

Education and Training Committee

Meeting Date	09 September 2026
Title	Revised standards of education and training – education quality assurance compliance assessment approach
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Executive Summary This paper sets out the approach that the Education team will take to assessing compliance against our revised standards of education and training (SETs). The revised SETs become effective, meaning education providers are required to meet them, from September 2027. The revised SETs are a more significant change than previous updates. As a result, education providers will require time to review their programmes and make any necessary changes. Education providers will have a 12-month period to do this. We must also ensure that our compliance activity is proportionate, risk-based, and achievable within available resources. The compliance approach has three stages: 1. <u>Compliance declaration (by the end November 2027)</u> Education providers will formally declare that they have reviewed the revised SETs and made any necessary changes 2. <u>Updated institution level information (by the end August 2028)</u> Education providers will submit an updated institutional 'baseline' document explaining how their policies and processes align with the revised SETs 3. <u>Full compliance assessment (three years from the 2027-28 academic year)</u> We will assess all education providers against the revised SETs, using existing monitoring processes. Education providers identified as higher risk will be prioritised earlier in the three year period By the end of August 2030, all HCPC-approved education providers and programmes will have undergone a full assessment against the revised SETs, with regulatory action taken where compliance cannot be demonstrated.	
Action required	The Committee is asked to review the information provided and seek clarification on any areas.

Previous consideration	The revised SETs and implementation timeframes were approved at Council in July 2026.
Next steps	Within the 2026-27 academic year, the Education team will undertake activities to: • Support education providers, education partners, and the Education team on the adoption of the revised SETs • Make updates to guidance, information, and templates for education providers, education partners, and the Education team • Decide which education providers will be prioritised for the compliance assessment
Financial and resource implications	None – activities will be managed through the existing Education workplan and budget, supported by the current investment in the Education team
Associated strategic priority/priorities	Putting patients at the centre of smarter, preventative regulation Supporting healthcare workforce development through proportionate, agile regulation
Associated strategic risk(s)	SR01 - Delivery of Regulatory Requirements
Risk appetite	Regulation - measured
Communication and engagement	• Engagement was undertaken through the SETs review consultation on the timeframes for implementation – the implementation period was agreed by Council in July 2026 • We will undertake continued engagement with education providers and other stakeholders through the 2026-27 academic year, to support adoption of the revised SETs • This will include clearly defining the requirement to adopt the revised SETs from September 2027, and when the compliance assessment will be undertaken for each education provider
Equality, diversity and inclusion (EDI) impact and Welsh language standards	None
Other impact assessments	N/A

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Reason for consideration in the private session of the meeting (if applicable)	Not applicable
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Revised standards of education and training – education quality assurance compliance assessment approach

1. Executive summary

- 1.1. The HCPC's revised standards of education and training (SETs) will become effective from September 2027. All approved education providers and programmes are required to meet the revised SETs from that date.
- 1.2. The revised SETs are a more significant change than previous updates. As a result, education providers will require time to review their programmes and make any necessary changes. We must also ensure that our compliance activity is proportionate, risk-based, and achievable within available resources.
- 1.3. The compliance approach has three stages:
 - Compliance declaration (by the end November 2027)
Education providers will formally declare that they have reviewed the revised SETs and made any necessary changes
 - Updated institution level information (by the end August 2028)
Education providers will submit an updated institutional 'baseline' document explaining how their policies and processes align with the revised SETs
 - Full compliance assessment (three years from the 2027-28 academic year)
We will assess all education providers against the revised SETs, using existing monitoring processes. Education providers identified as higher risk will be prioritised earlier in the three year period
- 1.4. New education providers seeking approval for programmes starting from September 2027 will be assessed directly against the revised SETs. Existing education providers seeking approval for new programmes during the 2026-27 academic year will continue to be assessed against the current SETs but will be required to confirm that their programmes will comply with the revised standards when they take effect.
- 1.5. These approaches will:
 - Ensure all education providers comply with the revised SETs
 - Maintain public protection
 - Focus regulatory activity where risk is greatest
 - Align with our existing education quality assurance model
 - Be achievable for both education providers and HCPC
- 1.6. By the end of August 2030, all HCPC-approved education providers and programmes will have undergone a full assessment against the revised SETs, with regulatory action taken where compliance cannot be demonstrated.

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2. Previous approaches

2.1. Previous standards reviews have normally included:

- At least a 12-month implementation period
- Education provider self-assessment, and application of internal changes
- Targeted regulatory review after implementation

2.2. These approaches have generally been successful, and inform the approach to the revised SETs.

Version of the SETs effective from 2018

2.3. The current version of the SETs was published in June 2017 and came into effect in September 2018. This means that education providers had a 15 month period to implement the current version of the SETs from the date they were published.

2.4. Changes to the SETs that became effective in September 2018 were less substantial than the changes that become effective from September 2027. To assess compliance, we required education providers to demonstrate how they made changes to align with the revised SETs in a two year period through our 'annual monitoring' exercise in our previous education quality assurance (QA) model. The 2018 revised standards could be considered in a modular way, as most standards remained unchanged, and there were only a small number of new standards.

2.5. New programmes planned to start from September 2018 were required to meet the revised SETs through our approval assessments in the 2017-18 academic year. This was possible due to the limited scope of the changes. Therefore, we decided this additional requirement was reasonable and achievable for education providers to deliver.

Embedding revised SOPs and SCPEs into programmes

2.6. The current SETs require that the standards of proficiency (SOPs) and standards of conduct, performance and ethics (SCPEs) are embedded into programme design, delivery, and assessments. We required education providers to deliver revised standards as follows for new cohorts:

- Revised standards of proficiency – from September 2023
- Revised standards of conduct, performance and ethics – from September 2024

2.7. We gave education providers a lead in time of 15 months for the SOPs and 12 months for the SCPEs before we required that they delivered the revised standards to new cohorts, and then asked them to reflect on key change themes from the standards, and the process by which they had reviewed and where required updated their programme(s). This was undertaken through

performance review¹, when each education provider was next required to engage through this process.

- 2.8. The vast majority of education providers were able to demonstrate how they delivered these sets of standards at the first time of asking, with a small number of education providers requiring additional time, which sometimes included them needing to undertake remedial work with existing cohorts to ensure they were taught and assessed against the revised sets of standards.

3. Rationale for our approaches to reviewing the revised SETs

- 3.1. The revised SETs are a more substantial change than previous standards reviews. We have also changed our education quality assurance model since the previous SETs were introduced. Therefore, a different compliance approach is required than for the previous SETs review.
- 3.2. When designing our approach to assess education providers and programmes against the revised SETs, we considered our approaches following previous standards reviews (SETs, SOPs and SCPEs). There are the following similarities to previous reviews in the approach we are taking for the current SETs revisions:
- The period from the standards being published, and when education providers need to meet the standards (the effective date) is at least 12 months, allowing education providers to make changes required
 - Compliance checking starts following the date the standards come into effect
 - Proactive demonstration of how standards are met required from education providers
 - Determination of whether revised standards are met, made by partners through structured assessments, including the ability to further explore specific areas, and withdraw approval should revised standards not be met
- 3.3. Our current model of education quality assurance is substantially different to our previous quality assurance approach, which was in place when we last reviewed the SETs. Most relevant is that we now apply a group of SETs at the institution level (where the same approaches apply across programmes), and assess at the institution level wherever possible.
- 3.4. This change is most prevalent through our proactive monitoring process. In our previous model, this was a two yearly cycle of declarations and audits at the programme level. In our current model we focus our monitoring at the institution level, and delve into professional level detail where required, and the monitoring cycle length for each education provider is determined on their performance and any risks (a period of one to five years).
- 3.5. There is also a significant difference in the scope of changes with the current SETs review, when compared to the 2018 changes. Those changes were less

¹ Performance reviews are periodic reviews of education provider performance, with a set of self-reflective themes linked to our SETs.

substantial than the changes for the current SETs review. In 2018, we introduced three new standards, strengthened requirements linked to our Standards of conduct, performance and ethics, and made minor updates to terminology.

3.6. Changes for the current review are fundamental in nature, and a broader range of topics will need to be considered by education providers, which may include changes required to meet the revised SETs. This also means that considering compliance will be more complex for the Education team, and more involved for education providers in terms of demonstrating compliance.

3.7. Considering the above, our approach is:

- Publish the revised SETs in September 2026
- Require education providers to meet the revised SETs from an effective date of September 2027
- Require a declaration from education providers that they have done this in the three months following the effective date
- Require an updated institution level information from education providers by the end of August 2028
- Assess compliance with the revised SETs for existing education providers across three academic years

3.8. We believe this approach strikes the right balance between the changes education providers need to make, the resources available to education providers and the HCPC, and our public protection duties.

4. Benchmarking

4.1. Other regulators have also implemented revised standards over multiple years rather than requiring immediate full assessment, for example:

- The General Dental Council's (GDC) Safe Practitioner framework took effect from August 2025, and they require all education providers to be mapped against the framework by the 2030-31 academic year (a four year period)²
- The Professional Standards Authority's (PSA) combined Standards for Regulators and Accredited Registers came into effect on 1 July 2026, and implementation will be staggered, meaning performance reviews of regulators for 2025-26 use the previous version (the Standards of Good Regulation)³
- The Nursing and Midwifery Council (NMC) released their updated framework for nursing and midwifery education in January 2023⁴, and required all approved education institutions to 'demonstrate that they are implementing required changes' by the end of January 2025⁵

² [GDC – learning outcomes and behaviours](#)

³ [Our Standards | PSA](#)

⁴ [Standards framework for nursing and midwifery education - The Nursing and Midwifery Council](#)

⁵ [NMC - Future programme standards: Nursing webinar \(13 February 2023\)](#)

5. Assessment of new programmes

- 5.1. All education providers and programmes will need to meet the revised SETs from September 2027. This includes new programmes which are planned to start from September 2027 that we approve within the 2026-27 academic year (which is before the effective date of September 2027).

New education providers to the HCPC

- 5.2. We will assess any education provider new to the HCPC and their programmes against the revised SETs, for any planned programme start dates of September 2027 onwards. This will ensure that we are confident that the revised SETs are met by new education providers and their programmes, which are by nature riskier because we do not have historical understanding of how they perform against our requirements.
- 5.3. This is reasonable because new education providers would be evidencing our standards for the first time, and therefore compliance with the revised standards is appropriate, as these standards are available from September 2026, and they are not making changes to meet the revised SETs with the current SETs as a starting point.
- 5.4. At the time of writing, there are no proposals from education providers who are new to the HCPC that are due to start in September 2027. If this changes, we will consider what tailored support the education providers, members of the education team, and our partners involved in any assessments, require to meet and apply the revised SETs.

HCPC-approved education providers

- 5.5. For HCPC-approved education providers, our normal approach through approval assessments⁶ is for us to consider alignment of newly proposed programmes with existing provision at the education provider. This means we do not normally need to re-assess institution level standards through most approval assessments, unless there is a proposed new model of learning within the education provider. For example, where an education provider is proposing their first apprenticeship programme for an HCPC profession, we will assess the institution level SETs proactively, as the approaches to meeting these SETs will be different to their other HCPC-approved programmes.

2026-27 academic year

- 5.6. Most new proposed programmes assessed in 2026-27 will have a first intake date of September 2027. This means that these programmes will need to meet the revised SETs from when they start.

⁶ Approval assessments are our reviews of education providers and programmes against our standards, when a new programme is proposed. Programmes need to be approved by us before they can start.

- 5.7. Requiring education providers to demonstrate how they will meet revised institution level standards through approval assessments in 2026-27 would come with the following risks / issues:
- 5.8. Education providers will have limited time with the revised SETs while developing their proposals, and before submitting their documentation. This could be very limited for any documentary submissions provided in the months after the SETs are published⁷.
- 5.9. The Education team and partners will have limited time with the revised SETs, to be able to effectively apply them – this comes with potential risks, for example:
- Poor application of the revised SETs due to needing to get members of the team and partners up to speed quickly, and
 - Delivering training too early may reduce knowledge retention, as individuals may not have an immediate opportunity to apply the revised SETs
- 5.10. As existing education providers do not need to meet the revised standards until September 2027, and considering the risks noted above, for programmes assessed in 2026-27, we will:
- Continue to review alignment with the current institution level SETs
 - Require education providers to demonstrate how they meet current programme level SETs
 - Include a declaration in the programme level SETs mapping document for the education provider to confirm that the programme will meet the revised SETs from the effective date
 - Include these programmes (where they are approved) in the compliance assessment for approved education providers, alongside their other programmes
- 5.11. This means that:
- Education providers and HCPC have time to be ready to meet / assess against the revised SETs
 - Risks with non-compliance are managed in the same way for all programmes delivered by each education provider
 - All programmes have the same starting point for our revised SETs compliance assessments from the 2027-28 academic year, which makes this compliance exercise easier to apply

2027-28 academic year

- 5.12. All education providers and programmes assessed from the 2027-28 academic year onwards will be assessed against the revised SETs.

6. Approved education provider compliance activities

- 6.1. The effective date of September 2027 means that education providers and programmes must meet the revised SETs from that date. The communication

⁷ This would apply to at least four assessments (data correct 12 August 2026)

and engagement activities from September 2026 will be clear on this point, and we will proactively support education providers to understand changes, and what they need to consider to address these changes.

- 6.2. We will not be able to assess whether education providers will comply with the revised SETs before September 2027, as:
- Prior to the effective date, education providers will need to consider the changes and make their own changes to meet the revised SETs, and
 - We do not have the internal resources to undertake this volume of assessments prior to September 2027
- 6.3. Therefore, we will apply a three-stage compliance exercise, and phase our detailed compliance assessments based on risk. At a high level, our compliance timetable is:
- September 2026 – revised SETs published
 - September 2027 – revised SETs become effective
 - End of November 2027 – initial compliance declaration (phase 1 compliance)
 - End of August 2028 – education providers supply an updated institution ‘baseline’ document, which sets out their institution approaches at a policy / process level, linked to the revised institution level SETs (phase 2 compliance)
 - End of August 2030 – full assessment of compliance completed. Undertaken across the three academic years from 2027-28 (phase 3 compliance)

6.4. Initial compliance requirements

Declaration

- 6.5. All education providers will be required to submit a formal declaration that they have reviewed and aligned with the revised SETs by the end of November 2027. This follows the implementation period of 12 months, where we will be clear on the requirement for education providers to meet the revised SETs by September 2027.
- 6.6. Although we will not validate declarations at this stage, they will give us a level of early assurance that changes have been considered and made. Requiring a declaration drives accountability at education providers for a nominated individual to formally declare to the regulator that they have undertaken a programme of activity to review and where needed made changes to align with the revised SETs. This is a light touch administrative exercise for education providers and the Education team.
- 6.7. We will be clear through our communication and engagement that we will require this declaration, and the consequences of not being able to make this in a timely manner.
- 6.8. If education providers do not return the declaration, or are not able to complete it as they have not undertaken required developments, we will open focused

review⁸ assessments, to ensure they make any changes needed, and where they do not, withdraw regulatory approval. This essentially brings forward the full compliance assessment for education providers who do not complete this initial declaration.

Updated institution baseline

- 6.9. An institution 'baseline' document is a summary of an education provider's key policies and processes that support compliance with institution-level SETs. We use this document when undertaking assessments of education providers and their programmes, to understand the context of how the education provider functions. This helps us to make judgements, such as whether proposed programmes align with institution approaches, and how policies and processes are intended to function when concerns are raised to us.
- 6.10. All education providers have previously supplied an institution baseline. They were first provided when education providers first engaged with our current regulatory model (earliest 2021-22 academic year), and are updated through each education provider's performance review submission. Education providers are familiar with updating and providing these documents, which are relatively light touch for them to complete.
- 6.11. By the end of 2027-28 (the end of August 2028), all education providers will be required to submit an updated institution level baseline document, that states at a high level how they meet the revised institution level SETs. This will be provided through one of the following:
- Through their performance review assessment, if in 2027-28
 - Through focused reviews related to the revised SETs, if in 2027-28 (for this and the above bullet point, see the [full assessment of compliance](#) section below)
 - As part of any approval request for new programme(s) received in 2027-28
 - As part of any focused review response triggered by external data, intelligence, or a concern, that is set at the institution level, received in 2027-28
 - Through a proactive request from the Education team, towards the end of the academic year (if not returned through one of the above options)
- 6.12. We will review this document to ensure it is completed correctly (eg, all sections are completed correctly in line with the intentions of each section), but will not determine whether the revised institution level SETs are met by education providers solely on the supply of this document (although we do recognise that some education providers will provide their updated baseline document through the same process that we will use to assess compliance with the revised SETs).
- 6.13. If education providers do not return an updated institution baseline, we will open focused review assessments, to ensure they make any changes needed,

⁸ Focused reviews are how we assess specific areas at education providers, that need to be reviewed against our SETs

and where they do not, withdraw regulatory approval. This essentially brings forward the full compliance assessment for education providers who do not return this documentation.

Full assessment of compliance

6.14. We will group together new and materially changed SETs into themes (at both the institution and programme level), and require education providers to reflect on those themes through one of the following mechanisms in the three academic years from 2027-28:

- Performance review – where a review is already planned in 2027-28, 2028-29 or 2029-30
- Focused review – for education providers not included in performance review in 2027-28, 2028-29 or 2029-30

The assessment mechanism

6.15. The mechanism for assessment is in line with how we considered changes to the revised Standards of proficiency, and Standards of conduct, performance and ethics. It enables education providers to address all new standards and material changes in a thematic way, that is directly linked to the requirements of each new / materially changed standards.

6.16. Our professional education partners will make a judgement on education provider reflections and whether those are reasonable for them to have embedded the revised SETs.

6.17. This approach:

- Provides a strong level of assurance, in keeping with our right touch regulatory principles
- Aligns with existing self-reflective monitoring approaches
- Enables exploration of issues where needed, including taking action where education providers have not met our requirements

Three year assessment period

6.18. We have decided to undertake a three year review period, because:

- There is limited public risk in learners meeting our requirements for registration⁹, as the revised SETs maintain current requirements that learners are taught and assessed against our requirements for registration
- All education providers are required to meet the revised SETs for the effective date of September 2027, and will submit a declaration that they have done so, and provide an institution baseline in the 2027-28 academic year
 - Where education providers comply with these requirements, this will provide an initial level of confidence that education providers have considered the revised SETs, and made changes where relevant to meet them

⁹ The Standards of proficiency for the profession, and the Standards of conduct, performance and ethics – which are not changing as part of the SETs revisions

- Where education providers do not comply with these requirements, we will undertake further investigations by bringing forward the compliance exercise for those education providers
- We are confident (as evidenced through previous reviews) that education providers are 'properly organised' to deliver education and training, including making changes where they need to. This is the foundation for our [approach to change](#)
- Non-compliance would be picked up in a relatively short period
 - For most education providers, this would be before the first set of learners undertaking programmes with the revised SETs in place complete their programme
 - By August 2030, around two thirds of education providers will have been assessed for compliance in the previous two academic years, and the remaining third will have completed or be under assessment
- This is achievable within our planned resourcing envelope

6.19. This will mean that we have assurance as follows at the end of each academic year:

Academic year	Number of education providers – performance review (projected)	Number of education providers – focused review	Cumulative % assessed for compliance
2027-28	35	14	38
2028-29	30	14	64
2029-30	21	14	100

How risk will be managed

6.20. To manage the risk of education providers not making the required changes:

- Education providers we have judged as higher risk through our monitoring assessments already have a shorter performance review period, which means that they would be in the compliance exercise via performance review in the first two academic years
- We will consider the phasing of focused review assessments based on risk, for example ensuring education providers meeting the following criteria are prioritised through reviews in earlier years:
 - New education providers, who started their first programme in the 2025-26 or 2026-27 academic year
 - Where education providers have previously struggled to demonstrate how they have embedded the revised Standards of proficiency and / or the revised Standards of conduct, performance and ethics
 - Education providers with the most learners
 - Where data and insight shows that there may be additional risks present within the management and delivery of programmes
 - Where an education provider does not return their declaration or updated institution baseline documentation by the deadline

6.21. If education providers have not complied with the revised SETs, we will define specific areas that need to be addressed by setting regulatory requirements. If

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the revised SETs are not complied with by education providers and / or programmes, we will withdraw approval.