

HCPC approval process report

Education provider	University of East London
Name of programme(s)	BSc (Hons) Occupational Therapy via apprenticeship, Work based learning
Approval visit date	12 – 13 May 2021
Case reference	CAS-16000-B9F9M0

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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:

Claire Brewis	Occupational therapist
Joanna Goodwin	Occupational therapist
Niall Gooch	HCPC executive

Other groups involved in the virtual approval visit

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

Richard Hartey	Independent chair (supplied by the education provider)	University of East London
Deirdre Larkin	Secretary (supplied by the education provider)	University of East London
Clair Parkin	Professional body panel	Royal College of Occupational Therapists
Alison Warren	Professional body panel	Royal College of Occupational Therapists

Karen Morris	Professional body panel	Royal College of Occupational Therapists
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Section 2: Programme details

Programme name	BSc (Hons) Occupational Therapy via apprenticeship
Mode of study	WBL (Work based learning)
Profession	Occupational therapist
Proposed first intake	01 September 2021
Maximum learner cohort	Up to 25
Intakes per year	1
Assessment reference	APP02244

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	Not required because it is a new programme

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 spoke to learners enrolled on the existing approved physiotherapy programme
Service users and carers (and / or their representatives)	No	The education provider was not able to arrange a meeting and we considered we could discuss the relevant issues with the programme team
Facilities and resources	Not Required	Discussion of this area was incorporated into the programme team meeting
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 26 June 2021.

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

Condition: The education provider must demonstrate how they will ensure appropriate oversight of the process by which employer partners allocate placements to learners.

Reason: The visitors were aware from programme documentation and from discussions at the visit that responsibility for finding and allocating particular placement settings would sit with the employers of the learners on the programme. This was not in itself an inappropriate arrangement, as the HCPC does not specify how the allocation of

settings should work. However, the visitors did consider that the education provider did need to exercise some level of oversight of the employer partners' decision-making. The programme team stated that this would be achieved through existing interpersonal relationships between the education provider staff and the employers. Nevertheless it was the view of the visitors that there needed to be a more formal and specific description of how this process would work on an ongoing basis, even if individual staff members left – which may endanger an arrangement based on the informal personal links.

The visitors were therefore unable to be certain the standard was met, and require further evidence of how the education provider will ensure that on a consistent basis, all learners' placement allocations are appropriately handled.

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

Condition: The education provider must demonstrate that they have a clear plan in place for how to involve service users and carers in the programme.

Reason: The visitors were aware from the documentation and from discussions at the visit that there would be service user involvement in the programme. However, they were not able to see the detail of this involvement. The mapping document cited a narrative of service user and carer involvement but did not give detail about how those involved would be selected and how their involvement would be planned and assessed. In the discussion of service user and carer activity at the visit, the programme team gave a broad idea of their plans but did not provide the kind of detail noted above. The visitors were therefore unable to determine whether the standard was met, and require further evidence showing that the service user and carer involvement on the programme will be sustainable, appropriate and clear.

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

Condition: The education provider must demonstrate how they will ensure that all curriculum areas will be appropriately covered by staff with relevant specialist knowledge and expertise.

Reason: The visitors were aware from their review of documentation and from conversations at the visit that the intended staffing arrangements were not yet in place, and that further staff recruitment was planned to be in place by the start date of September 2021. The visitors noted there was a recruitment plan in place to ensure an appropriate range of staff for autumn 2021. However, the visitors considered that the job description and person specification did not specify clearly the areas that the new staff would need to cover – for example, in the key areas of foundational occupational therapy. There was therefore a risk that the recruitment process would not ensure that the new staff had relevant specialist knowledge and expertise. The visitors therefore require that the education provider submit further evidence to demonstrate how they will ensure that the recruitment process can deliver appropriate staff.

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

Condition: The education provider must demonstrate that they have an effective process enabling learners to raise concerns about the safety and wellbeing of service users in any setting.

Reason: The mapping document pointed the visitors to a section of the programme handbook that gave a brief narrative of the raising concerns procedure. The handbook mentioned a formal raising concerns policy but this was not included in the documentation.

The visitors discussed the procedure for raising concerns with the programme team and were assured that one was in place. The learners also mentioned one. However, as they had not seen its details, the visitors considered that they were unable to be sure the standard was met. For example, the visitors were unclear how learners were able to recognise situations where service users may be at risk, how they were supported in raising any concerns, and the clear mechanism for ensuring action is taken in response. The visitors therefore require that the education provider submit further evidence showing that an effective policy is in place.

4.10 The programme must include effective processes for obtaining appropriate consent from service users and learners.

Condition: The education provider must demonstrate that they have an effective process for obtaining appropriate consent from learners.

Reason: The visitors were not clear, either from the documentation or from discussions at the visit, how the education provider intended to obtain appropriate consent from learners. The mapping document cited documents that referred to obtaining consent but the actual policy was not included and the discussions with the programme team did not make it clear to the visitors that learners would be enabled to understand what the expectations and arrangements about the obtaining of consent were. The visitors were therefore unable to determine whether the standard was met and require further evidence.

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 demonstrate that they will maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Reason: The visitors were provided with a narrative of how the audit programme would work, and the mapping document cited parts of the validation document explaining many of the details of practice-based learning. The visitors were also able to discuss the audit arrangements with the programme team and with practice educators. However, they were not clear what exactly would be audited and how potential problems would be flagged through the process, because they had not seen, for example, a completed audit form. They were therefore unable to determine whether the standard was met and require further evidence to demonstrate that the audit system will be thorough and effective.

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 25 August 2021 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).