

Education and Training Committee, 10 March 2020

Update on the threshold level of qualification for entry to the Register (SET 1) for Operating Department Practitioners

Executive summary and recommendations

## **Introduction**

The first of the standards of education and training ('SET 1') sets out the threshold level of qualification required for entry to the Register for each of the professions we regulate. SET 1 does this by specifying types of academic awards.

In March 2018, we changed SET 1 for a profession for the first time; the education threshold for paramedics was increased from equivalent to certificate to degree level, following a public consultation.

When historically considering whether to review SET 1, the case was made for both paramedics and ODPs. Therefore, when we decided to take forward the review for paramedics, we committed to re-consider the ODP threshold at a later date.

This paper summarises our work in this area to date, and sets out the Executive's intention to consult on the ODP SET 1 in the next financial year.

An Equality, Diversity and Impact assessment will be completed in preparation for this consultation, which SMT, ETC and Council will be invited to comment on. This will build upon the EDI feedback we received in the paramedic threshold consultation.

Please note that, in terms of implementation, it is highly likely that there will need to be a lead in period for education programmes (similar to the decision to increase SET 1 for paramedics, which will not formally change until September 2021). We will seek stakeholder's views on this as part of the consultation.

## **Decision**

ETC is invited to discuss this paper.

## **Resource implications**

Resource implications will be factored into the Policy and Standards and Education workplan for 2020-21.

## **Financial implications**

Financial implications will be factored into the Policy and Standards and Education workplan for 2020-21.

## **Appendices**

Appendix A - Update on the threshold level of qualification for entry to the Register (SET 1) for Operating Department Practitioners

Appendix B – Profile of pre-registration ODP programmes (as of 30 January 2020)

## **Date of paper**

02.03.20

## **Update on the threshold level of qualification for entry to the Register (SET 1) for Operating Department Practitioners**

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When historically considering whether to review SET 1, the case was made for both paramedics and ODPs. Therefore, when we decided to take forward the review for paramedics, we committed to re-consider the ODP threshold at a later date.

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### **About the threshold level of qualification to the Register**

SET 1 provides the threshold levels of qualification 'normally' expected to meet the remainder of the standards of education and training, and thus deliver the standards of proficiency.

For most of the professions, the level specified in SET 1 was established when the SETs were first developed and published. This was based on the level specified by the CPSM as part of its joint-validation arrangements with the professional bodies.

For most professions the level in SET 1 has therefore been uncontroversial. It simply reflected the unanimous consensus position that the professions, education providers and commissioners had reached over a number of years.

However, determining the (continuing) level set out in SET 1 has been more problematic where there is variation in the awards and/or levels of existing entry level education and training, or where the level of education and training for an existing regulated profession is changing.

As SET 1 is a 'normative' level, it follows that a change in the level set would not automatically mean that programmes below the new level would have their on-going approval removed. It might be observed that arguably the role of others, particularly

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<sup>1</sup> <https://www.hcpc-uk.org/globalassets/consultations/2017/threshold-level-for-paramedics/consultation-on-threshold-level-of-qualification-for-entry-to-the-register-for-paramedics---consultation-analysis.pdf>

commissioners, has a greater role to play in determining the actual level of education and training delivered. However, in discussion with stakeholders, the HCPC is considered nevertheless to have an important leadership role in this area, notwithstanding the 'normative' status of the standard.

## **Background to the ODP threshold**

ODPs first became registered with the HCPC from October 2004. SET 1 for ODPs is a Diploma of Higher Education. This level has remained unchanged since the ODP register was opened.

In April 2011, the professional body for ODPs, the College of Operating Department Practitioners (CODP), published its revised curriculum at BSc (Hons) degree level in England, Wales and Northern Ireland and Non honours degree level provision in Scotland.

In 2013, the Committee received a paper from the Executive on the operational activities relating to ODP programmes.<sup>2</sup> The paper reviewed the impact of the revised curriculum on approved programmes in the 2010-11 & 2011-12 academic years. In this, we noted that:

Our standards do not prevent the CODP recommending an academic level higher than a Diploma of Higher Education. A small number of programmes have already been approved by us at a level higher than this. As long as all programmes deliver the SOPs at (or above) the threshold level, the variation of academic levels does not present a problem for us.

In late 2013, the Council of Deans of Health published a position statement arguing that the threshold level for entry to the profession should be increased to a BSc (Hons) degree.<sup>3</sup> This is argued on the basis of the need for an extra year to incorporate more content on subjects such as pharmacology and human factors and the need for practitioners with a higher degree of autonomy.

## **Past consideration of SET 1**

In light of the above, in June 2014 we took a paper to ETC which considered SET 1 for ODPs.<sup>4</sup> It also considered SET 1 for paramedics, which stakeholders also felt needed to be changed.

This paper highlighted that 83% of paramedic programmes were being delivered above the threshold level, compared to only 29% of ODP programmes. The paper therefore recommended:

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<sup>2</sup> <https://www.hcpc-uk.org/globalassets/education/reports/review-of-operational-activities-relating-to-an-operating-department-practitioner-programme.pdf>

<sup>3</sup> <http://www.councilofdeans.org.uk/wp-content/uploads/2013/10/ODP-BSc-Threshold-position-20131030-final1.pdf>

<sup>4</sup> <https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2014/june/enc-11---threshold-level-of-qualification-for-entry-to-the-register/>

‘... that the Committee should proceed to consider SET 1 for paramedics in the first instance, before proceeding to consider the case for operating department practitioners in more detail in due course.’

In September 2014 ETC agreed that, in principle, there was a persuasive case for changing the level specified in SET 1 for paramedics. However, there were concerns about the differences in provision across the UK. Further papers were taken to ETC in June 2015 and June 2016, setting out the position across the four nations. This led to, in June 2017, ETC recommending to Council that a consultation be held. This consultation ran from September to December 2017 and, in March 2018, we confirmed our decision to increase the threshold to degree level.

When undertaking the consultation analysis for the paramedics, we reviewed the profile of pre-registration programmes for ODPs. This had increased, to 54% of programmes, but still was not considering sufficient to warrant a revisiting of the ODP threshold.

### **Assessment against the SET 1 policy statement**

In March 2018, ETC discussed the implications of making a change to SET 1 for other HCPC regulated professions. It was noted that HCPC was developing a policy statement on the factors taken into account in deciding to propose a change to SET 1. This was published in April 2019 (approved by Council in December 2018) and sets out the broad principles we will need to consider when deciding whether to review SET 1.<sup>5</sup> These are:

- the Standards of Proficiency (SOPs) and the development of the profession;
- the profile of pre-registration programmes; and
- the views of stakeholders.

We also published a follow up statement in September 2019, setting out how we assess SET 1 when approving and monitoring programmes.<sup>6</sup>

Following the publication of this statement, the Policy and Standards team committed to revisit the ODP threshold in the 2019-2020 financial year.

### **The ODP SOPs and the development of the profession**

The SOPs for ODPs were reviewed in 2007-2008 and a small number of changes were made and became effective in November 2008. No comments were raised regarding SET 1 as part of this consultation.

They were then once again reviewed in July 2013, with revised standards published in May 2014. As part of this review, several respondents commented that SET 1

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<sup>5</sup> <https://www.hcpc-uk.org/globalassets/resources/policy/policy-statement-on-set1-threshold.pdf>

<sup>6</sup> <https://www.hcpc-uk.org/globalassets/resources/policy/assessing-set-1---threshold-level-of-qualification.pdf>

should be increased, in light of developments in the profession outlined above. In our consultation analysis, published in April 2014, we responded:

We have no present plans to consult on amending this standard to change the threshold level for operating department practitioners. The vast majority of education programmes for operating department practitioners are delivered at the threshold of Diploma of Higher Education and only a relatively few are currently delivered at BSc Honours degree level. However, we keep all our standards under regular review, so we may revisit this issue in the future.

Since then, further developments have occurred in the profession. In April 2017, ODPs came under the remit of the Chief Allied Health Professions Officer for England and were recognised as AHPs. This has allowed for greater professional engagement and shared work initiatives for ODPs.

In March 2019, we launched our next review of the SOPs for all 15 of our professions, including ODPs. We are provisionally due to consult on the revised SOPs for ODPs from July 2020 – September 2020.

In gathering feedback on the SOPs to inform our review, we have engaged with the professional bodies for ODPs – the College of ODPs and the Association for Perioperative Practice. Both organisations have raised SET 1 with us, and consider that it needs to be reviewed.

The Association for Perioperative Practice also informed us that they had contacted the three education providers which provide diploma level training only, and they all planned to introduce degree level training in September 2020.

In response to professional bodies, we have stated:

We have committed to review the current profile of approved programmes for ODPs and consider whether SET 1 should be changed in our department work plan for 2019-20. Any proposals to change SET 1 would then have to be approved by our Education and Training Committee and Council, and would require a public consultation. Timescales for this will need to be considered alongside other commitments in our work plan, such as the review of our Standards of proficiency.

### **The current profile of pre-registration ODP programmes**

Since last reviewing the threshold for ODPs, we have continued to monitor the profile of pre-registration ODP programmes.

In June 2014, only 29% of ODP programmes were delivered above the threshold (at either BSc Hons or BSc level). Since then, the percentage of programmes delivered above the threshold has steadily increased to 54% in January 2018, 77% in June 2019 and, at the time of writing, 79% (out of a total of 43 programmes, only 9 are delivered at diploma level). Of these, three education providers have diploma level provision only and the remaining deliver mixed diploma / degree level training. All proposed new programmes will be delivered above the threshold.

This is now at similar levels to the number of paramedic programmes above the threshold when we first considered changing SET 1; 83% (although at the point we made the decision to take forward the consultation this had increased to 96%). It also is significantly higher than the number of paramedic programmes at degree level when we decided to increase the threshold to degree level (49%).<sup>7</sup>

### **Next steps – establishing the views of stakeholders**

It is clear that the profession has developed, and the norm for ODP training is now at degree level. With further developments to the profession to be reflected in the SOPs, it is our view that following this there will be clear need for us to consider if SET 1 needs to be revised.

In order to review SET 1, we will need to hold a public consultation where we can get the professions and other stakeholder's opinion on whether SET 1 should increase. We will also be able to consult on possible timescales for implementation.

It is highly likely that we will need an implementation lead in period for education programmes. For paramedics, when the decision was made to increase SET 1, the implementation period decided until 1 September 2021, after which we will only continue to approve paramedic programmes that are delivered at degree level.

Timescales for this consultation are currently subject to the Policy and Standard's team's capacity. At the time of writing, we are working at a significantly reduced capacity due to ongoing recruitment.

We also want this to take place following the SOPs review consultations, which we plan (subject to Council approval) to run from April to September 2020. We then intend to take our consultation analysis and response document to December 2020 Council. This would allow any decision to revise the threshold to account for any changes to the SOPs.

With that in mind, the Executive intends to take a consultation document to ETC and Council in December 2020. The consultation would run from January to March 2021, and propose to increase SET 1 for ODPs to Bachelor's degree with honours.

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<sup>7</sup> <https://www.hcpc-uk.org/globalassets/consultations/2017/threshold-level-for-paramedics/consultation-on-threshold-level-of-qualification-for-entry-to-the-register-for-paramedics---consultation-analysis.pdf> para 5.7

## Profile of pre-registration operating department practitioner programmes

Figures correct as 30.01.2020

**Table 1: All open approved programmes by type of award**

Type of award	Number of programmes	
Bachelors	1	2%
Bachelors with Honours	33	77%
Diploma of Higher Education	9	21%
<b>Total</b>	<b>43</b>	

**Table 2: All approved programmes by level of award<sup>1</sup>**

Level of award	Number of programmes	
Level 6/9/10	34	79%
Level 5/8	9	21%
<b>Total</b>	<b>43</b>	

**Table 3: All approved programmes by type of award and country**

Type of award	England	Scotland	Wales	NI
Bachelors	1	0	0	0
Bachelors with Honours	32	0	1	0
Diploma of Higher Education	8	1	0	0
<b>Total</b>	<b>41</b>	<b>1</b>	<b>1</b>	<b>0</b>

**Table 4: Summary of proposed new programmes by type of award\***

Type of award	Number of programmes	
Bachelors with Honours	7	100%
Bachelors	0	0%
Diploma of Higher Education	0	0%
<b>Total</b>	<b>7</b>	

\* All proposed programmes are in England

**Table 5: Summary of provision by provider and level**

Type of award	Number of providers	
Level 6 provision only	18	69%
Level 5 provision only	3	12%
Mixture of level 6 and 5 provision	5	19%
<b>Total</b>	<b>26</b>	

<sup>1</sup> Levels are from the Framework for Higher Education Qualifications and then after '/' the Scottish Credit and Qualifications Framework. Level 4/7 includes Certificates of Higher Education; Level 5/8 Diplomas of Higher Education and Foundation degrees; level 6/9/10 Bachelor's degrees.