

HCPC approval process report

Education provider	St Mary's University, Twickenham
Name of programme(s)	BSc (Hons) Physiotherapy, Full time
Approval visit date	29 April 2020
Case reference	CAS-15817-Q8Z3T6

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Executive Summary

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

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

Section 1: Our regulatory approach

Our standards

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

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

How we make our decisions

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

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

HCPC panel

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

Anthony Power	Physiotherapist
Jo Jackson	Physiotherapist
Temilolu Odunaike	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.

Iain Cross	Independent chair (supplied by the education provider)	St Mary's University, Twickenham
Mandhir Gill	Secretary (supplied by the education provider)	St Mary's University, Twickenham
Nina Paterson	Professional body representative	Chartered Society of Physiotherapy (CSP)
Heather Stewart	Professional body representative	Chartered Society of Physiotherapy (CSP)

Section 2: Programme details

Programme name	BSc (Hons) Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed First intake	01 September 2020
Maximum learner cohort	Up to 40
Intakes per year	1
Assessment reference	APP02194

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

Section 3: Requirements to commence assessment

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

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

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

Group	Met	Comments
Learners	No	As this was a virtual visit and, given the current situation around the Covid-19 pandemic, we decided that it was unnecessary to meet with this group
Service users and carers (and / or their representatives)	No	As above
Facilities and resources	No	As above
Senior staff	Yes	
Practice educators	No	Practice educators were unable to attend this visit as they were needed as frontline workers in the current Covid-19 pandemic. Questions were sent to representatives after the visit.
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 08 July 2020.

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

Condition: The education provider must ensure that appropriate information about the programme is provided to potential applicants, both within the programme documentation and on the education provider's website, to allow them to make an informed decision about taking up a place on the programme.

Reason: The visitors noted from the programme documentation and, discussions with the programme team, that information about what was required of applicants before

they could take up a place on the programme was not clearly contained in the information provided to applicants. This includes information such as:

- their requirement around the enhanced criminal conviction check;
- their requirement around the occupational health check; and
- the potential cost to learners.

At the visit, the programme team told the visitors that their current process involves sending applicants information about the cost, such as costs of criminal conviction and occupational health checks and the other areas listed above, upon request. They also stated that potential applicants would have the opportunity to ask members of staff questions one-on-one on open days. However, the programme team agreed that neither the documentation nor the website had been fully updated to provide the necessary information that would assist potential applicants in their decision making to take up an offer of a place on the programme. As such, the visitors were unclear about how potential applicants would obtain the information they require to decide on taking up a place on the programme. The visitors considered that the information should be readily available to applicants before they apply and without them having to request it. The visitors therefore require the education provider to demonstrate how they will ensure applicants are aware of the requirements for admission to the programme. This includes information on criminal conviction and health checks and associated costs, as well as other costs associated with the programme. The visitors would expect to see this information both within the programme documentation and on the education provider's website.

2.4 The admissions process must assess the suitability of applicants, including criminal conviction checks.

2.5 The admissions process must ensure that applicants are aware of and comply with any health requirements.

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 how the admissions process assesses the suitability of applicants, including criminal conviction checks and ensures they are aware of and comply with any health requirements.

Reason: From the information provided in the documentation and from discussions at the visit, the visitors were clear that all learners must undergo a Disclosure and Barring Service (DBS) check as part of the admissions process to the programme. The visitors also saw in the documentation, particularly within the programme specification, information on health requirements that applicants must comply with to gain entry to the programme. However, the visitors noted that there was minimal information available on the website regarding DBS checks and health requirements. At the visit, the programme team told the visitors that the website had not yet been updated to provide details of how they will assess applicants' suitability, including criminal record checks and information on health requirements.

As the programme specification is not made available to applicants prior to applying, the visitors could not determine how applicants would know the health requirements and the process they need to engage in to determine whether they comply with these, prior

to applying. The visitors also could not ascertain how applicants will access information regarding DBS checks before applying onto the programme. For instance, they were unable to determine how or whether the practice based learning providers are involved in the decision-making process and who makes the final decision about accepting an applicant onto the programme should a health or DBS issue arise. The visitors noted that such information was not provided within the documentation or on the education provider's website. As such, the visitors require clear and specific information about the process for DBS checks at the point of admission as well as information on health requirements that applicants will need to comply with before they can be admitted onto the programme, and how they ensure applicants are aware of those requirements.

3.3 The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.

Condition: The education provider must demonstrate they have an effective process in place to ensure that the person holding overall professional responsibility for the programme is appropriately qualified, experienced and from the relevant part of the HCPC Register, unless other arrangements are appropriate.

Reason: The visitors were referred to a list of the academic staff as well as their curriculum vitae (CVs) as evidence for this standard. The visitors noted that the individual appointed to have overall professional responsibility for the programme is appropriately qualified and experienced in managing teams, as well as being on the relevant part of the HCPC Register.

However, they noted that there was no clear process in place to identify and secure a suitable person for this role if it becomes necessary to do so in the future. The senior team informed the visitors that, the current programme director was appointed because of his 'expertise' and that they are looking to appoint a deputy programme director to assist in the leadership of the programme. However, they did not provide any evidence that articulates the requirements for fulfilling this role, or the appointment process for the role.

As such, the visitors could not determine how the education provider would ensure that any person hired for the role, would be appropriately qualified, experienced and unless other arrangements are appropriate, on the relevant part of the HCPC Register. The visitors therefore require further evidence that demonstrates the process in place to appoint an individual to the role. In this way, the visitors can determine whether the process is effective and subsequently determine whether this standard is met.

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

Condition: The education provider must demonstrate that there is regular and effective collaboration with practice education providers.

Reason: In their mapping document, the education provider referred to the placement practice handbook, which provides a narrative of responsibilities of the education provider and practice education providers relating to collaboration for this programme. From this, the visitors were unable to determine evidence of when and how regular and

effective collaboration was being undertaken. From the programme team, the visitors received verbal reassurances that they collaborate with the different providers but they were unable to determine the nature or extent of this collaboration.

The visitors did not meet with practice educators at the visit, however, the visitors were able to send relevant questions to them following the visit, which they responded to. In their response, the majority of the practice educators informed the visitors that they do not have regular collaboration with the education provider. However, a third of those that responded said they have met with a member the programme team at least on one occasion. They also said they would be keen to set up and have regular meetings with the education provider to ensure they can best support learners. The visitors could see some level of commitment from the practice education providers to work in partnership with the education provider to support learners in practice-based learning, thereby ensuring effective delivery of the programme. However, they considered that the information received did not provide sufficient evidence to demonstrate there is a partnership and ongoing relationship between the education provider and the practice education providers. The visitors could not be assured that there has been and/or, that there will, be regular and effective collaboration between the education provider and the practice education providers to ensure the ongoing quality and effectiveness of the programme. They therefore require the education provider to demonstrate how they will ensure regular and effective collaboration with practice education providers before they can determine whether this standard is met.

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

Condition: The education provider must demonstrate that there is an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Reason: From their review of the programme documentation, the visitors were unable to see a timetable of the practice-based learning schedule. The visitors noted that the placement handbook provided a “placement provision (sample)” and a “placement tracker”. However, there was no information to show any agreement or commitment that placement provision had been made.

At the visit, the programme team mentioned that they have secured some practice-based learning through the Placement Management Partnership (PMP) - a well-established system that manages practice-based learning for education providers in London, but they also made it clear that they anticipated sourcing many of the additional placements outside of the PMP. They explained that about 50% of practice-based learning would be provided by their in-house clinic and other local private clinics and hospitals. Although the team provided verbal reassurances that they would be able to secure the required practice-based learning capacity for all learners, prior to the commencement of the programme, there was no clear evidence provided to demonstrate how this will be achieved.

In their responses to the visitors’ questions, two of the practice educators stated that they have capacity for practice-based learning, highlighting the number of placements available. Others acknowledged that they have minimal placement opportunities or that they are unsure of what they can offer. Whilst the visitors could see a level of commitment from the practice educators to cooperate with the education provider in the

provision and supervision of practice-based learning, they considered that there was no evidence provided to demonstrate how the education provider will ensure availability and capacity of practice-based learning for all learners.

As such, the visitors could not determine that this standard was met and therefore request that the education provider demonstrates the effective process in place to ensure the availability and capacity of practice-based learning for all learners.

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

Condition: The education provider must demonstrate how they will involve service users and carers in the delivery of the programme.

Reason: From the information provided in the documentary submission, the visitors noted that there were some form of service users and carers' involvement in the development of the programme. The visitors were provided with a survey from a stakeholder meeting held in February 2020 as evidence of how the education provider involves service users and carers in the programme. The visitors noted that the survey asked questions about the service users' thoughts on the programme. However, there was no explicit information provided anywhere within the documentation on how they would be involved in the programme. At the visit, the programme team informed the visitors that service users regularly take part in teaching and learning activities, as well as assessment. They also spoke about a suggestion for a café for the carers whilst their patients are with the learners. The visitors could see that that the education provider involved service users and carers in the development of the programme and is looking into different ways to involve them in the programme delivery. However, they could not see a formalised strategy of what their involvement would entail. The visitors were unable to determine:

- the process in place to plan, monitor and evaluate service user and carer involvement;
- how their involvement takes/will take place;
- how their involvement is appropriate; and
- how their involvement will contribute to governing and continuously improving the programme.

The visitors therefore require the education provider to provide further evidence demonstrating how service users and carers will be involved in the delivery of the programme.

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

Condition: The education provider must demonstrate how they ensure learners are aware of the process in place to support and enable them to raise concerns about the safety and wellbeing of service users and ensure that the process is readily accessible and clear to learners.

Reason: On review of the documentation, the visitors noted that the education provider referenced the 'Safeguarding Policy' in their mapping document to evidence this standard. The visitors noted that the policy itself provides information on how learners would recognise situations where service users may be at risk and supported them in raising concerns. However, the visitors noted that there was no information about this in the placement handbook, to which learners may refer should they have any issue or

concern in regard to service user safety and wellbeing in practice-based learning environment. The visitors saw no information in the handbook to demonstrate how learners are made aware of what they need to do when they believe the safety or wellbeing of service users is at risk. At the visit, the programme team acknowledged that the documentation submitted did not provide clear guidance on how learners will raise concerns in practice, should they feel that the safety or wellbeing of service users is being compromised and they committed to update the handbook with the appropriate guidance.

As the relevant information is not included in the placement handbook, the visitors were unclear how learners would know how or where to find this information easily. Therefore, in order for the visitors to make a judgement about whether this standard is met, the education provider must demonstrate how they will ensure that learners are made aware of the process in place to support and enable them to raise concerns about the safety and wellbeing of service users.

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

Condition: The education provider must demonstrate how the learning outcomes (LOs) of the modules ensure that those who successfully complete the programme meet the standards of proficiency (SOPs) for physiotherapists.

Reason: The documentation provided prior to the visit included module descriptors, together with a mapping document, giving information about how learners who successfully complete the programme will meet the SOPs. From reviewing the module descriptors, the visitors noted that they could not identify where some of the SOPs within the curriculum for physiotherapists were covered. In particular, the visitors noted that the coverage within the curriculum related to SOPs 13 and 14 was minimal or absent. The visitors noted that there was insufficient detail for them to be confident that the following SOPs are covered:

- 9.3 understand the need to engage service users and carers in planning and evaluating diagnostics, and therapeutic interventions to meet their needs and goals
- 13.1 recognise the role of other professions in health and social care
- 13.4 understand the structure and function of the human body, together with knowledge of health, disease, disorder and dysfunction, relevant to their profession
- 13.5 understand the theoretical basis of, and the variety of approaches to, assessment and intervention
- 13.6 understand the following aspects of biological science:
 - normal human anatomy and physiology, including the dynamic relationships of human structure and function as related to the neuromuscular, musculoskeletal, cardio-vascular and respiratory systems
 - patterns of human growth and development across the lifespan
 - factors influencing individual variations in human ability and health status
 - how the application of physiotherapy can cause physiological and structural change
- 13.7 understand the following aspects of physical science:

- the principles and theories from physics, biomechanics, applied exercise science and ergonomics that can be applied to physiotherapy
- the means by which the physical sciences can inform the understanding and analysis of movement and function
- the principles and application of measurement techniques based on biomechanics or electrophysiology
- the application of anthropometric and ergonomic principles
- 13.8 understand the following aspects of clinical science:
 - pathological changes and related clinical features commonly encountered in physiotherapy practice
 - physiological, structural, behavioural and functional changes that can result from physiotherapy intervention and disease progression
 - the specific contribution that physiotherapy can potentially make to enhancing individuals' functional ability, together with the evidence base for this
 - the different concepts and approaches that inform the development of physiotherapy intervention
- 13.9 understand the following aspects of behavioural science:
 - psychological, social and cultural factors that influence an individual in health and illness, including their responses to the management of their health status and related physiotherapy interventions
 - how psychology, sociology and cultural diversity inform an understanding of health, illness and health care in the context of physiotherapy and the incorporation of this knowledge into physiotherapy practice
 - theories of communication relevant to effective interaction with service users, carers, colleagues, managers and other health and social care professionals
 - theories of team working
- 14.2 be able to deliver and evaluate physiotherapy programmes
- 14.13 recognise the need to discuss, and be able to explain the rationale for, the use of physiotherapy interventions
- 14.15 be able to conduct appropriate diagnostic or monitoring procedures, interventions, therapy, or other actions safely and effectively
- 14.16 be able to select, plan, implement and manage physiotherapy interventions aimed at the facilitation and restoration of movement and function
- 14.18 be able to select and apply safe and effective physiotherapy-specific practice skills including manual therapy, exercise and movement, electrotherapeutic modalities and kindred approaches

For example, the visitors noted:

- that in PHP4003 - Introduction to Management of Musculoskeletal and Neurological Conditions, electrotherapy is mentioned in the LOs (which relate to SOP 13.7) but not in the content
- that PHP4001 - Anatomy I and Neuromusculoskeletal Assessment – Upper Quadrant, intends to address learning about injuries, but it was difficult to understand how the proposed content linked to the learning outcomes (in particular LOs III, VI & VII) as these LOs did not relate to injuries.
- that there was no mention of dementia within the module content, which the visitors would expect to address SOPs 13.4, 13.6, 13.9 amongst other SOPs
- that they were unclear how SOP 9.3 will be delivered, given the lack of service users' involvement throughout the programme.

As the visitors could not be certain that the LOs will deliver all of the SOPs, they therefore require the education provider to submit further evidence, such as the revised module descriptors and mapping document, to clearly define the link between the learning outcomes associated with all aspects of the programme. The information provided must demonstrate how the learning outcomes will ensure that those who successfully complete the programme meet the standards of proficiency (SOPs) for physiotherapists.

4.3 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 that the programme reflects the philosophy, core values, skills and knowledge base articulated in any relevant curriculum guidance.

Reason: The visitors reviewed the standards of proficiency (SOPs) mapping, the programme specification and the programme handbook. They also discussed with the programme team how the programme was intended to reflect the expectations and guidance for physiotherapy learners. The visitors noted that the philosophy was articulated by the programme team but this was not reflected in the programme documentation. The visitors considered that the curriculum presented in the documentation adopts a medical view of health with little reflection of the wider communities with whom physiotherapists work with, particularly in relation to mental health, learning disabilities and older people.

Therefore, the visitors considered that the education provider would need to clearly articulate within the programme handbook, evidence of how the philosophy, core values, skill and knowledge base will be reflected in the curriculum.

4.4 The curriculum must remain relevant to current practice.

Condition: The programme team must demonstrate how they will ensure that the curriculum will remain relevant to current practice.

Reason: From their review of the module descriptors and through discussions at the visit, the visitors noted that the programme has minimal inclusion of mental health and other areas of relevance to contemporary physiotherapy practice. For instance, the visitors noted that there was no mention of dementia, occupational health, primary care, health promotion, fitness for work or learning disabilities which are all required to work across the population. Although public health is mentioned frequently, it remains unclear to the visitors how this is reflected in learning as there was little or no mention of the specifics - for instance, dementia or learning disabilities – in any of the modules. During the visit, the programme team informed the visitors that they are starting to introduce non-traditional aspects of the programme such as women's health and mental health into the programme. However, the visitors considered that they would need to see how these are clearly articulated in the module descriptors before they can determine whether this standard is met. As such, the visitors require the education provider to submit evidence demonstrating how they will ensure that the curriculum remains relevant to current practice.

4.5 Integration of theory and practice must be central to the programme.

Condition: The education provider must further articulate the structure of theory and practice learning to ensure learners are prepared and competent for practice.

Reason: Through the documentary review and discussions with the programme team, the visitors learnt that the education provider intended to deliver teaching in the first year, using case studies and clinical procedures. This would provide learners with sufficient knowledge to attend practice-based learning in their second year. However, the programme team mentioned the possibility of moving some of the modules in order to ensure that learners have built up knowledge sufficient for them to go into practice-based learning in their second year. The visitors understood that moving the modules might allow learners to consolidate learning and be better prepared for practice-based learning, however, they were unclear how the integration would work as this had not yet been clearly articulated in the programme documentation. The visitors considered that they would need to see the revised structure that shows how theory and practice are combined. This, they said would assure them that theory and practice are linked appropriately in a way that is relevant and meaningful to learners and that they will take place at appropriate times during the programme to make sure it is effective. The education provider must therefore articulate the structure of theory and practice learning and how the programme is designed to support it and ensure learners are prepared and competent for practice.

4.6 The learning and teaching methods used must be appropriate to the effective delivery of the learning outcomes.

Condition: The education provider must provide further evidence to demonstrate that the learning and teaching methods used, particularly as regards the proposed numbers of practical hours, are appropriate to the effective delivery of the learning outcomes.

Reason: Through the documentary review, the visitors understood that the learners will undertake taught elements of the programme in their first year, while in the second and third year, there will be a combination of taught and clinical placements. The visitors also noted that the education provider intends to combine the use of online materials and resources with intensive teaching weeks onsite. The face-to-face contact time will maximise the learning of clinical skills and involve seminars and group workshops. However, at the visit, the visitors heard that learners would also undertake 20 practical hours per week in some of the practice modules. The visitors were unclear how learners would be able to complete all the content identified within the proposed number of practical hours to gain the practical skills required for them to achieve the learning outcomes. As such, the visitors could not determine how the education provider will ensure that the proposed hours within modules would allow effective delivery of the learning outcomes. They therefore require further evidence of how they will ensure their method of delivering such modules, including the number of practical hours, will support learners in achieving the learning outcomes.

4.9 The programme must ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Condition: The education provider must articulate their strategy for ensuring that learners are able to learn with, and from professionals and learners, in other relevant professions.

Reason: The visitors reviewed the evidence submitted for this standard, which includes module descriptors across all levels of the programme. From the information provided, the visitors were unable to determine how learners will be able to learn with, and from professionals and learners in other relevant professions as there was no clear strategy of how inter-professional education (IPE) is incorporated into the programme.

In discussions with the programme team, the visitors heard that there will be opportunities for professionals such as nurses, social workers and speech and language therapists to come and talk to the learners before they go on to practice-based learning. The team also told the visitors that IPE is currently being delivered to learners on the MSc physiotherapy programme as dietetic staff deliver teaching on the nutrition aspect of the programme. However, they acknowledged that they have not considered IPE in a formal way but were constantly trying to incorporate it into their existing physiotherapy programme. The visitors were therefore unclear about how the education provider will ensure that learners are able to learn with, and from professionals and learners from other relevant professions. The visitors require the education provider to further articulate their strategy for inter-professional learning to ensure that learners will be able to learn with, and from professionals and learners in other relevant professions.

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 demonstrate how the structure, and range of practice-based learning will support the achievement of the learning outcomes and standards of proficiency for physiotherapists.

Reason: The visitors were able to review documentation relating to practice-based learning, including the placement handbook, programme specification and module descriptors. From their review, the visitors saw a timetable that showed learners will have weekly blocks of practice-based learning in their second and third year. However, there was no detailed information provided about the structure and range of practice-based learning or how it will support the achievement of the learning outcomes and the SOPs. At the visit, the visitors heard that some practice-based learning would take place outside of the Placement Management Partnership (PMP). The programme team confirmed to the visitors that they anticipate up to 50% of practice-based learning would be provided through their in-house clinic and other local private clinics and hospitals. However, the visitors noted that there was no information provided about structure, and range of this practice-based learning either or how they are deemed to be appropriate to the design and content of the programme and the learning outcomes. The team also confirmed that details of the range of practice-based learning are yet to be finalised. As the visitors did not see details of what learners will be learning whilst on placement, they were unable to determine how the structure, and range of practice-based both within and outside of the PMP would support the achievement of the learning outcomes and the SOPs. They therefore request that the education provider provide further evidence showing the structure and range of practice-based learning in both PMP and non-PMP sites and how it supports the achievement of the learning outcomes and SOPs for physiotherapists. In this way, the visitors can determine whether this standard is met.

5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

5.4 Practice-based learning must take place in an environment that is safe and supportive for learners and service users.

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

Condition: The education provider must demonstrate that they have a thorough and effective system in place for ensuring the quality of the non-PMP practice-based learning and for ensuring the environment is safe and supportive for learners and service users.

Reason: From their review of the documentation and from discussions at the visit, the visitors understood that there is an audit process in place for ensuring quality in practice-based learning provided through the PMP and that there were policies in place to ensure that the environment is safe and supportive for both learners and service users. However, at the visit, it was clear that the programme team anticipated sourcing additional practice-based learning outside of the PMP. Through correspondence received from practice educators following the visit, the visitors were made aware that the quality of practice-based learning within existing the PMP settings was ensured through feedback from learners and the education provider. As such, the visitors were satisfied that there is a thorough and effective system in place for ensuring the quality of practice-based learning provided through PMP settings. The visitors however noted that there was lack of clarity around how the audit system will work in the non-PMP practice-based learning sites. The visitors were unclear if the education provider will run a separate system to monitor the quality and ensure the safety and supportiveness of the environment of practice-based learning in these types of settings. As the education provider has the overall responsibility for overseeing all practice-based learning for the programme, the visitors therefore request that the education provider submit further evidence showing that they have a thorough and effective system in place for approving and monitoring non-PMP practice-based learning. The evidence provided must also demonstrate their mechanism for ensuring that non-PMP practice-based learning environment would also be safe and supportive for all learners and service users.

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

Condition: The education provider must ensure that there is an adequate number of appropriately qualified and experienced staff involved in all practice-based learning settings.

Reason: The visitors reviewed the evidence provided for this standard, including the practice placement handbook. The visitors noted that there was minimal information provided about additional practice-based learning capacity and associated staff needed in all practice-based learning setting. Although a small number of the practice educators, in their response to the visitors' questions following the visit, highlighted the numbers of practice educators available to deliver practice-based learning, the visitors considered that the responses appeared to be from practice-based learning provided through the PMP only. The visitors saw no information about the number of staff in non-PMP settings and as such, they could not base their judgement on the PMP numbers alone. They considered that they would need to see further evidence showing how the education provider will ensure there is sufficient support for all learners on the

programme before they can determine whether the standard is met. Therefore, the education provider must submit further evidence that demonstrates how they will ensure the programme is adequately staffed with appropriately qualified and experienced staff in all practice-based learning settings.

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 demonstrating how they ensure practice educators outside of the PMP, undertake regular training required to support learning and for the delivery of the learning outcomes of the programme.

Reason: From their documentary review, discussions at the visit and through correspondence received from practice educators, the visitors were satisfied that the education provider would provide appropriate support and training to practice educators within the PMP. However, for practice educators sourced outside of the PMP, the visitors were unclear if the same applied to them, as this was not made clear within the documentation nor through discussions at the visit. At the visit, the visitors learnt that the programme team holds training and support days to encourage continuing professional development (CPD) between practice educators and the teaching staff.

Also, through correspondence received from practice educators within the PMP setting, the visitors were informed that the education provider regularly offers one-day training course to this set of practice educators. The practice educators also told the visitors that they regularly receive support from the education provider and that there is close communication between themselves and the education provider. Whilst the visitors could see that the education provider provides regular training to practice educators within the PMP arrangements, it is unclear how this will be provided for practice educators sourced outside of the PMP. As such, the visitors require the education provider to demonstrate how they will ensure that practice educators sourced outside of the PMP, also undertake the appropriate and regular training they need to be able to support learning and for the delivery of the learning outcomes of the programme.

6.1 The assessment strategy and design must ensure that those who successfully complete the programme meet the standards of proficiency for the relevant part of the Register.

6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.

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

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 the following:

- how the assessment strategy and design would ensure that those who successfully complete the programme meet the SOPs for physiotherapists

- how the assessments provide an objective, fair and reliable measure of learners' progression and achievement; and
- how they ensure the assessment methods employed are appropriate to, and effective at, measuring the learning outcomes.

Reason: The visitors reviewed the evidence for these standards, including the module descriptors and the programme specification. The visitors noted that the evidence provided showed how the HCPC standards of proficiency (SOPs) and learning outcomes have been mapped to the relevant modules. Given the reasoning identified for SET 4.1 above, the visitors were unable to determine how the education provider would ensure that the assessments for those LOs listed would provide objective, fair and reliable measure of learners' progression and achievement. For similar reasons, they were unable to identify where some of the SOPs within the curriculum for physiotherapists were covered. The SOPs which the visitors were unable to identify in sufficient detail were:

- 9.3 understand the need to engage service users and carers in planning and evaluating diagnostics, and therapeutic interventions to meet their needs and goals
- 13.1 recognise the role of other professions in health and social care
- 13.4 understand the structure and function of the human body, together with knowledge of health, disease, disorder and dysfunction, relevant to their profession
- 13.5 understand the theoretical basis of, and the variety of approaches to, assessment and intervention
- 13.6 understand the following aspects of biological science:
 - normal human anatomy and physiology, including the dynamic relationships of human structure and function as related to the neuromuscular, musculoskeletal, cardio-vascular and respiratory systems
 - patterns of human growth and development across the lifespan
 - factors influencing individual variations in human ability and health status
 - how the application of physiotherapy can cause physiological and structural change
- 13.7 understand the following aspects of physical science:
 - the principles and theories from physics, biomechanics, applied exercise science and ergonomics that can be applied to physiotherapy
 - the means by which the physical sciences can inform the understanding and analysis of movement and function
 - the principles and application of measurement techniques based on biomechanics or electrophysiology
 - the application of anthropometric and ergonomic principles
- 13.8 understand the following aspects of clinical science:
 - pathological changes and related clinical features commonly encountered in physiotherapy practice
 - physiological, structural, behavioural and functional changes that can result from physiotherapy intervention and disease progression
 - the specific contribution that physiotherapy can potentially make to enhancing individuals' functional ability, together with the evidence base for this

- the different concepts and approaches that inform the development of physiotherapy intervention
- 13.9 understand the following aspects of behavioural science:
 - psychological, social and cultural factors that influence an individual in health and illness, including their responses to the management of their health status and related physiotherapy interventions
 - how psychology, sociology and cultural diversity inform an understanding of health, illness and health care in the context of physiotherapy and the incorporation of this knowledge into physiotherapy practice
 - theories of communication relevant to effective interaction with service users, carers, colleagues, managers and other health and social care professionals
 - theories of team working
- 14.2 be able to deliver and evaluate physiotherapy programmes
- 14.13 recognise the need to discuss, and be able to explain the rationale for, the use of physiotherapy interventions
- 14.15 be able to conduct appropriate diagnostic or monitoring procedures, interventions, therapy, or other actions safely and effectively
- 14.16 be able to select, plan, implement and manage physiotherapy interventions aimed at the facilitation and restoration of movement and function
- 14.18 be able to select and apply safe and effective physiotherapy-specific practice skills including manual therapy, exercise and movement, electrotherapeutic modalities and kindred approaches.

For example in PH4005, the visitors noted that there were nine learning outcomes all of which appear to be broad. The visitors noted that the type of assessment methods identified made it difficult to envisage how the three learning outcomes listed below would be measured as the education provider did not provide information on the actual tasks that the assessment consists of:

- LO4: Actively reflect on and lead change within their practice as needed to take account of new developments
- LO5: Demonstrate critical awareness of the need to manage their own workload and resources effectively in accordance to HCPC and CSP standards and keep up to date.
- LO9: Understand the concept of confidentiality and the principles of information governance within health and social care.

Relating to this example:

- The visitors saw that the written task (application of theory to a case study) is designed to develop learners' ability to produce an academic piece of work in a critical and succinct manner that is required at entry BSc level while also demonstrating practical application of theoretical content. However, they were unable to determine exactly what the written task was.
- The visitors noted that the poster and oral presentation will be a mini-snapshot of the written portfolio at mid-way to give the learners an opportunity for practice of professional presentation skills as well as progression of their final portfolio. Learners will be expected to answer questions on their poster to demonstrate understanding of professional practice in healthcare based on clinical application of theory. The visitors were unclear what learners would be asked to demonstrate on their poster as this information was not provided.

The above detail is provided to illustrate the shortfall in the education provider's evidence in relation to these standards. In addition to PH4005, the visitors also identified lack of clarity around the following modules:

- PHP4001, PH4003 and PH4004 – minimal practical skills teaching hours with ambitious learning outcomes and it was difficult to see how all LOs will be assessed by the proposed assessments;
- PHP4002 – unclear how the achievement of LOs V, VII and VIII be measured by the specified assessments;
- PHP4005 – the visitors considered that there was not enough detail about the assessments to see how LOs IV, V and IX are measured.
- PHP4006 – there were minimal practical skills teaching hours with ambitious learning outcomes and it was difficult to see how all LOs will be assessed by the proposed assessments. In particular LOs V & VI;
- PHP5001 – unclear how assessment of LOs IV, V and VI will be achieved.
- PHP5006 – minimal practical skills teaching hours with ambitious learning outcomes and it was difficult to see how LOs III,IV and V will be assessed by the proposed assessments;
- PHP6001 – minimal practical skills teaching hours with ambitious learning outcomes and it was difficult to see how all LOs V,VI and VII will be assessed by the proposed assessments;
- PHP6002 – minimal practical skills teaching hours with ambitious learning outcomes and it was difficult to see how LOs III, IV, V and VI will be assessed.

The visitors considered that in order for them to have a clear understanding of how the assessments measure the learning outcomes and that they are fair and reliably measure learners' progression and achievement, the education provider needs to show what the assessment tasks actually consist of. In this way, the visitors would be able to see how the assessments will actually work.

The visitors therefore require additional evidence to demonstrate how:

- the education provider ensures the assessments are objective, fair and reliably measure learners' progression and achievement; and
- the assessment methods used are appropriate to, and effective at, measuring the learning outcomes and the SOPs which will in turn determine whether the SOPs for physiotherapists are met.

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.

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

Recommendation: The education provider should keep under review their staff planning as it relates to their areas of specialist knowledge and expertise to ensure that there continues to be educators with a variety of specialisms, (particularly within areas of relevance to contemporary physiotherapy practice), to deliver the programme.

Reason: The visitors were satisfied that this standard was met at threshold, as the staff currently in place for the programme demonstrated to the visitors how they will cover the core aspects of the curriculum. However, the visitors noted that when it comes to other areas of contemporary physiotherapy practice, such as mental health, occupational health, primary care, health promotion, fitness for work and learning disabilities, the programme did not appear to have staff in place, who could cover these areas. Although the education provider stated that they would be inviting visiting lecturers who are specialists in their fields, to deliver specialist areas, the visitors considered that as the learner numbers grow, the education provider will need more specialist staff to ensure that there is sufficient resource to cover the demand. The visitors therefore recommend that as the number of learners increase in years 2 and 3, the education provider should take the opportunity to broaden their staff base to continue to be able to deliver some of the specialist areas of the programme.

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](#).