Consultation on service user involvement in education and training programmes approved by the Health and Care Professions Council (HCPC)

A consultation seeking the views of stakeholders on a proposal to amend the standards of education and training and supporting guidance to require the involvement of service users in approved programmes.
1. Introduction

1.1 We are the Health and Care Professions Council (HCPC). This consultation seeks the views of stakeholders on a proposal to amend the HCPC’s standards of education and training and supporting guidance to require the involvement of service users in approved programmes.

1.2 We are proposing to make this change because we consider that service users should be involved in approved programmes and that requiring involvement through our standards is consistent with our aim of ensuring that someone completing an approved programme meets the standards of proficiency and is fit to practise and eligible to apply for registration.

1.3 In this document we have used the term ‘service user’ to refer to those who typically use or are affected by the services of health and care professionals once they successfully complete an HCPC approved programme and become registered with us. This can include a variety of different individuals and organisations including patients, clients, carers and other members of the multi-disciplinary team.

1.4 This consultation will be of particular interest to education providers offering programmes approved by the HCPC; professional bodies; advocacy organisations; service users; and others with an interest in this area.

1.5 The consultation will run from 3 September 2012 to 7 December 2012.

About the Health and Care Professions Council (HCPC)

1.6 We are a regulator and were set up to protect the public. To do this, we keep a register of professionals who meet our standards for their professional skills and behaviour. Individuals on our Register are called ‘registrants’.

1.7 We currently regulate 16 professions.

   – Arts therapists
   – Biomedical scientists
   – Chiropodists / podiatrists
   – Clinical scientists
   – Dietitians
   – Hearing aid dispensers
   – Occupational therapists
   – Operating department practitioners

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– Orthoptists
– Paramedics
– Physiotherapists
– Practitioner psychologists
– Prosthetists / orthotists
– Radiographers
– Social workers in England
– Speech and language therapists

1.8 Before 1 August 2012, we were known as the Health Professions Council (HPC).

About the standards of education and training

1.9 The standards of education and training (‘SETs’) are standards which apply to education and training programmes which lead to eligibility to apply for registration.¹

1.10 The standards of education and training cover such areas as admissions, assessment standards and practice placements. A programme which meets all of these standards will enable a student who successfully completes that programme to meet the standards of proficiency for the safe and effective practice of their profession.

About the approval of education and training programmes

1.11 We visit education and training providers to approve pre-registration education and training programmes against our standards of education and training.² We approve programmes that lead directly to an individual’s eligibility to register and gain access to the relevant protected title(s) for their profession (or, in a small number of cases, which lead to a mark or annotation of the Register). We also approve Approved Mental Health Professional (AMHP) training in England.

¹ You can find copies of these standards and the supporting guidance on our website here: www.hcpc-uk.org/aboutregistration/standards/sets
² You can find out more about our education processes on our website here: www.hcpc-uk.org/publications/brochures/index.asp?id=491
1.12 The approval process involves an approval visit and initial decision about whether a programme meets our standards. The visit is conducted by two visitors, at least one of which is from the profession with which the programme is concerned. A programme might be approved subject to meeting certain conditions against our standards of education and training. We normally approve a programme on an open-ended basis, dependent on satisfactory monitoring. This means that we do not have a cyclical or periodic schedule of approval visits.

1.13 There are two monitoring processes – annual monitoring and major change. Both of these processes are paper-based but may trigger a new approval visit. The annual monitoring process is a retrospective process where we look back at the programme and decide whether it continues to meet the standards. The major change process considers significant changes to a programme and their effect in relation to our standards. If information from either process indicates that further investigation is necessary we may decide to re-visit a programme before deciding whether the standards continue to be met.

About this document

1.14 This document is divided into four sections.

- **Section one** introduces the document.

- **Section two** provides some background information to the consultation, explaining why we are interested in this area.

- **Section three** explains our consultation proposals.

- **Section four** includes the text of the proposed standard and supporting guidance.

Consultation questions

1.15 We would welcome your response to our consultation and have listed some questions to help you. The questions are not designed to be exhaustive and we would welcome your comments on any related issue.

1.16 The questions are included in section four of this document. However, they are also listed below.

Q1. Do you agree that the standards of education and training should be amended to require the involvement of service users in approved programmes? If not, why not?
Q2. Do you consider that the proposed standard and guidance are appropriate to different types of approved programmes, and to different professions? If not, why not?

Q3. Do you agree with the approach to defining ‘service users’ in the proposed standard and guidance? If not, why not?

Q4. Do you agree that there should be a lead-in period, with the standard becoming effective from the 2015–2016 academic year? If not, what alternative arrangements should we put in place?

Q5. Do you have any other comments you would like to make about the proposed standard and guidance, or about any other aspect of the proposals?

How to respond to the consultation

1.17 You can respond to this consultation in the following ways.

- By completing our easy-to-use online survey:
  www.research.net/s/HCPconsultationserviceuserinvolvementeducation

- By emailing us at: consultation@hcpc-uk.org

- By writing to us at the following address.

  Consultation on service user involvement in education
  Policy and Standards Department
  The Health and Care Professions Council
  Park House
  184 Kennington Park Road
  London
  SE11 4BU
  Fax: +44(0)20 7820 9684

1.18 Please note that we do not normally accept responses by telephone or in person. We normally ask that consultation responses are made in writing. However, if you are unable to respond in writing, please contact us on +44(0)20 7840 9815 to discuss any reasonable adjustments that would help you to respond.

1.19 Please complete the online survey or send us your response by 7 December 2012.

Please contact us to request a copy of this document in Welsh or in an alternative format.
1.20 Once the consultation period is completed, we will analyse the responses we receive. We will then publish a document which summarises the comments received and explains the decisions we have taken as a result. This will be published on our website.
2. Background information

2.1 This section provides some background information to the consultation, explaining why we are interested in this area, including the findings of research we commissioned.

Why have we been looking at this area?

2.2 We have been actively considering and reviewing our approach in this area for a number of years.

2.3 The standards of education and training guidance already supports and encourages education providers to provide evidence of service user involvement in their programmes as part of showing us how they meet our standards. For example, we refer to the role of service user feedback in monitoring and evaluating programmes (SET 3.3) and the contribution of service users to teaching and learning (SET 4.8).

2.4 However, the involvement of service users is not currently a requirement of the standards themselves. Therefore it is possible that we could approve a programme which did not involve service users at all.

2.5 In August 2012, we became responsible for regulating social workers in England. Involving service users and carers in the selection of students has been a requirement for social worker training. The involvement of service users and carers has also been identified as important in other areas including in assessment; teaching and learning; and quality assurance.3

2.6 In addition, every year the Council for Healthcare Regulatory Excellence (CHRE)4 undertakes a performance review of the nine regulators within its remit against its ‘Standards for Good Regulation’. The CHRE has previously commented that it expects that ‘patients’ should be involved in the design and delivery of approved programmes and has noted our work looking at this issue.

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4 The CHRE will become the Professional Standards Authority for Health and Social Care in 2012
Why did we commission research on this topic?

2.7 In 2011 we commissioned Kingston University and St George's (University of London) to undertake some research for us looking at the involvement of service users in the design and delivery of programmes we approve. The research looked at the 15 professions we then regulated (not social workers in England) and included a literature review; a survey of approved education providers; focus groups with students, educators and service users; and a workshop to discuss the research findings and develop recommendations.

2.8 We commissioned the research to help us in deciding whether we should strengthen our requirements in this area by amending our standards of education and training and supporting guidance to require service user involvement for a programme to be approved by us.

2.9 We had good information about the extent of involvement in social work programmes in England, but wanted to gain a better understanding about the extent and type of involvement activities carried out by education providers on programmes we approved at the time. We also wanted to find out about good practice in involving service users in education; identify the potential benefits, facilitators and barriers to user involvement; and explore the relationship between involvement activities and improved public protection.

What were the research findings?

2.10 We found that most previous research on this topic is about medicine, nursing and social work education, so we hope that the research will make a positive contribution to this area. We also hope it will be helpful to education providers across the breadth of professions we regulate in thinking about how they involve service users in their programmes.

2.11 The following provides a short summary of some of the research findings. In section three, we discuss the conclusions we have drawn as a result. In section four, we outline our consultation proposals and questions.

2.12 There were no education providers, approved programmes or professions that did not involve service users in some way. Service user involvement was most common in the area of programme planning, but education providers also frequently involved service users in selecting students; in teaching; and in providing formative feedback on students. Service users were less involved in summative assessment of students.

2.13 A range of benefits of involvement were frequently identified – for students, programmes and service users. Involving service users was perceived to lead to improved programmes which better reflect the needs and wishes of service users; to provide a ‘real world’ link between theory and practice; and to result in professionals who are more able to provide a ‘user-focused’ service in which service users are involved in decisions about their care or services.

2.14 A number of facilitators, barriers and challenges to and for service user involvement were identified. They included infrastructure and support (including funding for involvement activity); cultural issues (including expertise and leadership); and service user issues (including recruitment and concerns about representativeness).

2.15 One challenge identified during the course of the research was the definition of service users. A variety of different potential service users were identified, including patients, clients, carers and colleagues. This was particularly an issue for those professions registered by us that do not typically have regular contact with ‘traditional’ service users such as patients or clients. For example, occupational psychologists, who typically provide services to organisations.

2.16 In our CPD standards we use the term ‘service user’ to refer to anyone who uses or is affected by the services of a registrant, including, for example, carers, and this was reflected in the usage of the term in the research. In the workshop that formed part of the research some argued that carers should be identified as a distinct group alongside service users. In social work in England, requirements have been for the involvement of ‘service users and carers’.

2.17 There was general support for involving service users in education but with some caveats and concerns about the need for a separate standard, what that standard might look like, and the practicalities of meeting it.
3. Developing a standard and supporting guidance

3.1 This section provides information about what we are proposing and why.

What are we proposing?

3.2 We are proposing to amend the standards of education and training and the supporting guidance to require the involvement of service users in approved programmes.

3.3 We know from the research that many, if not all, HCPC approved education providers are already involving a diverse range of service users in their programmes in a range of different ways. However, at present service user involvement is not a specific requirement of the standards of education and training.

3.4 We consider that service users should be involved in approved programmes and that requiring involvement through our standards is consistent with our aim of ensuring that someone completing an approved programme meets the standards of proficiency and is fit to practise and eligible to apply for registration. We consider that it can help to ensure that programmes are up-to-date with the expectations and experiences of service users; ensure that students benefit from a wide range of different perspectives; and ensure that, once qualified, registrants understand the need to, and are able to, involve service users in decisions about their care or services.

3.5 We consider that an additional standard of education and training would recognise the involvement activities that are already taking place, whilst acting as a driver for education providers to think about how best to involve service users in their programmes, sending out a strong message that service user involvement has an important contribution to make to public protection.

What is our thinking behind the proposed standard?

3.6 The research found some strong arguments that involvement needs to be planned and systematic to be meaningful and effective and that tokenism should be avoided. It also indicated that there are some challenges to involvement that need to be considered and overcome or negotiated.

3.7 Although the research indicated that many if not all education providers delivering approved programmes are involving service users in some way in their programmes, it also indicated that some education providers may involve service users more systematically than others and in different aspects of their programmes.
3.8 We want to develop a standard which is enabling and meaningful. It needs to strike an appropriate balance between setting an appropriate threshold benchmark for all education providers, whilst being flexible enough to recognise the diversity of the professions we regulate and the diversity of the programmes we approve. It also needs to recognise that different education providers and different professions are at different stages of implementing and exploring effective service user involvement.

3.9 We have proposed a standard and supporting guidance which we consider is broad and enabling, allowing for flexibility and diversity, whilst setting a clear expectation that service users must be involved in approved programmes. We know from the research that some stakeholders advocated making much more prescriptive requirements. However, given the circumstances described here, and because this would be the first time we would be making a specific requirement on this topic, we consider that it is appropriate to set a broad standard. We review all of the standards we publish on a regular basis, so we could consider making the requirement more specific or more demanding in the future.

3.10 We approve programmes across 16 hugely diverse professions which work in a variety of different environments and with a variety of different people. As a result, who service users are for individual professions may vary considerably. Some professions will work closely with carers such as family members, whilst others may work in different ways with individuals and organisations or use different terminology to refer to who they work with.

3.11 We have considered carefully the arguments made by some during the research for explicitly referencing ‘carers’ in the proposed standard. Many education providers will already be involving carers in their programmes. Our existing standards of proficiency (currently subject to rolling review and consultation) include standards about effective communication with carers and working in partnership with carers. However, we recognise that whilst for some professions the phrase ‘service users and carers’ is already in wide usage, for others ‘service users’ is used broadly to refer to all those who use or are affected by a registrant’s services, including carers where applicable.

3.12 We have proposed using the term ‘service users’ in the proposed standard, with the guidance setting out clearly that this includes a wide range of different groups, including carers. ‘Service users’ in the proposed standard refers to those who typically use or who are affected by the services provided by HCPC registrants. However, we very much welcome the views of our stakeholders and we have asked a specific consultation question on this topic.
3.13 We will want to see evidence that an education provider has considered the service user groups appropriate to their profession and programme. They would need to explain where and how service users are involved.

**When would the standard and guidance become effective?**

3.14 Once the consultation closes, we will consider the responses we receive and decide whether we should amend our proposals.

3.15 We propose that if a new standard and guidance is introduced, that we should allow approved programmes a lead-in period before they have to start demonstrating that they meet our requirements. This would allow a reasonable period of time for education providers to understand the new requirement; to review how they involve service users; and possibly to make any changes to their programmes which might be necessary. This also allows more time to communicate our requirements, for example in our seminars with education providers.

3.16 If a new standard was agreed, we anticipate this would happen in the late spring of 2013. We would then propose a period of two academic years before the standard became effective. We propose that the standard should become effective from the 2015–2016 academic year. Any new programmes would have to meet the standard in order to be approved from this date. Existing approved programmes would have to provide evidence of meeting the standard as part of the annual monitoring process.
4. Consultation proposal and questions

4.1 We propose to amend SET 3, ‘Programme Management and Resources’. The proposed standard and supporting guidance is shown on the next page.

Consultation questions

4.2 The following are the questions we are asking on our proposals. They are not intended to be exhaustive and we would welcome comments on any other related issue.

4.3 We would be particularly interested in the views of stakeholders about whether we have been successful in setting-out a clear expectation for involvement, whilst ensuring that the standard is reasonable and appropriate across the different professions and programmes we regulate and approve.

4.4 The consultation questions are as follows.

Q1. Do you agree that the standards of education and training should be amended to require the involvement of service users in approved programmes? If not, why not?

Q2. Do you consider that the proposed standard and guidance are appropriate to different types of approved programmes, and to different professions? If not, why not?

Q3. Do you agree with the approach to defining ‘service users’ in the proposed standard and guidance? If not, why not?

Q4. Do you agree that there should be a lead-in period, with the standard becoming effective from the 2015–2016 academic year? If not, what alternative arrangements should we put in place?

Q5. Do you have any other comments you would like to make about the proposed standard and guidance, or about any other aspect of the proposals?
Proposed SET and guidance

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<tr>
<th>SET 3.17</th>
<th>Service users must be involved in the programme</th>
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**Guidance**

You must provide evidence of how and where service users are involved in the programme.

The term ‘service user’ is used as a broad phrase to refer to the involvement of those who typically use or are affected by the services of registered health and care professionals. Service users may include patients, clients, carers, organisations, other members of the multidisciplinary team and so on.

Who service users are will vary between and within the different professions we regulate. For example, biomedical scientists typically interact with other clinicians rather than directly with patients or carers; occupational psychologists provide services primarily to organisations. We will want to see that you have considered the service user groups which will be appropriate for your profession and your programme.

Service users could be involved in a programme in a variety of different ways. For example in the following.

- Selection and recruitment of students.
- Development of teaching tools and materials.
- Programme or module development, planning and evaluation.
- Role play and teaching of students.
- Feedback on students.
- Assessment of students.
- Quality assurance.

We do not prescribe the areas of the programme in which service users must be involved, but we will want to see evidence that involvement is taking place, and that you are able to explain where service users are involved, appropriate to your programme. You are also encouraged to explain how you evaluate the involvement of service users in your programme.

The information you provide us to show how you meet this standard may also be relevant to meeting SET 3.3 and SET 4.4.