

9 September 2021

Education and Training Committee Governance Documents

Executive Summary

Should the Committee agree to fully implement the new Education QA model, some changes will be required to the Committee’s governing documents to reflect the new forms of decision making. This paper presents amended governance documents for the Committee to recommend to Council, and for one document, to approve.

Appendices	Appendix 1 – ETC Rules Appendix 2 – ETC Standing Orders Appendix 3 – ETC Scheme of Delegation
Previous consideration	The Committee has previously discussed the suitable governance arrangements for the operation of the new Education QA model. The amendments to these governance documents reflect the Committee’s steer.
Decision	ETC is invited to recommend the ETC rules and Standing Orders to the Council for approval. ETC is invited to approve the ETC Scheme of Delegation.
Next steps	Presentation to Council for approval at its meeting of 22 September 2021.
Strategic priority	Strategic priority one, to continually improve and innovate.
Financial and resource implications	The resource and financial implications are accounted for within the Governance budget for 2021-22
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Education and Training Committee Governance Documents

1. Introduction

Earlier on the meeting's agenda the Committee will be asked to approve the full implementation of the new Education QA model.

Should the Committee be minded to agree to implementation, in order to operationalise this model changes need to be made to the formal governance documents which support the workings of the ETC.

2. Summary of changes

The changes made follow the arrangements agreed by the Committee at its meeting in June 2021. As a reminder, below is the table of decision tiers presented in that paper.

Tier	How the tier would function	Decisions taken through the tier	Process level decisions
1 (Papers-based)	<ul style="list-style-type: none"> • Allocations and timings agreed in advance • Electronic papers shared with two Committee members rota'd • Set period to agree / disagree with visitor recommendations for each item 	<p>Where:</p> <ul style="list-style-type: none"> • Only the visitors' view is presented to the Committee (ie there are no observations or other evidence to be considered); and • The executive judges there is no information which suggests, or realistic prospect based on past governance decision-making, that the Committee will make a decision other than the one recommended by the visitors 	<p>Decisions through the approval process:</p> <ul style="list-style-type: none"> • Approval of programmes with no conditions • Setting of conditions with no observations, and • Final approval following conditions being met <p>Decisions through AEPM:</p> <ul style="list-style-type: none"> • Education provider recommended continuing approval, and • No issues of note outstanding to be considered through focused review, and • No observations supplied by the provider
2 (Panel meeting)	<ul style="list-style-type: none"> • Meetings arranged in advance, but cancelled if no business presented • Electronic papers shared in advance • Decisions made in the meeting 	<p>Where:</p> <ul style="list-style-type: none"> • The decision is low impact but exceptional decision • A discussion is required to make a decision (ie, there is more than one viable option), • The decision does not at this time relate to non / withdrawal of approval 	<ul style="list-style-type: none"> • Consideration of visitors' recommendations where provider observations supplied (approvals and AEPM) • Recommendation for focused review out of AEPM • Focused review reports with a continue to approve recommendation

Tier	How the tier would function	Decisions taken through the tier	Process level decisions
3 (Committee meeting)	<ul style="list-style-type: none"> • Items added to existing meetings, or one item meetings arranged if decision is urgent • Electronic papers shared in advance • Decisions made in the meeting 	Where the decision relates to non / withdrawal of approval	<ul style="list-style-type: none"> • Conditions not met, non-approval decision • Withdrawal of approval recommended through focused review

The governance documents are presented with tracked amendments. They have undergone legal review to ensure they remain compliant with our legislation.

Below is a summary of the changes for clarity.

ETC Rules – appendix 1

- The current document will need to be revoked and replaced with a set of new Rules as presented.
- The information in paragraphs 1-5 remains up to date and therefore has not been amended.
- Paragraph 6 has been amended to reflect a change in the purpose of a panel meeting and to include information in relation to the papers-based approach (tier 1).

ETC Standing Orders – appendix 2

- Amendments have been made to reflect the addition of the papers-based approach (tier 1), as well as the requirement for meetings to be held virtually (when required).

ETC Scheme of Delegation – appendix 3

- The new tier of decision making does not alter the matters that are reserved to the Committee or those that have been delegated to the Chief Executive or Head of Education. We have mirrored the proposed amendments the standing orders, to add clarity on where decisions are papers-based, for Panel or for the Committee.

3. Decision

The Committee is invited to recommend the revised ETC rules and ETC standing orders to the Council for approval. The ETC Scheme of delegation is within the gift of the Committee and so the Committee is invited to approve this document.

The Health and Care Professions Council (Education and Training Committee) (Constitution) Rules 2020

Made [\[x\] September 2021](#) ~~3rd December 2020~~.

Coming into force [\[x\] September 2021](#) ~~4th December 2020~~.

These Rules are made by the Health and Care Professions Council in exercise of the powers conferred upon it by paragraph 17(1) of Schedule 1 to the Health Professions Order 2001.

Citation and commencement

1. (1) These Rules may be cited as the Health and Care Professions Council (Education and Training Committee) (Constitution) Rules 202~~10~~.

(2) These Rules come into force on [\[x\] September 2021](#) ~~4th December 2020~~.

Interpretation

2. In these Rules—

“the Committee” means the Education and Training Committee;

“the Chair” has the meaning given in rule 5(1) and includes a person nominated under rule 5(4) or 6(2) to serve as Chair at a meeting;

“the Constitution Order” means the Health and Care Professions Council (Constitution) Order 2009;

“member”, except in the phrase “Council member”, means a member of the Committee and includes the Chair; and

“the Order” means the Health and Social Work Professions Order 2001.

Revocation

3. The Health and Care Professions Council (Education and Training Committee) (Constitution) Rules 20~~20~~~~18~~ are revoked.

The Committee

4. (1) The Education and Training Committee comprises five members, of whom—

(a) three must be Council members;

(b) one must be a person who has experience in relation to the provision or assessment of professional education and training which the Council considers will assist the Committee in performing its functions; and

(c) one must be a registrant who, when first appointed, has been admitted to the register for less than five years.

(2) The Council must determine the term of office of each member on appointment.

(3) Subject to paragraph (5), a member may be appointed for a term of not more than four years and is eligible for re-appointment, but no person may be a member for more than an aggregate of 8 years during any period of 20 years.

(4) A Council member may not be appointed as a member of the Committee for a term which exceeds that person’s term of office as a Council member.

(5) A person ceases to be a member of the Committee—

(a) if the member resigns, which the member may do at any time by notice in writing to the Council;

- (b) in the case of a member who is a Council member—
 - (i) on ceasing for any reason to be a Council member, or
 - (ii) if the member’s Council membership is suspended by the Privy Council under Article 7 of the Constitution Order;
- (c) in the case of any other member, if the member becomes a person who, in the opinion of the Council, would be liable to removal or suspension from the Council under Article 6 or 7 of the Constitution Order if that person was a Council member; or
- (d) if the Council, by majority vote, terminates the person’s appointment as a member of the Committee.

Committee Chair

- 5. (1) The Council must appoint a member as the chair of the Committee (“the Chair”).
- (2) The Council must determine the term of office of the Chair on appointment, which may not exceed that person’s term of office as a member of the Committee.
- (3) A person serving as Chair ceases to do so—
 - (a) if the member resigns as Chair, which the member may do at any time by notice in writing to the Council;
 - (b) on ceasing for any reason to be a member of the Committee or (where applicable) a Council member;
 - (c) if the Council, by majority vote, terminates the person’s appointment as Chair.
- (4) If, for any reason, the Chair is absent from or unable to act as Chair at a meeting or the office of Chair is vacant, the members who are present at a meeting of the Committee must nominate one of their number to serve as Chair at that meeting.

Quorum

- 6. (1) Subject to paragraph (2), the quorum of the Committee is half of the total number of members of the Committee, plus one.
- (2) At a panel meeting of the Committee the quorum is any two members (who must nominate one of their number to act as Chair at that meeting).
- (3) A “panel meeting” means a meeting of the Committee which has been convened only to conduct one or more of the following items of business (and at which no other business is conducted)—
 - (a) considering Visitors’ reports which are submitted to the Committee in accordance with Article 16(7) of the Order and any observations upon those reports received by the Committee under Article 16(9) of that Order and, if thought fit, approving the course of education or training, qualification or institution to which a report and observations (if any) relate;
 - ~~(b) considering and, if thought fit, approving any proposed change to an approved programme;~~
 - (b) considering and, if thought fit, approving a recommendation for a focussed review any matter arising from the monitoring of an approved programme;
 - (c) considering focused review reports, and if thought fit, providing a continue to approve recommendation.
 - ~~(d) considering and, if thought fit, withdrawing approval from an approved programme which the Committee is satisfied no longer admits or recruits students; or~~
 - ~~(e) where a concern is raised with the Committee under any arrangements it may establish for that purpose—~~
 - ~~(i) considering and determining whether an approved programme continues to meet the Standards of Education and Training; and~~

~~(ii) subject to paragraph (4), deciding what steps (if any) must be taken to address a concern which it determines is well founded.~~

(4) The steps that may be taken at a panel meeting under paragraph (3)~~(e)(ii)~~ do not include non-approval or withdrawal of approval from an approved programme, which may only be undertaken at a Committee meeting.

(5) Where a decision is papers-based, two Committee members will be required to confirm or reject the decision.

~~(5)~~(6) In paragraph ~~(4)~~ an “approved programme” means a course, qualification or institution which is approved by the Committee under Part IV of the Order.

Sealed with the common seal of the Health and Care Professions Council on [x] September 2021~~3rd December 2020.~~



Christine Elliott
Chair

John Barwick
Registrar

Explanatory Note

These Rules prescribe the composition of the Health and Care Professions Council’s Education and Training Committee, provide for the chairing of that Committee and specify its quorum for transacting business.

The Rules revoke and replace the Health and Care Professions Council (Education and Training Committee) (Constitution) Rules 2020~~18~~.

Education and Training Committee

Standing Orders

1. Terms of Reference

- 1.1 The Education and Training Committee is to perform:
 - a) the functions conferred on it by or under the Health Professions Order 2001; and
 - b) and other functions that the Council may require it to undertake.
- 1.2 A panel meeting of the Committee (an Education and Training Panel) may only conduct one or more of the items of business of the Committee specified in rule 6(~~43~~) of the Health and Care Professions Council (Education and Training Committee) (Constitution) Rules 202~~10~~.
- 1.3 The Committee will present a report to the Council on its activities annually

2. Membership and Quorum

- 2.1 The composition of the Education and Training Committee is determined by the Council in the Health and Care Professions Council (Education and Training Committee) (Constitution) Rules 2020.
- 2.2 The quorum at a meeting of the Committee is any three members, The quorum for a Panel is two members. If, during a meeting a quorum ceases to exist, the meeting must be dissolved and all remaining business adjourned to the next meeting of the Committee or a Panel (as the case may be).
- 2.3 Where a decision is papers-based, this requires the approval of any two members.

3. Chair

- 3.1 The Chair, who is appointed by the Chair of Council, is to preside at any Committee meeting.
- 3.2 If the Chair is absent from or unable to preside at a meeting, the members present must nominate another member to serve as chair at that meeting.

- 3.3 The Chair must provide a report on the work of the Committee to the Council at least once each year, as the Council may direct.

4. Frequency and Notice of Meetings

4.1 ~~As a minimum, the Education and Training Committee meetings~~ are only required for decisions which require discussion, ~~must meet three times in each year.~~

4.2 A monthly papers-based approval route will be used for all other pre-defined decisions, with two members confirming or rejecting such decisions through correspondence.

4.14.3

Where a Committee meeting is held The Secretary must give members at least seven days' notice of the time and place of a meeting. Failure to send notice of a meeting to a member does not invalidate the proceedings of that meeting.

5 Decision Making

5.1. The Committee shall make decisions based on a tier system set out as follows:

- a) Tier 1 - Papers-based
- b) Tier 2 - Panel meeting
- c) Tier 3 - Committee meeting

5.2 The operation of each Tier is as follows:

- a) Tier 1 – where only the visitors view is presented to the Committee, and the executive considers there is no information which suggests that the Committee will make a decision other than the one recommended by the visitors, papers shall be shared with two rota'd Committee members who have a set period of time to confirm their approval or rejection of the visitors recommendations. The decision cannot relate to the non-approval or withdrawal of approval of a programme;
- b) Tier 2 – Panel meetings shall be arranged in advance where the executive considers that discussion is likely to be required to make a decision, but the decision does not relate to non-approval or withdrawal of approval of a programme;
- c) Tier 3 – Items shall be added to existing Committee meetings or one item meetings shall be arranged where an urgent decision is required. Decisions in relation to non - approval or withdrawal of approval of a programme may be made at Committee meetings.

5. 5.6. Agenda

5.46.1 The Secretary must issue an agenda for each meeting. Except in cases of urgency or where circumstances make it impracticable to do so, the agenda for a meeting and any accompanying papers must be sent to members at least seven days before the meeting.

6.7. Transparency

6.47.1 Subject to Standing Order 132.5, all Committee meetings must be open to the public unless the business under consideration concerns:

- a) information relating to a registrant, former registrant or applicant for registration;
- b) information relating to an employee or office holder, former employee office holder or an applicant for any post or office;
- c) the terms of, or expenditure under, a tender or contract for the purchase or supply of goods or services or the acquisition or disposal of property;
- d) negotiations or consultation concerning labour relations between the Council and its employees;
- e) any issue relating to legal proceedings which are being contemplated or instituted by or against the Council;
- f) action being taken to prevent or detect crime or to prosecute offenders;
- g) the source of information given to the Committee in confidence; or
- h) any other matter which, in the opinion of the Chair, is confidential or the public disclosure of which would prejudice the effective discharge of the Committee's or Council's functions.

7.8. Minutes of meetings

7.48.1 The Secretary must keep minutes of each meeting, which must include a record of the members present at that meeting.

7.28.2 At each meeting, the minutes of the preceding meeting must be confirmed (or confirmed as amended) and be signed by the Chair as a true record of that meeting. The signed minutes of a meeting, unless the contrary is proved, are conclusive proof of the proceedings of that meeting.

7.38.3 The Committee must report to Council formally after each meeting.

8.9. Conduct of Meetings

8.49.1 The order of business at a meeting must follow that set out in the agenda unless it is varied by the Chair with the consent of the meeting.

8.29.2 A member may only initiate a debate or move a motion on a matter which is not on the agenda with the consent of the Chair. All motions must relate to matters that are within or related to the functions of the Committee.

8.39.3 A member must speak to the subject under discussion. The Chair may call attention to any irrelevance, repetition or other improper conduct on the part of a member and, where the member persists in that conduct, may direct that member to cease speaking.

8.49.4 A ruling by the Chair on any question of order, whether or not provided for by the Standing Orders, is final and not open to debate.

9.10. Voting

9.110.1 Except where the Order specifies otherwise, any question at a meeting is to be decided by a majority of the members present voting by a show of hands.

9.210.2 In the event of an equality of votes, the Chair is entitled to an additional casting vote.

10.11. Disorder

10.111.1 Members must comply with the Code of Conduct adopted by the Council.

10.211.2 If, in the Chair's opinion, a member has persistently disregarded the ruling of the Chair or behaved in a manner which is obstructing the business of the meeting, the Chair may order that member to withdraw from the whole or part of the remainder of the meeting.

10.311.3 If a person other than a member interrupts the proceedings at any meeting, the Chair may order that person to be removed from the meeting or may order the part of the room which is open to the public to be cleared.

10.411.4 In the event of a disturbance which, in the Chair's opinion, prevents the orderly conduct of business, the Chair may adjourn the meeting for a period that the Chair considers appropriate.

11.12. Members' interests

11.112.1 Members must make a declaration of their personal interests in the form required by the Council (which must be published in the Council's Register of Members' Interests) and must ensure that their interests as set out in that Register are accurate and up to date.

11.212.2 The agenda for every meeting must include as an item of business the declaration of interests.

11.312.3 A member who has a personal interest in any matter under consideration at that meeting, whether or not declared in the Register of Members' Interests, must promptly disclose that interest to the meeting. If the interest is a prejudicial interest, the member must withdraw from the meeting during the Committee's consideration of that matter

12.13. Virtual meetings

~~42.113.1~~ Meetings of the Committee~~r~~ (or a Panel) ~~should~~~~may~~ be held by electronic means where possible, without any number of the members participating in the meeting being required to be together at the same place.

~~42.213.2~~ Where a meeting is to be conducted by electronic means, the notice under Standing Order 4.~~32~~ must include the arrangements for members to access the meeting.

~~42.313.3~~ At a meeting held by electronic means, members must be able:

- a) to hear and be heard by (and, where practicable, to see and be seen by) the other participating members and any person invited to participate in the meeting; and
- b) to be heard by (and, where practicable, seen by) any members of the public or the press attending the meeting.

~~42.413.4~~ At a meeting held by electronic means, the Chair is to determine the method by which votes are to be cast and Standing Order ~~109~~.1 does not apply.

~~42.513.5~~ Where practicable, the Committee must make arrangements (such as by telephone or video conference or live webcast or streaming) for the public and press to be able to attend remotely a meeting held by electronic means.

~~43.14.~~ **Approval of resolutions without meeting**

~~43.114.1~~ A resolution which, with the Chair's consent, is circulated to, and approved in writing or electronic form by at least three quarters of the members entitled to receive notice of and attend a Committee meeting is as valid as if it had been passed at such a meeting.

~~44.15.~~ **The Secretary**

~~44.115.1~~ The Secretary to the Council, or any other person that the Secretary to the Council may appoint, is to be the Secretary to the Committee (the Secretary).

~~45.16.~~ **Effectiveness**

~~45.116.1~~ The Committee should periodically review its own effectiveness and report to the Council on this assessment.

~~46.17.~~ **Adoption**

~~46.117.1~~ These Standing Orders were adopted by the Council on ~~[x]~~ September 3 December 20210 and supersede all previous versions. They apply to any Committee meeting held after that date.

Education and Training Committee Scheme of Delegation

1 Introduction

- 1.1 The Education and Training Committee (the **Committee**) is responsible for discharging the statutory functions conferred upon it by the Health and Social Work Professions Order 2001 (the **Order**) and the Executive is responsible for the operational implementation of the Committee's decisions.
- 1.2 This scheme of delegation (the **Scheme**) is intended to facilitate the efficient and effective discharge of the Committee's functions in a manner which reflects that division of responsibilities.-
- 1.3 The Scheme sets out the decisions which the Committee:
 - 1.3.1 has reserved or must reserve to itself;
 - 1.3.2 has delegated to the Chief Executive and Registrar (the **Chief Executive**) or persons nominated by the Chief Executive;
 - 1.3.3 has delegated to nominated Directors and persons nominated by them.
- 1.4 The Scheme does not affect:
 - 1.4.1 decisions of an administrative nature, which form part of the Executive's responsibilities for the day to day administration of the HCPC's affairs under the direction of the Chief Executive; or
 - 1.4.2 any statutory function conferred upon the Registrar by or under the Order, the discharge or delegation of which is a matter for the Chief Executive (as Registrar).

2 Withdrawal of delegated power

- 2.1 The Scheme remains in force until it is amended or revoked by the Committee.
- 2.2 The Scheme does not apply to any matter in respect of which the Committee has resolved that delegated authority is not to be exercised.

3 Exercise of delegated power

- 3.1 Any power delegated under the Scheme must be exercised in a manner which is consistent with the requirements of the Order, any rules made under it, any policies or procedures established by the Committee and the Committee's obligations under the general law.

- 3.2 In particular, the decision maker must have regard to Article 3(4) of the Order, which provides that the over-arching objective of the HCPC in exercising its functions is the protection of the public.
- 3.3 The decision maker must also recognise that lawful exercise of a statutory power requires not only formal compliance with the conditions laid down for its performance but also compliance with the principle that all statutory powers must be exercised in good faith and for their proper purpose.
- 3.4 Delegation does not impliedly authorise sub-delegation. Consequently, a person to whom the Committee has delegated any power may not permit another person to exercise that power unless the Committee has expressly authorised them to do so.

4 Matters reserved to the Committee

- 4.1 The Committee retains ultimate responsibility for all policy matters, including agreeing the overall strategy for the performance of its functions.
- 4.2 The Committee retains responsibility for the following decisions which, to the extent that it is lawful to do so, may only be delegated by means of a specific resolution of the Committee:
 - 4.2.1 responding to any consultation by the Council under Article 7 of the Order on the making of rules or the determining or varying of fees;
 - 4.2.2 approving, for the purpose of Article 12(1) of the Order, qualifications awarded in the United Kingdom which attest to the standard of proficiency required for admission. (This is a function which has been delegated to the Committee by the Council without authority to sub-delegate);
 - 4.2.3 establishing procedures under Article 12(2) of the Order for the assessment of qualifications obtained, and training and experience acquired, outside of the United Kingdom;
 - 4.2.4 giving advice to the Council under Article 14 of the Order in relation to the establishment of Standards of Proficiency, Standards of Education and Training and Standards of Continuing Professional Development;
 - 4.2.5 responding to any consultation by the Council under Article 15 of the Order on the establishment of Standards of Education and Training and requirements for admission to and participation in education and training;
 - 4.2.6 approving courses of education and training, qualifications, institutions and tests of competence under Article 15(5) of the Order;
 - 4.2.7 ensuring that universities and other relevant bodies in the United Kingdom are notified of the Standards of Education and Training and the Council's requirements for admission to and participation in such education and training and taking appropriate steps to satisfy the Committee that these standards and requirements are

- being met;
 - 4.2.8 approving education and training provided outside of the United Kingdom under Article 15(6) of the Order;
 - 4.2.9 receiving any report submitted to the Committee by a Visitor under Article 16(7) of the Order;
 - 4.2.10 imposing reporting requirements on Visitors under Article 16(7)(b) of the Order;
 - 4.2.11 withdrawing or refusing approval of an institution for failure to provide information and assistance under Article 17(3) of the Order;
 - 4.2.12 withdrawing or refusing approval of a course of education and training, qualification or institution under Article 18 of the Order;
 - 4.2.13 responding to any consultation by the Council under Article 21(3) of the Order on the giving of guidance in relation to the Standards of Conduct, Performance and Ethics or the standards of education and training, supervision and performance of persons who provide services in connection with those provided by registrants.
- 4.3. The Committee is also responsible for making decisions in relation to any matter for which it has granted delegated authority but where:
- 4.3.1 the person who would otherwise have delegated authority to act has an actual or potential interest; or
 - 4.3.2 in the opinion of the Chief Executive, it would be more appropriate for the Committee to make the decision.

5 Committee Decision Making

5.1. The Committee shall make decisions based on a tier system set out as follows:

5.1.1 Tier 1 - Papers-based

5.1.2 Tier 2 - Panel meeting

5.1.3 Tier 3 - Committee meeting

5.2 The operation of each Tier is as follows:

5.2.1 Tier 1 – where only the visitors view is presented to the Committee, and the executive considers there is no information which suggests that the Committee will make a decision other than the one recommended by the visitors, papers shall be shared with two rota'd Committee members who have a set period of time to confirm their approval or rejection of the visitors recommendations. The decision cannot relate to the non-approval or withdrawal of approval of a programme;

5.2.2 Tier 2 – Panel meetings shall be arranged in advance where the executive considers that discussion is likely to be required to make a decision, but the decision does not relate to non- approval

or withdrawal of approval of a programme;

5.2.3 Tier 3 – Items shall be added to existing Committee meetings or one item meetings shall be arranged where an urgent decision is required. Decisions in relation to non - approval or withdrawal of approval of a programme may be made at Committee meetings.

65 Matters delegated to the Chief Executive and any officer nominated by the Chief Executive

- 65.1.** determining applications for admission to the register, including determining whether the applicant holds an approved qualification and meets the health and character requirements for safe and effective practice;
- 65.2.** determining applications for renewal of registration and readmission to the register, including determining whether the applicant needs to meet or has met any additional requirements required by Article 10 of the Order;
- 65.3.** determining applications for admission to the register made under Article 13 of the Order;
- 65.4.** requiring a person to submit further evidence, documents or information in respect of any application for admission or readmission to the register or renewal of registration;
- 65.5.** requiring a person to submit evidence of the continuing professional development (CPD) activity they have undertaken in compliance with standards made under Article 19(1) of the Order;
- 65.6.** removing a person from the register under Article 19(3) of the Order for failing to comply with CPD standards.

76. Matters delegated to the Head of Education and any officer nominated by the Head of Education

- 76.1.** Inviting (but not selecting) the Visitors who are to visit any place or institution for any purpose under Part IV of the Order;
- 76.2.** Sending a copy of any report received by the Committee from a Visitor under Article 16(7) of the Order to the institution concerned and notifying that institution of its right to make observations in accordance with Article 16(9) of the Order;
- 76.3.** Requiring a relevant institution to provide information and assistance under Article 17(3) of the Order (information and assistance reasonably required in connection with the discharge of the Committee's functions);
- 76.4.** Giving notice to the institution concerned and notifying that institution of its right to make observations in relation to any proposal by the Committee to refuse or withdraw approval in accordance with Article 18 of the Order.

[x]6-September 202148