

HCPC approval process report

Education provider	University of Sunderland
Name of programme(s)	BSc (Hons) in Occupational Therapy, Full time BSc (Hons) in Physiotherapy, Full time
Approval visit date	10-11 January 2019
Case reference	CAS-13590-V7Z7C9

Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	4
Section 4: Outcome from first review.....	4
Section 5: Visitors' recommendation	13

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:

Joanna Jackson	Physiotherapist
Joanne Stead	Occupational therapist
Deirdre Keane	Lay
Shaista Ahmad	HCPC executive
Tamara Wasylec	HCPC executive (observer)

Other groups involved in the approval visit

As we were considering the approval of two different professions including Occupational Therapy and Physiotherapy, there were representatives from their respective professional bodies including the Royal College of Occupational Therapists and Chartered Society of Physiotherapy. Outlined below are the details of the other groups in attendance at this approval visit. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Adrian Moore	Independent chair (supplied by the education provider)	University of Sunderland
Margaret Young	Secretary (supplied by the education provider)	University of Sunderland
Susan Alexander	Quality Assistant	University of Sunderland
Professional body panel members		
Julie Taylor	Representative of Royal College of Occupational Therapists	Royal College of Occupational Therapists
Claire Brewis	Representative of Royal College of Occupational Therapists	Royal College of Occupational Therapists
Georgina Callister	Representative of Royal College of Occupational Therapists	Royal College of Occupational Therapists
Caroline Grant	Representative of Royal College of Occupational Therapists	Royal College of Occupational Therapists
Nina Paterson	Representative for Chartered Society of Physiotherapy	Chartered Society of Physiotherapy
Jackie Waterfield	Representative for Chartered Society of Physiotherapy	Chartered Society of Physiotherapy

Section 2: Programme details

Programme name	BSc (Hons) in Occupational Therapy
Mode of study	FT (Full time)
Profession	Occupational therapist
Proposed First intake	01 September 2019
Maximum learner cohort	Up to 25
Intakes per year	1
Assessment reference	APP02010

Programme name	BSc (Hons) in Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed First intake	01 September 2019
Maximum learner cohort	Up to 25
Intakes per year	1
Assessment reference	APP02012

We undertook this assessment of two new programmes 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	
Curriculum vitae for relevant staff	Yes	
External examiners' reports for the last two years, if applicable	No	As we are considering approval of 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.

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 March 2019.

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 clear and accurate information about the programmes are provided to potential applicants, to ensure that they can make an informed choice about whether to take up a place on the programme.

Reason: This condition applies to both programmes. From a review of the documentation, the visitors noted that pertinent information about admissions related to criminal conviction checks, health checks and associated costs incurred to learners on the programmes was contained within the programme specification. Although the information was clear, the visitors were unsure how applicants would have access to the information contained within the programme specification when considering whether to apply for a place on the programme. As such, the visitors were unable to determine how applicants would have access to this information prior to applying to the programme. Therefore, the visitors require further clarification about how applicants can access this information to ensure they have all the information they require to make an informed choice about whether to take up a place on these programmes. As such, the education provider must provide evidence to demonstrate how they will inform applicants about admissions, criminal convictions checks and occupational health checks and the costs incurred to learners on the programmes. In this way, the visitors can determine whether this standard is met.

2.3 The admissions process must ensure that applicants have a good command of English.

Condition: The education provider must ensure that information about the programmes English language requirements are clear and accurate across all materials.

Reason: This condition applies to both programmes. From a review of the documentation, the visitors noted that the entry requirements regarding International English Language Testing System (IELTS) for the programmes were due to be amended to “level 7, with no element below 6.5”. The visitors were happy that this amendment would meet SOP 8.2 for physiotherapists and occupational therapists as required by the HCPC. However, as this entry requirement had not been finalised within the programme documentation, the visitors were unclear how the admissions process ensured that applicants had a good command of spoken English to communicate effectively with service users and carers, educators and others. The visitors therefore require the education provider to revise the documentation to ensure accurate information is provided for applicants concerning English language requirements for these programmes.

3.2 The programme must be effectively managed.

Condition: The education provider must demonstrate there are appropriate support systems in place to effectively support the new programme leaders to manage the programmes.

Reason: This condition applies to both programmes. In the documentation received prior to the visit, the visitors learned that there are named programme leaders, for each programme, who have overall professional responsibility. At the visit, the visitors were provided with the curriculum vitae for the programme leaders appointed to those roles. They were also provided with a role profile for the Senior Lecturer in Occupational Therapy and for Physiotherapy role. From reviewing these documents, the visitors noted that there were certain criteria within the role profiles which did not match the experience of the new programme leaders. The visitors heard how the programme leaders might be supported by members of the staff team at the education provider. However, they were unclear of the details of what management and support structures would be in place to support programme leaders in their roles should a programme leader be recruited who does not meet the role profile. As such, the visitors require further evidence of the support structures which will routinely be put in place to support new programme leaders in their role, who do not meet the role profile for the position. In this way the visitors can determine how the programme would be effectively managed.

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 there is a robust process in place to ensure that the individual holding overall professional responsibility for the programmes is appropriately qualified and experienced unless other arrangements are appropriate, on the relevant part of the Register.

Reason: This condition applies to both programmes. For this standard, the visitors were made aware of the individuals who currently have overall professional responsibility for the programmes. In discussions with the senior team, they confirmed that there is no formal process in place to ensure that the person who is recruited to hold overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register. The visitors heard that a process is yet to be written however, the visitors were told that the programme leaders would be supported by “critical friends”. In this instance, the education provider provided role profiles. However, the individuals appointed did not meet all the criteria within the job profiles. The visitors noted that as they do not meet the role profile they may not be in a position to fulfil the role unless there are support mechanisms in place to ensure the function of the role is performed satisfactorily. As such the visitors require further information about the effective process which is in place to ensure that the person holding overall professional responsibility for the programmes will be appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register and if they do not meet the job role specification, how they are supported to perform their role 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 demonstrate that there is an effective process in place to ensure the availability and capacity of practice-based learning for all learners on the programmes.

Reason: This condition applies to both programmes. From a review of the programme documentation, the visitors understood that learners will undertake practice-based learning as part of the programme. In discussions at the visit, the visitors noted that the education provider is in the process of agreeing where the practice-based learning will take place. As the agreements have not yet been confirmed, the visitors could not determine what arrangements are in place. Therefore, the visitors could not determine whether there is an effective process in place, which ensures the availability and capacity of practice-based learning for all learners on the programmes. As such, visitors require further information regarding the process the education provider has in place, to ensure there are sufficient practice based learning opportunities for all learners, across the three years, including the agreements in place between the education provider and the practice education providers. In this way, the visitors can determine whether this standard is met.

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

Condition: The education provider must provide a plan for how it intends to recruit staff to ensure there is an adequate number of appropriately qualified and experienced staff in place to deliver the programme.

Reason: This condition applies to both programmes. In a review of the documentation and in discussions with the programme and senior teams, the visitors heard that new staff will be recruited to these programmes. The visitors heard that there would be one more staff member for each programme recruited in January 2019 and another staff member for each programme in Summer 2019. However, the visitors were unable to ascertain what the education provider required in regards to the newly recruited team members qualifications and experiences and how this relates to the curriculum taught on these programmes. As such, the visitors require further evidence which demonstrates the education provider's plan to recruit a sufficient number of staff who are suitably qualified and experienced to deliver the curriculum. The visitors also require information as to how the required experience and qualification profiles of the new staff members will complement the team to ensure they can support the delivery of the breadth of knowledge taught on these programmes.

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

Condition: The education provider must provide further evidence to demonstrate that subject areas will be taught by staff with the specialist knowledge and expertise for the physiotherapy programme.

Reason: This condition applies to the physiotherapy programme. In a review of the documentation and in discussions with the programme and senior teams, the visitors heard that new posts will be recruited for this programme. However, the visitors were

not able to ascertain what the education provider's requirements are in regards to the newly recruited team members' qualifications and experience and how this relates to the curriculum taught on these programmes. As such, the visitors require further evidence of the education provider's rationale about how they intend to support the delivery of the programme through ensuring that subject areas such as neurological and cardiorespiratory practice are delivered by those with the relevant specialist knowledge and expertise. As such, the visitors require information as to how the required experience and qualification profiles of the new staff members will complement the staff team to ensure they have the relevant specialist knowledge and expertise to deliver the subject areas and can support the delivery of the breadth of knowledge taught on this programme.

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

Condition: The education provider must provide further evidence to demonstrate that, subject areas will be taught by staff with the specialist knowledge and expertise for the occupational therapy programme.

Reason: This condition applies to the occupational therapy programme. In a review of the documentation and in discussions with the programme and senior teams, the visitors heard that new posts will be recruited for this programme. However, the visitors were not able to ascertain what the education provider's requirements are in regards to the newly recruited team members' qualifications and experience and how this relates to the curriculum taught on this programme. Additionally, it appeared from the module descriptors that much of the programme would be delivered by sports professionals rather than occupational therapists. As such, the visitors require information as to how the profile of the new staff members will complement the staff team to ensure they have the relevant specialist knowledge and expertise to deliver the subject areas, and can support the delivery of the breadth of knowledge, within the context of the occupational philosophy, taught on this programme.

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 revise the programme documentation to ensure that the resources to support learning is accurate and appropriate to deliver an effective programme.

Reason: From a review of the programme documentation, the visitors noted various instances of inaccurate and inconsistent information. For example, in the appendices the programme is referred to as an "Occupational Health" programme rather than Occupational Therapy. The visitors also noted that there were inconsistencies across the documentation whereby there were different module names, numbers and credit values. Furthermore, the visitors noted that the programme specification states "The HCPC standards require that student achieve at least 1000 hours practice placement to develop threshold competency to enter the register". This statement is inaccurate and could be misleading to learners as the HCPC does not specify a requirement for the number of practice-based learning hours a learner must complete before they are eligible to apply for registration with the HCPC. Therefore, the education provider must

ensure that that they revise the programme documentation to ensure that the resources to support learning is accurate and appropriate.

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 clarify what changes have been made to the programmes, and how the changes to the programmes ensure the learning outcomes meet the standards of proficiency for occupational therapists and physiotherapists.

Reason: This condition applies to both programmes. From reviewing the information provided, the visitors deemed that this standard was met, however through discussions at the visit it was evident that the education provider was considering revising the learning outcomes and assessments associated with the programmes. As such, the visitors considered that the changes which included reducing the number of assessments and introducing new assessment methods, could impact upon this standard being met along with 6.1 and 6.5. Therefore, the education provider must provide information about any revisions to the learning outcomes and assessments introduced into the programme, so the visitors can assess if the standard is met.

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 articulate how the curriculum reflects the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Reason: For the Occupational Therapy programme, the visitors noted that there was a lack of occupational therapy philosophy throughout the programme. For example, in the documentation the modules OCC103 Functional Anatomy and Movement for Occupational Therapy and OCC102 Physiology and Pathology for Occupational Therapy did not have an occupational therapy focus. As such, the visitors could not identify how the programme reflected relevant occupational therapy philosophy applicable to the profession. Additionally the visitors noted that on this programme the learners complete an occupational assessment in year one but they do not cover any content about this until year two so the visitors were unable to establish how learners would attain the skills to prepare them to complete this assessment. As such, the visitors were unable to establish how the programme would reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance to ensure the content is relevant to the profession of occupational therapy. Therefore, the visitors require further evidence, which demonstrates that this standard is met.

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must demonstrate that there is a process in place to ensure the curriculum remains relevant to current practice on an ongoing basis.

Reason: For the Occupational Therapy programme, the visitors read the documentation prior to the visit and noted that there was a range of modules, which did not take account off and reflect the current practice to ensure the curriculum remains relevant. For example, OCC103 Functional Anatomy and Movement for Occupational Therapy and OCC102 Physiology and Pathology for Occupational Therapy. The

programme team acknowledged this was the case and they would need to review the modules to ensure they contained content, which reflects current practice. The visitors noted that the issue of currency related to a lack of input from those with expertise in current occupational therapy practice. As such, the visitors require further evidence of the revised modules to ensure the curriculum is relevant to current practice in addition to any plans to ensure the curriculum remains relevant to current practice.

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must demonstrate that there is a process in place to ensure the curriculum remains relevant to current practice on an ongoing basis.

Reason: For the Physiotherapy programme, the visitors read the documentation prior to the visit and noted that there were a range of modules which did not take account of and reflect the current practice to ensure it remained relevant. For example, these included PTY302 Contemporary Perspectives in Physiotherapy Practice and PTY304 the Emerging Graduate Physiotherapist. The visitors discussed this with the programme team and they acknowledged that they would need to review all the modules in more detail to ensure the curriculum remained relevant to current practice. Additionally, the visitors pointed out to the programme team that the reading lists provided were out of date, they agreed that these should have been updated. As such, the visitors require further evidence of how the modules ensure that the curriculum remains relevant to current practice and the reading lists are updated to reflect current practice within the profession.

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 what interprofessional learning there will be on the programmes, and how they will ensure that learners learn with and from professionals and learners in other relevant professions.

Reason: This condition applies to both programmes. For this standard, the visitors were referred back to the module descriptors. From reading the module descriptors, the visitors were unable to determine where in the programmes learners would be involved in learning with and from others in other relevant professions. From the discussions at the visit, the visitors heard that interprofessional learning would be mandatory however they were unclear on the details of how this would be delivered or the rationale behind the design and delivery of interprofessional education. Additionally, the visitors were unclear how the education provider intends to ensure that it is relevant for learners on these programmes. From the information provided and through discussions at the visit, the visitors were unable to determine the following:

- what interprofessional education will take place on the programmes;
- why the professions and learners selected are relevant for each programme and;
- how learners will be able to learn with, and from, professionals and learners in other relevant professions.

Therefore, the education provider is required to articulate what interprofessional learning there will be on the programmes, and how they will ensure that learners on these programmes will learn with, and from professionals and learners in other relevant professions.

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

Condition: The education provider must clarify which system will be in place for approving and ensuring the quality of practice-based learning for both programmes.

Reason: This condition applies to both programmes. In a review of the documentation, the visitors were unable to determine the system used to approve and ensure the quality of practice-based learning for both programmes. At the visit, the visitors were provided with a quality control audit tool which is currently used for nursing programmes and existing approved programmes. In discussions with the programme teams and the senior teams, the visitors understood that the education provider would like to introduce the ARC placement management system which is used by other education providers within the region. There were also further discussions about a number of different systems the education provider would like to have in place such as the programme leader being responsible for visiting and approving role emerging placements. However, there was no confirmation provided as to which systems would be in use for these programmes. Therefore, the visitors would like further clarification of the system which will be used to approve and ensure the quality of all practice-based learning and how the education provider ensures it is thorough and effective, so they can determine whether this standard is met.

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

Condition: The education provider must demonstrate how they ensure there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning for the number of learners on the programme.

Reason: This condition applies to both programmes. The visitors were directed to the practice placement handbook for this standard. From the information provided they were unable to establish how the education provider ensures that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning. In discussion with the practice education providers, the visitors were told that the agreements in principle had not been finalised between the education provider and the practice education providers regarding the provision of practice-based learning. As such, the visitors were unable to determine what arrangements are in place which ensure that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning. Consequently, the visitors require further evidence which articulates the confirmed arrangements in place between the education provider and the practice educators which ensure that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning. Additionally, the visitors require evidence which clearly outlines the process used by the education provider to ensure that there is an adequate number of qualified and experienced staff involved in practice-based learning for these programmes, including how these arrangements are agreed and reviewed going forward. In this way the visitors can determine whether there is an effective process for ensuring that there is an adequate number of appropriately qualified and experienced staff involved in all practice-based environments.

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 demonstrate that practice educators have the relevant knowledge, skills and experience to support learners on the practice-based learning element of the programme.

Reason: This condition applies to both programmes. The visitors were directed to the practice placement handbook for this standard. From the information provided, they were unable to establish how the education provider ensures practice educators have the relevant knowledge, skills and experience to support safe and effective learning. In discussions at the visit, the visitors noted that the agreements in principle had not been finalised between the education provider and the practice education providers regarding the provision of practice-based learning. As such, the visitors were unable to determine how the education provider ensures that all practice educators have the relevant knowledge, skills and experience to support safe and effective learning. Consequently, the visitors require further evidence which articulates the arrangements in place between the education provider and the practice educators which ensure that practice educators have the relevant knowledge, skills and experience to support safe and effective learning. Additionally, the visitors require evidence which clearly outlines the process used by the education provider to ensure that all practice educators have the relevant knowledge, skills and experience to support safe and effective learning.

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.

Condition: The education provider must clarify what changes have been made to the assessment strategy and design, and how the changes continue to ensure the programmes meet the standards of proficiency for occupational therapists and physiotherapists.

Reason: This condition applies to both programmes. From reviewing the information provided, the visitors deemed that this standard was met, however through discussions at the visit it was evident that the education provider was considering revising the assessment strategy and design associated with the programmes. As such, the visitors considered that reducing the number of assessments and introducing new assessment methods could impact upon this standard being met. Therefore, the education provider must provide evidence of any revisions to the learning outcomes and assessments introduced into the programmes, so the visitors can assess if the standard is met.

6.4 Assessment policies must clearly specify requirements for progression and achievement within the programme.

Condition: The education provider must demonstrate which assessment policy will apply for the Occupational Therapy programme.

Reason: This condition applies to the Occupational Therapy programme. From reviewing the programme specification the university regulations state, "The study load for a full-time student is 120 credits per year. The maximum load is 140 credits per year, including any failed module trailed under 4.3.3". The visitors noted that a

programme specific regulation was requested. In other areas of the programme specification it mentions that a programme specific regulation has been granted. From reading this, the visitors were unclear on whether this regulation is in place or if this is still under review. Therefore, the visitors need further clarification on whether a programme specific regulation has been agreed and what that might be in order to make a judgement as to whether or not the assessment policies clearly specify the requirements for progression and achievement.

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 24 April 2019 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).