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## HCPC approval process report

Education provider	University of Portsmouth
Name of programme(s)	MSc Physiotherapy (Pre-Registration), Full time
Approval visit date	01 - 02 July 2021
Case reference	CAS-16847-N2B4N7

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### Executive Summary

We are the Health and Care Professions Council (HCPC), a regulator set up to protect the public. We set standards for education and training, professional knowledge and skills, conduct, performance and ethics; keep a register of professionals who meet those standards; approve programmes which professionals must complete before they can register with us; and take action when professionals on our Register do not meet our standards.

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet our standards of education and training (referred to through this report as 'our standards'). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.

## Section 1: Our regulatory approach

### Our standards

We approve programmes that meet our education standards, which ensure individuals that complete the programmes meet proficiency standards. The proficiency standards set out what a registrant should know, understand and be able to do when they complete their education and training. The education standards are outcome focused, enabling education providers to deliver programmes in different ways, as long as individuals who complete the programme meet the relevant proficiency standards.

Programmes are normally [approved on an open-ended basis](#), subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed [on our website](#).

### How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint [partner visitors](#) to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation of the visitors, inclusive of conditions and recommendations. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process reports, and any observations from education providers (if submitted). The Committee meets in public on a regular basis and their decisions are available to view [on our website](#).

### HCPC panel

We always appoint at least one partner visitor from the profession (inclusive of modality and / or entitlement, where applicable) with which the assessment is concerned. We also ensure that visitors are supported in their assessment by a member of the HCPC executive team. Details of the HCPC panel for this assessment are as follows:

Anthony Power	Physiotherapist
Elsbeth McCartney	Speech and language therapist
Niall Gooch	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

The planned chair was not available due to unforeseen circumstances, so various panel members acted as chair	Independent chair (supplied by the education provider)	Portsmouth University
Allisson Cory	Secretary (supplied by the education provider)	Portsmouth University
Nina Paterson	Professional body reviewer	Chartered Society of Physiotherapy

Jo Jackson	Professional body reviewer	Chartered Society of Physiotherapy
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## Section 2: Programme details

Programme name	MSc Physiotherapy (Pre-Registration)
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 25
Intakes per year	1
Assessment reference	APP02315

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for certain evidence and information from education providers. The following is a list of evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence, we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

<b>Group</b>	<b>Met</b>	<b>Comments</b>
Learners	Yes	As the programme is not yet running we spoke to learners from the undergraduate sports science programme.
Service users and carers (and / or their representatives)	Yes	We met with a representative of Healthwatch Portsmouth who had been involved in staff interviews
Facilities and resources	Yes	
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

## Section 4: Outcome from first review

### **Recommendation of the visitors**

In considering the evidence provided by the education provider as part of the initial submission and at the virtual approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

### **Conditions**

Conditions are requirements that must be met before programmes can be approved. We set conditions when there is insufficient evidence that standards are met. The visitors were satisfied that a number of the standards are met at this stage. However, the visitors were not satisfied that there is evidence that demonstrates that the following standards are met, for the reasons detailed below.

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 02 September 2021.

#### **2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.**

**Condition:** The education provider must demonstrate how they will ensure that all applicants have full information about the extra costs which may be incurred by learners on the programme.

**Reason:** From their review of the programme documentation, the visitors were aware that it was likely that many learners would incur certain extra costs associated with their practice-based learning. For example additional accommodation requirements if their practice-based learning location was a long distance from their normal home. This was

stated in the Course Details and Supporting Information document, which would be available to learners. However, the visitors could not see where these potential costs were laid out in the information available to applicants. They were therefore unable to determine whether the admissions process ensures that applicants have the information required to make an informed choice about whether to take up an offer.

Additionally the visitors were informed at the visit that some anatomy knowledge would be required of applicants. This was not made clear in the information that would be available to applicants, and the visitors' view was that this might impede their ability to make an informed choice.

The visitors therefore require further evidence showing that all applicants will have access to appropriate information about additional costs, and about the full admission requirements of the programme.

**3.5 There must be regular and effective collaboration between the education provider and practice education providers.**

**3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

The following condition applies to the above standards. For simplicity, as the issue spans both standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate how they will ensure that there is effective ongoing collaboration between themselves and their practice education providers and that within this collaboration there is an effective process for securing sufficient placement capacity.

**Reason:** To evidence these standards the education provider cited their Course Details and Supporting Information document. This briefly described the Professional Liaison Group (PLG), which is the committee that provides the point of contact between the education provider and practice education providers. This mentioned an intention for the PLG to meet twice a year but did not provide information about the composition, remit, agenda-setting and record-keeping of the PLG. The visitors were therefore unable to determine prior to the visit whether the work of the PLG would constitute regular and effective collaboration, or whether it would guarantee effective processes for ensuring availability and capacity of practice-based learning. At the visit they asked the senior team, programme team, and the practice educators about the PLG. From these groups they received verbal reassurances about how the PLG would work – that it would include representatives from key partner organisations, and that it would have standing agenda items about matters such as capacity and collaboration.

The education provider representatives noted that there were strong relationships between individuals at both the practice partners and the education provider. However, while the visitors noted that this would be helpful in the PLG's work, the purpose of these standards is to put education provider-practice partner relations on a formal, regularised footing so that co-operation continues even if key staff members leave.

In the light of the above, the visitors considered that without additional documentary evidence, they could not yet determine whether the standards were met. They therefore require the education provider to submit further evidence demonstrating how they will ensure:

- Regular, effective collaboration that continues on an ongoing basis; and
- Sufficient suitable placements for all learners on the programme.

With regard to this condition, the visitors wished to emphasise that the start date of the programme was only five months away and that in their view there remained a considerable amount for the education provider to do in securing sufficient availability and capacity for the planned learner numbers on the programme.

### **3.7 Service users and carers must be involved in the programme.**

**Condition:** The education provider must demonstrate how they will ensure that service users and carers are appropriately involved with the programme.

**Reason:** As with SETs 3.5 and 3.6, in their evidence for this standard the education provider referred to the Course Details and Supporting Information document. This contained a brief description of the education provider's intentions around service user and carer involvement. It mentioned a service users and carers group that had been established, which had already had some input into staff recruitment and would in future have input into learner selection and programme design.

At the visit, the programme team elaborated on the documentary evidence, for example by explaining how service user involvement in curriculum development would be planned and evaluated. The visitors found this clarification useful but could not determine how the service user and carer group would work in the future. They therefore require the education provider to submit additional evidence clarifying the service user and carer strategy, in particular demonstrating that the involvement of service user and carers would be planned and evaluated appropriately.

### **3.10 Subject areas must be delivered by educators with relevant specialist knowledge and expertise.**

**Condition:** The education provider must demonstrate how they will ensure that, by the start date, the programme will have in place sufficient educators with relevant specialist knowledge and expertise.

**Reason:** The visitors were aware from the Course Details and Supporting Information document that the education provider had committed to some additional recruitment before the programme start date. However, the visitors wanted some extra clarity about the number of lecturers who would be teaching on the physiotherapy programme, their registrant status, and the amount of time that would be available for this specific programme. The visitors understood that the plan was for two further 0.6 FTE registrant physiotherapists to be added, alongside the existing 0.8 FTE registrant physiotherapists.

At the visit the senior team told the visitors that the recruitment process was ongoing and would be complete in time for the programme to start, but they were not able to give a clear timeframe for its completion. The visitors noted that the start date for the

programme, January 2022, was relatively close, and that if the additional staff were not in place by then, the programme might have difficulty in running as planned.

They therefore considered that it was important to have a clear understanding of how the education provider would ensure that their recruitment would complete successfully before January 2022. They considered that this was particularly important as the Course Details and Supporting Information document indicated that the education provider intended to support the programme leader, who was not a physiotherapy registrant, with a strong physiotherapy team.

They require the education provider to submit further evidence to support the assurances given to the visitors at the visit, to clarify the time available to the programme, and to show what contingency plans were in place if they were not able to recruit.

**3.17 There must be an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.**

**Condition:** The education provider must demonstrate that an effective process is in place for learners to raise concerns in practice-based learning.

**Reason:** The mapping document pointed the visitors to the practice handbook, which contained a hyperlink to the raising concerns procedure on the education provider's website. However, the visitors were not able to view the details of the procedure because it was not yet online. At the visit the programme team assured the visitors that the process was effective and that learners would be enabled to raise concerns as necessary. One of the learners to whom the visitors spoke was from another programme within the same School. She was able to give an example of a time when she had successfully raised a concern, and she had no adverse observations about the process. However, the visitors considered that to determine whether the standard was met, they needed to review the process that would be followed by learners on this Physiotherapy programme. They therefore require the education provider to submit evidence outlining the process and demonstrating that this process is effective in enabling learners to raise concerns about service user safety and wellbeing where necessary and appropriate.

**4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.**

**4.2 The learning outcomes must ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.**

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that the module learning outcomes ensure that learners meet the standards of proficiency (SOPs) and the standards of conduct, performance and ethics (SCPEs).

**Reason:** The education provider submitted module descriptors as evidence for these standards. Prior to the visit, the visitors considered that it was difficult to make a full determination about whether the learning outcomes could ensure that learners met the SOPs and the SCPEs. This was because there was relatively little detail in the descriptors. For example, they mostly did not have indicative content and reading lists. The HCPC does not explicitly require the inclusion of such material, but in its absence the visitors were unclear what exactly would be taught and how. This meant that they were not clear how the learning outcomes would be met. This in turn meant that they could not be sure that the SOPs and the SCPEs would be achieved.

At the visit, the visitors were able to discuss with the programme team the lack of detail in the modules. They were informed by the education provider that they did have a clear idea of module content. The lack of detail in the existing descriptors was the result of an institutional policy which prevented programmes from publishing full module descriptors until a programme had been approved. However, as noted above, without evidence demonstrating the module content, the visitors were unable to understand how learners would meet the learning outcomes. They considered that they would need to have a clear idea of how the learning outcomes would be met before they could consider that the standards noted above were met. Therefore they require the education provider to submit further evidence demonstrating that the module content would be appropriate, such that the learning outcomes would enable learners to meet both the SOPs and SCPEs.

**4.11 The education provider must identify and communicate to learners the parts of the programme where attendance is mandatory, and must have associated monitoring processes in place.**

**Condition:** The education provider must demonstrate that they will manage unsatisfactory attendance, including how learners will be enabled to make up missed learning.

**Reason:** In the mapping for this standard, the education provider referred the visitors to the Course Details and Supporting Information document, which informed the learners that all parts of the programme were compulsory. However, it did not give them any information about what would happen if their attendance, in either practice-based learning or academic sessions, was not satisfactory, and how they would be enabled / expected to catch up. The issue was discussed with the programme team at the visit. The visitors were told that there were procedures in place to manage such situations, but the visitors were not able to see a formal policy outlining what would happen, which meant that they could not be sure that all learners would be enabled to understand what they would need to do. The guidance for this standard notes that “Learners need to be aware of your requirements and any consequences of missing compulsory parts of the programme”, and the visitors were not clear how learners would be made aware of such consequences. They therefore require the education provider to submit further evidence showing how learners will be enabled to understand what will happen and what they will need to do, if they do miss parts of the programme that are compulsory.

**6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.**

**Condition:** The education provider must demonstrate that assessment on the programme will enable learners to meet the learning outcomes.

**Reason:** As outlined in the condition under SETs 4.1 and 4.2 above, the visitors noted that there was a lack of detail across the module descriptors, and they were aware from discussions at the visit that there was an institutional policy reason for this. The lack of detail meant that it was not clear to them which parts of the programme content would be assessed by which methods, and they were therefore unable to determine whether the assessment methods for the programme would enable learners to meet the learning outcomes. They therefore require further evidence showing that the content of the modules is such that the education provider's approach to assessment is suitable. This condition should be considered alongside the condition set under SETs 4.1 and 4.2.

## Section 5: Outcome from second review

### **Second response to conditions required**

The education provider responded to the conditions set out in section 4. Following their consideration of this response, the visitors were satisfied that the conditions for several of the standards were met. However, they were not satisfied that the following conditions were met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following conditions are met, they require further evidence.

#### **3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

**Condition:** The education provider must demonstrate how they will ensure that there is effective ongoing collaboration between themselves and their practice education providers and that within this collaboration there is an effective process for securing sufficient placement capacity.

**Reason condition not met at this time:** To address this condition, the education provider submitted records of meetings with practice partners, as well as the terms of reference for relevant committees and copies of presentations that had been given at meetings with practice partners. They also indicated that they had been co-operating with other local education providers to co-ordinate practice education more effectively.

The visitors considered that this was helpful evidence in understanding how the process to ensure that there was enough availability and capacity. However, the documentation submitted as evidence did not show the final numbers and types of placement that had been secured. The visitors were therefore unable to be clear that the process illustrated in the conditions response was effective in securing the necessary placements. Without an understanding of how well the meetings and the partnerships were delivering settings, the visitors could not be sure that the standard was met. They therefore require further evidence demonstrating that the process can deliver sufficient appropriate placements.

**Suggested documentation:** Specific information about how many placements have been secured by the process outlined in the conditions response, so that the visitors can make a judgment about the effectiveness of the process.

### **3.10 Subject areas must be delivered by educators with relevant specialist knowledge and expertise.**

**Condition:** The education provider must demonstrate how they will ensure that, by the start date, the programme will have in place sufficient educators with relevant specialist knowledge and expertise.

**Reason condition not met at this time:** To address this condition, the education provider provided an update on their recruitment. They noted that they had made an offer to an applicant for the 0.8FTE Senior Lecturer post and that a 0.6FTE Lecturer post had been advertised, with interviews taking place in early September 2021. They also noted their outreach to other professionals who could potentially be involved in the programme as visiting lecturers.

The visitors considered that this was appropriate progress towards meeting the standard, but were also aware that the various aspects of completing the staff team were not yet complete at the time of the conditions submission. They were therefore unable to determine that the standard was met, and require further evidence in the form of an update about the recruitment initiatives mentioned in the conditions response.

**Suggested documentation:** Information relating to the recruitment processes, showing how those procedures mentioned in the conditions response have gone forward.

## **Section 6: Visitors' recommendation**

In considering the evidence provided by the education provider as part of the initial submission and at the virtual approval visit, the visitors recommend that there is sufficient evidence to demonstrate that our standards are met, and that the programme(s) are approved.

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 5, the visitors are satisfied that the conditions are met and recommend that the programme(s) are approved.

This report, including the recommendation of the visitors, will be considered at the 07 December 2021 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).