

Visitors' report

<b>Name of education provider</b>	London Metropolitan University
<b>Programme name</b>	Professional Doctorate in Counselling Psychology
<b>Mode of delivery</b>	Full time Part time
<b>Relevant part of HPC Register</b>	Practitioner psychologist
<b>Relevant modality / domain</b>	Counselling psychologist
<b>Date of visit</b>	18 – 19 April 2012

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## Executive summary

The Health Professions Council (HPC) approve educational programmes in the UK which health professionals must complete before they can apply to be registered with us. The HPC is a health regulator and our main aim is to protect the public. The HPC currently regulates 15 professions. All of these professions have at least one professional title which is protected by law. This means that anyone using the title 'Practitioner psychologist' or 'Counselling psychologist' must be registered with us. The HPC keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

The visitors' report which follows outlines the recommended outcome made by the visitors on the ongoing approval of the programme. The education provider has until 1 June 2012 to provide observations on this report. This is independent of meeting any conditions. The report and any observations received will be considered by the Education and Training Committee (Committee) on 5 July 2012. At this meeting, the Committee will accept the visitors' recommended outcome, including the conditions. If necessary, the Committee may decide to vary the conditions.

The education provider is due to redraft and resubmit documentary evidence in response to the conditions outlined in this report by 27 July 2012. The visitors will consider this response and make a separate recommendation to the Committee on the ongoing approval of the programme. It is anticipated that this recommendation will be made to the Committee on 23 August 2012.

## Introduction

The HPC visited the programme at the education provider as the practitioner psychologist profession came onto the register in 2009 and a decision was made by the Education and Training Committee to visit all existing programmes from this profession. This visit assessed the programme against the standards of education and training (SETs) and considered whether those who complete the programme meet the standards of proficiency (SOPs) for their part of the Register.

This visit was part of a joint event as the professional body considered their accreditation of the programme. The professional body and the HPC formed a joint panel, with an independent chair and secretary, supplied by the education provider. Whilst the joint panel participated in collaborative scrutiny of the programme and dialogue throughout the visit; this report covers the HPC's recommendations on the programme only. As an independent regulatory body, the HPC's recommended outcome is independent and impartial and based solely on the HPC's standards. A separate report, produced by the professional body, outlines their decisions on the programme's status.

## Visit details

Name of HPC visitors and profession	David Packwood (Counselling psychologist) Robert Stratford (Educational psychologist)
HPC executive officer (in attendance)	Victoria Adenugba
Proposed student numbers	22 (between full and part time cohorts)
First approved intake	January 2004
Effective date that programme approval reconfirmed from	September 2012
Chair	Vincent Hargy (London Metropolitan University)
Secretary	Abbey Bibi (London Metropolitan University) Crystal Peirera (London Metropolitan University)
Members of the joint panel	Elena Manafi (The British Psychological Society) Kimberley Wilson (The British Psychological Society) Molly Ross (The British Psychological Society)

## Sources of evidence

Prior to the visit the HPC reviewed the documentation detailed below, sent by the education provider:

	Yes	No	N/A
Programme specification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Descriptions of the modules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SETs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SOPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Practice placement handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Curriculum vitae for relevant staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
External examiners' reports from the last two years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

During the visit the HPC saw the following groups or facilities:

	Yes	No	N/A
Senior managers of the education provider with responsibility for resources for the programme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programme team	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Placements providers and educators/mentors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Learning resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Recommended outcome

To recommend a programme for ongoing approval, the visitors must be assured that the programme meets all of the standards of education and training (SETs) and that those who complete the programme meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that a number of conditions are set on the programme, all of which must be met before the programme can be approved.

The visitors agreed that 48 of the SETs have been met and that conditions should be set on the remaining 9 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for ongoing approval. Conditions are set when certain standards of education and training have not been met or there is insufficient evidence of the standard being met.

The visitors have also made a number of recommendations for the programme.

Recommendations are observations on the programme or education provider which do not need to be met before the programme is recommended for ongoing approval. Recommendations are normally set to encourage further enhancements to the programme and are normally set when it is felt that the particular standard of education and training has been met at, or just above the threshold level.

## Conditions

### **3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.**

**Condition:** The education provider must ensure that formal protocols are used to obtain trainees' consent when they participate as service users, and to manage situations when trainees decline from participating as service users, in practical and clinical teaching.

**Reason:** From the documentation submitted the visitors learnt that trainees would be participating as service users during the programme. At the visit the visitors were presented with the Client consent forms, however they were unable to determine a formal process for obtaining trainees' consent and no documentary evidence of this was presented. From the discussions with the programme team, the visitors learnt that verbal consent is obtained. The programme team also discussed how they made applicants to the programme clear about what level of involvement was expected during the course of the programme.

The visitors were concerned that there was no formal protocol in place to detail how records were maintained to indicate consent had been obtained or how situations where trainees decline from participation were managed. In light of this, the visitors were not satisfied the programme gained informed consent from trainees or could appropriately manage situations where trainees decline to participate. The visitors therefore require the education provider to implement appropriate formal protocols for obtaining consent from trainees and for managing situations where trainees decline from participating.

### **4.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards of proficiency for their part of the Register.**

**Condition:** The education provider must revise the programme documentation to make explicit how the learning outcomes of the programme allow students to meet the following standard of proficiency (SOP):

#### **2a.4 be able to analyse and critically evaluate the information collected**

- understand the use and interpretation of tests and other assessment procedures
- be able to critically evaluate risks and their implications

**Reason:** From a review of the documentation provided prior to the visit, the visitors were unclear as to how the programme ensures that those students who successfully complete the programme can meet the above standards of proficiency. The 'Professional and Ethical Issues' module was referenced within the SOPs mapping document provided by the education provider as evidence as to how this SOP could be met by students. From a review of this evidence the visitors were clear about how students were taught the ethical implications of using tests. However, the visitors were unclear as to how students were taught to undertake appropriate tests as well as how to analyse and critically evaluate the information collected. The visitors were concerned that if a student was on a placement where tests were not used or where there were no supervisors who

had knowledge of how to undertake tests then students would not be able to meet this SOP. The visitors were also concerned that students may be prevented from going out on placement and performing tests and other assessment procedures without having first developed the skills required to safely do so. In order for the visitors to be assured that this standard is met, the visitors require further evidence of when and how students are taught how to administer and interpret tests. The visitors require this information to ensure that individuals completing the programme are fully prepared before they go out on placement and are able to meet all the standards required for safe and effective practice of the profession.

#### **4.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards of proficiency for their part of the Register.**

**Condition:** The education provider must revise the programme documentation to make explicit how the learning outcomes of the programme allow students to meet the following standard of proficiency (SOP):

##### **2b.1 be able to use research, reasoning and problem solving skills to determine appropriate actions**

- be able to conduct service evaluations

**Reason:** From the documentation provided prior to the visit, the visitors were unclear as to how the above standards of proficiency were taught within the programme. In discussions with the programme team the visitors were informed that service evaluation was included with the third year doctoral research module and there were plans to also cover this during earlier in the programme. The visitors considered the response from the team but felt that the specific requirements of service evaluation, as distinct from research, were not explicitly documented. In order for the visitors to be assured that this standard is met, revised documentation is required which clarifies where and how the learning outcomes for the programme linked to the above standards of proficiency are delivered. The visitors require this information to ensure that individuals completing the programme will be able to meet all the standards required for safe and effective practice of the profession.

#### **5.3 The practice placement settings must provide a safe and supportive environment.**

**Condition:** The education provider must ensure that formal mechanisms are put in place which ensures that all practice placement settings provide a safe and supportive environment.

**Reason:** From the documents submitted and from discussions with the programme team the visitors did not have enough evidence to demonstrate that the education provider has a thorough and effective system in place to ensure that all practice placements provided a safe and supportive environment. The visitors noted that the education provider does have mechanisms in place; they learnt that the placement co-ordinator for this programme may visit some new placement settings otherwise communication was established via email or telephone calls prior to a student going on placement. The visitors did not see the

audit tool used to approve placements and were concerned that the current mechanism in place did not thoroughly ensure that risk assessments and safety policies were in place before students went on placement. The visitors also learnt that placements were not revisited or monitored again unless it was necessary due to issues or concerns being flagged by students. They learnt that students' feedback on their placement experiences by completing a 'Placement Site Information Sheet' and that this information is stored in a 'practice placement database' for students to refer too. They were concerned that the current monitoring mechanism in place relied solely on student feedback and from a review of the sheet they were unable to see how safety procedures and policies were checked to ensure they remained current and in place. As the programme team must maintain overall responsibility for each placement including ensuring the placement setting provides a safe and supportive environment the visitors require the programme team to provide further evidence of how they approve and how they will also monitor placements to be assured that this SET is being met. The visitors suggest the condition for SET 5.4 be looked at alongside this condition as they are closely linked.

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

**Condition:** The programme team must provide further evidence of the formal policies and processes in place for the approval and ongoing monitoring of practice placements

**Reason:** From the documents submitted and from discussions with the programme team the visitors did not have enough evidence to demonstrate that the education provider has a thorough and effective system in place for the approval and monitoring of placements. The visitors noted that the education provider does have mechanisms in place; they learnt that the placement co-ordinator for this programme may visit some new placement settings otherwise communication was established via email or telephone calls prior to a student going on placement. The visitors however did not see the audit tool used to approve placements and therefore could not assess its suitability. They were also concerned that if there is no formal policy in place for the approval of placements there is a possibility for this to be overlooked if the placement co-ordinator is away or changes. There is also the possibility for inconsistencies to arise dependant on what mechanism was being used to initially contact a new placement if there is no formal procedure. The visitors also learnt that placements were not revisited or monitored again unless issues or concerns had been raised by students. They learnt that student's feedback on their placement experiences by completing a 'Placement Site Information Sheet' and that this information is stored in a 'Practice placement database' for students to refer too. They were concerned that the current monitoring mechanism in place relied solely on student feedback and there was no formal policy or procedure used by the programme team to monitor placements. As this SET requires that the programme team has policies and processes for approving placements and details of systems for ongoing monitoring of placement providers the visitors require the programme team to provide further evidence to be assured that this SET is being met.

## **5.8 Practice placement educators must undertake appropriate practice placement educator training.**

**Condition:** The programme team must put in place a formalised mechanism to ensure that all practice placement educators are trained and have their training updated regularly.

**Reason:** From discussion with the programme team, and in discussion with the practice placement providers, the visitors learnt that new practice placement educators were given training if they were visited otherwise training was provided via the telephone by the placement co-ordinator however no refresher training was offered. The visitors were not provided with the training content or broad learning outcomes of the training provided to placement educators.

As a result the visitors could not identify how the programme team ensures that practice placement educators are trained to assess students in a clear and consistent way and made fully aware of the requirements for supervision on this programme. The visitors were also unable to determine how updates to the programme would be related to placement educators if no form of retraining was offered. The visitors learnt during discussion with the programme team that plans to create an online forum for placement providers were being discussed and that this could be a platform where training and refresher training could be held however the visitors could not establish any guarantee that this would take place and what training would be provided. The visitors therefore require further evidence to demonstrate how the programme team will ensure that placement educators have sufficient training to be able to supervise students from this programme. Primarily the visitors require further evidence of how the programme team ensures that placement educators can assess students to the required standard and how this will be updated on a regular basis. The visitors suggest the condition for SET 6.5 be looked at alongside this condition as they are closely linked.

## **5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:**

- **the learning outcomes to be achieved;**
- **the timings and the duration of any placement experience and associated records to be maintained;**
- **expectations of professional conduct;**
- **the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and**
- **communication and lines of responsibility.**

**Condition:** The programme team must provide further evidence of how students and practice placement educators are fully prepared for before placements commence.

**Reason:** From a review of the programme documentation and in discussion with the practice placement providers the visitors noted that practice placement educators are provided with the handbook for placement providers prior to supervising a student. The visitors were unclear about what information was provided to placement educators about the assessment procedures to be used to ensure that learning outcomes are met and marked consistently across all

placements. During discussions with the Placement providers and Students the visitors learnt that whilst some placements provide an induction others did not. The visitors learnt that before the programme started the placement co-ordinator delivered a general introduction to students about placements. The visitors were unable to establish if this induction was thorough enough to prepare students before they went on placement. The visitors therefore require further evidence of the information provided to students to ensure that they are well informed about what is expected of them and their responsibilities during a placement. In this way the visitors can determine how the programme team ensures that students fully prepared before they go on placement. The visitors also require further evidence of the information provided to placement educators to ensure that they are aware of the learning outcomes a student must meet whilst on placement and the measurement to be used for assessment. In this way the visitors can determine how the programme team ensures that practice placement educators are fully prepared to supervise students and assess their performance.

### **6.1 The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.**

**Condition:** The education provider must provide evidence to demonstrate how the assessment strategy of the programme ensures that students who successfully complete the programme meet the following standard of proficiency (SOP):

#### **2a.4 be able to analyse and critically evaluate the information collected**

- understand the use and interpretation of tests and other assessment procedures
- be able to critically evaluate risks and their implications

**Reason:** From the documentation provided prior to the visit, the visitors could not identify how the assessment strategy ensures that students are able to meet the above standards of proficiency. In particular, they were unclear as to where students were assessed on their knowledge of how to undertake appropriate tests as well as how to analyse and critically evaluate the information collected. From a review of the 'Professional and Ethical Issues' module, referenced within the SOPs mapping document provided by the education provider as evidence as to how this SOP could be met by students, the visitors were clear about how students were assessed on the ethical implications of using tests. However, the visitors were unclear as to how students were assessed on how to undertake appropriate tests. As it was unclear in the assessment strategy where this skill would be assessed, the visitors require further evidence to ensure that this standard is met. The visitors therefore require further evidence that demonstrates where, in the assessment strategy, the students will be assessed on their knowledge of how to undertake appropriate tests as well as how to analyse and critically evaluate the information collected. In this way the visitors can be sure that the students who successfully complete the programme can meet SOP 2a.4 and that this standard is met.

## **6.1 The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.**

**Condition:** The education provider must provide evidence to demonstrate how the assessment strategy of the programme ensures that students who successfully complete the programme meet the following standard of proficiency (SOP):

### **2b.1 be able to use research, reasoning and problem solving skills to determine appropriate actions**

- be able to conduct service evaluations

**Reason:** From the documentation provided prior to the visit, the visitors could not identify how the assessment strategy ensures that students are able to meet the above standards of proficiency. In particular, they were unclear as to where students were assessed on their knowledge of how to conduct service evaluations. In discussions with the programme team the visitors were informed that service evaluation was included with the third year doctoral research module and there were plans to also cover this during earlier in the programme. The visitors considered the response from the team but felt that the specific requirements of service evaluation, as distinct from research, were not explicitly documented. As it was unclear in the assessment strategy where this knowledge would be assessed, the visitors require further evidence to ensure that this standard is met. The visitors therefore require further evidence that demonstrates where, in the assessment strategy, the students will be assessed on their knowledge of how to conduct service evaluations. In this way the visitors can be sure that the students who successfully complete the programme can meet SOP 2b.1 and that this standard is met.

## **6.5 The measurement of student performance must be objective and ensure fitness to practise.**

**Condition:** The education provider must ensure that the measurement of student performance is assessed consistently and objectively across all placements and ensures fitness to practice.

**Reason:** During discussions with placement supervisors the visitors learnt that they were provided with a 'Practice placement competency evaluation form' which showed ten broad areas and a set of specific competency pointers to illustrate the kinds of skills and abilities students are being assessed on. The assessment measurement is left to each placement supervisor's discretion. As the visitors learnt that currently there was no training provided to practice placement supervisors on assessment and marking the trainees objectively they were unable to determine how marking was equal and consistent across all placement sites. The visitors therefore require further evidence of how the programme team will ensure that the measurement of student performance is objective and ensures fitness to practice across all placements. The visitors suggest the condition for SET 5.8 be looked at alongside this condition as they are closely linked.

**6.11 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 the relevant part of the Register.**

**Condition:** The education provider must revisit the programme documentation to clearly articulate within the assessment regulations that at least one of the external examiners appointed to the programme must be HPC registered unless alternate arrangements have been agreed.

**Reason:** At the visit the programme team presented the visitors with the education provider's policy on the recruitment of external examiners. The visitors were unable to see where it clearly articulated the requirement for an external examiner of a programme approved by the HPC to be appropriately registered. The visitors were happy that the current external examiner meets the requirement of the HPC. However this standard requires that the assessment regulations of the programme must state that at least one external examiner appointed to the programme needs to be appropriately registered or that suitable alternative arrangements should be agreed. Therefore the visitors require evidence that HPC requirements regarding the appointment of external examiners to the programme have been included in the programme documentation, specifically in the assessment regulations, to ensure that this standard is met.

## Recommendations

### **3.8 The resources to support student learning in all settings must be effectively used.**

**Recommendation:** The education provider should consider how best to inform the HPC of any changes to the physical resources associated with the programme.

**Reason:** The visitors were content that this standard was met. However if the programme moves to the new campus as suggested in the programme team meeting, the visitors recommend that the education provider should notify the HPC as soon as possible through the major change process when the final arrangements of this move have been finalised and are underway. This is due to the fact that they were unable to physically check out resources at the new site therefore there is scope of some of the resources discussed to change which could impact on how the programme continues to meet this standard.

### **6.8 Assessment regulations, or other relevant policies, must clearly specify requirements for approved programmes being the only programmes which contain any reference to an HPC protected title or part of the Register in their named award.**

**Recommendation:** The education provider should consider clearly articulating against all references to the Master of Science (MSc) award that it does not provide eligibility for admission to the HPC Register.

**Reason:** Within the 'Postgraduate Course Handbook' (p4), the 'Programme overview and information for prospective applicants' (p5) and the 'Course Specification' (p5) the visitors discovered statements that clearly articulated that the MSc in Psychological Counselling to not lead to eligibility to apply for Registration with the HPC, as such they were content that this standard was met. To further clarify that the MSc is not approved by the HPC the visitors suggest that in any instance where the MSc is discussed as a possible exit route within the Professional Doctorate in Counselling Psychology documentation the programme team should reiterate that the MSc does not lead to eligibility to apply for Registration with the HPC.

David Packwood  
Robert Stratford



28<sup>th</sup> May 2012

Dear Victoria,

**Re: Education Provider's observations on HPC report following approval visit for the Professional Doctorate in Counselling Psychology, 18-19<sup>th</sup> April 2012**

Thank you very much for sending through the visitors' outcomes report following our approval recent visit and the attached guidance regarding making observations about it.

In response to this, I did have a query about the accuracy of some of the statements made in the report regarding the conditions relating to points 5.3 and 5.4, specifically as outlined below:

"The visitors did not see the audit tool used to approve placements.."

"...placements were not revisited or monitored again unless it was necessary due to issues or concerns being flagged by students"

"... if there is no formal policy in place for the approval of placements there is a possibility for this to be overlooked..."

I thought we did provide the panel with the audit tool that we use to approve placements, and which demonstrates that we do have a formal policy in place for the approval and monitoring of placements. This tool can be found in Appendix D of the Practice Placement Provider Handbook, the 'Placement Agreement' (attached here in case helpful). This tool and Section 6.1 of the Handbook make specific reference to the criteria used to approve practice placements, including safety and risk policies. In addition, all active placements need to re-complete this form annually, so it would not be entirely accurate to state that the programme does not currently monitor placements unless issues are raised by students.

I hope this email is useful and look forward to hearing from you shortly.

Best wishes,  
Mark

Dr Mark Donati  
Course Leader and Principal Lecturer  
Professional Doctorate in Counselling Psychology

Visitors' response to observations on conditions.

Received as an email on 7 June 2012.

**Re: HPC visitors' report - London Metropolitan University - Professional  
Doctorate in Counselling Psychology - full and part time**

Upon further discussion and reflection on the observation submitted by the  
Education provider, we are agreed that this programme meets SET 5.3.

However we still need to see evidence that the ongoing monitoring (SET 5.4) is  
robust in ensuring placements meet the required standards particularly where no  
initial visit has been made.

Dave Packwood  
Robert Stratford

## Visitors' report

<b>Name of education provider</b>	Mary Hare
<b>Validating body / Awarding body</b>	Oxford Brookes University
<b>Programme name</b>	Foundation Degree in Hearing Aid Audiology
<b>Mode of delivery</b>	Full time
<b>Relevant part of HPC Register</b>	Hearing aid dispensers
<b>Date of visit</b>	22 - 23 May 2012

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## Executive summary

The Health Professions Council (HPC) approve educational programmes in the UK which health professionals must complete before they can apply to be registered with us. The HPC is a health regulator and our main aim is to protect the public. The HPC currently regulates 15 professions. All of these professions have at least one professional title which is protected by law. This means that anyone using the title 'Hearing aid dispenser' must be registered with us. The HPC keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

The visitors' report which follows outlines the recommended outcome made by the visitors on the ongoing approval of the programme. The education provider has until 9 July 2012 to provide observations on this report. This is independent of meeting any conditions. The report and any observations received will be considered by the Education and Training Committee (Committee) on 5 July 2012. At this meeting, the Committee will accept the visitors' recommended outcome, including the conditions. If necessary, the Committee may decide to vary the conditions.

The education provider is due to redraft and resubmit documentary evidence in response to the conditions outlined in this report by 10 August 2012. The visitors will consider this response and make a separate recommendation to the Committee on the ongoing approval of the programme. It is anticipated that this recommendation will be made to the Committee on 13 September 2012.

## Introduction

The HPC visited the programme at the education provider as the Hearing aid dispenser profession came onto the register in April 2010 and a decision was made by the Education and Training Committee to visit all existing programmes from this profession. This visit assessed the programme against the standards of education and training (SETs) and considered whether those who complete the programme meet the standards of proficiency (SOPs) for their part of the Register.

This visit was an HPC only visit. The education provider and validating/awarding body did not validate or review the programme at the visit and the professional body did not consider their accreditation of the programme. The education provider supplied an independent chair and secretary for the visit.

## Visit details

Name of HPC visitors and profession	Hugh Crawford (Hearing aid dispenser) Richard Sykes (Hearing aid dispenser)
HPC executive officer(s) (in attendance)	Victoria Adenugba
Proposed student numbers	12 per cohort
First approved intake	July 2009
Effective date that programme approval reconfirmed from	September 2012
Chair	Barry Downes (British Society of Hearing Aid Audiologists)
Secretary	Andria Thomas (Mary Hare)

## Sources of evidence

Prior to the visit the HPC reviewed the documentation detailed below, sent by the education provider:

	Yes	No	N/A
Programme specification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Descriptions of the modules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SETs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SOPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Practice placement handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Curriculum vitae for relevant staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
External examiners' reports from the last two years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

During the visit the HPC saw the following groups or facilities:

	Yes	No	N/A
Senior managers of the education provider with responsibility for resources for the programme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programme team	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Placements providers and educators/mentors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Learning resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Recommended outcome

To recommend a programme for ongoing approval, the visitors must be assured that the programme meets all of the standards of education and training (SETs) and that those who complete the programme meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that a number of conditions are set on the programme, all of which must be met before the ongoing approval of the programme is reconfirmed.

The visitors agreed that 53 of the SETs have been met and that conditions should be set on the remaining 4 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for ongoing approval. Conditions are set when certain standards of education and training have not been met or there is insufficient evidence of the standard being met.

The visitors have also made a number of recommendations for the programme.

Recommendations are observations on the programme or education provider which do not need to be met before the programme is recommended for ongoing approval. Recommendations are normally set to encourage further enhancements to the programme and are normally set when it is felt that the particular standard of education and training has been met at, or just above the threshold level.

## Conditions

### **2.1 The admissions procedures 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 review the programme documentation, including advertising materials, to ensure that the terminology used is accurate and reflective of the language associated with statutory regulation and the HPC.

**Reason:** The documentation submitted by the education provider included references to the programme which do not comply with the advertising guidance issued by HPC. The 'Student handbook 2012-2014' stated that the 'programme leads to the ability to register with the Health Professions Council'. Such statements imply an automatic link between completing the programme successfully and registration with the HPC which is misleading. Successful completion of an approved programme confers eligibility to apply for registration with the HPC. Within the student handbook it is also stated that the programme is 'a qualification regulated by the Health Professions Council' this is incorrect as the HPC approves programmes, but regulates professions. The visitors also noted that in some instances the online advertising material and programme documentation refers to HPC Registration or standards as applying to 'Hearing aid audiologists', this is misleading as HPC registration and the HPC standards relate to the protected title of hearing aid dispensers that the HPC regulates. The visitors also noticed within the student handbook a statement that 'this foundation degree programme follows the framework laid down by the HPC in order to achieve registration in all the required professional standards of proficiency'. This statement is misleading as the HPC does not provide a framework as such but programmes must meet all the HPC's standards of education and training which in turn will ensure that students who successfully complete an approved programme can meet all the HPC's standards of proficiency. This does not automatically guarantee entry onto the HPC Register as a hearing aid dispenser. The visitors require the education provider to review and resubmit the programme documentation, including any advertising materials, to ensure that the terminology used is accurate, reflects the language associated with statutory regulation and avoids any potential confusion for applicants and students.

### **5.3 The practice placement settings must provide a safe and supportive environment.**

**Condition:** The programme team must put in place formal mechanisms which ensure that all practice placement settings provide a safe and supportive environment.

**Reason:** Documentation submitted prior to the visit did not include any mechanism of how the programme team ensured that all their placements had the relevant safety policies and procedures in place. There was no evidence of any risk assessments undertaken or how health and safety policies and procedures are monitored at placement settings. During discussions with the

programme team the visitors learnt that there was currently no system in place to check that placements were safe and supportive before students went on a placement. The programme team currently uses the requirement that all supervisors must be HPC registered as assurance that this standard is being met, since to maintain registration hearing aid dispensers must continue to meet all the HPC standards of proficiency which are necessary for safe and effective practice. The visitors were concerned that this method was not rigorous enough for the programme team to use exclusively to ensure that placement environments are safe and supportive for students. As the programme team must maintain overall responsibility for each placement including ensuring the placement setting provides a safe and supportive environment the visitors require the programme team to provide further evidence of how they will ensure all placement settings provide a safe and supportive environment. The visitors suggest the condition for SETs 5.4 be looked at alongside this condition as they are closely linked.

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

**Condition:** The education provider must put in place an effective system for approving and monitoring all practice placements.

**Reason:** Documentation submitted prior to the visit did not include any evidence of how the programme team approved and monitored all their placements. During discussions with the programme team the visitors learnt that currently placements were approved subject to the supervisors having the relevant HPC registration as a hearing aid dispenser. The programme team currently uses the requirement that all supervisors must be HPC registered as assurance that this standard is being met, since to maintain registration hearing aid dispensers must continue to meet all the HPC standards of proficiency which are necessary for safe and effective practice. The visitors were concerned that this method was not rigorous enough for the programme team to use exclusively to approve and monitor placements. They were also concerned that any issues with placement sites would only be flagged up by students after they had started their placement. As the programme team must maintain overall responsibility for each placement including approving and monitoring placements the visitors require the programme team to provide further evidence of how they will ensure all placement settings are approved and monitored.

#### **5.8 Practice placement educators must undertake appropriate practice placement educator training.**

**Condition:** The education provider must ensure practice placement educators undertake appropriate practice placement educator training.

**Reason:** From the discussions with the programme team the visitors learnt that practice placement educator training was not mandatory and as such there was a low take up for training. The visitors learnt that the programme team currently uses HPC registration as an assurance that this standard is being met and that placement educators are appropriately qualified and experienced to supervise

students. The visitors were concerned that HPC registration alone did not guarantee or provide placement educators with enough training to supervise students on this programme. They were concerned that without some form of mandatory training of new placement educators there was no way for the programme team to be assured that educators were suitably equipped to take on students and prepared to deliver formative and summative assessments. As this standard requires that the programme team trains all new practice placement educators and follows this up with regular refresher training the visitors require that the programme team ensures that all placement educators undertake appropriate practice placement educator training before receiving students. The visitors therefore require evidence on the training that will be provided to practice placement educators and how this will be record and monitored.

## Recommendations

### **3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.**

**Recommendation:** The education provider should consider reviewing the resources levels for the programme.

**Reason:** The visitors were content that this standard was met. However if the programme recruits further numbers on the proposed HND programme, the visitors would like the education provider to consider reviewing the number of relevant equipment, such as audiometers numbers, for the programme to ensure there continues to be an adequate number of resources to support student learning and that all students can benefit from this without constraints upon their onsite learning.

### **3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.**

**Recommendation:** The education provider should consider reviewing the Student Consent Form to further emphasise that students have the right to opt out of practical and clinical teaching where participating as service users.

**Reason:** From a review of the programme documentation the visitors noted that the education provider has a student consent form that it uses to obtain consent where students participate as service users in practical and clinical teaching. The visitors are therefore satisfied that this standard has been met. Through discussions the visitors noted good practice in that the programme team introduce this form as part of the programme induction and verbally discuss the fact that students may be able to opt out of practical and clinical teaching sessions should they, for example, have specific cultural or health requirements. However, to enhance this good practice the visitors would like to recommend that the education provider consider adding this information to the student consent form to formally emphasise that students have the right to opt out of practical and clinical teaching where participating as service users.

### **5.10 There must be regular and effective collaboration between the education provider and the practice placement provider.**

**Recommendation:** The programme team should consider keeping the collaborative arrangements between themselves and the practice placement providers under review to ensure that the collaboration continues effectively.

**Reason:** Through discussions with the programme team and placement providers the visitors noted that there was collaboration taking place between the education provider and the practice placement provider. As such they are content that this standard has been met. To ensure that collaboration continues and encompasses any new placement providers that could develop when the new

HND programme begins, the visitors suggest that the programme team monitor the collaboration between them and their placement providers to ensure that it continues and remains effective.

Hugh Crawford  
Richard Sykes

## Visitors' report

<b>Name of education provider</b>	Mary Hare
<b>Validating body / Awarding body</b>	Newbury College
<b>Programme name</b>	Higher National Diploma in Hearing Aid Audiology
<b>Mode of delivery</b>	Full time
<b>Relevant part of HPC Register</b>	Hearing aid dispensers
<b>Date of visit</b>	22 - 23 May 2012

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## Executive summary

The Health Professions Council (HPC) approve educational programmes in the UK which health professionals must complete before they can apply to be registered with us. The HPC is a health regulator and our main aim is to protect the public. The HPC currently regulates 15 professions. All of these professions have at least one professional title which is protected by law. This means that anyone using the title 'Hearing aid dispenser' must be registered with us. The HPC keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

The visitors' report which follows outlines the recommended outcome made by the visitors on the approval of the programme. The education provider has until 9 July 2012 to provide observations on this report. This is independent of meeting any conditions. The report and any observations received will be considered by the Education and Training Committee (Committee) on 5 July 2012. At this meeting, the Committee will accept the visitors' recommended outcome, including the conditions. If necessary, the Committee may decide to vary the conditions.

The education provider is due to redraft and resubmit documentary evidence in response to the conditions outlined in this report by 10 August 2012. The visitors will consider this response and make a separate recommendation to the Committee on the approval of the programme. It is anticipated that this recommendation will be made to the Committee on 13 September 2012.

## Introduction

The HPC visited the programme at the education provider as it was a new programme which was seeking HPC approval for the first time. This visit assessed the programme against the standards of education and training (SETs) and considered whether those who complete the programme meet the standards of proficiency (SOPs) for their part of the Register.

This visit was an HPC only visit. The education provider and validating/awarding body did not validate or review the programme at the visit and the professional body did not consider their accreditation of the programme. The education provider supplied an independent chair and secretary for the visit.

## Visit details

Name of HPC visitors and profession	Hugh Crawford (Hearing aid dispenser) Richard Sykes (Hearing aid dispenser)
HPC executive officer(s) (in attendance)	Victoria Adenugba
Proposed student numbers	25
Proposed start date of programme approval	September 2012
Chair	Barry Downes (British Society of Hearing Aid Audiologists)
Secretary	Andria Thomas (Mary Hare)

## Sources of evidence

Prior to the visit the HPC reviewed the documentation detailed below, sent by the education provider:

	Yes	No	N/A
Programme specification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Descriptions of the modules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SETs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SOPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Practice placement handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Curriculum vitae for relevant staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
External examiners' reports from the last two years	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The HPC did not review External examiners' reports from the last two years prior to the visit as there is currently no external examiner as the programme is new.

During the visit the HPC saw the following groups or facilities:

	Yes	No	N/A
Senior managers of the education provider with responsibility for resources for the programme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programme team	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Placements providers and educators/mentors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Students	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>
Learning resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The HPC met with students from the Foundation Degree in Hearing Aid Audiology, as the programme seeking approval currently does not have any students enrolled on it.

## Recommended outcome

To recommend a programme for approval, the visitors must be assured that the programme meets all of the standards of education and training (SETs) and that those who complete the programme meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that a number of conditions are set on the programme, all of which must be met before the programme can be approved.

The visitors agreed that 52 of the SETs have been met and that conditions should be set on the remaining 5 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for approval. Conditions are set when certain standards of education and training have not been met or there is insufficient evidence of the standard being met.

The visitors have also made a number of recommendations for the programme.

Recommendations are observations on the programme or education provider which do not need to be met before the programme is recommended for approval. Recommendations are normally set to encourage further enhancements to the programme and are normally set when it is felt that the particular standard of education and training has been met at, or just above the threshold level.

## Conditions

### **2.1 The admissions procedures 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 review the programme documentation, including advertising materials, to ensure that the terminology used is accurate and reflective of the language associated with statutory regulation and the HPC.

**Reason:** The documentation submitted by the education provider included references to the programme which do not comply with the advertising guidance issued by HPC. The 'Student handbook 2012-2014' stated that the 'programme leads to the ability to register with the Health Professions Council'. Such statements imply an automatic link between completing the programme successfully and registration with the HPC which is misleading. Successful completion of an approved programme confers eligibility to apply for registration with the HPC. Within the student handbook it is also stated that the programme is 'a qualification regulated by the Health Professions Council' this is incorrect as the HPC approves programmes, but regulates professions. The visitors also noted that in some instances the online advertising material and programme documentation refers to HPC Registration or standards as applying to 'Hearing aid audiologists', this is misleading as HPC registration and the HPC standards relate to the protected title of hearing aid dispensers that the HPC regulates. The visitors also noticed within the student handbook a statement that 'this foundation degree programme follows the framework laid down by the HPC in order to achieve registration in all the required professional standards of proficiency'. This statement is misleading as the HPC does not provide a framework as such but programmes must meet all the HPC's standards of education and training which in turn will ensure that students who successfully complete an approved programme can meet all the HPC's standards of proficiency. This does not automatically guarantee entry onto the HPC Register as a hearing aid dispenser. The visitors require the education provider to review and resubmit the programme documentation, including any advertising materials, to ensure that the terminology used is accurate, reflects the language associated with statutory regulation and avoids any potential confusion for applicants and students.

### **3.8 The resources to support student learning in all settings must be effectively used.**

**Condition:** The education provider must revise the programme documentation and submit the finalised version for review.

**Reason:** The documentation submitted for this programme prior to the visit was not the finalised versions, as the programme is seeking initial approval the documentation is still being finalised subject to the requirements of the HPC and the awarding body. To ensure that all the documentation for this programme is finalised and suitable for use before the programme begins. The visitors require the finalised programme documentation to be submitted for review.

### **5.3 The practice placement settings must provide a safe and supportive environment.**

**Condition:** The programme team must put in place formal mechanisms which ensure that all practice placement settings provide a safe and supportive environment.

**Reason:** Documentation submitted prior to the visit did not include any mechanism of how the programme team would ensure that all their placements had the relevant safety policies and procedures in place. There was no evidence of how any risk assessments would be undertaken or how health and safety policies and procedures would be monitored at placement settings. During discussions with the programme team the visitors learnt that there was currently no system in place to check that placements were safe and supportive before students went on a placement. The programme team discussed that they would use the requirement that all supervisors must be HPC registered as assurance that this standard would be met, since to maintain registration hearing aid dispensers must continue to meet all the HPC standards of proficiency which are necessary for safe and effective practice. The visitors were concerned that this method was not rigorous enough for the programme team to use exclusively to ensure that placement environments are safe and supportive for students. As the programme team must maintain overall responsibility for each placement including ensuring the placement setting provides a safe and supportive environment the visitors require the programme team to provide further evidence of how they will ensure all placement settings provide a safe and supportive environment. The visitors suggest the condition for SETs 5.4 be looked at alongside this condition as they are closely linked.

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

**Condition:** The education provider must put in place an effective system for approving and monitoring all practice placements.

**Reason:** Documentation submitted prior to the visit did not include any evidence of how the programme team would approve and monitor all their placements for this programme. During discussions with the programme team the visitors learnt that placements would be approved subject to the supervisors having the relevant HPC registration as a hearing aid dispenser. The programme team would use this requirement as assurance that this standard would be met, since to maintain registration hearing aid dispensers must continue to meet all the HPC standards of proficiency which are necessary for safe and effective practice. The visitors were concerned that this method was not rigorous enough for the programme team to use exclusively to approve and monitor placements. They were also concerned that any issues with placement sites would only be flagged up by students after they had started their placement. As the programme team must maintain overall responsibility for each placement including approving and monitoring placements the visitors require the programme team to provide further evidence of how they will ensure all placement settings are approved and monitored.

## **5.8 Practice placement educators must undertake appropriate practice placement educator training.**

**Condition:** The education provider must ensure practice placement educators undertake appropriate practice placement educator training.

**Reason:** From the discussions with the programme team the visitors learnt that practice placement educator training was not mandatory. The visitors learnt that the programme team would use HPC registration as an assurance that this standard would be met and that placement educators are appropriately qualified and experienced to supervise students. The visitors were concerned that HPC registration alone did not guarantee or provide placement educators with enough training to supervise students on this programme. They were concerned that without some form of mandatory training of new placement educators there was no way for the programme team to be assured that educators were suitably equipped to take on students and prepared to deliver formative and summative assessments. As this standard requires that the programme team trains all new practice placement educators and follows this up with regular refresher training the visitors require that the programme team ensures that all placement educators undertake appropriate practice placement educator training before receiving students. The visitors therefore require evidence on the training that will be provided to practice placement educators and how this will be record and monitored.

## Recommendations

### **3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.**

**Recommendation:** The education provider should consider reviewing the resources levels for the programme.

**Reason:** The visitors were content that this standard was met. However if the programme recruits further numbers in the future, as discussed during the programme team meeting, the visitors would like the education provider to consider reviewing the number of relevant equipment, such as audiometers numbers, for the programme to ensure there continues to be an adequate number of resources to support student learning and that all students can benefit from this without constraints upon their onsite learning.

### **3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.**

**Recommendation:** The education provider should consider reviewing the Student Consent Form to further emphasise that students have the right to opt out of practical and clinical teaching where participating as service users.

**Reason:** From a review of the programme documentation the visitors noted that the education provider has a student consent form that it will use to obtain consent where students participate as service users in practical and clinical teaching. The visitors are therefore satisfied that this standard has been met. Through discussions the visitors noted good practice in that the programme team will introduce this form as part of the programme induction and verbally discuss the fact that students may be able to opt out of practical and clinical teaching sessions should they, for example, have specific cultural or health requirements. However, to enhance this good practice the visitors would like to recommend that the education provider consider adding this information to the student consent form to formally emphasise that students have the right to opt out of practical and clinical teaching where participating as service users.

### **5.10 There must be regular and effective collaboration between the education provider and the practice placement provider.**

**Recommendation:** The programme team should consider keeping the collaborative arrangements between themselves and the practice placement providers under review to ensure that the collaboration continues effectively.

**Reason:** Through discussions with the programme team and placement providers the visitors noted that there was collaboration taking place between the education provider and the practice placement provider. As such they are content that this standard has been met. To ensure that collaboration continues and encompasses any new placement providers that could develop when the new

HND programme begins, the visitors suggest that the programme team monitor the collaboration between them and their placement providers to ensure that it continues and remains effective.

Hugh Crawford  
Richard Sykes

## Observations from Programme Team on Visitors' report

<b>Name of education provider</b>	Mary Hare
<b>Relevant part of HPC Register</b>	Hearing aid dispensers
<b>Date of visit</b>	22 - 23 May 2012

Observations (x3): Reasons for conditions 5.3, 5.4 and 5.8 include 3 statements better explained with tracked changes as suggested below.

### 5.3

**Reason:** Documentation submitted prior to the visit did not include any mechanism of how the programme team ensured that all their placements had the relevant safety policies and procedures in place. There was no evidence of any risk assessments undertaken or how health and safety policies and procedures are monitored at placement settings. During discussions with the programme team the visitors learnt that there was currently no system in place to check that placements were safe and supportive before students went on a placement. Students are already employed as a requirement for admission to the programme, Once they are accepted on the programme this employment then becomes their work placement...

### 5.4

**Reason:** Documentation submitted prior to the visit did not include any evidence of how the programme team approved and monitored all their placements. During discussions with the programme team the visitors learnt that currently placements were approved subject to the supervisors having the relevant HPC registration as a hearing aid dispenser. The programme team currently uses the requirement that all supervisors must be HPC registered as assurance that this standard is being met, since to maintain registration hearing aid dispensers must continue to meet all the HPC standards of proficiency which are necessary for safe and effective practice. The visitors were concerned that this method was not rigorous enough for the programme team to use exclusively to approve and monitor placements. They were also concerned that any issues with placement sites would only be flagged up by students after they had started their placement. Students are already employed as a requirement for admission to the programme, Once they are accepted on the programme this employment then becomes their work placement...

...

### 5.8

**Reason:** From the discussions with the programme team the visitors learnt that practice placement educator training was not mandatory and as such there was a low take up for training. The visitors learnt that the programme team currently uses HPC registration as an assurance that this standard is being met and that placement educators are appropriately qualified and experienced to supervise students. The visitors were concerned that HPC registration alone did not guarantee or provide placement educators with enough training to supervise students on this programme. They were concerned that without some form of mandatory training of new placement educators there was no way for the programme team to be assured that educators were suitably equipped to take on students and prepared to deliver formative and summative assessments. As this

standard requires that the programme team trains all new practice placement educators and follows this up with regular refresher training the visitors require that the programme team ensures that all placement educators undertake appropriate practice placement educator training before receiving students. The visitors therefore require evidence on the training that will be provided to practice placement educators and how this will be record and monitored. Students are already employed as a requirement for admission to the programme, Once they are accepted on the programme this employment then becomes their work placement...

Visitors' response to education providers' observations on the visitors report to Mary Hare - Foundation Degree in Hearing Aid Audiology and Higher National Diploma Hearing Aid Audiology - Full time.

Received as a series of emails on 20 and 21 June 2012.

**Email sent by Hugh Crawford to B.Potter and Richard Sykes  
On 20/06/2012 13:10**

Hi Ben,

I have had a telephone conversation with Richard on this subject and although we will make separate replies I believe we both in the same place with this -

SET's 5.3, 5.4 and 5.8 put responsibility for approving and monitoring placements together with the training of practice placement educators with the education provider or at least to ensure training happens via on-line support or a professional body.

I cannot see how EP can relinquish this responsibility just because the student has to be externally employed as part of the admissions process. When BSc students are in placement within the NHS, they are technically employed for that year by the trust, but their EP would still be complying with the SET's in question re approving and monitoring their placements which is kind of the same thing here?

Within the guidance notes for the SET's there are suggestions as to how this can be achieved and evidenced as this may not be as difficult as the EP believes it to be - a copy of the H&S Policy from the employer for example might assist in meeting this SET?

Likewise with PE training, this needn't be on-site as the guidance notes offer other suggestions.

Trust this helps Ben and I'm sure Richard's reply will be along the same lines.

Best regards

Hugh

**Email sent by Richard Sykes to B.Potter and Hugh Crawford  
on 20/06/2012 13:14**

Hi Ben,

I have read the programme teams observation report, the key point that has been made is that the students are employed and therefore the argument appears to be that it is the responsibility of the employer.

Is this scenario different to a University offering a foundation degree associated with the NHS? Students are employed by the NHS but the education provider accepts that they should check the quality of placements etc.

I therefore consider that the observations provided do not answer the conditions and that they still are outstanding.

Kindest regards,

Richard

**Email sent by B.Potter to Richard Sykes and Hugh Crawford  
on 20 June 2012 15:24**

Hi Richard and Hugh,

Thank you both very much for your quick replies and your observations. I believe that you are correct in this and that it is still the responsibility of the Education Provider to evidence how they make themselves satisfied that the placements are suitable.

In regards to the observations being made, I think the education provider does indeed accept this and is willing to meet the conditions on this basis. However they would like to include the wording within the reports to ensure that everything is factually accurate.

Essentially they are asking whether it would be acceptable to yourselves to include the sentences highlighted within the reports but keep the conditions the same?

Thank you both again for getting back so quickly, it really is tremendous help. I look forward to hearing from you both.

Kind regards

Ben

**Email sent by Richard Sykes to B.Potter and Hugh Crawford  
on 20/06/2012 16:36**

Hi Ben,

If the intent of the education provider (EP) is as you stated and the condition applies to them as the EP then I am happy for the addition to the condition made by the EP as long as it is determined that the meaning of the condition in essence remains the same.

I will await Hugh's views.

Kindest regards,

Richard

**Email sent by Richard Sykes to B.Potter and Hugh Crawford  
on 21/06/2012 16:33**

Hi Ben,

My apologies if I've misunderstood this - if the EP want to include these statements as 'points of clarification' then I would have no objection to this. Assuming as per previous comments they still retain overall responsibility for ensuring placements are approved and monitored by a sensible and workable manner and PE training similarly.

Having seen Richard's email and spoken to him on the phone, I know he is of the same mind.

Trust this is helpful.

Regards  
Hugh