

HCPC approval process report

Education provider	University of Bedfordshire
Name of programme(s)	BSc (Hons) Occupational Therapy, Full time BSc (Hons) Physiotherapy, Full time
Approval visit date	06-07 May 2020
Case reference	CAS-15826-T2C1C5

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Executive Summary

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

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

Section 1: Our regulatory approach

Our standards

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

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

How we make our decisions

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

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

HCPC panel

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

Ian Hughes	Lay
Rebecca Khanna	Occupational therapist
Carol Rowe	Physiotherapist
John Archibald	HCPC executive

Other groups involved in the virtual approval visit

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

Paul Sant	Independent chair (supplied by the education provider)	University of Bedfordshire
Nathan Spencer	Secretary (supplied by the education provider)	University of Bedfordshire
Annie Danbury	Internal panel member	University of Bedfordshire
Sally Feaver	External panel member	Oxford Brookes University

Liz Grant	Quality and standards representative	University of Bedfordshire
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Section 2: Programme details

Programme name	BSc (Hons) Occupational Therapy
Mode of study	FT (Full time)
Profession	Occupational therapist
Proposed first intake	01 September 2020
Maximum learner cohort	Up to 15
Intakes per year	1
Assessment reference	APP02196

Programme name	BSc (Hons) Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed first intake	01 September 2020
Maximum learner cohort	Up to 15
Intakes per year	1
Assessment reference	APP02197

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

Section 3: Requirements to commence assessment

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

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	

Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	No	The programmes have not yet run.

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

Group	Met	Comments
Learners	Yes	We met with learners from the BSc (Hons) Operating Department Practice, BSc (Hons) Paramedic Science, BSc (Hons) Sports Therapy and BSc (Hons) Social Work programmes.
Service users and carers (and / or their representatives)	Not Required	
Facilities and resources	No	Questions related to facilities and resources were explored in other meetings.
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

Section 4: Outcome from first review

Recommendation of the visitors

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

Conditions

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 18 June 2020.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must provide further information confirming the maximum learner numbers for the initial intake of the programmes, and about how they will manage any possible risks to the delivery of the programmes and the learner experience.

Reason: From the documentation provided prior to the visit the visitors were made aware that each programme was looking to recruit a maximum of 15 learners. However, the visitors were also made aware of a reference to the programmes initially recruiting five learners each. In the meeting with the senior team the visitors were informed the programme initially intended on recruiting a maximum of 15 learners. However, the visitors had received memorandums of understanding related to practice-based learning to cover a maximum of five learners. The visitors were therefore unclear about the learner numbers being recruited to the programme initially.

Although the visitors were informed the education provider has experience of working with low numbers of learners, the visitors were unsure how the education provider would sustain the programmes with these low numbers of learners. They considered the overall learner experience and programme delivery while on the programme may be affected by these low learner numbers, as the diversity of experience in experiential and collaborative learning may be reduced, which in turn might affect the achievement of the learning outcomes. The visitors were unsure how the learner experience and programme delivery is going to be monitored and managed when working with a small-sized cohort.

The visitors therefore require further information confirming the maximum learner numbers, and about how the education provider will manage any possible risks to the delivery of the programme and the learner experience.

3.2 The programme must be effectively managed.

Condition: For the BSc (Hons) Occupational Therapy programme, the education provider needs to demonstrate how the programme management ensures the course coordinator can lead the programme effectively.

Reason: For the BSc (Hons) Occupational Therapy programme, the visitors were informed at the visit that the course coordinator had recently left. An appointment for their replacement had been made, and the new course coordinator was due to start in July, with the programme due to start two months after. The visitors considered it was unclear given the timescales involved, if there are structures in place which will support the new course coordinator so they are able to use their profession-specific expertise to effectively manage the start-up and initial delivery of the programme in the time available. The visitors therefore require further information about the programme management structure and arrangements with clear information about roles and responsibilities so the course coordinator is supported to lead the programme effectively.

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

Condition: The education provider must show how they will ensure all learners on the programme have access to practice-based learning to meet their learning needs.

Reason: To evidence this standard, the visitors received evidence of Memorandums of Understanding for the initial intake of five learners. However, in the meeting with the senior team the visitors were informed the programme initially intended on recruiting a maximum of 15 learners. The visitors were therefore unclear about the learner numbers being recruited to the programme initially. Although the visitors considered they had seen evidence the availability of practice-based learning for five learners, the visitors were unclear whether there was availability of practice-based learning for 15 learners.

At the visit, the visitors were also made aware of the proposed development of the programme, which included an increase in learner numbers. However, the visitors were unclear how the education provider considers plans for future learners.

The visitors therefore require further evidence of the process to ensure all learners on the programme have access to practice-based learning to meet their learning needs, and that this process considers both future and current learners plans for practice placements.

3.9 There must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

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

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

Condition: The education provider must demonstrate there are an appropriate number of staff who are able and equipped with the necessary knowledge and expertise to deliver the programmes effectively.

Reason: To meet these standards, the visitors were informed each programme has a course co-ordinator who leads the programme and who are HCPC-registered for the discipline they lead. The visitors were made aware the course co-ordinator is the sole member of each programme team who is HCPC-registered in that profession. The visitors were informed that academic staff from across the Faculty and hourly-paid lecturers will also contribute to the programme.

However, from the information provided and from discussions, the visitors were unclear what experience and knowledge was required of individuals in order for them to be suitable for recruitment as an hourly-paid lecturer, so they are suitable and well-equipped to take part in teaching and to support learning in the subject areas they are involved in.

The visitors therefore were also unsure whether there are an appropriate number of staff who are able and equipped to deliver the programme effectively, and that educators have the necessary knowledge and expertise to deliver their parts of the programme effectively.

The visitors require further documents to demonstrate there are an appropriate number of staff who are able and equipped to deliver the programme effectively, and that

educators have the necessary knowledge and expertise to deliver their parts of the programme effectively.

3.11 An effective programme must be in place to ensure the continuing professional and academic development of educators, appropriate to their role in the programme.

Condition: The education provider must show how they make sure sessional or visiting lecturers and practice educators, are able to develop and maintain their professional and academic skills, so they are able to deliver the programme effectively.

Reason: From the documentation provided prior to the visit, the visitors were made aware of a staff development plan in place to assure the development of staff in both research and teaching. The visitors were made aware this applies to staff at the education provider. However the visitors were unclear how the education provider makes sure that those educators who are not permanently employed, but who are sessional or visiting lecturers and practice educators, are able to continue to develop and maintain their professional and academic skills so they are able to deliver the programme effectively. The visitors therefore require further information about how the education provider makes sure that those educators who are sessional or visiting lecturers and practice educators, are able to continue to develop and maintain their professional and academic skills so they are able to deliver the programme effectively.

3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.

Condition: The education provider must show that programme-specific resources are available and accessible to all learners and educators (in all settings) to support the breadth the learning and teaching requirements of the programme.

Reason: Prior to the visit, the visitors were informed there were a variety of resources to support learning in place including 'BREQ' the education provider's virtual learning environment (VLE), a personal academic tutoring scheme, additional learning support from 'StudyHub', learning resources and dedicated specialist learning spaces.

The visitors were also made aware of a list of budgeted equipment for the programmes and also received a virtual tour presentation detailing planned development. However, the visitors were unclear which resources were going to be used by learners on each specific programme. The visitors were also unclear when the development will be ready, and the time it will be available to learners of each programme, both within the programme cohort and as part of any larger groups.

In the meeting with the programme team, the visitors were made aware that only practice educators with an honorary contract would have access to the education provider's library. The visitors were further informed that a practice educator would have to ask for an honorary contract, as this was not automatic, and that the education provider was unsure if practice educators were aware of this. The visitors considered access to the library resources to be vital for practice educators in non-NHS settings. Practice educators in NHS settings would have access to NHS library resources but those in non-NHS settings may not have access to the materials used by on the programme.

The visitors therefore need to see further evidence:

- of the resources which are going to be used by learners on each specific programme;
- when the development will be ready, and the time it will be available to learners of each programme, both within the programme cohort and as part of any larger groups; and
- that programme resources are readily available to educators in non-NHS settings to support the required learning and teaching activities of the programme.

5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

Condition: The education provider must provide further information about the range and structure of practice-based learning, including how they support the design, content and learning outcomes of the programme.

Reason: From the information provided, the visitors were informed a range of practice-based learning had been identified within the NHS primary and tertiary care settings and the private, voluntary and independent sector. With reference to occupational therapy, the visitors were made aware of one forensic placement. However, they were unable to see where practice-based learning specifically within other mental health settings, and where placements within private, independent or third sector settings would take place. With reference to physiotherapy, the visitors were unable to see any mental health placements. The visitors considered experience of these areas to be essential for both programmes as they reflect the nature of modern practice and the different settings that physiotherapists and occupational therapists would be expected to have experience in at the point of registration.

Therefore, the visitors were not satisfied that the range of practice-based learning settings was sufficient to ensure learners are able to meet the learning outcomes of the programme. The visitors would like further information about the range of practice-based learning, with reference to how learners progress during practice-based learning, in relation to the SOPs and the learning outcomes.

The visitors were also unclear how the part-time structure of practice-based learning has been agreed, and will work in practice. The visitors considered there are implications related to timetabling for employers, the education provider and learners. The visitors would like further information about the rationale for this structure, information about the decisions relating to this and how they related to the design and content of the programme and the learning outcomes.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

Condition: The education provider needs to provide further evidence that there is sufficient and suitable support for learners to take part in safe and effective practice-based learning.

Reason: The visitors were informed that the number of practice educators are discussed at each Quality Education Practice Learning meeting and is a feature of the educational audit. The visitors were also made aware that the education provider also

supports learners through the provision of link lecturers. However, the visitors did not see evidence of the settings the range of practice-based learning would take place in, and so could not determine whether the qualifications and experience of staff is appropriate to the specific aspects of practice-based learning they are involved in. The visitors were therefore unsure how the education provider will ensure there are enough staff across the range of practice-based learning who are going to be appropriately qualified and experienced. The visitors need further evidence that there is sufficient and suitable staff for learners to take part in safe and effective practice-based learning.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

Condition: The education provider must show how they ensure practice educators in non-NHS roles have the necessary knowledge, skills and experience to support safe and effective practice-based learning in relation to the programme's learning outcomes, and that all learners would not be assessed by practice educators without HCPC registration.

Reason: To evidence this standard, the visitors were informed the education provider will deliver a Practice Educator preparation day and will provide a range of other online resources to support Practice Educators. The visitors were comfortable with how the education provider makes sure practice educators from NHS settings are suitable in terms of their knowledge, skills and experience in order to support and develop learners in a safe and effective way, and that this was appropriate. However, the visitors were unsure of the education provider's rationale that the content of the preparation day is inclusive of practice educators from the non-statutory sector, in order to support learners in a safe, effective and equitable way. The visitors were unclear what process is in place to make sure the skills, experience and knowledge of those practice educators in non-NHS settings is appropriate.

In addition to the above, the visitors received a statement informing them that learners would not be assessed by non-HCPC registered practice educators, in both NHS and non-NHS settings. However, the visitors had not seen formal evidence of a policy related to this. The visitors would also need to see documentary evidence of the formal policy in relation to this.

The visitors therefore consider they need further information:

- about how the education provider ensures practice educators in non-NHS roles have the necessary knowledge, skills and experience to be able to support safe and effective practice-based learning in relation to the learning outcomes of the programme; and
- formally confirming the education provider's approach to the role of non-HCPC registered staff not being involved in learner assessment.

5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

Condition: The education provider must provide further evidence of how they ensure they train all practice educators and that this is followed up with regular refresher training and support.

Reason: To meet this standard, the visitors were informed practice educators will be provided with updates and online resources. They will also be able to attend Practice Experience Group meetings to be informed of curriculum developments and or consulted on changes to school or university policy. In the meeting with the programme team, the visitors were informed both those new to the role and those who had experience of the role would both be offered a training day. However, the visitors had not seen evidence of the topics covered in these days, and were unclear whether it would be training appropriate to learners' needs and the delivery of the programme, or if it was an induction to the role. The visitors therefore consider they need further information that practice educators are appropriately prepared so they can support learning and assess learners effectively.

Section 5: Visitors' recommendation

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

This report, including the recommendation of the visitors, will be considered at the 20 August 2020 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).