

Health Professions Council
Education and Training committee 12th June 2007
Higher Education Regulation Review Group concordat

Executive Summary and Recommendations

Introduction

At its meeting in March 2007, the Education and Training Committee discussed the Higher Education Regulatory Review Group Concordat, and agreed that HPC should pursue signing up to this.

Attached to this paper is a draft appendix to the Concordat (which each signatory to the agreements puts together) for the Committee's consideration.

Decision

The Education and Training Committee is asked to agree:

- the attached draft HPC appendix to the Concordat;
- that the Executive should then forward the draft Appendix to the HERRG Secretariat, who will circulate this to HERRG members, and forward back any relevant comments or suggested changes;
- that if any suggested changes from HERRG are minor, that these should be made by the Executive and HPC should become a signatory to the Concordat, and this should be brought back to note by the Committee at its next meeting; and
- that if suggested changes from HERRG are substantive, that these should be brought back to the next ETC meeting for consideration.

Background information

In May 2006 the Higher Education Regulation Review group published a concordat on inspection and data collection within higher education. This concordat is based upon the principle that *'Good regulation is proportionate, consistent, transparent, targeted and accountable. Best practice in management and governance within autonomous higher education institutions is to be encouraged and supported. Unnecessary burdens from external bureaucracy and regulation should be reduced.'*

These principles are in line with the Council's own intention that regulation should be targeted, risk-based, and proportionate.

The Concordat has already attracted sixteen signatories from across a variety of sectors, including organisations within the health regulatory arena including the Department of Health, and Skills for Health.

The full concordat, including each of the appendices by signatory organisations, can be downloaded here:

<http://www.dfes.gov.uk/hegateway/uploads/HE%20CONCORDAT.pdf>

Resource implications

The resource implications of the actions included in the appendix are included as part of the Education team's workplan for this financial year.

Financial implications

None

Background papers

None

Appendices

None

Date of paper

31st May 2007

Health Professions Council (HPC) draft Annex to the Higher Education Concordat

Introduction

We welcome the opportunity to become a signatory to the Higher Education Regulatory Review Group concordat. We see this as part of our commitment to demonstrating how our processes are modern, risk-based, and light touch as far as is commensurate with our responsibility as a statutory regulator of health professionals to protect the public. This appendix sets out information about us and our role, our current processes, how our processes are aligned with the principles of the concordat, and what we plan to do in the future to further improve this.

About us

We are an independent, statutory regulator, created by the Health Professions Order 2001. We regulate the members of thirteen professions:

- Arts therapists;
- Biomedical scientists;
- Chiropodists/podiatrists;
- Clinical scientists;
- Dietitians;
- Occupational therapists;
- Operating department practitioners;
- Orthoptists;
- Paramedics;
- Physiotherapists;
- Prosthetists & orthotists;
- Radiographers; and
- Speech & language therapists.

We may also regulate other professions in the future. We were established in order to protect the public by running four key processes:

- setting standards;
- approving programmes;
- keeping a register; and
- taking action when registered health professionals do not meet our standards.

Our commitment to the Concordat is related to our activity around the second of these key processes: the approval of programmes. In order to be registered with us, health professionals must demonstrate that they meet our standards, in effect that they are fit to practise their profession safely and effectively. Most applicants to the Register apply via our 'UK approved course route'. This means that we already know, through approving their education provision, that these applicants meet our professional standards for their knowledge and skills.

The role of the HPC in programme approval

It is therefore vital to our role that we run an approvals system which is robust enough to ensure that those who gain registration have been adequately educated and trained. In determining our processes for the approval and monitoring of programmes, we therefore constantly need to balance our desire to run a process which is light-touch, with our statutory responsibility to ensure that programmes approved by us deliver graduates who can meet our standards.

This important statutory role around public protection means that we can rely on other organisation's findings where appropriate, but we still retain a duty under our legislation to make our own, independent approvals decision which is based on our standards for safe and effective practice. This means that our decision for approval differs from that of, say, the Quality Assurance Agency, since we are only concerned with matters that would effect the ability of the programme to deliver graduates who are capable of safe and effective practice. Likewise, we may need to look in more detail at matters relating to professional practice that may lie beyond the remit of other regulatory organisations, for example, practice placement provision.

When we visit an education provider we will normally send two 'Visitors'. Visitors are partners of the HPC, working on our behalf to assess whether the education provider and the programme meet our Standards of Education and Training. We will normally send two health professionals from the relevant part of the Register, and will generally include one health professional with academic experience, and one clinician.

In common with other approvals processes, the possible outcomes from a visit are that:

- the standards are met and the course is approved;
- conditions are set, and the course is approved subject to those conditions being fulfilled; or
- the standards are not met, and the course is not approved.

Once granted, approval is open-ended, subject to the programme participating in our annual monitoring and major/minor change process.

More information about our approvals and monitoring process is available on our website, www.hpc-uk.org

In particular, we publish the following online and in hard copy:

- Standards of Education and Training
- Standards of Education and Training guidance
- The Approval Process
- Annual Monitoring
- Major / Minor Change

Meeting the principles of the concordat

A key principle behind the development of our new approvals and monitoring process, in 2003, was that our processes should, as far as possible, align with and build upon existing approval and quality assurance processes already used by education providers.

Our standards

We have set broad, enabling standards which are focussed on the outcomes that are achieved from education provision. For example, we do not set detailed requirements for curricula, for how programmes should be resourced, or precise requirements as to how programmes should be delivered. We believe that this allows education providers the flexibility to plan a programme which meets local needs, or to develop new ways of educating students, within an enabling regulatory framework which ensures that threshold standards are met.

We are also committed to remaining open to feedback on areas where our standards may be proving un-necessarily burdensome or restrictive. Part of this commitment is demonstrated through our programme of standards review. However, in addition to periodic, thorough standards reviews, we also remain open to making changes between reviews, where feedback suggests that this is needed.

An example of this is a recent change to our requirement for external examiners, which we made after recognising that some programmes preferred to use an external examiner who was not from the relevant part of our Register, but could nonetheless carry out the role effectively.

A further example is the recent decision by our Council to no longer require a separate approval event for certain post-registration modules, where the module is already embedded in HPC approved pre-registration education. We can now approve these modules as stand-alone provision by a paper-based, targeted exercise with our Visitors. We believe that since the provider and programme have already been approved by us, this represents a reasonable and proportionate response to our duty to be assured that our standards are being met.

Working with HEIs own validation processes

As far as possible, we aim for our procedures to run alongside the existing processes that a higher education institution already operates. If the education provider is holding an internal or other validation event, we will try to arrange the visit for the same day(s). We would normally expect that our Visitors would use the same facilities, including the same sessions with, for example, the programme team, the head of school, practice placement educators, and students.

Likewise, when we ask for documentation to support the visit, we would normally expect that the programme team will send us the information (including, for example, a self-evaluation document) that they have already prepared for their own validation event. We then only ask for the education provide to complete cross-referencing documents (which we provide), to direct our Visitors to where they can find information that relates to the standards which underpin their decision-making.

We believe that this part of our process is in line with the aim of the concordat that signatory bodies should assess quality and standards ‘in a co-ordinated and appropriate manner’.

Open-ended approval

Approval, once granted, is open-ended, subject to completion of annual monitoring. We believe this is a proportionate way of reflecting the fact that education providers are committed to quality assurance, and also that any changes to the programme would be subject to our major / minor change process. This also means that we can target our resources towards visits which are required because of a new programme, a newly regulated profession, or a programme where we have reason to believe that a separate visit is necessary to ensure our standards continue to be met.

Likewise, our annual monitoring process is designed to reflect the fact that education providers are already subject to ongoing monitoring requirements from other organisations. We require each approved programme to submit information to us each year. Every other year, this information includes internal and external quality information where appropriate. During the intervening years, the education provider will send us a signed form to confirm that they continue to meet our standards. Also, if an education provider has been approved by us either that year, or the preceding year, we do not require that they participate in annual monitoring.

Again, this is designed to strike a balance between fulfilling our statutory duty to ensure that programmes continue to meet our standards, and reducing the regulatory burden on Higher Education Institutions.

Further work

We will be carrying out a full review of our Standards of Education and Training, which is due to begin in September 2007. We propose to include the Concordat as part of this review, and to ask the working group reviewing the standards (which will include members of our Council as well as external members with appropriate experience) to consider how far our standards are commensurate with the principles of the concordat, and whether any changes should be made to improve the standards in this respect.

This will have been undertaken by the group by December 2007.

We also plan to further review and refine our Annual Monitoring process, which we first began operating in the academic year 2005 - 2006. We will look at this process in November 2007, to establish whether any changes are needed, and we will consider the principles of the concordat during this process, and consider how far we might adapt our processes in the interests of making our Annual Monitoring process easier for education providers to participate in, while still ensuring that it offers a useful and proportionate way of ensuring that education providers and programmes continue to meet our standards.

In particular, we will investigate whether we can collect data directly from the Higher Education Statistics Agency (HESA) data to use as part of the Annual Monitoring process.

This will be completed by April 2008.

Similarly, we also plan to review our major / minor change process, to review how successful it has been, and whether it can be improved. During this process, we will also consider the principles of the Concordat. In particular, we are aware that we currently do not specify what documents should be provided by an education provider to support a proposed major change. We believe that this could create additional or un-necessary work for programme staff, who may feel that they need to assemble additional information for us, as well as information prepared for their internal validation, or for any other purposes.

When we review our major change process, therefore, we will also consider whether, in line with the Concordat, we can collect information from HESA, and furthermore, we will consider specifying to education providers that we only expect them to provide us with existing documentation, and that we do not expect them to prepare additional information for us about their major change.

This will be completed by April 2008.

Concordat review

We will review this appendix eighteen months after signing up to it. At that time, our Education and Training Committee will consider a paper which reviews what work we have done in this area, and how far that work is aligned with, is informed by, or contributes further to, the principles in the Concordat. We will then re-draft our Appendix if necessary to reflect this.