

HCPC approval process report

Education provider	Education provider
Name of programme(s)	Master of Podiatric Surgery, Part time
Approval visit date	30-31 October 2018
Case reference	CAS-12995-V5D9Z5

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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 for podiatric surgery (for education providers) (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. For this particular visit, there is no Podiatric Surgeon on the panel, as this is within the rules around visitor section set out by the committee in June 2015.

Details of the HCPC panel for this assessment are as follows:

Gordon Burrow	Chiropodist / podiatrist (Prescription only medicines – administration)
Andrew Robinson	Orthopaedic surgeon
Susanne Roff	Lay
Tamara Wasylec	HCPC executive
Shaista Ahmad	HCPC executive

Other groups involved in the approval visit

There were other groups in attendance at the approval visit as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Sara Eastburn	Independent chair (supplied by the education provider)	Education provider
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Julie Hogan	Secretary (supplied by the education provider)	Education provider
Kim Bryan	External panel member	College of Podiatry representative
Alison Hart	External panel member	College of Podiatry representative
Alan Borthwick	External panel member	College of Podiatry representative
John Malik	External panel member	College of Podiatry representative

Section 2: Programme details

Programme name	Master of Podiatric Surgery
Mode of study	PT (Part time)
Entitlement	Podiatrists practising podiatric surgery
Proposed first intake	01 August 2019 ¹
Maximum learner cohort	Up to 15
Intakes per year	1
Assessment reference	APP01865

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involves consideration of documentary evidence and an onsite 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 require 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.

Required documentation	Submitted	Reason(s) for non-submission
Programme specification	Yes	
Module descriptor(s)	Yes	
Handbook for learners	Yes	
Handbook for practice based learning	Yes	
Completed education standards mapping document	Yes	
Completed proficiency standards mapping document	Yes	

¹ The programme was approved by the Education and Training Committee (ETC) in September 2019. This meant that the programme start date was moved to September 2020 by the education provider.

Curriculum vitae for relevant staff	Yes	
External examiners' reports for the last two years, if applicable	Not Required	As this is a new programme, this document is not required.

We also expect to meet the following groups at approval visits:

Group	Met
Learners	Yes
Senior staff	Yes
Practice education providers	Yes
Service users and carers (and / or their representatives)	Yes
Programme team	Yes
Facilities and resources	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 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. The visitors determined that a further visit is required to make an appropriate assessment of the response to the conditions. Any further visit would need to focus on the standards on which conditions have been set. This would include meetings with the programme team, senior team, practice educators and service users and carers. The education provider has suggested that the visit takes place on 18 and 19 March 2019 to allow the education provider sufficient time to prepare their response to the conditions and considering the start date of August 2019.

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 23 January 2019.

A.1 The admissions procedures must give both the applicant and 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 provide further evidence of the admissions information that applicants will receive to demonstrate that they will have all of the information they require to make an informed choice about taking up a place on the programme.

Reason: For this standard, the visitors were referred to the programme specification, which contained details about the admission criteria for the programme. This information included the requirement for an “Enhanced DBS Check...required by the Disclosure and Barring Service”. However, there were no details provided about who would pay for a Disclosure and Barring Service (DBS) check to be carried out. Additionally, the visitors did not see information about any additional costs trainees may incur such as programme fees and travel costs on placement. In discussions with the programme team, the visitors were informed the education provider would pay for the cost of the DBS and trainees would need to pay the costs for travel to placements. Due to the lack of this information in the programme documentation, the visitors could not see how trainees are made aware of the costs trainees would incur on this programme. As such, the education provider will need to ensure that information provided to the trainee regarding additional costs is accurate so they can make an informed choice about whether to take up a place on the programme.

In addition to this, the programme specification states, “Applicants should have written confirmation of a podiatric surgical training post with an appropriately trained surgical tutor/clinical supervisor or equivalent”. From discussions with the programme team, the visitors were informed that this surgical training post would form the practice-based learning element of the programme, which will be audited by the education provider. However, the visitors could not see how potential applicants would have access to the information contained within the programme specification. The visitors were unable to see how the education provider intends to communicate the following information to prospective applicants:

- any associated costs to the trainee;
- costs incurred to trainees on the programme including accommodation and travelling to and from placements; and,
- the admissions criteria specifically the expectation that trainees must have written confirmation of a podiatric surgical training post.

Therefore, the visitors require further information, which demonstrates that applicants have the information they require to make an informed choice about the programme.

A.2 The admissions procedures must apply selection and entry criteria, including appropriate academic and professional entry standards.

Condition: The education provider must ensure the criteria used to assess applicants ensures that they have the relevant academic and professional entry standards to be admitted onto the programme.

Reason: From a review of the documentation provided prior to the visit, the visitors reviewed the professional and academic entry requirements on page 7 of the programme specification of the document. From this information and discussions with the programme team, the visitors were not clear about the selection and entry criteria used to select applicants onto the programme. Specifically, it states “Applicants should have a College of Podiatry National Training Number or equivalent”. However, the visitors were unable to identify that an equivalent to this exists and therefore could not determine whether or not the equivalent to this would be an appropriate entry standard. The visitors were unable to determine from the evidence provided and from discussions at the visit, whether the admissions procedures will be applying appropriate academic and professional entry standards and how this will be communicated to applicants.

Therefore, the visitors require further evidence about the criteria used to assess trainees throughout the selection process to ensure that they have the relevant, knowledge, skills and ability to undertake the programme and how this is communicated to applicants.

A.2 The admissions procedures must apply selection and entry criteria, including appropriate academic and professional entry standards.

Condition: The education provider must ensure the criteria used to assess applicants ensures that they have the relevant knowledge, skills and ability to be admitted onto the programme.

Reason: From a review of the documentation provided prior to the visit, the visitors read that all the modules taught on this programme require “POM-S and POM-A”. However, this admission criterion was not included within the entry criteria provided. In discussions with the programme team, they confirmed that the applicant would need to have a POM-S and POM-A annotation to apply for the programme. As the visitors were provided with different information about what is required at the application stage they were unable to determine whether the admissions procedures apply appropriate academic and professional entry standards. Therefore, the visitors require the education provider to ensure that the entry requirements are made clear in the documentation provided to applicants and are consistent throughout.

A.3 The admissions procedures must apply selection and entry criteria, including accreditation of prior (experiential) learning and other inclusion mechanisms.

Condition: The education provider must further define the accreditation of prior (experiential) learning mechanisms applicable to the programme and how this information is made available to potential applicants and assessors.

Reason: From a review of the documentation, the visitors were directed to the generic university APEL policy. In discussion with the programme team, the visitors were told that trainees would be able to gain accreditation for prior learning on this programme. For instance, if they had completed 300 hours in the placement setting they could receive 120 credits which would be equivalent to part 1 of the existing programme delivered by the College of Podiatry. The visitors noted that applicants prior learning and experience would be assessed using the learning outcomes for the programme. However, the visitors also noted there was a lack of clarity around how the programme level and module level learning outcomes ensure individuals completing the programme meet the standards for podiatrists practising podiatric surgery (as detailed in conditions relating to standards C.1, E.1 and E.4)

Based on these findings, the visitors could not determine, how consistent judgements would be applied to assess that an applicant’s prior learning or experience meets the required standards and ensures that the standards for podiatrists practicing podiatric surgery are met via this process to ensure safe and effective practice. In particular, the visitors could not determine the assessment criteria to be used by both applicants and assessors to consider how any evidence provided meets different learnings outcomes.

Additionally, the visitors could not determine what the process is for applying the policy regarding applications with APEL considerations. For instance, the visitors could not

determine who would make an assessment that the prior learning of an applicant met the required standard or whether they were qualified and experienced to make that judgement. Therefore, the visitors require further evidence to demonstrate what the process is regarding the application of the APEL policy, by what assessment criteria prior learning and experience is measured and assessed to decide how learning outcomes are met, and how this information is made available to prospective applicants and assessors.

B.1 The programme must have a secure place in the education provider's business plan.

Condition: The education provider must provide further evidence of the commitment that has been made to ensure the programme is viable and has a secure place in the education providers' business plan.

Reason: From a review of the documentation, the visitors understood that approval was requested for a maximum of 40 students on this programme. In discussions at the visit, the visitors heard that only six trainees had undertaken the College of Podiatry (COP) podiatric surgical training programme, with three fully completing the training programme. The visitors also heard that the education provider requires a minimum of 10 trainees to permit a module to run and to be viable. From the information provided, the visitors considered that if a similar number of trainees undertake the programme, then it may not be viable according to the education provider's minimum participant requirements. Therefore, the visitors require further documented evidence to demonstrate that there is sufficient interest in the programme to ensure the programme is viable and can run effectively.

B.1 The programme must have a secure place in the education provider's business plan.

Condition: The education provider must provide further evidence to show that the programme is supported by practice education providers and the strategy for staffing this programme to demonstrate that the programme has a secure place in the education provider's business plan.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry (COP) would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield. The visitors noted that the entry requirements stipulate "applicants should have written confirmation of a podiatric surgical training post with an appropriately trained surgical tutor/clinical supervisor or equivalent." As such, learners are responsible for sourcing their own surgical tutor and surgical trainee placement. During the practice educators' meeting the visitors were unable to meet with those who would be responsible for providing placement opportunities such as the NHS trusts who recruit to podiatric surgical training posts. Therefore they could not ascertain the level of support from the NHS trust as a potential practice education provider for this programme. They were also unable to determine how relationships between the practice education providers and the education provider were formed and maintained. Therefore the visitors were unable to establish how the education provider had ensured

that the NHS trusts and any other potential practice education providers were in support of and committed to the delivery of this programme as they were unable to meet them. The visitors also noted that visiting lecturers formed an integral part of the delivery of the programme. However, it was unclear how such individuals were appointed to contribute to the programme in this capacity, beyond being put forward to them by the COP. The visitors reviewed no further evidence to explain the capacity of visiting lecturers who were available to support the programme, and the areas in which they would be involved. As such the visitors require further information which demonstrates how the education provider forms and maintains effective and collaborative relationships with practice education providers and visiting lecturers. In this way, the visitors will be able to determine whether the programme has a secure place in the education provider's business plan.

B.2 The programme must be effectively managed.

Condition: The education provider must provide further evidence that there is a management structure in place to manage the programme effectively.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield. However, from a review of the documentation, the visitors understood that the programme would be managed by the education provider and delivered in part by the College of Podiatry (COP) in collaboration with the education provider. In discussions and from the memorandum of understanding tabled at the visit, the visitors heard that the COP would support a variety of areas such as "the provision and support of practice learning opportunities for students at both institutions". However, the entry requirements state that learners find their own trainee placement and surgical tutor before applying. From the disparity in the information provided, the visitors could not clearly see what the management structure of the programme is and what the role and responsibilities of the COP is, if any, in the delivery of the programme. Consequently, the visitors require further evidence, which outlines the roles and responsibilities of all parties involved in the management and delivery of the programme in order to demonstrate how the programme will be effectively managed.

B.5 There must be an adequate number of appropriately qualified, experienced and, where required, registered staff in place to deliver an effective programme.

Condition: The education provider must demonstrate who is responsible for teaching each element of the programme and how they ensure that these members of staff are appropriately qualified and experienced.

Reason: For this standard the visitors reviewed the curriculum vitae provided by the education provider in relation to this standard. Through their reading of the documentation, they could not ascertain who, from the staff CVs provided, would be teaching each element of the programme to ensure that they are appropriately qualified and experienced to do so. In discussions with the programme team, the visitors were made aware of who would be leading modules and teaching certain elements of the

programme. However, they could not determine who would teach the podiatric surgery practice-specific elements of the programme and therefore whether they were appropriately qualified and experienced to teach those elements of the programme. The visitors heard that affiliate/visiting lecturers would teach certain parts of the programme however, the visitors did not have details about who those lecturers were and what elements they would be teaching. As such, the visitors could not determine whether there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme. Therefore, the visitors require evidence which demonstrates who is responsible for teaching each element of the programme and how they ensure that they have the appropriate qualifications and experience to deliver the learning. In this way, the visitors can determine whether there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

B.6 Training must be delivered by staff with relevant specialist expertise and knowledge.

Condition: The education provider must demonstrate who is responsible for teaching each element of the programme and how they ensure that that these members of staff have the relevant specialist expertise and knowledge.

Reason: This condition links to the condition placed on B.5. For this standard, the visitors reviewed the curricula vitae provided by the education provider in relation to this standard. Through their reading of the documentation, they could not ascertain who, from the staff curricula vitae provided, would be delivering each element of the programme to ensure that they have the relevant specialist expertise and knowledge to do so. In discussions with the programme team, the visitors learned who would be leading modules and teaching some elements of the programme. However, they could not determine who would teach the podiatric surgery professions-specific elements of the programme and therefore whether they were appropriately qualified and experienced to teach those elements of the programme. The visitors heard that affiliate lecturers would teach certain parts of the programme however, the visitors did not details about who those lecturers are and what elements they would be teaching. As such, the visitors could not determine whether there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme. Therefore, the visitors require evidence which demonstrated who is responsible for teaching each element of the programme and how they ensure that they have the relevant specialist expertise and knowledge to deliver the learning.

B.7 A programme for staff development must be in place to ensure continuing professional and research development.

Condition: The education provider must demonstrate how they ensure that staff responsible for the delivery of this programme are supported in undertaking relevant continuing professional and research development.

Reason: To evidence this standard the visitors were directed to the staff curriculum vitae, programme specification and the placement handbook. From the documentation, the visitors were unable to determine how the teaching staff maintained their research and professional development to enable them to deliver an effective programme. At the visit, the visitors were told that the programme team engages in some development. For instance, a member of the programme delivery team is currently undertaking professional training in podiatric surgery and were supported by the education provider

to undertake this professional development. However, from discussions with the programme team, the visitors could not determine what development opportunities are in place for affiliate lecturers or for others in the core staff team. The visitors were therefore, unable to gain a full understanding of the current participation from staff in research and continued professional development. The visitors were unclear about how the programme team, specifically affiliate lecturers will be supported through their staff development to deliver the podiatric-surgery specific elements of the programme. The visitors therefore require further information to evidence how the education provider ensures that staff, including affiliate lecturers, are supported to undertake relevant continuing professional and research development to deliver the programme effectively.

B.8 The resources to support trainee learning in all settings must be effectively used.

Condition: The education provider must develop the virtual learning environment resource, which supports trainee learning, before the planned start date for the programme and is effectively used.

Reason: The education provider delivered a presentation of the virtual learning environment (VLE). The visitors saw the information contained on the VLE was incomplete and not fully developed. Although the visitors heard that the students would have access to pertinent programme information, they did not have sight of the information that students would have access to within the VLE whilst studying on this programme. The visitors noted that because the content specific to this programme was not available for the visitors to see within this resource, they could not determine if it supports trainee learning. For instance, they could not see how a trainees would know what they are expected to learn on each module and how they are assessed for each element of the programme. As such, they could not see how trainees in the practice-based setting, accessing the VLE would know what they are expected to achieve for each module or how their learning would be assessed. Additionally, it was unclear which elements of the programme recorded via lecture capture must be accessed by the trainee and how the education provider monitors engagement by trainees. Therefore, the visitors require the education provider to demonstrate what information will be contained within the VLE to determine if the learning resources are appropriate to support trainee learning at the start of the programme.

B.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to trainees and staff.

Condition: The education provider must demonstrate that the learning resources, including IT facilities, will be appropriate to the curriculum and readily available to students and staff.

Reason: This condition links to the condition placed on B.8. The education provider delivered a presentation of the virtual learning environment (VLE) trainees and staff would have access to on the programme. The visitors saw the information contained on the VLE was incomplete and not fully developed and that the trainees would use the VLE to access core learning resources. Although the visitors heard that, the students will have access to pertinent programme information, including module schedules, reading lists, lecture capture, assessments and resources they did not have sight of the information that students would have access to within the VLE whilst studying on this programme. The visitors noted that because the content specific to this programme was

not available for the visitors to see within this resource, they could not determine if it is appropriate to the curriculum. For instance, they could not see how trainees would know what they are expected to learn on each module and how they are assessed for each element of the programme. Additionally, the visitors noted that trainees would complete an online portfolio of evidence from practice placement experience. However they could not see how trainees are informed about how to complete the portfolio. Therefore the visitors require the education provider to provide the information that will be contained within the VLE to determine if the learning resources are appropriate to the curriculum and readily available to staff and students at the start of the programme and how trainees are informed about how to utilise the VLE to complete the portfolio on placement.

B.15 Throughout the course of the programme, the education provider must have identified any mandatory components and must have associated monitoring mechanisms in place.

Condition: The education provider must identify mandatory components of the programme and the associated monitoring mechanisms, the consequences for not meeting these requirements, and demonstrate how this information is effectively communicated to trainees.

Reason: The education provider delivered a presentation of the virtual learning environment (VLE). The visitors saw the information contained on the VLE was incomplete and not fully developed. Although the visitors heard that the students would have access to pertinent programme information, they did not have sight of the information that students would have access to within the VLE whilst studying on this programme. The visitors noted that because the content specific to this programme was not available for the visitors to see within this resource, they could not determine which elements of the programme were compulsory for trainees to attend or access via the VLE. From the programme team the visitors heard that there were compulsory elements of the programme. The visitors were that for those who could not physically attend a compulsory session at the education provider, they could access the session via the VLE lecture capture facility. When asked if accessing the session via lecture capture is compulsory, the visitors noted that it could be, and that engagement could be monitored. The visitors heard that 100 per cent attendance is required of trainees on the practice-based element of the programme. The visitors heard that the clinical supervisor would be expected to report a trainee's non-attendance to the programme team. However, the visitors were unclear how the education provider ensures that the clinical supervisor is aware of this responsibility and at what point they should contact the education provider. Additionally, the visitors were unclear how trainees would be made aware of the attendance requirement for the practice based element of the programme. Due to the physical attendance or virtual access requirements not being defined at this stage, and the documentation not clearly stating the attendance requirement on practice based learning, the visitors could not determine what the mandatory attendance requirements are for this programme. Additionally the visitors heard what the education provider could do to monitor attendance or access of the VLE but could not determine that the education provider had a clear process in place for monitoring of required attendance or access. It follows that the visitors could not determine how trainees would be made aware of these requirements or the consequences for not meeting requirements set out by the education provider. As such, the visitors require the following information to determine whether this standard is met:

- the elements of the programme where trainee attendance or access via the VLE is mandatory;
- how attendance or access of mandatory elements is monitored
- the consequences for trainees who do not meet the mandatory attendance or access requirements for the programme; and
- how trainees, clinical supervisor and staff are made aware of this information.

B.16 Service users and carers must be involved in the programme.

Condition: The education provider must demonstrate that there is a clear policy for service user and carer involvement in this programme, that the service users and carers are supported in their role and that this involvement is appropriate to the programme.

Reason: At the visit, the visitors met a service user who was involved in a podiatry programme delivered by the education provider. From discussions with the service user, the visitors noted that they were not involved in this programme. In discussion with the programme team, the visitors heard that service users and carers will form part of the programme board and will be involved in interviewing trainees. The visitors were not provided with minutes from programme board meetings to demonstrate service user and carer involvement. They also did not meet service users and carers with relevant experience to this programme who would be on the programme board and would interview trainees. They were also unable to establish how those service users and carers would be prepared for their role in the programme and the plan for continued service user and carer involvement in the programme. As such, they were unable to determine how service users and carers have been or will be involved in the programme. Therefore, the visitors require information, which demonstrates how service users and carers are involved in this programme, the plans to support them in their role and how their involvement is appropriate to the programme.

C.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards for podiatrists practising podiatric surgery

Condition: The education provider must clearly articulate how the learning outcomes for the programme modules ensure that those who successfully complete the programme meet the standards for podiatrists practicing podiatric surgery.

Reason: For this standard, the visitors were directed to the module specifications on pages 24 to 41. From their review of the module specifications, they could not establish where each standard for podiatrists practicing podiatric surgery was addressed within the learning outcomes. The visitors reviewed the programme intended learning outcomes, on page 2 of the programme specification, and noted that there are 17 learning outcomes. However, the visitors could not see how those learning outcomes would deliver the standards for podiatrists practising podiatric surgery. The visitors reviewed the standards mapping document, which is meant to map where in the programme curriculum, the standards for podiatrists practicing podiatric surgery will be covered. In some instances, the mapping was made to module level learning outcomes, and in other areas, links were made more generically to programme level outcomes. In addition, there were instances where learning outcomes didn't fully address the requirements of the standards. For instance, for standard 1.8 the visitors were directed to the "Podiatric Surgery in Practice" module specification and to learning outcomes two and three within the specification. The visitors were able to see that learning outcomes

two and three should be covered in the module. The visitors noted that learning outcome three, “Synthesise detailed knowledge of anatomy and human locomotion to apply in the context of podiatric surgery”, seemed to relate to HCPC standard 1.8, “understand anatomy in the in the context of podiatric surgery and how surgical intervention can impact on human locomotion”. However, on closer inspection the visitors could not see how the part of the standard, which requires a trainee to demonstrate that they understand how surgical intervention can impact on human locomotion, is covered in that learning outcome. The visitors also noted that throughout the programme documentation, they were unable to see where the learning outcomes map to and deliver the required standards for podiatrists practicing podiatric surgery. As such, they were unable to determine that the learning outcomes ensure that those who complete the programme will meet the standards for podiatrists practicing podiatric surgery. Therefore, the visitors require the education provider to review the documentation and provide detailed information about how the learning outcomes for the programme ensure that trainees who successfully complete the programme meet the standards for podiatrists practicing podiatric surgery.

C.2 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Condition: The education provider must demonstrate how the programme reflects the philosophy, core values, skills and knowledge base as articulated in any curriculum guidance relevant to podiatrists practicing podiatric surgery.

Reason: From a review of the programme specification and from discussions at the visit, the visitors understood that the programme curriculum incorporates the existing surgical training programme curriculum developed and delivered by the College of Podiatry. As such, the visitors understood that the programme should reflect the philosophy, core values, skills and knowledge base as articulated in that curriculum. However, from their review of the documentation the visitors could not determine how that curriculum has fed in to the development of this programme curriculum. As such, the visitors require evidence, which clearly describes how the relevant curriculum guidance, was used to develop this programme’s curriculum so that the visitors can make a judgement as to whether it is reflected in the new programme curriculum. The visitors note that the programme may not reflect some curriculum guidance, and where this is the case, they require a rationale for the departure from the curriculum guidance they have cited, which explains how trainees are able to practice safely and effectively.

C.3 Integration of theory and practice must be central to the curriculum.

Condition: The education provider must demonstrate how integration of theory and practice will be central to the curriculum.

Reason: From the documentation provided the visitors were able to see that the course structure would involve a day of theoretical learning in the first month of the year followed by practice-based learning with assessments interspersed throughout the year. This structure applies to all three years of the programme. The visitors could also see from the module specifications that trainees would first undertake the module Podiatric surgical assessment and diagnosis, which aims to “incorporate theoretical principles of podiatric surgical assessment and diagnosis into [your] clinical practice”. The visitors were able to see how theory is integrated in to the practical parts of the programme. However from a review of the module descriptors, the visitors were unclear about how

practice based elements are covered in the context of theoretical learning within the programme. As such, the visitors were unable to determine whether the programme structure enables the integration of theory and practice throughout this programme, specifically in the academic elements of the programme. Therefore, the visitors require further evidence of the delivery pattern for theoretical elements of the programme, and how this ensures that integration of theory and practice will be central to the curriculum.

D.2 The length of time spent in practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

Condition: The education provider must provide further evidence of the range of placement settings that trainees will experience to support the delivery of the programme and the achievement of the learning outcomes.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield.

From the evidence provided prior to the visit the visitors understood that practice based learning will take place in the trainees' surgical training post and that the College of Podiatry is supporting the practice-based learning on this programme through providing surgical tutors approved by the College of Podiatry to supervise the trainees on the programme. The visitors noted that trainees can learn and be assessed in a range of settings including "NHS primary care, acute and mental health Trusts, the private and independent sector and social care settings". In the programme specification, the visitors noted that the surgical placement sites are approved by the education provider and the College of Podiatry Faculty of Podiatric Surgery, and are subject to one of two agreements with the education provider: a learning development agreement or practice partnership agreement. As the visitors did not have sight of these agreements they could not determine whether there is a range of placement settings approved that trainees will experience on this programme. In discussions with the programme team the visitors were unable to see how the education provider ensures parity of experience for the trainees by ensuring that all trainees have the opportunity to experience the range of placements or the agreements in place to ensure the availability of those placements to trainees on this programme. In the clinical supervisor meeting, the visitors met with representatives of the College of Podiatry Faculty of Podiatric Surgery and heard reassurances that the college is committed to supporting the programme by identifying suitable surgical tutors. However the visitors did not meet with those who would be surgical tutors on the programme nor did they meet individuals from the placement settings such as representatives from the NHS or mental health trusts during the visit who would be able to demonstrate their commitment to providing placement opportunities to trainees or employers who would be in a position to provide and commit staff resources, such as surgical tutors, to support trainees on this programme. The visitors noted the importance of ensuring trainees have sufficient exposure to a variety of placements. However, the visitors could not find further detail in the documentation which evidenced the availability of a range of placement experiences, in particular how these placements will be integrated within the programme and information on the

learning outcomes which have been agreed must be achieved with their placement providers. In addition, the visitors were unable determine the number, duration and range placements available for trainees on the programme and which placement providers would be responsible for providing these experiences. The visitors therefore, require further evidence to show how the education provider ensures there is an appropriate number, duration and range of placements to support the delivery of the programme, and the achievement of the learning outcomes for all trainees.

D.3 The practice placements must provide a safe and supportive environment.

Condition: The education provider must demonstrate how their process for approving placements will ensure that placements provide a safe and supportive environment for trainees.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield.

This condition relates to the condition on standard D.4. In the programme specification and in discussion with the programme team, the visitors noted that surgical placement sites are approved by the education provider and the College of Podiatry Faculty of Podiatric Surgery. The visitors were not provided with written details of the formal approval process itself however they noted in the documentation that placement providers are subject to one of two agreements with the education provider: a learning development agreement or practice partnership agreement. As the visitors were not provided with the system for approving placements or what approval criteria the placements must meet to be approved by the education provider they could not determine whether the process for approving placements is effective and thorough. Additionally, the visitors noted that surgical placement sites are subject to a learning development agreement or practice partnership agreement with the education provider. The visitors were unclear how the education provider chooses between these two documents and what part the agreements play in the approval and monitoring of practice placements. Specifically, how these agreements ensure that the placement settings meet with the education provider's approval and monitoring criteria. In the programme specification, the visitors read that placements were monitored against the Practice Placement Quality Assurance (PPQA) audit criteria. This audit system is categorised by professions including podiatrist but not podiatrist practising podiatric surgery, as such the visitors were unclear whether the criteria used by the PPQA to audit placements for the listed professions would be appropriate for this area of practice or whether the audit criteria matched with the criteria required by the education provider, which was not provided to the visitors. As such the visitors could not determine the following:

- the criteria practice placements must satisfy in order to meet with the education provider's approval;
- The system for first approving a placement setting;
- How the education provider monitors the placement to ensure it continues to meet their approval criteria; and,

- How often placements are monitored.

The visitors therefore, require further evidence to show how the education provider ensures that there is a thorough and effective system for approving and monitoring all practice placements prior to trainees undertaking their placements

D.4 The education provider must maintain a thorough and effective system for approving and monitoring all practice placements.

Condition: The education provider must demonstrate what thorough and effective system is in place for approving and monitoring all placements.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield.

In the programme specification and in discussion with the programme team, the visitors noted that surgical placement sites are approved by the education provider and the College of Podiatry Faculty of Podiatric Surgery. As the visitors were not provided with a detailed account of the system for approving placements or what approval criteria the placements must meet to be approved by the education provider they could not determine whether the process for approving placements is effective and thorough. Additionally, the visitors noted that surgical placement sites are subject to a learning development agreement or practice partnership agreement with the education provider. The visitors were unclear how the education provider chooses between these two documents and what part the agreements play in the approval and monitoring of practice placements. Specifically, how these agreements ensure that the placement settings meet with the education provider's approval and monitoring criteria. In the programme specification, the visitors read that placements were monitored against the Practice Placement Quality Assurance (PPQA) audit criteria. This audit system is categorised by professions including podiatrist but not podiatrist practising podiatric surgery, as such the visitors were unclear whether the criteria used by the PPQA to audit placements for the listed professions would be appropriate for this profession or whether the audit criteria matched with the criteria required by the education provider, which was not provided to the visitors. For example, the visitors were unclear whether the audit process included a check of what the equality and diversity policies at the placement setting or whether practice placements were expected to adopt the equality and diversity policies of the education provider. At the visit the visitors were told that the programme delivered by the college of podiatry required a more robust approach to quality assuring the programme. However, in discussions with the programme team the visitors could not determine what measures the team were taking to ensure that there was a more robust quality assurance process in place to ensure parity and quality of experience among trainees in placements on this programme. Additionally, the visitors were not clear on what would happen should an issue arise on placement whereby the trainees would need to undertake a different placement. They could not determine the process for dealing with issues such as poor quality and break down of placement and who would be responsible for finding the learner another suitable training opportunity. As such the visitors could not determine the following:

- the criteria practice placements must satisfy in order to meet with the education provider's approval;
- The system for first approving a placement setting;
- How the education provider monitors the placement to ensure it continues to meet their approval criteria;
- How often placements are monitored; and,
- The process for dealing with placements whereby quality falls below the required level or the placement is no longer available and the trainees requires a new placement.

The visitors therefore, require further evidence to show how the education provider ensures that there is a thorough and effective system for approving and monitoring all practice placements prior to the first trainees undertaking their placements.

D.9 There must be regular and effective collaboration between the education provider and the practice placement provider.

Condition: The education provider must provide further evidence of the regular and effective collaboration between the education provider and the practice placement providers.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield.

From the evidence provided prior to the visit the visitors understood that practice based learning will take place in the trainees' surgical training post and that the College of Podiatry is supporting the practice-based learning on this programme through providing surgical tutors approved by the College of Podiatry to supervise the trainees on the programme. The visitors noted that trainees can learn and be assessed in a range of settings including "NHS primary care, acute and mental health Trusts, the private and independent sector and social care settings". In the programme specification, the visitors noted that the surgical placement sites are approved by the education provider and the College of Podiatry Faculty of Podiatric Surgery, and are subject to one of two agreements with the education provider: a learning development agreement or practice partnership agreement. As the visitors did not have site of these agreements they could not determine how collaboration with the various practice education providers such as NHS, private sector and social care settings is regular and effective. In discussions with the programme team and the representatives from the college of podiatry, the visitors noted that there was regular communications and collaboration in various forms between them, through meetings and joint development of the curriculum. However this standard is concerned with the collaboration between the education provider and the practice education providers such as the NHS and non NHS placement providers. As the visitors were unable to meet with representatives from the NHS trusts or those from non-NHS settings during the visit, they were unable to determine that there is regular and effective collaboration between the education provider and the practice education providers. As such, the visitors were unable to determine how this standard is met. The

visitors therefore require further evidence that the collaboration between the education provider and practice placement provider will be regular and effective.

D.10 Trainees and clinical supervisors must be fully prepared for the practice placement environment which will include information about:

- **the learning outcomes to be achieved;**
- **the timings and the duration of the experience and associated records to be maintained;**
- **expectations of professional conduct;**
- **the professional standards which trainees must meet;**
- **the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and**
- **communication and lines of responsibility.**

Condition: The education provider must provide evidence which demonstrates how pertinent information about learning outcomes to be achieved and timing and duration of placements is communicated and understood by trainees and clinical supervisors.

Reason: This relates the conditions placed on standards C.1. From their review of the programme documentation the visitors noted that they were unable to determine where in the curriculum and assessment documentation the standards for podiatrists practicing podiatric surgery are covered in full. The visitors also could not determine where the learning outcomes deliver the standards for podiatrists practicing podiatric surgery. Additionally, the visitors had a demonstration of the VLE, from the demonstration given they were unable to ascertain where in the assessment documentation trainees and clinical supervisors would know which learning outcomes were to be achieved at which stage in the placement. The timing and duration of the placement experience was not clear to the visitors within the assessment documentation as such, they were unsure how clinical supervisors and trainees would know what learning outcomes should be covered at various stages in the placements. As such, the programme team must provide evidence which demonstrates how the learning outcomes and timing and duration of experience are communicated to trainees and clinical supervisors to ensure they are fully prepared for placement.

D.10 Trainees and clinical supervisors must be fully prepared for the practice placement environment which will include information about:

- **the learning outcomes to be achieved;**
- **the timings and the duration of the experience and associated records to be maintained;**
- **expectations of professional conduct;**
- **the professional standards which trainees must meet;**
- **the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and**
- **communication and lines of responsibility.**

Condition: The education provider must provide evidence which demonstrates how pertinent information about assessment procedures and implications of, and any actions to be taken in the case of, failure to progress is communicated and understood by trainees and clinical supervisors.

Reason: From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield.

From the documentation and through discussions with the programme team the visitors understood that trainees must pass their placement to successfully complete the programme. In discussion with representatives from the College of Podiatry in the practice educator meeting, the visitors heard that trainees will be offered 2-3 year, fixed term surgical training post contracts by the employer. The visitors were told, should a trainee fail their placement then the time limitation of their fixed, short term contract would prevent the trainee from continuing in that post for much longer after they have failed the programme. The visitors were not clear how this information was communicated to the trainees and clinical supervisors to ensure that they understand the consequences for the job role and trainee position should trainees fail to progress. Consequently, the visitors require further evidence which clearly outlines to trainees and clinical supervisors the assessment procedures when a trainee fails to progress and the consequences in their trainee surgical post.

D.12 A range of learning and teaching methods that respect the rights and needs of service users and colleagues must be in place in the approved clinical learning environment.

Condition: The programme team must provide further evidence as to how they ensure that trainees, while on placement, introduce themselves appropriately and that service users and carers are appropriately informed of any trainee's role in their care or treatment.

Reason: In their review of the documentation the visitors noted content within the curriculum which covers consent. However in their review of the documentation and in discussion with the trainees at the visit, it was not clear how the education provider ensures that clinical supervisors are informed that they are expected to respect the needs of the service users by ensuring appropriate consent is gained for trainees to be involved in their treatment. The visitors require further information which demonstrates how clinical supervisors are informed that they are required to respect the needs of the service users by making them aware of trainees and by gaining appropriate consent from the service user for trainees to be involved. In this way the visitors can determine whether this standards are met.

E.1 The assessment strategy and design must ensure that the trainee who successfully completes the programme has met the standards for podiatrists practising podiatric surgery.

Condition: The education provider must demonstrate how the learning outcomes deliver the standards for podiatrists practising podiatric surgery and how the learning outcomes are assessed to ensure those who successfully complete the programme meet those standards.

Reason: This relates to the condition on standard C.1. From their review of the module specifications, the visitors could not establish where each standard for podiatrists practicing podiatric surgery was addressed within the learning outcomes. For instance, for standard 1.8 the visitors were directed to the Podiatric Surgery in Practice module specification and to learning outcomes two and three within the specification. The visitors were able to see that five intended learning outcomes were covered in the module including learning outcomes two and three, referred to in the standards mapping document. The visitors noted that learning outcome three, “Synthesise detailed knowledge of anatomy and human locomotion to apply in the context of podiatric surgery”, seemed to relate to standard 1.8, “understand anatomy in the in the context of podiatric surgery and how surgical intervention can impact on human locomotion”. However, on closer inspection the visitors could not see how the part of the standard, which requires a trainee to demonstrate that they understand how surgical intervention can impact on human locomotion, is covered in the learning outcome. The visitors noted that this was a consistent issue across the programme documentation, where the learning outcomes do not clearly show how they deliver the required standards. As such, they were unable to determine that the learning outcomes ensure that those who complete the programme will meet the standards for podiatrists practicing podiatric surgery. Consequently the visitors could not determine that the assessment design and strategy ensures that the trainee who successfully completes the programme has met the standards for podiatrists practising podiatric surgery. Therefore, the visitors require detailed documentation, such as detailed module specifications and portfolio assessment content, which clearly articulates how trainees who successfully complete the programme cover the learning outcomes, which deliver the standards for podiatrists practicing podiatric surgery and how those learning outcomes are assessed.

E.4 Assessment methods must be employed that measure the learning outcomes.

Condition: The education provider must demonstrate that assessments are clearly and appropriately linked to the learning outcomes, and that the assessment methods used are appropriate.

Reason: This relates to the above condition placed on standard E.1. From their review of the documentation, the visitors were not able to see how the marking criteria and assessment methods being used in the modules were linked to the learning outcomes which ensure that trainees meet the standards for podiatrists practicing podiatric surgery by the end of the programme. For instance, for module descriptor “Developing Podiatric Surgical Practice” the visitors noted that this module would be assessed via formative and summative assessments. The summative assessment would be a “6000 word or equivalent reflective structured portfolio demonstrating a range of surgical assessments and management skills” to measure learning outcomes 1-4. Learning outcome 3 incorporates all of the standards for podiatrists practicing podiatric surgery. The visitors could not see how the summative assessment was an appropriate assessment method to measure that a trainee has met all of the standards for podiatrists practicing podiatric surgery. The visitors were not provided with an assessment document so they could not determine whether the assessment methods measured each of the learning outcomes and therefore could not determine the appropriateness of the method of assessment. The programme team gave verbal reassurances in discussions that assessments would be linked to learning outcomes going forward, but the visitors considered that it was necessary for them to see written

evidence of how this would be done, in order for them to be satisfied that the standard was met and ensure transparency of expectations of trainees. Therefore the visitors require the education provider to submit evidence showing how each method of assessment used in the programme is linked to a particular learning outcome and how that learning outcome delivers the standards for podiatrists practicing podiatric surgery. In this way they can be confident that all students successfully completing the programme will have demonstrated the skills and knowledge needed to be safe and effective.

E.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.

Condition: The education provider must demonstrate how they will ensure that assessment of trainees' placement portfolios is conducted by those who are appropriately qualified and experienced to do so and to appropriate standards.

Reason: In their review of the documentation and in discussions with the programme team, the visitors noted that the academic tutors assessing and moderating trainees are not qualified and/or trained in the subject areas in which they are expected to assess the trainees work. The visitors would expect that where the trainees demonstrate their learning on the subject of podiatric surgery academic staff who are experienced or qualified in the practice area would be able to ensure that the appropriate standard is achieved in the assessment. However, there is currently no one on the staff team with knowledge, expertise or a qualification in that subject area. As such the visitors could not determine how the appropriate standards in assessment are achieved or the effective monitoring and evaluation mechanisms which are in place to ensure this. Therefore the visitors require further evidence which demonstrates the effective monitoring and evaluation mechanisms which are in place to ensure appropriate standards in assessment.

E.7 Assessment regulations must clearly specify requirements for trainee progression and achievement within the programme.

Condition: The education provider must provide further evidence to demonstrate the requirements for trainee progression and achievement within the programme.

Reason: In their review of the documentation, the visitors noted that there is are expected progression criteria on page 89 of the Master of Podiatric Surgery Placement Handbook. It denotes where the placement progress should link to the College of Podiatry's surgical training programme and how those stages link to the standards for podiatrists practicing podiatric surgery. The visitors were unable to see what the consequences of not meeting these progression criteria would be for the trainee. For instance, the visitors could not see what would happen should a trainee fail to progress within the clinical setting or how this is communicated to the trainee and clinical supervisor. The visitors were also unable to see where in the assessment regulations is clearly specifies requirements for trainee progression and achievement within the programme. Therefore the visitors require to see how the assessment regulations clearly set out for trainees, the requirements they must achieve in order to progress on the programme. In this way the visitors can determine whether the trainees are provided with sufficient information about what is required of them to progress within the programme.

E.8 Assessment regulations, or other relevant policies, must clearly specify requirements for approved programmes being the only programmes which contain any reference to an HCPC-protected title or part of the Register in their named award.

Condition: The education provider must revisit the programme documentation to clearly articulate that the exit awards do not confer eligibility to apply for an annotation on trainees' registration, should the annotation of the HCPC register be approved.

Reason: The visitors noted in the documentation, that there are two possible exit points from this programme, the postgraduate certificate and postgraduate diploma in Clinical Podiatric Practice. In discussions with the programme team, the visitors were told that trainees who achieved the exit awards other than the Master of Podiatric Surgery programme would not be eligible for an annotation with the HCPC. As such, the visitors require further evidence that the assessment regulations to clearly reflect that only on completion of the Master of Podiatric Surgery could a trainee apply for the annotation, should the annotation be officially approved.

E.10 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the Register.

Condition: The education provider must provide further evidence to demonstrate that the assessment regulations clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the HCPC Register.

Reason: From reviewing the documentation, the visitors noted that the external examiner will be a professionally qualified podiatrist and an individual who is approved by both the education provider and the College of Podiatry. The visitors noted that the role of the external examiner is to ensure academic and professional standards are maintained on the programme. They did note that although the external examiner must be qualified in the podiatrist profession, there was no requirement in the assessment regulations for the external examiner to be registered with the HCPC or whether other arrangements would be agreed the HCPC. In discussion with the programme team the visitors were unable to determine how a podiatrist would have the necessary experience and qualifications in the practice area that would enable them to ensure that academic and professional standards for podiatrists practicing podiatric surgery are maintained on the programme. As such, the visitors require the education provider to review the assessment regulations to ensure that they specify the requirement for at least one external examiner to be appointed who is appropriately experienced and qualified in a relevant area of practice to ensure they can provide a level of appropriate and relevant, external quality assurance for the programme. Additionally, the assessment regulations should stipulate that the external examiner is from the relevant part of the Register unless other arrangements are agreed with the HCPC.

Section 5: Details of the visit to consider the first conditions response

In order for us to progress with the visit to consider the first conditions response, we required a documentary response to the conditions 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.

Required documentation	Submitted
First response to the conditions contained in Section 4 of this report	Yes

The visit took place on 18 - 19 March 2019. We met the following groups as required in the recommendation by visitors' in section 4.

Group	Met
Senior staff	Yes
Practice education providers	Yes
Service users and carers (and / or their representatives)	Yes
Programme team	Yes

HCPC panel for considering the conditions response

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. For this particular visit, there is no Podiatric Surgeon on the panel, and this is within the rules around visitor selection set out by the committee in June 2015.

Details of the HCPC panel for this assessment are as follows:

Gordon Burrow	Chiropodist / podiatrist (Prescription only medicines – administration)
Andrew Robinson	Orthopaedic surgeon
Roseanne Connolly	Lay
Tamara Wasylec	HCPC executive

Section 6: Outcome from second review

Second response to conditions required

The education provider responded to the conditions set out in section 4 and the visitors considered the response prior to and during a second visit to the education provider. 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.

B.1 The programme must have a secure place in the education provider's business plan.

Condition: The education provider must provide further evidence to show that the programme is supported by practice education providers and the strategy for staffing this programme to demonstrate that the programme has a secure place in the education provider's business plan.

Reason condition not met at this time: The visitors reviewed the response to conditions and the additional information tabled at the visit. The visitors noted that the audit checklist which will be completed to provide details of the particular training opportunities available in each placement had not yet been completed for each placement. The visitors noted that without the information about the detail of each placement that will be obtained through the audit process, they were unable to ascertain whether there were sufficient training opportunities for learners on this programme and for this curriculum. The visitors also noted that, in the additional information tabled at the visit, there was list of potential surgical training placements. The visitors noted that the list of surgical training placements were accompanied by letters from the trusts in which the placements will take place. Some letters showed support for the placements whereas others did not clearly explain how many learners they agreed to train or for how long the placement would continue, for instance the full three years of the programme. As such the visitors could not determine that there is sufficient support from the practice education providers to provide enough placements or that there is an appropriate range of particular training opportunities within that placement to ensure the learner could meet the learning outcomes. As such the visitors require further evidence of how the education provider will ensure the following:

- Confirmation of the surgical training placements that have been secured for this programme
- Information which demonstrates that the placements are adequate for the learners on this programme and that they can undertake a range of training opportunities within the placement;
- The education provider's plans for ensuring surgical training placements continue to be available for subsequent years and future cohorts.

In particular, the visitors require information about when the education provider plans to engage with placement providers to ensure there continues to be sufficient availability of practice based learning opportunities for learners on the programme going forward. The visitors will consider this evidence to determine whether this standard is met.

Suggested documentation: Completed audits containing particular surgical training opportunities within placements, confirmation of specific placements including numbers and timeframes and the plan to ensure continued placement provision for future cohorts.

B.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to trainees and staff.

Condition: The education provider must demonstrate that the learning resources, including IT facilities, will be appropriate to the curriculum and readily available to students and staff.

Reason condition not met at this time: The visitors reviewed the response to the conditions and noted the programme information provided to applicants who wish to be admitted on the programme was clear. In their review of the information provided to applicants the visitors noted that service users and carers would now be involved in interviewing applicants to the programme. However, at the revisit, the programme team clarified that learners would not be interviewed by the service users and carers. Due to the disparity in the admissions process information provided to applicants and that provided at the revisit, the visitors were unclear how learners would have accurate information about the admissions process, specifically regarding interviews. The visitors therefore require the education provider to remove references to service user and carers interviewing applicants in the programme resources so as not to mislead applicants about the process for applying to the programme. Following this the visitors can determine whether the learning resources, including information provided at the application stage, is appropriate and readily available to trainees and staff.

Suggested documentation: Revised admissions documentation which will be available to applicants, which clearly states what applicants can expect from the admissions process regarding interviews.

B.15 Throughout the course of the programme, the education provider must have identified any mandatory components and must have associated monitoring mechanisms in place.

Condition: The education provider must identify mandatory components of the programme and the associated monitoring mechanisms, the consequences for not meeting these requirements, and demonstrate how this information is effectively communicated to trainees.

Reason condition not met at this time: The visitors reviewed the programme specification provided prior to the revisit and noted that the attendance requirement was not clear throughout the documentation. The visitors understood that “Full clinical attendance is required” to progress on the programme. However, as the learners will also attend academic sessions and access online sessions the visitors were unclear what the attendance requirement is for the academic component of the programme. In discussion with the programme team, the visitors were told that attendance for all aspects of the programme is mandatory and where trainees are unable to attend sessions they would be expected to access the resources on the VLE (such as lecture capture) and this would be monitored to ensure trainees accessed missed sessions. The visitors noted that, at the revisit, the education provider identified the mandatory components of the programme however this information needs to be made clear to trainees and staff on the programme. As such, the visitors require evidence that the documentation provided to trainees and staff clearly reflects the attendance requirement for the academic component of the programme, including how learners will make up for missed sessions. In this way, the visitors can be sure that learners have a clear understanding of what elements of the programme they must attend to complete the programme.

Suggested documentation: Revised documentation clearly stipulating the mandatory attendance requirement for the programme, including mechanisms to make up missed sessions.

C.3 Integration of theory and practice must be central to the curriculum.

Condition: The education provider must demonstrate how integration of theory and practice will be central to the curriculum.

Reason condition not met at this time: The visitors were directed to the programme specification and module descriptors for this standard. They understood that learners on the programme must have completed the MSc Theory of Podiatric Surgery or equivalent and that this programme aims to enable the integration of the theoretical knowledge into practice. The visitors also noted that there are some elements of theory taught on this programme. However, through the response to the conditions the visitors could not see how the theory taught on this programme is integrated with the practical elements of the programme. This standard requires the education provider to ensure that trainees are able to apply the knowledge they learn on this programme to practice as a basic part of being prepared and competent to practice. As such the visitors require further evidence of how the theory taught on this programme is linked to the practical part of the programme and how they support each other. The visitors require information about how integration takes place throughout the programme to ensure it is relevant and meaningful to learners and takes place at appropriate times during the programme to ensure it is effective.

Suggested documentation: Information about how the theory and practice are linked. For instance, how learners have the opportunity to learn theory and understand why it is important, but also reflect on and learn how to apply theory frameworks in practice.

D.2 The length of time spent in practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

Condition: The education provider must provide further evidence of the range of placement settings that trainees will experience to support the delivery of the programme and the achievement of the learning outcomes.

Reason condition not met at this time: The visitors reviewed the response to conditions and the additional information tabled at the visit. The visitors noted that the audit checklist which will be completed to provide details of the particular training opportunities available in each placement had not yet been completed for each placement. The visitors noted that without the information about the detail of each placement that will be obtained through the audit process, they were unable to ascertain whether there were sufficient training opportunities for learners on this programme and for this curriculum. For instance they could not determine the number of procedures trainees would be exposed to in each placement or their role in the procedures, whether observing or assisting. The visitors were also unclear how many training procedures would be available per trainee in each unit. The visitors were also unable to determine whether there is a sufficient range of local subspecialty training opportunities available for each learner, for instance vascular surgery, diabetology, orthopaedic surgery, rheumatology, and radiology. As this information has not yet been gathered by the education provider the visitors could not determine that there is a sufficient range of placement settings replete with a suitable range and number of procedures for learners to complete, in order to ensure trainees can achieve the learning outcomes. As such the visitors require further evidence of the appropriate range and length of placement

opportunities, including the trainees' role in the surgery to ensure they are appropriate to support the delivery of the programme and achievement of the learning outcomes.

Suggested documentation: Information such as the audit checklist, mentioned by the education provider, to demonstrate the range of surgical procedures a trainee will undertake in each placement and their role in the surgical procedure. Along with any other information the education provider can provide to evidence this standard.

D.4 The education provider must maintain a thorough and effective system for approving and monitoring all practice placements.

Condition: The education provider must demonstrate what thorough and effective system is in place for approving and monitoring all placements.

Reason condition not met at this time: The visitors reviewed the documentation provided prior to the revisit and discussed the approval and monitoring processes with the programme team. The visitors noted that the processes are sufficient however, they are yet to see evidence that the processes to approve and monitor practice placements have commenced to ensure there are sufficient placements. As such the visitors cannot determine whether the education provider's approval and monitoring processes are thorough and effective. As such, the visitors require further evidence of the completed practice placement approval processes which ensure that there are sufficient placements for learners by the start of the programme.

Suggested documentation: Information about the completed approval of the placements required for the first cohort of learners on this programme.

E.7 Assessment regulations must clearly specify requirements for trainee progression and achievement within the programme.

Condition: The education provider must provide further evidence to demonstrate the requirements for trainee progression and achievement within the programme.

Reason condition not met at this time: In reviewing the documentation for the revisit, the visitors understood that trainees who do not complete all of the hours for the programme would not be able to complete the programme. However in discussion with the programme team the visitors were told that learners get an opportunity to suspend the training if it appears that they will not achieve the required hours. The trainees may then be reintroduced to the programme in a later year, to complete the rest of their hours. The visitors noted to the programme team that this information was not clear in the documentation provided to trainees. As such the visitors require the education provider to clearly specify how those who do not complete the required hours may suspend their training and by what mechanism they would be re-introduced to the training at a later stage. The visitors require evidence of how this information is made clear to trainees, so they have the information they require about progression and achievement within the programme.

Suggested documentation: Information about the process for reintroducing learners to the programme when they have not met the required hours for the programme.

E.10 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the Register.

Condition: The education provider must provide further evidence to demonstrate that the assessment regulations clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the HCPC Register.

Reason condition not met at this time: The visitors noted through the conditions response and in discussions at the revisit that the education provider's requirements for the external examiner is that the individual can perform foot and ankle surgery for instance, a vascular surgeon. However, the visitors were unable to see how a vascular surgeon is appropriately experienced and qualified to assess musculoskeletal surgery of the foot, for example. Therefore the visitors were unable to determine how the requirements for the appointment of an external examiner are appropriate for this programme. As such, the visitors require evidence of how the education provider will ensure that there is an appropriately qualified and relevantly experienced individual, to undertake the role of external examiner for this programme. For instance, an orthopaedic foot and ankle surgeon (who is a member of a foot and ankle subspecialty association) or someone who is an HCPC annotated podiatrist practicing podiatric surgery. The visitors require this information to determine whether this standard is met.

Suggested documentation: Evidence of the specific requirements for the appointment of an external examiner with the appropriate qualifications, experience and membership of a subspecialty association or that the person is an HCPC annotated podiatrist practicing podiatric surgery.

Recommendations

We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

A.2 The admissions procedures must apply selection and entry criteria, including appropriate academic and professional entry standards.

Recommendation: The visitors recommend the education provider revisits the entry criteria to ensure it is inclusive, appropriate and relevant to the programme.

Reason: The visitors consider this standard is met. The visitors noted that the entry criteria requires trainees to have undertaken the Objective Assessment of Professional Skills (OAPS) test, have a training number from the College of Podiatry, which requires learners to be a member of the College. Those criteria require the trainee to pay a cost. The visitors noted that those particular entry criteria also states "or equivalent" (in some of the documentation), which may not include a cost for applicants. The visitors recommend that the education provider considers the relevance of trainees undertaking the OAPS test, whether it is a necessary expenditure for the learner and if not, what other alternatives would be acceptable as an indicator of some experience in a surgical environment prior to applying to this programme. The visitors also recommend that the education provider offer clarity on the requirement for trainees to have indemnity

insurance rather than stipulating a learner must have a trainee number from the COP to evidence that they have indemnity insurance. The visitors noted that for those with an NHS contract, which already provides trainees with indemnity insurance, trainees would be expected to pay an unnecessary, extra cost to secure a second source of insurance. The visitors would recommend the education provider consider revising their entry requirements for learners who are already covered through their training placement with the NHS, so as not to impose unnecessary financial burden on trainees.

B.1 The programme must have a secure place in the education provider's business plan.

Recommendation: The visitors recommend that the education provider monitor the number of learners on the programme to ensure there is sufficient interest for the programme to run.

Reason: The visitors have noted that approximately five trainees per year completed the College of Podiatry's surgical training programme. This number is lower than the planned cohort size for this programme. The senior team noted that they are able to run the programme with less numbers initially, if required. The visitors suggest that this may not be sustainable in the long run and recommend the education provider keep under review how many learners would be needed to ensure that the programme remains sustainable and has a secure place in their business plan.

B.2 The programme must be effectively managed.

Recommendation: The visitors recommend the education provider clarify the roles and responsibilities of those outside of the programme team so all parties share a mutual understanding of governance and management of the programme.

Reason: The education provider offered clarity in the programme team meeting about the nature of the collaboration between the College of Podiatry and the education provider. The visitors were therefore satisfied that this programme is effectively managed. There were a number of areas where representatives from the College of Podiatry appeared to have a different view about how the programme would be delivered and their roles and responsibilities in the programme. The visitors recommend that the education provider ensures that communication with other parties is clear so that all parties understand their remit and responsibilities of their role in the delivery and management of this particular programme.

B.9 The resources to support trainee learning in all settings must effectively support the required learning and teaching activities of the programme.

Recommendation: The education provider should continue to develop and review the virtual learning environment (VLE) to ensure it continues to support the learning and is fully completed by the final year of delivery.

Reason: The visitors noted that this standard is met. The visitors were satisfied with the finished sections of the VLE and the proposed content, but noted that the final year has not yet been inputted on to the VLE. The visitors recommend that the education provider continue to develop the VLE to ensure that it is ready for the final year of the programme and to ensure the resources continue to support trainee learning.

Section 7: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 6, the visitors are not satisfied that the conditions are met for the reason(s) noted below, and recommend that the programme(s) are not approved.

This report, including the recommendation of the visitors and any observations provided by the education provider, will be considered at a future meeting of the ETC. At this meeting, the ETC will determine whether proceedings for the consideration of non-approval of the programme should be commenced in accordance with Article 18(4) of the Health and Care Professions Order 2001. At the meeting, the ETC may decide to:

- approve the programme;
- commence non-approval proceedings; or
- direct the executive to undertake any other course of action it deems necessary to inform its decision regarding the approval of the programme(s).

In reaching this decision, the ETC will

- provide reasons for their decision; and
- provide the Executive with any necessary instructions to give effect to the decision.

If the ETC is minded to not approve the programme, the education provider will have a 28 day period to provide observations on this decision, which will then be taken to a future ETC meeting alongside the visitors' report. At that future meeting, the ETC will make a decision about whether to not approve the programme.

B.1 The programme must have a secure place in the education provider's business plan.

Condition: The education provider must provide further evidence to show that the programme is supported by practice education providers and the strategy for staffing this programme to demonstrate that the programme has a secure place in the education provider's business plan.

Reason condition not met: In reviewing the second conditions response, the visitors noted that the education provider has provided the following:

- the specific number of agreed learners per year across the programme;
- a commitment for the number of placements required from partners, with commitment that there will be sufficient range of experiences within these placement sites;
- the minimum number of surgical procedures (observing, assisting, and undertaking) required to demonstrate competence; and
- a completed placement audit, provided to demonstrate that the audit process is robust.

The visitors considered this information in relation to the original condition, and they have reached the conclusion that the education provider has not met this standard as it has not demonstrated that it will have practice-based learning of the quality, number and range required in place for all learners when the programme commences. They consider this for the reasons noted below.

Year on year workforce numbers and training capacity are not aligned

The visitors note that the throughput of existing trainees and new places available do not match. For example, the total number of training places for 2020 is noted as 26, but when taking the numbers stated from the previous year (who would still be on the programme) plus new learners, the total number of learners would be 27. The visitors note this misalignment will also apply across future years of training. For these reasons, the visitors are not satisfied the education provider has secured enough training places to support the planned trainee numbers.

Insufficient progress to quality assure placement sites

The visitors are not satisfied that only one audit had been completed as of June 2019, before the programme is intended to commence in September 2019. They believe this means there is no room for slippage with the proposed audit schedule, which they believe is, in and of itself, unachievable. The visitors are also not clear what would happen if a placement site fails a scheduled audit. They note that should this occur, it will affect the programme's ability to place all trainees, and they were not given any contingency planning to manage this scenario.

In reaching this conclusion the visitors note that the audit schedule was provided for the first time through the education provider's second (and final) conditions response, and therefore they were unable to request contingency plans to address this specific scenario as an additional part of the requirements set to meet this condition.

B.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to trainees and staff.

Condition: The education provider must demonstrate that the learning resources, including IT facilities, will be appropriate to the curriculum and readily available to students and staff.

Reason condition not met: The education provider submitted updated information to clarify the involvement of service users in the admissions process to meet the outstanding issue related to this condition. The visitors were satisfied with this information.

Admissions information not appropriate to support engagement with the programme

However, in reviewing all the evidence provided, the visitors are not satisfied that the admissions information more generally is appropriate to support engagement with the programme. This finding is based on the visitors noting that previously required amendments or deletions were still present in the admissions information, as follows:

- The requirement for indemnity insurance through College of Podiatry (COP) is misleading for applicants as this would not be required of all trainees. The visitors note indemnity insurance would be in place for most trainees as NHS employees, and HCPC registrants must declare they have this in place as a condition of their registration.
- It is also the case that the requirement in section 16.7 that applicants "should have a College of Podiatry National Training Number or equivalent", is not needed as this was only stipulated to ensure they had indemnity insurance.

- It is not stated clearly to applicants currently undertaking the current COP's podiatric surgery training route, who would be seeking to access the programme at the start of year two via the APEL process, must have undertaken the MSC in Theory of Podiatric Surgery, as required for the normal entry route.
- It is unclear to applicants if they pay for a Designated Barring Scheme (DBS) check which is required as part of the admissions process, or if this is covered by the education provider or the trainee's employer.

The visitors note that their findings here do not relate to the condition set for this standard, and more appropriately relate to standards A.1 and A.3 (which relate to the information provided to applicants through admissions and APEL), which they determined were met earlier in the approval process. However, as incorrect information relating to admissions remains at this stage of the process, the visitors consider that this standard is not met.

Logging of placement experience

As above, the visitors note that this issue does not relate to the previously outstanding issue of service user and carer involvement in the admissions process.

However, the visitors note that staff and trainees need to have access to the Podiatric and Surgical Clinical Outcome Measurement (PASCOM) system in order to log surgery. However, they also note that accessing this system (by being a member of the COP) was not a requirement for trainees. Therefore, the visitors conclude that not all trainees will be able to log surgery in the method required.

Therefore, as the IT facilities for a key part of the programme are not available to all trainees and staff, the visitors consider that this standard is not met.

D.2 The length of time spent in practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

Condition: The education provider must provide further evidence of the range of placement settings that trainees will experience to support the delivery of the programme and the achievement of the learning outcomes.

Reason condition not met: Through evidence provided, the education provider has defined the minimum number of 'specific operations' required to be undertaken by each trainee in practice, including breakdown of level of practice required. A completed audit was also provided, to demonstrate how the audit tool will be used to ensure the appropriate range of practice experience will be provided at a specific site.

The visitors considered this information in relation to the original condition, and have reached the conclusion that the standard is not met as the education provider has not demonstrated that it will have practice-based learning of the quality, number and range required in place for all learners when the programme commences. They have reached this conclusion for the reasons noted below.

Insufficient assurance is gained through placement audits regarding the range of complexity within the 'specific operations' available

In the completed audit the visitors noted that the 'specific operation' numbers were above the minimum threshold required to be undertaken by each learner. However, as there is a range of complexity within each specific operation, from simple to more complex procedures, the visitors note that the audit tool does not identify the levels of complexity available at a specific site. As such, the visitors are not satisfied the audit tool gives the education provider the assurance needed to determine that the necessary range of specific operations of the required complexity is available in all centres. Therefore, they are not assured that trainees will have access to the wide range of experience (at all levels of surgical podiatry practice) required to demonstrate clinical competence.

There is a lack of clarity regarding range of appropriate practice experiences required at each level of the programme

In the conditions response, Table 1 is an 'Example procedure table' which notes the specific operations, and the "minimal range of surgical experience" required at specific levels of practice. Table 2 is a list of descriptors for the levels of practice.

From reviewing this information, the visitors are unclear how a number of areas in the levels of practice are intended to function, specifically:

- Requirements for the breakdown of 'specific operations' between Levels 3a & 3b: The visitors noted the minimum number of specific operations within Level 3 were split into sub levels as follows:
 - 3a requiring "Experience of and satisfactory completion of the procedure on a cadaver".
 - 3b noting that "Trainees are scrubbed-in acting as 1st or 2nd assistant during the operation. The trainee may complete elements of the case according to experience/training. The components undertaken by the trainee are logged using the standardized sheets provided."

The visitors note that this information does not indicate the required split of practice across sub-levels 3a and 3b. This leads the visitors to conclude that the vast majority of practice at this level could be undertaken on a cadaver rather than in a live operating environment. The visitors note that in doing so, a trainee could move from level 3a to level 4, bypassing any experience gained as a 1st or 2nd assistant, as indicated in the requirement for Level 3b. The visitors are not satisfied that such an arrangement ensures that clinical competence is achieved to the level required, before a trainee progresses to the next level of practice.

- Requirements for the breakdown of 'specific operations' between Levels 4 and 5: Similarly to the above, these levels are noted together within Table 1, but have different level descriptors, namely "can do" (level 4) and "can do / can manage complications" (level 5) in Table 2. From this, the visitors note that a trainee could complete only level 4 operations, and therefore are not satisfied that such an arrangement ensures that clinical competence is achieved to the level required.
- The statement in relation to Level 3b "acting as 1st or 2nd assistant": The visitors noted that from this descriptor, it might be that a trainee could undertake all practice at this level as a 2nd assistant. The visitors noted that at this level of practice, they would expect the trainees to act in a more significant capacity in

live operations. Again, the visitors are not satisfied that such an arrangement ensures that clinical competence is achieved to the level required.

- Discrepancy of the definition of ‘principal surgeon’: In table 2, the education provider notes ‘that the trainee acts as a principle surgeon for 90% of the case’. In table 3 (which provides “the minimum information to be recorded for each of the case included in [the candidate’s] surgical log”), they define a principle surgeon as ‘performing more than 50% of the procedure’. Therefore, the visitors are not satisfied with the clarity of the requirements to progress to clinical competence.

D.4 The education provider must maintain a thorough and effective system for approving and monitoring all practice placements.

Condition: The education provider must demonstrate what thorough and effective system is in place for approving and monitoring all placements.

Reason condition not met: To evidence how this condition is met, the education provider supplied one completed audit, along with an audit schedule which aimed to complete all audits before the programme’s intended start date of September 2019. When previously reviewing evidence provided for this standard, the visitors noted that “that the [audit] processes are sufficient however, they are yet to see evidence that the processes to approve and monitor practice placements have commenced to ensure there are sufficient placements.” However, on reviewing the completed audit, the visitors noted that the audit process itself was not being used as they understood it would be from previous evidence and discussions with the provider.

As such, the visitors conclude that this standard is not met for the following reasons:

Placement audit tool is insufficient

The visitors note that from reviewing the completed audit that was provided, the audit has not ensured that the placement meets the requirements of the programme.

Therefore, the visitors note that the process to audit placements is not a thorough and effective. Specifically, from the completed audit, the visitors noted:

- In the completed audit the visitors noted that the ‘specific operation’ numbers were above the minimum threshold required to be undertaken by each learner. However, as there is a range of complexity within each specific operation, from simple to more complex procedures, the visitors note that the audit tool does not identify the levels of complexity available at a specific site. As such, the visitors are not satisfied the audit tool gives the education provider the assurance needed to determine that the necessary range of specific operations of the required complexity are available in all centres.
- Whilst the minimum threshold of specific operations to be undertaken by each trainee are noted through the audit, the visitors believe that there is not much room for slippage within a given placement. The visitors considered that, in the case of sickness, or if more simple training cases were not available due to service demands, a trainee would be unable to progress as needed to achieve the level of proficiency required of them. Therefore, the visitors consider that the minimum thresholds for specific operations are not sufficient to ensure each site has the training capacity needed to support effective learning, as is the case for

the specific audit they reviewed. In reaching this conclusion, the visitors note they have not specifically raised these scenarios with the education provider to understand how the minimum thresholds might be managed.

- The clinical supervisor noted through the completed audit is a registrar. However, from previous discussions with the education provider and reviews of evidence submitted, they expected that trainees would be “supervised by appropriately qualified mentors/ supervisors led by a Consultant Podiatric Surgeon” (as detailed in the programme specification, section 14.5). From the audit, the visitors noted that the education provider has not ensured that a Consultant Podiatric Surgeon is in place to ‘lead’ a team of supervisors. In doing so, the audit process has not ensured the programme’s requirements for the supervision of trainees are met.
- There is only one supervisor listed, but from previous conversations and reviews of evidence, the visitors understood that there would be a team of supervisors (as noted in the bullet above) to ensure the required range of skills and training in a variety of techniques was available. The visitors also noted that
 - the availability and time spent with other specialities / professions is limited, and there is no specific information about the arrangements and agreements which have been reached in this area.
 - The ‘Specialist Area/s of Surgical Practice’ listed are limited to diabetes, general elective and ‘other high risk’. The visitors are unclear what is meant by ‘Other high risk’, and consider that these areas should be specified and consistent between different teaching centres.

These findings indicate to the visitors that the audit process does not ensure there is an appropriate range of experience and supervision at the site to support trainees effectively to meet the requirements of the programme.

- Some wording with the audit tool does not make sense, specifically the requirement under health and safety that “The placement has carried out a risk assessment of the kind activities in the environment that will be faced in the environment”. The visitors conclude it would be difficult for the audit tool to be utilised by programme and placement staff as it is difficult to understand what information is required to be gathered in relation to health and safety.
- There were missing dates and signatures on the completed audit provided. The visitors note, given the importance of this tool to the quality assurance of practice environments being utilised, that the education provider must ensure the audit is completed fully. The absence of key dates and signatures suggests both the education provider and the placement site have not engaged with the tool as effectively as required to ensure all parties are agreed as to the provision of learning experiences which meet the requirements of the programme.

E.7 Assessment regulations must clearly specify requirements for trainee progression and achievement within the programme.

Condition: The education provider must provide further evidence to demonstrate the requirements for trainee progression and achievement within the programme.

Reason condition not met: At the second visit, the visitors were told that trainees would “get an opportunity to suspend the training if it appears that they will not achieve the required hours”. In their previous reasoning, the visitors asked the provider to explain “what mechanism [trainees] would be re-introduced to the training at a later stage”. From reviewing the second conditions response, the visitors understood that if a trainee missed clinical placements, they would have to defer a year, or would be removed from the programme.

Considering this response, and linking to the outstanding issue relating to placement capacity for B.1, the visitors noted that there would be no scope for practice sites to supervise an extra trainee at short notice, and that there appears to have been no capacity within the system to support a trainee that fails their placement. Therefore, the visitors noted that any deferred trainees would not be able to undertake practice-based learning, with the limited number of placements available, meaning the mechanisms available to trainees to support additional practice learning, as detailed here are impractical.

Therefore, the visitors consider that this standard is not met.

E.10 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the Register.

Condition: The education provider must provide further evidence to demonstrate that the assessment regulations clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the HCPC Register.

Reason condition not met: In their response to this condition, the education provider noted that the external examiner must “Provide evidence of suitability in surgical practice to evaluate appropriately the candidates against the HCPC standards for podiatrists practising podiatric surgery” (criteria 2).

From the criteria, including the above, the visitors noted that the education provider will not ensure that the person appointed to this role has experience of working on the foot and ankle, and of musculoskeletal surgery. The visitors consider this experience necessary as the foot and the vagaries of bone surgery to the foot is different to all other types of surgery. As such they would expect that the position is filled by an individual with that specialism, to enable them to be able to properly assess and then oversee the assessment processes to ensure they are fit for purpose. In reaching this conclusion, the visitors note that they have previously stated that the individual appointed to this role should be an “orthopaedic foot and ankle surgeon (who is a member of a foot and ankle subspecialty association) or someone who is an HCPC annotated podiatrist practicing podiatric surgery” (section 6). They note, however, that the education provider has not been explicit in its requirements in this area in relation to the professional grouping of the individual to be appointed.

For the Masters programme, the visitors also note that a requirement for the Annotation is included in error specifically that the recruited external examiner will “support the appraisal of existing podiatric surgeons applying for HCPC annotation.” This is inaccurate for the Masters programme.

Therefore, the visitors consider that this standard is not met.

Appendix 1 – decision notice from the Education and Training Committee (ETC) meeting 11 September 2019

Education and Training Committee

Programmes previously recommended for approval subject to conditions where the visitors have recommended non-approval:

Programme name	Master of Podiatric Surgery
Education provider	University of Huddersfield
Mode of delivery	PT (Part time)
Assessment ref	APP01865
Date of decision	11 September 2019

Panel: Maureen Drake
Luke Jenkinson
Sonya Lam
Stephen Wordsworth (Chair)

Decision
That the programme, which was previously recommended for approval subject to conditions, should be approved, as the conditions have been met.
Reasons
<p>Visitors recommended that the programme was not approved, as they were not satisfied that several conditions were met. The Committee considered this recommendation, alongside observations from the education provider, and from the professional body (the College of Podiatry).</p> <p>1. Condition B.1- the Committee noted the visitors' position in relation to this condition not being met, as follows:</p> <ul style="list-style-type: none"> • Year on year workforce and training numbers are not aligned • There is insufficient progress to quality assure placements, including what would happen if an audit was failed <p>In considering this position, the Committee noted:</p> <ul style="list-style-type: none"> • The visitor's outstanding issues for this standard were not related to the original condition • The issue related to insufficient progress to quality assure placements would not sit under this standard, but would rather be linked to standards under standards area D

- Evidence provided by UoH corrected the misalignment of the workforce and training numbers

The Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

2. Condition B.10 - the Committee noted the visitors' position in relation to this condition not being met as follows:

- Admissions information was not appropriate to support engagement with the programme
- As membership of the professional body was not required, not all candidates would be able to log placement experience via the CoP owned PASCOS system

In considering these positions, the Committee noted:

- The visitor's outstanding issues were not related to the original condition
- In relation to the admissions information, the visitors had previously made a recommendation in this area, which would not require a provider response.
- UoH's comments that the candidates did not need to access the PASCOS system through the programme, but that it might be used to provide information and evidence around learning.

The Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

3. Condition D.2 - the Committee noted the visitors' position in relation to this condition not being met, as follows

- Insufficient assurance is gained through placement audits regarding the range and complexity within 'specific operations' available as practice experience
- There is a lack of clarity regarding the range of appropriate practice experiences required at each level of the programme

In considering the visitors' position, the Committee noted that

- The visitor's outstanding issues were not related to the original condition
- They did not consider that podiatric surgery required a higher level of assurance regarding the range and complexity of placements than other HCPC approved programmes
- That the information provided by UoH through the process had exceeded the level usually required to meet HCPC standards at a threshold level
- That the education provider and placement providers (with the processes in place to support learning) would be able to

manage placement experience for individuals to ensure they had access to the range of placements required to support their learning needs, and to sign off competencies

- There was an inconsistency with the visitors being content that standard E.1 had been met which relates to the assessment of competence
- In their observations, UoH had provided clarity around the specific points raised by the visitors relating to the range of appropriate practice experiences required at each level of the programme, and would update their documentation to reflect this.

With the above in mind, the Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

4. Condition D.4 - the Committee noted the visitors' position in relation to this condition not being met was that the placement audit tool does not allow for the judgement that practice based learning is of sufficient quality. In considering this position, the Committee noted:

- That the placement quality assurance arrangements in place were based upon the HEE Practice Placement Quality Assurance (PPQA) audit tool
- The information provided by UoH through the process had exceeded the level usually required to meet HCPC standards at a threshold level
- Under the wording of the standard, it is not necessary to see completed audits in order to approve programmes. Rather, this standard is about the process in place being reasonable to assess that the placement environment will meet the needs of learners.
- The HCPC annual monitoring process would receive information relating to the quality of practice-based learning in the future, and any issues with this could be picked up through this process.

The Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

5. Condition E.7 - the Committee noted the visitors' position in relation to this condition not being met was that there is no capacity in the system should a learner need to defer / delay their studies. In considering the visitors' position, the Committee noted:

- That trainees would be employees of a trust, and that there is no information to suggest that any deferral would not be appropriately managed by the education provider and the candidate's employer.

- It appeared that the visitors were setting more detailed requirements in this area than is reasonable for assessing whether the standard is met at a threshold level

Considering the above, and the information provided by UoH, that these situations would be reasonably managed on a case by case basis, the Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

6. Condition E.10 - As with the annotation programme the Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

The Committee decided that as there were no outstanding issues against the standards (for the reasons noted above), the UoH Master of Podiatric Surgery (Part time) was approved.

Signed:



Panel Chair