



CHCC COLLEGE OF HEALTH CARE CHAPLAINS



Unite the union response to the Health & Care Professions Council (HCPC) consultation on Standards of Education and Training Review

Introduction

This consultation response is submitted by Unite the union - Britain and Ireland's largest trade union. Unite's members work in a range of industries including manufacturing, transport, financial services, print, media, construction, not-for-profit sectors and public services.

Unite is the third largest trade union in the NHS and represents 100,000 health sector workers. This includes seven professional associations – the Community Practitioners and Health Visitors' Association (CPHVA), Guild of Healthcare Pharmacists (GHP), Medical Practitioners Union (MPU), Society of Sexual Health Advisers (SSHA), Hospital Physicians Association (HPA), College of Health Care Chaplains (CHCC) and the Mental Health Nurses Association (MHNA) – and members in occupations such as allied health professions, healthcare science, applied psychology, counselling and psychotherapy, dental professions, audiology, optometry, social work, building trades, estates, craft and maintenance, administration, information and communications technology (ICT), support services and ambulance services.

Unite also has 80,000 members in local authorities and 50,000 in the voluntary and community sector many of whom work in services directly involved with or linked to health and social care.

The following response was submitted via the HCPC online survey that was available for completion between 17 November 2025 and 16 February 2026 via: <https://www.hcpc-uk.org/news-and-events/consultations/2025/consultation-on-revisions-to-the-standards-of-education-and-training/>.

Consultation response

3. Individual or Organisation

1. Are you responding to this consultation on behalf of an organisation?

Yes

No

4. Organisation Respondent Details

2. Please tell us the full name of your organisation.

Unite the union

3. Please select the category below that best describes your organisation

Professional Body
Advocacy group
Public Body
Employer
Education Provider
Lawyer / Legal Provider
Other (please specify): Trade union

4. Where is your organisation active?

England
Northern Ireland
Scotland
Wales
UK-wide
International
Other (please specify):

5. Please tell us the contact email for your organisation

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5. Consultation Questions

6. What effect has the revised structure (including the institution/programme split and glossary) had on the accessibility and understanding of the standards? Please explain your reasons as to why things have improved or not.

Improved it
No change
Don't know
Worsened it

Please explain your answer

Comparing the current structure (Standards of education and training, 2017¹) and the proposed revised standards of education and training, we do not believe there is a marked difference in their structure. We do not believe this is problematic as we believe both have a logical layout that can easily be followed.

We welcome the inclusion of the glossary, however we do question why several terms appear to be included but do not appear to feature anywhere in the text of the document, for example; apologising, Protected title and Threshold level. We are unsure whether these were added on purpose or whether it was an error made whilst drafting the new standards.

¹ <https://www.hcpc-uk.org/resources/standards/standards-of-education-and-training/>

7. How well do the revised standards support the embedding of equality, diversity and inclusion across all aspects of education and training, and where could further improvements be made?

Believe they support the embedding of EDI

Neutral

Don't know

Believe they worsen the embedding of EDI

Please explain your answer

Whilst we believe the two draft standards (2.2 and 7.2) go some way to embedding equality, diversity and inclusion we wonder whether the document could have gone further, making more explicit reference to EDI in more standards, for example, 3. Safety and wellbeing, 4. Admissions and 6. People and partnerships – Learners and service users. To further develop this argument, as an example, 6.3. could have included a specific reference to ensuring that service users and carers should be representative of the communities that are served locally.

Whilst 4.1 attempts to address the concerns raised by stakeholders in respect of ‘potential barriers faced by applicants from marginalised groups and different entry routes and aligns with the HCPC’s commitment to fairness in admissions’. We are not clear how this will be meaningfully addressed. For example, we are aware of the HCPC advocating contextual applications and interviewing but does this really happen in all education institutions?

We also believe that the standards would be improved by the inclusion of explicit reference to and the requirement of institutions to demonstrate that they have anti-discriminatory practices in place and that there is evidence of decolonised and trauma informed curriculum.

8. Do the revised standards take the right approach to supporting inclusive education and training and addressing barriers to access, participation, and course completion? Please explain your reasoning.

Believe that they take the right approach

Neutral

Don't know

Disagree that they take the right approach

Please explain your answer

Whilst the updated standards allude to inclusion/inclusive education we wonder whether this could have been stated in more explicit terms. For example, in 3.2. We would recommend that this is clarified in the guidance that will sit alongside the revised standards.

Members highlighted a lack of inclusion on issues like pregnancy and birth and how institutions should support learners. There was also concerns expressed how in the equality impact assessment there was a reference to 'non-white learners'. It was felt this was a pejorative term and it did not feature in the research paper that it referenced, which instead referred to 'BAME [Black, Asian, and Minority Ethnic] Student Experiences'. Members believed there were more appropriate words to use.

Members highlighted that there isn't comment in the SETS in respect of the actual curriculum requirements highlighting that this must be aligned with equality, diversity, inclusion and trauma informed care. A further point was made that it is important to consider the lived experience off staff as this is too often overlooked.

Another example that was shared with us was that 'lots of trainees are completing [clinical psychology] courses "burnt out". They know that "wellbeing" is mentioned, but should they be doing workplace risk assessments as standard?'

9. Do the revised standards set out sufficient expectations for providers on the appropriate role of technology in education? How could they be further improved?

Agree that they set out sufficient expectations

Neutral

Don't know

Disagree that they set out sufficient expectations

Please explain your answer

We recognise there is a risk with writing standards that they can either be so highly prescriptive that they quickly become out of date or try to counter this risk by being so ill-defined that they are worthless. We believe you have achieved a reasonable balance by including standards related to new technologies (5.5., 8.10. and 9.3.) in a sensible way.

Concerns were raised by members in that they expected that organisations should ensure that any technology providers are ethical and safe. We are aware of current controversies in respect of some providers appear to have poor regulation and have been linked with unethical practices. Members also expressed that there should be consideration for the environmental impact of their practises.

Members expressed a need for clarity on when artificial intelligence usage was appropriate and not appropriate in academic work.

10. Are the revised standards applicable to all models of learning, including apprenticeships, blended learning, and employer-led programmes? Please explain any gaps you believe to be present.

Applicable to none

Applicable to some

Applicable to all

Please explain your answer

Similar to our response to a previous question, whilst there is a sometimes difficult balance to be achieved between too specific versus too vague, we feel you have achieved this in respect of the different models of learning.

11. Are the expectations around partnership working and shared governance clear and appropriate for all settings where programmes are delivered? What could be improved?

Agree that they are clear and appropriate

Neutral

Don't know

Disagree that they are clear and appropriate

Please explain your answer

Whilst implied, there is no specific reference to 'governance' in the standards, apart from in the glossary. The 'Commentary on the proposed revised standards of education and training'² does make some helpful comments providing extra clarity in respect of 2.1. We believe the standards would be strengthened by either including this in the clause or by adding this extra detail in the guidance that will sit alongside the standards.

12. Are there any aspects of the revised standards that could result in equality and diversity implications for groups or individuals based on protected characteristics, as defined by the Equality Act 2010?

Age

Disability

Gender reassignment

Marriage and civil partnership

Pregnancy and maternity

Ethnicity

Religion or belief

Sex

Sexual orientation

Please explain your answer

We welcome that the HCPC has included an Equality Impact Assessment as part of the consultation so this can be considered alongside the changes that you are proposing. We are not aware of any additional issues that should be considered.

² <https://www.hcpc-uk.org/globalassets/consultations/2025/sets/commentary-on-the-proposed-revised-standards-of-education-and-training.pdf>

13. What challenges, if any, do you foresee in implementing the proposed revised standards within your organisation or sector?

None.

14. Once any changes to the standards are finalised, how long would your organisation need to implement the changes?

Whilst this question is not directly applicable to our organisation, we believe your suggestion of 12-months for implementation seems reasonable and we would support it unless we are presented with a compelling argument against this proposed timescale.

15. Do you have additional comments, concerns, or recommendations about the proposed revisions to the Standards of Education and Training not already discussed above?

Whilst the new standard 2.3 requires 'The education provider regularly monitors, evaluates and enhances the quality, safety and fairness of education and training provision across all settings' we are concerned that there is not a standard that requires organisations to ensure students/trainees are able to raise any concerns safely without fear of implications for their qualification/employment. This appears to be a serious omission especially as the commentary document states that the HCPC is aware of, and reflecting on, stakeholder concerns about poor quality practice-based learning and negative placement experiences. This could also include an expectation that students have the rights to be supported and represented through any discussions and/or processes.

The current standards have a guidance document that sits alongside them³. This is a very comprehensive document that ensures that the current standards has a wide body of supplementary information that further clarifies how they should be applied.

We are aware from our discussion with officials from the HCPC that a new guidance document will be created to sit alongside the revised standards once published. Whilst accepting that it would have been difficult to produce the guidance for the draft revised standards for consideration during this consultation phase, not knowing how they might be changed, we are taking in good faith that the guidance once published will help to deliver on the promised improvements rather than undermine that intent.

16/02/2026

This consultation response was submitted on behalf of Unite the union by:

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³ <https://www.hcpc-uk.org/resources/guidance/standards-of-education-and-training-guidance/>

For further information, please contact:

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