
Internal Audit report – Education Standards

Executive Summary

As part of the 2021-22 Internal Audit Plan as approved by the Committee, BDO LLP have undertaken a review of the HCPC's Education standards.

The objective of the audit was to provide assurance over HCPC's policies, processes and controls intended to meet the PSA standards relating to education. The audit examines the process for approving and monitoring providers and programmes.

Previous consideration	None.
Decision	The Committee is invited to discuss the report.
Next steps	Recommended actions agreed with the Executive will be tracked for progress in the Committee's standing recommendation tracker report.
Strategic priority	All
Risk	<ul style="list-style-type: none">• only suitable organisations are approved and appointed to deliver educational programmes;• the content and delivery of educational programmes provided by approved organisations are also appropriately approved as the curriculum and /or teaching methods produce learners that meet the requisite standards• previously approved organisations meet expected standards, and drops in standards are readily detected and actioned by HCPC;• curriculum inadequacies for approved programmes, either in delivered content by providers or brought on through changes in professions' requirements, are readily detected and actioned by HCPC..

Financial and
resource
implications

The cost of the audit is included in the Internal Audit annual fee.

Author BDO LLP



HEALTH & CARE PROFESSIONS COUNCIL

INTERNAL AUDIT REPORT - FINAL REPORT

EDUCATION STANDARDS

MARCH 2022



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Document history		Distribution	
Final Report	14/04/22	Health & Care Professions Council	[current version]

Auditor: William Giffin
Reviewed by: William Jennings

1 Executive Summary

Introduction

- 1.1 As part of the Health & Care Professions Council (HCPC) internal audit plan for 2021/22, as approved by the Audit & Risk Assurance Committee, we undertook an audit of HCPC’s Education controls, specifically around the process for approving and monitoring education providers and education programmes.
- 1.2 HCPC is a UK-wide regulator of 15 health and care professions with a statutory responsibility of regulating these professions so that the registered professionals meet required standards, including setting the standards for professionals’ education, training and conduct. The primary purpose of doing so is in order to protect members of the public who receive care.
- 1.3 The Professional Standards Authority (PSA), which regulates HCPC’s activities, has two standards relating to education to which HCPC aims to follow:
 - Standard Eight - The regulator maintains up-to-date standards for education and training which are kept under review, and prioritise patient and service user care and safety; and
 - Standard Nine - The regulator has a proportionate and transparent mechanism for assuring itself that the educational providers and programmes it oversees are delivering students and trainees that meet the regulator’s requirements for registration, and takes action where its assurance activities identify concerns either about training or wider patient safety concerns.
- 1.4 HCPC has a quality assurance model to approve and monitor approved education providers. Providers must be approved before they can deliver a learning programme. In order to do this, they have to meet set standards of education and training. HCPC has developed a framework by which a provider must meet 52 standards split between content of the course but also overall governance of the education provider.
- 1.5 To be approved as an education provider, institutions have to meet all these standards and submit evidence of this. HCPC then allocates “partners” or “visitors” to conduct assessments of education providers. These panels are commonly made up of existing practising professionals. This exercise assesses the education provider and also the content of the course.
- 1.6 Once the programme and provider are approved, they are both reviewed continually to make sure they meet the required standards. Monitoring takes place primarily on an institution level across some key areas. These reviews can either be “performance reviews” which are periodic and planned at the start of the year, and “focused reviews” which are conducted as required, to understand the impact on the quality of provision. Factors which can trigger a “focused” review include where commissioning organisations or professional bodies (e.g., the College of Paramedics) update curriculum guidance, or lower National Union of Students survey scores are identified.
- 1.7 A new model for conducting quality assurance assessments has been introduced with recommendations for improvement made by a range of stakeholders, including partners and education providers. This model was piloted from January to August 2021, and formally launched from September 2021.
- 1.8 Final decisions regarding quality assurance assessments, once completed, are made by the Education and Training Committee, a sub-committee of Council.

Review objectives and approach

- 1.9 The objective of the audit was to provide assurance over HCPC’s policies, processes and controls intended to meet the PSA standards relating to education. To come onto the register via the UK route, a registrant has to have completed an approved education programme. The audit will examine the process for approving and monitoring providers and programmes. The key risks relating to this activity relate to both the organisation providing the education and the content of the education programme itself. The specific risk areas assessed for this review are whether:
- only suitable organisations are approved and appointed to deliver educational programmes;
 - the content and delivery of educational programmes provided by approved organisations are also appropriately approved as the curriculum and /or teaching methods produce learners that meet the requisite standards
 - previously approved organisations meet expected standards, and drops in standards are readily detected and actioned by HCPC;
 - curriculum inadequacies for approved programmes, either in delivered content by providers or brought on through changes in professions’ requirements, are readily detected and actioned by HCPC.
- 1.10 Our approach was to conduct interviews to establish the processes and control frameworks that have been designed and put in place in regard to the approval of new learning providers and programmes as well as the ongoing management of existing learning providers and programmes. We then obtained and reviewed relevant documentation to evaluate the design of the processes. We through interview we ascertained and evaluated the prescribed processes. We conducted sample testing, to confirm that controls were operating as intended. However, due to the launch of the new model for conducting quality assurance assessments in September 2021, some of our testing has been limited to the design of the new processes due to a lack of available examples to assess.

Key conclusions

■ (Green)

Overall, there is a sound control framework in place to achieve system objectives and the controls to manage the risks audited are being consistently applied. There may be some weaknesses but these are relatively small or relate to attaining higher or best practice standards.

- 1.11 HCPC has a comprehensive set of 52 standards that all new and current learning providers and their programmes must meet to hold HCPC approval. HCPC conducts reviews of the standards every five years and each review takes two to three years to complete. We reviewed the last review of the standards which was completed in 2017. Upon the completion of HCPC’s review of standards, a report is written and published widely. We reviewed the review process and noted it is very detailed and HCPC’s published review document provides a very clear explanation of the process undertaken and the decisions made. The detail and ease of access to the report provides a high level of transparency and assurance of the process and decisions made for all stakeholders.
- 1.12 Whilst HCPC formally reviews their 52 standards every seven to eight years, there is an established process to add, remove or change standards mid review cycle if it becomes apparent this is necessary. Evidence was provided for this when in 2018 HCPC introduced a standard requiring learning providers to have service user and carer involvement in education and training programmes. This allows HCPC some adaptability to address gaps in the standards which in turn helps minimise risks that learning providers do not meet required standards.

- 1.13 However, due to the time that the review of the standards takes and the reactive nature of there is still some risk that changes in standards are either not identified or made quickly enough due to the considerable amount of time between the publication of each review. To further reduce this risk, we recommend that the Education and Training Committee conducts an annual exercise to review and confirm that no changes to the standards are required.
- 1.14 HCPC has a range of resources to help ensure that panel decision making is appropriate and consistent, this includes guidance and frameworks which are available to partners as well as Education Officers, who work with panels from the start of each process and using their experience gained from previous processes. HCPC also introduced the new model/process of approving or reviewing learning providers to partners so that they were aware and comfortable with change. However, while materials are made available to partners, formal refresher training does not take place. We consider there to be a risk that partners may not be fully familiar with all aspects of the process, nor their requirements, creating inconsistent decision making. Education Officers could provide brief refresher training to panels at the start of new processes to mitigate this risk.
- 1.15 HCPC collects data on learning providers intermittently throughout the year from various sources, such as student satisfaction data, and does so as part of the performance review process. While various sources of data are collated and analysed, satisfaction survey results used to inform whether an interim “focused” review takes place are Learning Provider and wider subject-matter specific, rather than individual course specific. HCPC should continue to develop other sources of 3rd party information to feed into its wider intelligence sources to inform the education programme.

Recommendations summary table

1.16 The following table summarises the recommendations made across the key risks audited, grouped by priority ratings:

Key risk area	Rating	Recommendation Priority rating		
		1	2	3
1 Unsuitable organisations are approved	Green	-	-	1
2 Unsuitable programmes are approved	Green	-	-	1
3 Previously approved organisations are no longer suitable for approval	Green	-	-	-
4 Previously approved programmes are no longer suitable for approval	Green Amber	-	1	-
Total recommendations made		-	1	2

1.17 The following tables in Section 2 Key Findings show the results of our analysis by each key risk area. Areas for improvement are highlighted with the key recommendations in the right-hand columns.

2 Key Findings

Key Risk Area 1: Suitable organisations are appointed to deliver educational programmes

Assessment:

Green

Background

To ensure learning providers applying for HCPC approval perform to the required standards and quality as set out by the 52 standards of proficiency and this is appropriately approved by the panel of partners and the Education and Training Committee.

Findings & implication

Positive findings

- HCPC has a comprehensive set of 52 standards that all new and current learning providers and their programmes must meet to hold HCPC approval. HCPC review the standards every seven to eight years. We reviewed the last review of the standards which was completed in 2017. Upon the completion of the review, a report is written and widely published. We reviewed this published document, and found it was very detailed and provided a very clear explanation of the process undertaken and the decisions made. The level of detail and ease of access to the report provides a high level of transparency and assurance of the process and decisions made for all stakeholders.
- Whilst HCPC formally reviews their 52 standards every seven to eight years, they also have the ability to add, remove or change standards mid review cycle if it becomes apparent this is necessary. Evidence was provided for this when in 2018 HCPC introduced a standard requiring learning providers to have service user and carer involvement in education and training programmes. This allows HCPC to be adaptable and quickly move to fix gaps in the standards at anytime which in turn helps to ensure that learning providers are always operating to the appropriate quality.

Areas for improvement and implication

- Reviews of HCPC's 52 standards are triggered every five years and each review takes two to three years to complete. As such, the standards are reviewed and updated every seven to eight years. This is an understandable approach due to the time that the review of the standards takes however, without other controls in place to mitigate the risk there is a possibility due to the considerable amount of time between the publication of each review that issues with the standards may not be picked up in a timely manner and as a result approved learning providers and programmes are not meeting the quality required by HCPC.

Recommendation

1. HCPC should continue to keep the standards under review and provide an annual update to the Education and Training Committee highlighting any issues which have arisen that could prompt an interim review mid-cycle.

Priority 3



Management response

Accept

Action: Develop an annual reporting mechanism to highlight any issues that could prompt an interim review of the Standards to the Education and Training Committee.

Action Owner: Head of Policy, Standards and Strategic Relationships

Completion date: 31/08/2022

Internal Audit Report - EDUCATION STANDARDS

- We requested evidence of service user input for Boots Hearing Care and we found that HCPC did not include a service user in the process. At the time of the review, the process technically did not have the requirement that they 'always' included a service user in the process (as is now required in the new process) and it was instead defined as 'normally' included. While the new process requires service user input in all cases, and so this observation does not highlight a weakness within controls as they currently exist, we still highlight this as a potential minor limitation to the Boots Hearing Care review analysed in our sample.
-

Key Risk Area 2: Qualifying programmes & teaching methods are appropriately approved

Assessment:

Green

Background

To ensure Education Programmes applying for HCPC approval are up to the required standards and quality, as set out by the 52 standards of proficiency, they are assessed and approved by the panel of partners and the Education and Training Committee.

Findings & implication

Positive findings

- We requested evidence that Boots Hearing Care's educational programme had submitted a portfolio of evidence demonstration that they met HCPCs standards, and this had been reviewed by the partners before final approval by the Education and Training Committee. We found that process reports detailing the process and decisions of the partners and board alongside a signed decision notice, evidencing the Education and Training Committees approval of the provider/programme is available on HCPC's public website. This provides a high level of transparency and evidence that the process is being completed appropriately.
- An Education Officer is present for all Partner Panel meetings providing a HCPC face that has experience on a wide range of previous decisions and panels which helps to ensure decisions are consistent across all performance reviews.

Areas for improvement and implication

- HCPC has a range of resources to help ensure that panel decision making is appropriate and consistent, this includes guidance and frameworks which are available to partners as well as Education Officers, who work with panels from the start of each process and use their experience gained from previous processes. HCPC also introduced the new model/process of approving or reviewing learning providers to partners so that they were aware and comfortable with the change. However, no refresher training is planned to take place. With any change in process it is always advised to conduct specific training on key elements of changes at the start of each review, conducted by a partner.

Recommendation

2. HCPC should introduce refresher training for the panel of partners to remind them of the process and what is required of them at the start of each review.

Priority 3



Management response

Accept

Action: Build step into process points for lead case exec to run through purpose of the process, and the ask of visitors

Action Owner: Head of Education

Completion date: 31/08/2022

Key Risk Area 3: Detecting drops in standards with previously-approved organisations

Assessment:

Green

Background

To ensure that previously approved Learning Providers continue to meet the required standards any drops in standards are detected through the monitoring of data, focus reviews or performance reviews, with corrective action taken by HCPC and providers where required.

Findings & implication

Positive findings

- HCPC has a risk-based grading system in place so that they can more closely monitor the learning providers that need it most. Performance reviews are performed every one to five years depending on the grade the provider is allocated, with the learning providers who have been approved for a significant period of time and who historically have performed well on performance reviews having more time between performance reviews than new learning providers that have scored poorly on performance reviews. This allows HCPC to more effectively and efficiently spread their resources to ensure all approved learning providers continue to perform to the required standards.
- Similarly a risk-based approach is adopted when analysing what action to take when an interim focus review is triggered. We selected a sample of five learning providers that had a focus review triggered in the last 12 months. For four of the five learning providers the decision was made, having reviewed the new information, to conduct an interim review, however in one case it was assessed that an interim review was not required as a cyclical performance review was due the following year. This triaging process helps to direct resources for focus reviews to cases where they are needed most.
- HCPC now collates up to 6 different data sets from public and internal sources, (eg National Student Survey data) annually and requests data from Learning providers during performance reviews. Where possible, though there are some limitations due to differences in coverage of surveys, these data sets are analysed and compared to identify trends with programme providers. This helps HCPC have a wider awareness of which courses or learning providers are appropriate for interim focus reviews.

Recommendation

None



Management response

n/a

Key Risk Area 4: Handling curriculum inadequacies for approved programmes

Assessment: Green Amber

Background

To ensure that previously approved Education Programmes continue to meet the required standards and quality as set out by the 52 standards of proficiency and any drops in standards are detected through the monitoring of data, focus reviews or performance reviews and action is taken by HCPC.

Findings & implication

Positive findings

- HCPC conducts ad-hoc monitoring of third party sources of information such as professional bodies and healthcare commissioning bodies to identify whether any changes in expected practices are reflected in the content of programmes delivered by Learning Providers. We noted examples of this triggering the new “focused review” process following the commissioning of new healthcare educational provision by Health Education and Improvement Wales. HCPC identified which Learning Providers were successful in winning contracts from this commissioning body and assessed whether existing education programmes met the requirements of new standards.
- HCPC plans to establish regular communication with the 26 professional bodies relevant to HCPC’s regulated professions. This will allow HCPC to be kept up to date with the current status of each of the professions that they regulate and any changes within standard guidance within professions will be identified to allow HCPC raise with Learning Providers whether any material changes to course content is required.

Areas for improvement & implication

- We were informed that while HCPC does commonly review third party data, such as satisfaction data for learning providers and for subjects, this data is not yet analysed for individual courses. There is the risk that positive feedback from students for some courses within a subject area could mask poor course quality for other individual courses delivered by Learning Providers.

Recommendation

3. HCPC should create a list of a range of sources of third party information, such as satisfaction surveys, to help identify whether individual course provision within approved Learning Providers meets acceptable standards.

Priority 2



Management response

Accept

Action: Exploration of further data sources through existing Education workplan items, including National Education Training Survey results, professional body insight, other sector body insight

Action Owner: Head of Education

Completion date: 31 August 2022

A Audit objectives, Risks & Scope

Terms of reference	
Objectives	The objective of the audit is to provide assurance over HCPC's policies, processes and controls intended to meet the PSA standards relating to education.
Key risk areas	<ul style="list-style-type: none"> • Controls are in place to identify and assess risks arising from an applicant registering for the first time, or for existing registrants when re-registering. • Suitable organisations are appointed / approved to deliver educational programmes • Qualifying programmes are appropriately approved as the curriculum and /or teaching methods produce learners that meet the requisite standards of proficiency • Previously approved organisations meet expected standards, and drops in standards are readily detected and actioned by HCPC • Curriculum inadequacies for approved programmes, either in delivered content by providers or brought on through changes in professions' requirements, are readily detected and actioned by HCPC.
Scope	<p>The audit is focused on controls in place to ensure that learners complete necessary education programmes at approved education providers, which result in them meeting a required standard of education and training prior to being admitted to their respective registers.</p> <p>We will assess how HCPC conducts its approval processes for authorising new educational establishments and new educational programmes. For a sample of recently approved new educational establishments and programmes we will review the steps taken to determine they comply with policy and procedural guidance notes.</p> <p>We will review how HCPC assesses the quality of educational programmes to ensure that learners reach the required standards on completion of the programmes</p> <p>We will also assess how HCPC conducts ongoing reviews to determine whether previously approved establishments and courses remain fit for purpose.</p>
Approach	We will interview key staff responsible for the processes above and assess the design of the control frameworks. This will be followed up with 'walking through' the processes using real examples sampled.

B Audit definitions

Opinion/conclusion	
 (Green)	Overall, there is a sound control framework in place to achieve system objectives and the controls to manage the risks audited are being consistently applied. There may be some weaknesses but these are relatively small or relate to attaining higher or best practice standards.
 (Green-Amber)	Generally a good control framework is in place. However, some minor weaknesses have been identified in the control framework or areas of non-compliance which may put achievement of system or business objectives at risk.
 (Amber)	Weaknesses have been identified in the control framework or non-compliance which put achievement of system objectives at risk. Some remedial action will be required.
 (Amber-Red)	Significant weaknesses have been identified in the control framework or non-compliance with controls which put achievement of system objectives at risk. Remedial action should be taken promptly.
 (Red)	Fundamental weaknesses have been identified in the control framework or non-compliance with controls leaving the systems open to error or abuse. Remedial action is required as a priority.

Any areas for improvement are highlighted with the key recommendations in the right-hand columns. The symbols summarise our conclusions and are shown in the far right column of the table:

Good or reasonable practice	
An issue needing improvement	
A key issue needing improvement	

Recommendation rating	
Priority ranking 1:	There is potential for financial loss, damage to the organisation's reputation or loss of information. This may have implications for the achievement of business objectives and the recommendation should be actioned immediately.
Priority ranking 2:	There is a need to strengthen internal control or enhance business efficiency.
Priority ranking 3:	Internal control should be strengthened, but there is little risk of material loss or recommendation is of a housekeeping nature.

C Staff consulted during review

Name	Job title
Andrew Smith	Executive Director for Regulation
Brendon Edmonds	Head of Education
Jamie Hunt	Education Manager
Ewan Shears	Governance Officer
Temilolu Odunaike	Education Officer

We would like to thank these staff for the assistance provided during the completion of this review.

FOR MORE INFORMATION:

SARAH HILLARY

Sarah.Hillary@bdo.co.uk

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