contribute to the foot health support workforce, there needs to be an understanding of what threshold education and training looks like across the entire foot health support workforce and to define, at each level, the scope of practice permissible to allow for the safe and effective use of the skills that foot health practitioners can offer to patients within an NHS setting

Within this, there would also be scope for existing NHS footcare assistants to upskill to the level of assistant practitioners. However, the existing numbers of NHS podiatry footcare assistants is insufficient to meet the service demand now, and certainly not in the future.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 2: Background to the Consultation

In podiatry the relationship between the regulated sector – podiatrists - and the non-regulated sector – foot care assistants, assistant practitioners and foot health practitioners - has often resulted in division rather than unity. The Standards provide an ideal opportunity to further consolidate and enhance work already underway, working with education providers to define new and innovative routes into podiatry training via recognised prior learning and new education routes such as the degree apprenticeship.

The level 5 foundation degree provides opportunities for upskilling the existing support workforce and providing step on points to the degree routes to train as podiatrists, thus expanding joiners to the regulated sector. The creation of the Standards is an opportunity to expand and harmonise the role of the podiatry support workforce within the NHS, enabling recognition for the first time of what foot health practitioners could contribute to the support workforce.



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 3: About the Standards

This section provides more information about the draft Standards for consultation.

3.1 How the Standards were developed

HEE is working with a range of partner organisations to ensure that there is sustained supply of registered podiatrists to support the care of patients in the NHS in England who need their services. The partner organisations have come together, with HEE, to form the Foot Health Consortium.

The Standards themselves were commissioned by HEE and developed by the Standards Writing Group. The development of the Standards was overseen by the Foot Health Education and Training Standards Group. Members of these groups included professional body representatives, educators, clinical managers, clinical practitioners, foot health practitioners and assistant practitioners in podiatry.

This work represents a considerable achievement, bringing together stakeholders across the foot health sector to develop for the first time a draft set of nationally agreed standards for the unregulated foot care workforce. Our thanks go to all the partner organisations and individuals who have contributed so valuably to this work.

The content of this consultation including any errors and omissions remains the responsibility of HEE.



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 3: About the Standards

3.2 Structure of the Standards

The Standards set out standards for the following groups at different levels of education and training on the Framework for Higher Education Qualifications:

- Foot Care Assistant (Level 3) / Foot Health Practitioner (Level 3)
- Foot Health Practitioner (Level 4)
- Assistant Practitioner (Level 5)

Two types of standards are included for each of the levels outlined above:

- 'Educational standards' – these set out what a practitioner in each of the roles and levels above should know, understand and be able to do, set out in the areas of key transferable skills, practical skills and knowledge and understanding.
- 'Clinical standards' – these set out for each of the groups and levels above what practitioners should know, understand and be able to do in relation to clinical footcare treatments.

Section 3: About the Standards

3.3 How the Standards will be used

Once the Standards are finalised, HEE will work in partnership with stakeholders in the foot health sector to facilitate their implementation. The focus throughout will be on meeting the objectives outlined in this document - to develop podiatry training routes and to safely meet patient needs in the NHS through the introduction of an expanded foot health support workforce.

Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

Section 3: About the Standards

3.3.1 Accreditation of foot health practitioner programmes

It is proposed that the Standards would form the basis of an accreditation process. Education providers delivering foot health practitioner programmes that choose to participate would be quality assured against the Standards. This would provide assurance that programmes produce practitioners who have met the threshold educational and clinical standards required for patient safety.

The Standards and accreditation process are intended to support pathways into pre-registration education and training in podiatry. In partnership with education providers, the Standards would contribute to increasing supply in podiatry. This could be achieved by helping to facilitate a pathway through which students who complete foot health practitioner programmes and assistant practitioner foundation degrees could have step on routes

onto existing BSc (hons) degree programmes or level 6 degree apprenticeship routes. This would enable foot health practitioners and assistant practitioners to upskill onto pre-registration programmes enabling them to become registered podiatrists. Some individual foot health practitioners already choose to go on to pre-registration education and training in podiatry and become part of the regulated community. The Standards and accreditation process are intended to support education providers in providing a more seamless pathway for foot health practitioners and assistant practitioners to train to become registered podiatrists.

A similar mechanism could also be put in place to assess and recognise existing foot health practitioners who can demonstrate that they meet the Standards.



Section 3: About the Standards

3.3.2 Workforce development and skills mix

The Standards are intended to support the NHS in utilising the full skills mix of the foot health workforce to meet demand, by providing a clear understanding of the footcare treatments that foot health practitioners, footcare assistants and assistant practitioners can safely perform.

The Standards provide increased clarity about the unregulated foot health workforce and what it can do. The Standards support the NHS in utilising the full skills mix of

the foot health workforce to meet patient demand, by helping to facilitate the utilisation of foot health practitioners within the NHS podiatry support workforce.

The accreditation of programmes will provide assurance that the Standards are being met, enabling greater recognition of the potential contribution of this workforce to foot care in the NHS.



Section 1: Introduction

- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

Section 2: Background to the Consultation

- 2.1 NHS recruitment and retention
- 2.2 Higher Education recruitment and retention
- 2.3 NHS workforce data
 - 2.3.1 The call to action
- 2.4 Role diversification and skill mix mapping
 - 2.4.1 Skill mix profiling
- 2.5 The wider support workforce

Section 3: About the Standards

- 3.1 How the Standards were developed
- 3.2 Structure of the Standards
- 3.3 How the Standards will be used
 - 3.3.1 Accreditation of foot health practitioner programmes
 - 3.3.2 Workforce development and skills mix

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- 1.1 About HEE
- 1.2 Consultation questions
- 1.3 How to respond

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