

## HCPC approval process report

Education provider	The Open University
Name of programme(s)	Postgraduate Certificate in Non-Medical Prescribing, Distance learning
Approval visit date	09 October 2018
Case reference	CAS-13344-C1L6C1

### Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	3
Section 4: Outcome from first review.....	4
Section 5: Visitors' recommendation .....	7

### Executive Summary

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

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

## Section 1: Our regulatory approach

### Our standards

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

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

### How we make our decisions

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

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

### HCPC panel

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

Janet Lawrence	Physiotherapist (Independent prescriber)
Gemma Quinn	Independent prescriber
Susanne Roff	Lay
Niall Gooch	HCPC executive

### Other groups involved in the approval visit

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

Mick McCormick	Independent chair (supplied by the education provider)	The Open University
Clare Wailes	Secretary (supplied by the education provider)	The Open University
Angela Alexander	Team leader	General Pharmaceutical Council

Mike Pettit	Team member	General Pharmaceutical Council
Ian Marshall	Rapporteur	General Pharmaceutical Council
Christopher McKendrick	Quality assurance officer	General Pharmaceutical Council

## Section 2: Programme details

Programme name	Postgraduate Certificate in Non-Medical Prescribing
Mode of study	DL (Distance learning)
Entitlement	Independent prescribing
Proposed first intake	01 February 2019
Maximum learner cohort	Up to 50
Intakes per year	2
Assessment reference	APP01964

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

## Section 3: Requirements to commence assessment

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

Required documentation	Submitted
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	Not Required – new programme

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

Group	Met	Comments
Learners	No	The education provider was not able to arrange a meeting with learners, saying that this was difficult because the programme used a distance learning model and had not yet admitted its first cohort.
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 14 December 2018.

### **B.6 Subject areas must be taught by staff with relevant specialist expertise and knowledge.**

**Condition:** The education provider must demonstrate how they will ensure that HCPC registered learners on the programme can receive appropriate support from staff to enable them to prescribe safely and effectively as a member of their profession.

**Reason:** The visitors reviewed the evidence submitted for this standard, including staff CVs and a teaching timetable. They also discussed staffing with the senior team and the programme team. From this evidence and the discussions, it was not clear how the education provider would ensure that all HCPC-registered professionals who came on to the programme as learners would be appropriately supported and supervised. For this reason, the visitors could not determine that learners who successfully complete the programme would be able to prescribe safely and effectively as part of their individual professional practice. The individuals identified as practice educators to whom the visitors spoke, did not seem to have a clear understanding of their role in giving

profession-specific support to learners from HCPC-registered professions. The visitors were aware from the documentation and discussions at the visit that there were named persons in place to provide profession-specific support for pharmacists and nurses on the programme, where necessary. There did not appear to be similar named persons for HCPC-registered professions. There were staff from therapeutic radiography and paramedic backgrounds available to the programme, but it was not clear how these staff would be used to support HCPC-registered professionals, and it was not clear whether staff would be available from other HCPC-registered professions that are eligible to become prescribers, for example diagnostic radiography. There is no HCPC requirement for prescribing programmes to have staff members from all HCPC-registered professions that may join the programme. However education providers do need to demonstrate how they will use their staff to ensure appropriate support and supervision for all HCPC-registered professionals who may come on to the programme. The visitors considered that at present it was not clear how this would be achieved. The programme team said that they had access to visiting lecturers who would provide such support but the visitors did not see evidence demonstrating how the education provider would ensure the involvement of such lecturers. They therefore require the education provider to submit further evidence showing how they will ensure that all learners from HCPC-registered professions will be appropriately supported and supervised on the programme, to enable them to prescribe safely and effectively as a professional.

**C.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards for independent and / or supplementary prescribers.**

**Condition:** The education provider must demonstrate how they will ensure that all learners meet standard for independent prescribers 2.3, which states that learners must “understand the legal framework of independent prescribing as it applies to their profession”.

**Reason:** The visitors reviewed the evidence submitted for standard for independent prescribers 2.3, including learning outcomes and a document laying out the scheduling of teaching and learning activities on the programme. They considered that the learning outcomes appeared to be appropriate. However, it was not clear from this evidence how all HCPC-registered learners on the programme would be enabled and supported to meet the particular learning outcomes relating to this standard for independent prescribers. This was due to the lack of clarity about whether appropriate staff would be available to support and supervise learners from some of the HCPC-registered professions, as outlined in the condition under standard for prescribing B.6 above. They therefore require the education provider to submit further evidence showing how learners will be supported to meet the learning outcomes dealing with their understanding of the law governing their practice in the specific context of their profession.

**C.9 When there is interprofessional learning the profession-specific skills and knowledge of each professional group must be adequately identified and addressed.**

**Condition:** The education provider must clarify their intentions concerning interprofessional learning for HCPC-registered learners on the programme, and how they intend to identify and address the profession-specific skills and knowledge of each professional group.

**Reason:** The visitors reviewed the evidence submitted for this standard, including a timetable of learning and teaching activities, and curriculum vitae for staff showing what skills those staff could bring to interprofessional learning (IPL) on the programme. They were aware that the programme team were planning to have IPL on the programme, and they discussed these plans. They were told in these discussions that decisions around IPL for particular professions would be based on the numbers joining the programme from those professions. While the visitors considered that this could be an appropriate general approach, it was not clear to them how such decisions would be made, and by whom, and what criteria would be used. There did not seem to be a process by which equitable and appropriate access to IPL for HCPC-registered learners could be ensured, so they were not able to determine whether the profession-specific skills and knowledge of each professional group could be adequately identified and addressed. The visitors considered that there was a possible link between this condition and those set under standards for prescribing B.6 and C.1, as they all concern a lack of clarity about how the education provider will make use of its staff to meet the professions-specific needs of HCPC-registered learners.

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

**Condition:** The education provider must demonstrate how they will ensure that the audit document used for practice placements is fit for purpose for all professionals on the programme.

**Reason:** The visitors reviewed the evidence submitted for this standard, including a handbook for designated medical practitioners (DMPs) and a sample of the audit document that would be used. They noted that it seemed to be tailored towards nursing learners and did not appear to provide appropriate opportunities for capturing whether placements were appropriate for HCPC-registered learners. They considered that while the audit document appeared to be a useful tool for approving and monitoring some placements, it was not clear how it would enable the education provider to ensure that all HCPC-registered professionals on the programme would have access to appropriate support and supervision while on placement. The visitors therefore require the education provider to submit further evidence of how their audit tool will assess the appropriateness of placements for all professionals who may be on the programme. The visitors considered that there was a possible link between this condition and those set under standards for prescribing B.6, C.1 and C.9 as they all concern a lack of clarity about how the education provider will make use of its staff to meet the professions-specific needs of HCPC-registered learners.

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

**Condition:** The education provider must clarify the timescale and the process for appointing an external examiner for the programme.

**Reason:** The visitors reviewed the evidence provided for this standard, including a guide to the external examiner role, and the name and a curriculum vitae for a person who was likely to be appointed. From this evidence and from discussions with the

programme, it was not clear to the visitors when an appointment would be made and what process would be followed. The guide that formed part of the evidence for the standard was a guide for external examiners themselves rather than a full description of the appointment process. The visitors therefore require the education provider to submit further evidence showing how they will ensure that an appropriately experienced and qualified external examiner will be appointed for the programme.

### **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.

#### **B.15 Service users and carers must be involved in the programme.**

**Recommendation:** The education provider should consider how they might strengthen and develop the service user and carer involvement on the programme.

**Reason:** The visitors considered that this standard was met at threshold, as there were appropriate service users and carers who were involved with the programme in an appropriate way, and their involvement had been planned and considered by the education provider. However, the visitors noted that there were relatively few service users and carers available who had experience of interacting with HCPC-registered professionals, and that their opportunities to contribute to the programme were somewhat limited. It was not clear, for example, if service users were involved in assessment. The visitors therefore considered that there was a risk that in future service user and carer involvement with HCPC-registered learners on the programme could fall below threshold level, if for example existing service users and carers withdrew from involvement or were no longer available to contribute in the same way.

### **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 30 January 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](#).