

Consultation on the revised threshold level of qualification for entry to the Register (SET 1) for Operating Department Practitioners
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1. Introduction

About this consultation

- 1.1 This consultation seeks the views of stakeholders on a revised threshold level of qualification for entry to the Register (SET 1) for Operating Department Practitioners (ODPs).
- 1.2 This document explains the current level for SET 1 for ODPs as well as the process for assessing the threshold and the argument for raising it.
- 1.3 The consultation will be of particular interest to HCPC registrants, professionals applying to be on the register, professional bodies, employers, education providers and stakeholders, legal representatives, and service users and carers.
- 1.4 The consultation will run from 25 January 2021 to 26 April 2021.

About this document

- 1.5 This document is divided into 4 sections.
 - **Section 1** introduces the document.
 - **Section 2** provides background to the current threshold for SET 1 as well as outlining the discussions surrounding the threshold since 2014.
 - **Section 3** explains the consultation proposal and questions.
 - **Section 4** sets out the next steps following the consultation.

About us

- 1.6 HCPC is a regulator and was 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', while those applying to be on the register are called 'applicants'.
- 1.7 We currently regulate 15 professions.
 - Arts therapists
 - Biomedical scientists
 - Chiropodists / podiatrists
 - Clinical scientists
 - Dietitians
 - Hearing aid dispensers
 - Occupational therapists

- Operating department practitioners
- Orthoptists
- Paramedics
- Physiotherapists
- Practitioner psychologists
- Prosthetists / orthotists
- Radiographers
- Speech and language therapists

2. Background

Background for SET 1

- 2.1 The first of the standards of education and training ('SET 1') sets out the threshold level of qualification normally required for entry to the Register for each of the professions we regulate. SET 1 does this by specifying types of academic awards.
- 2.2 The standard includes the term 'normally' as the HCPC's governing legislation requires the SETs to be established based upon the outcomes required to meet the standards of proficiency (SOPs).
- 2.3 The SETs and the SOPs are closely interlinked. The SOPs set out the standards required for safe and effective practice and the SETs outline what is necessary to achieve the SOPs. An increase in the threshold level of SET 1 would need to be justified on the basis that the level was necessary to deliver the SOPs.
- 2.4 We therefore consider whether the threshold level should be adjusted on a profession by profession basis, when we have evidence that the education and training needed to meet the SOPs needs to be changed in order to ensure that entrants to the register are capable of safe and effective practice. In assessing this, we will consider how a profession has developed over time, and the depth and complexity of education and training required to meet the SOPs.
- 2.5 A change in the content of the SOPs is not necessarily required to change SET 1. The SOPs are outcomes based and therefore can be delivered at a range of levels. It is the role of an education provider, assessed through the HCPC's education approval and monitoring processes, to ensure education provision equips graduating students with the skills and knowledge to practise safely and effectively, in line with the SOPs. A change in SET 1 may therefore indicate a change to the extent and degree of knowledge required to meet the SOPs, providing a step up in a profession's required level of knowledge and training without a significant change in content.

Background to proposed changes to SET 1 for ODPs

- 2.6 The current threshold for ODPs is Diploma of Higher Education (Dip HE). This equates to Level 5 in the Framework for Higher Education Qualifications (England, Wales and Northern Ireland) and Level 8 in the Scottish Credit and Qualifications Framework.
- 2.7 Increasing the threshold for SET1 for ODPs is not a new matter. A 2014 paper to the HCPC's Education and Training Committee considered SET1 for ODPs and paramedics¹. This followed a position statement from the Council of Deans of Health which stated that "the changes to ODP practice, changes to the clinical environment and new expectations for future roles suggest that there is a strong case to move the educational threshold from DipHE to BSc (Hons) on the grounds of patient benefit."²
- 2.8 Our stakeholder engagements have highlighted the increasing advanced practise within the ODP profession and the growth of their roles – particularly in England. We receive a significant number of enquiries from ODP registrants about their expanding scope of practise and have also seen ODPs being asked to perform a wide range of tasks during the response to COVID-19.
- 2.9 While the complexity of the roles of ODPs has been a key part of the information we have received from stakeholders, we are aware that the roles ODPs fulfil and the needs of healthcare systems are different across the four nations.
- 2.10 Since 2014, we have continued to monitor the profile of pre-registration ODP programmes. We consider the level at which providers offer programmes to be a useful proxy for assessment of the level and depth of training usually required to meet the SOPs. In June 2014, only 29% of ODP programmes were delivered above the threshold (at either BSc Hons or BSc level). Since then, the percentage of programmes delivered above the threshold has steadily increased to 54% in January 2018, 77% in June 2019 and, at the time of writing, 82% of 51 programmes. Of these, two education providers have diploma level provision only and the remaining deliver mixed diploma / degree level training. All proposed new programmes will be delivered above the threshold.
- 2.11 We have also received submissions from key stakeholders, both in engagement on this project and in our consultation on the standards of proficiency, about the level of training that can be delivered at diploma level now being insufficient to meet the SOPs. For example DipHE programmes do

¹ While the professions were considered together, at that stage, the SET1 for ODP was not considered for change as very few of the programmes were being offered at the level of BSc. when the HCPC proposed increasing SET 1 for paramedics in 2018, 82% of education programmes were being delivered at the proposed threshold.

² <http://www.councilofdeans.org.uk/wp-content/uploads/2013/10/ODP-BSc-Threshold-position-20131030-final1.pdf>

not cover aspects like all gender catheterisation and venepuncture which would be included in BSc programmes, and which are generally accepted as requirements for ODPs now..

Background to our proposals

- 2.12 The feedback from our stakeholders, together with the other information presented in this consultation, leads us to propose increasing the threshold in SET1 to BSc Honours or Level 6 in the Framework for Higher Education Qualifications (England, Wales and Northern Ireland) and Level 9-10 in the Scottish Credit and Qualifications Framework.
- 2.13 Early stakeholder engagement has made clear that this proposal may have different impacts across the four nations. In this case, Scotland may be specifically impacted as it currently has a single provider and it offers the DipHE programme. Our consultation aims to gather as much information as possible about the proposed changes and the steps we can take to mitigate impacts. Our consultation questions will also be gathering more information about respondents so that we can view the responses both as a UK-wide regulator but also with a commitment to viewing the responses from each of the four nations.
- 2.14 If the consultation was strongly in favour of the proposed increase, and the proposal to increase the threshold goes forward, the HCPC would work with all stakeholders on an implementation timeframe which continues to protect service users, allows providers to manage their programmes, and allows employers to plan their workforce needs.
- 2.15 Regardless of the outcome, we will continue to work with stakeholders across the UK to ensure that the highest standards of patient safety are maintained and that we move forward in a way which benefits all four nations.

3. Consultation questions

- 3.1 The HCPC welcomes your response to this consultation. We have listed some consultation questions below. These questions are not exhaustive, and we would also welcome your comments on any related issue. Please provide reasons alongside your answers where possible.
 - Q1. Do you agree that SET 1 for ODPs should be increased from diploma level degree level (that is, a move from Level 5 to Level 6 for FHEQ and from Level 8 to Level 9/10 for SCQF) Please provide comments.
 - Q2. If the threshold were to increase, what length of time would be needed to implement this change?
 - Q3. If the threshold were to increase, what support do you think the HCPC should provide to:

- a. ODP professional bodies
- b. Education Providers
- c. Employers
- d. Students
- e. Prospective applicants
- f. The UK government and the Devolved Administrations
- g. Any other stakeholders

Q4. Do you consider there are any aspects of our proposals that could result in equality and diversity implications for groups or individuals based on one or more of the following protected characteristics, as defined by the Equality Act 2010 and equivalent Northern Irish legislation³? If yes, please explain what could be done to change this.

We would particularly be interested in any reflections on how different groups may be disproportionately impacted by closing off the Diploma Higher Education pathway into the ODP profession.

- Age
- Disability
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and maternity
- Race
- Religion or belief
- Sex
- Sexual orientation

Q5. Do you have any other comments about the SET 1 threshold for ODPs?

How to respond to the consultation

3.2 The consultation closes on 26 April 2021. We look forward to receiving your comments.

3.3 You can respond to this consultation in one of the following ways:

- By completing our easy-to-use [online survey](#):
- By emailing us at: consultation@hcpc-uk.org
- By writing to us at:

Consultation on Guidance on Health and Character
Policy and Standards Department
The Health and Care Professions Council
Park House
184-186 Kennington Park Road
London
SE11 4BU

³ <http://www.equalityni.org/Footer-Links/Legislation>

- 3.4 Please note, due to COVID-19, the organisation is partly working from home and so post is not checked frequently. If you are able to respond by email or online survey, we would encourage you to do so.
- 3.5 Please note that we do not normally accept responses by telephone or in person. We ask that consultation responses are made in writing to ensure that we can accurately record what the respondent would like to say. However, if you are unable to respond in writing please contact us on +44 (0)20 7840 9815 to discuss any reasonable adjustments which would help you to respond.
- 3.6 Please note that, due to COVID-19, this telephone line is not staffed. However, you will be able to leave a message for the team to review and get back to you as soon as possible.
- 3.7 **Please contact us to request a copy of this document in an alternative format, or in Welsh.**
- 3.8 If you would prefer we do not make your response public, please indicate this when you respond.

4. Next steps

- 4.1 Once the consultation period has finished, we will analyse the responses we have received. We will then publish a document detailing the comments received and explaining the decisions we have taken as a result, including any further amendments needed. This will be available on our website.