

Major change visitors' report

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Section one: Programme details

Name of education provider	Mary Hare Services Ltd. (formerly Mary Hare)
Name of validating body	N/A (formerly EdExcel)
Programme title	HND Hearing Aid Audiology
Mode of delivery	Full time
Relevant part of the HCPC Register	Hearing aid dispenser
Date of submission to the HCPC	25 November 2016
Name and role of HCPC visitors	Elizabeth Ross (Hearing aid dispenser) Richard Sykes (Hearing aid dispenser)
HCPC executive	Jasmine Pokuaa Oduro-Bonsrah

Section two: Submission details

Summary of change

SET 1: Level of qualification for entry to the Register
 SET 2: Programme admissions
 SET 3: Programme management and resources
 SET 4: Curriculum
 SET 6: Assessment

The education provider is changing its validating body. Mary Hare Services Ltd will now award a certificate instead of the HND award previously awarded by the validating body EdExcel.

The following documents were provided as part of the submission:

- Major change notification form (completed by the HCPC executive)
- Context pack
- Major change SETs mapping document (completed by education provider)

- Programme specification
- Student Handbook
- Staff Curriculum Vitae

Section three: Additional documentation

- The visitors agreed that no further documentation was required in order to make a recommendation.
- The visitors agreed that additional documentation was required in order to make a recommendation. The standards of education and training (SETs), for which additional documentation was requested, are listed below with reasons for the request.

1. 1 The Council normally expects that the threshold entry routes to the Register will be the following:

Bachelor degree with honours for:

- **biomedical scientists (with the Certificate of Competence awarded by the Institute of Biomedical Science, or equivalent);**
- **chiropodists / podiatrists;**
- **dietitians;**
- **occupational therapists;**
- **orthoptists;**
- **physiotherapists;**
- **prosthetists / orthotists;**
- **radiographers;**
- **social workers in England; and**
- **speech and language therapists.**

Masters degree for arts therapists.

Masters degree for clinical scientists (with the Certificate of Attainment awarded by the Association of Clinical Scientists, or equivalent).

Foundation degree for hearing aid dispensers

Diploma of Higher Education for operating department practitioners.

Equivalent to Certificate of Higher Education for paramedics.

Professional doctorate for clinical psychologists.

Professional doctorate for counselling psychologists, or equivalent.

Professional doctorate for educational psychologists, or equivalent.

Masters degree for forensic psychologists (with the award of the British Psychological Society qualification in forensic psychology, or equivalent).

Masters degree for health psychologists (with the award of the British Psychological Society qualification in health psychology, or equivalent).

Masters degree for occupational psychologists (with the award of the British Psychological Society qualification in occupational psychology, or equivalent).

Masters degree for sport and exercise psychologists (with the award of the British Psychological Society qualification in sport and exercise psychology, or equivalent).

Reason: From the evidence provided the visitors were made aware that the education provider is intending to deliver and assess the certificate at the same academic level as the previous higher national diploma (HND) programme. However, from the evidence provided the visitors are unclear as to how the education provider will achieve this as they will not have an external organisation who will be validating this programme. In particular the visitors were unclear as to how the education provider will set the curriculum and assessment at the same level as an HND and how the curriculum and assessment will be continually assessed to ensure that it continues to meet the same standards as a HND.

Additional evidence: Additional evidence which will provide information about the policies and processes that the education provider has in place to assure the academic level of the certificate and how they will assure the curriculum and assessment meets the same level as a HND.

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.

Reason: The visitors were clear, from the information provided, that the education provider will now be awarding a certificate themselves and students will no longer be awarded a HND on the completion of their studies. However, in the evidence provided to the visitors they were unclear as to how the education provider is ensuring that students or prospective students are aware that on completion they will get a certificate from Mary Hare Services Ltd, not a HND awarded by EdExcel. As such the visitors are unclear as to how the education provider are ensuring that applicants have all of the information they require to make an informed choice about taking up a place on this programme.

Additional evidence: Further information about the advertising material and pre-course information that will provide applicants with the information that they will need in order to make an informed choice about applying to, and taking up a place on, the programme.

3.3 The programme must have regular monitoring and evaluation systems in place.

Reason: The visitors were clear, from the information provided, that the education provider will no longer seek validation from a partner organisation and instead will be awarding their own certificate. The visitors were also clear that the education provider intends to deliver this programme to the same academic level as the HND programme. However, from the evidence provided the visitors are unclear as to how the education provider will put in place policies and processes that will replace those of the external

organisation who have previously validated this programme. In particular the visitors were unclear as to what policies and processes the education provider have in place to set the curriculum and assessment at the same level as an HND and how the curriculum and assessment will be continually assessed to ensure that it continues to meet the same standards as a HND. The visitors were therefore unclear as to what regular monitoring and evaluation systems have been put in place at the education provider to ensure that the programme is being delivered at the standard stated by the education provider.

Additional evidence: Further information to show how regular monitoring and evaluation of the programme will be undertaken by the education provider. In particular the visitors require further information as to how the education provider will continue to ensure that the programme will continue to be delivered and students assessed at, or equivalent to, the HND level expected by the education provider.

3.13 There must be a student complaints process in place.

Reason: Previously, the education provider had a two tier system for their complaints process. Students who 'wished to take out a complaint normally did so under the education provider's procedures' and when the procedures at the education provider had 'been exhausted students were then referred to the awarding body'. From the evidence provided the visitors were made aware that the education provider will now use their own internal processes to deal with complaints. Due to the removal of the validating bodies' role in the complaints process, the visitors are unclear as to how the education provider will deal with complaints, once the procedures at the education provider have been exhausted and where there has been no resolution to the complaint.

Additional evidence: Further evidence of a formal student complaints process in place, how the education provider will inform students about this process and what recourse, if any, students may have if the complaint is not resolved at the education provider.

4.4 The curriculum must remain relevant to current practice.

Reason: The visitors were clear, from the information provided, that Edexcel will no longer be validating the programme and instead the education provider will be awarding the certificate themselves. The visitors were also clear that the education provider intends to deliver the same curriculum as the previous HND. However, from the evidence provided the visitors are unclear as to what processes and procedures the education provider has in place to ensure that the curriculum will remain relevant to current practice. Due to the removal of the external frameworks, which formerly undertook the regular review of the curriculum to ensure that it remains relevant to current practice, the visitors were unclear as to what regular review systems were in place to ensure the currency of the curriculum.

Additional evidence: Further information to show how what policies and processes the education provider has in place to regularly review the curriculum to ensure that it remains relevant to current practice.

6.2 All assessments must provide a rigorous and effective process by which compliance with external-reference frameworks can be measured.

Reason: The visitors were clear, from the information provided, that the education provider will no longer be seeking validation from Edexcel and instead be awarding their own certificate. The visitors were also clear that the education provider intends to apply the same assessment regulations as the previous HND. However, from the evidence provided the visitors are unclear as to how the education provider will put in place policies and processes that will replace those of the external organisation who have previously validated this programme. In particular they are unclear as to how the education provider will ensure that there is an effective process in place by which compliance with the external reference frameworks can be measured.

Additional evidence: Further information to show what rigorous and effective policies and processes are in place at the education provider to ensure the assessment of students continually remains compliant with external-reference frameworks.

6.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.

Reason: The visitors were clear, from the information provided, that the education provider will no longer seek validation from a partner organisation and instead will be awarding their own certificate. The visitors were also clear that the education provider intends to deliver this programme to the same academic level as the HND programme. Additionally the visitors were clear that an additional external examiner has been appointed to replace the duties previously carried out by the Edexcel auditor. However, from the evidence provided the visitors are unclear as to how the education provider will ensure there are effective monitoring and evaluation mechanisms in place as they will not have an external organisation who will be validating this programme. In particular the visitors were unclear as to how the education provider will set the curriculum and assessment at the same level as an HND and how the assessment will be continually measured to ensure that it continues to meet the same standards as a HND. The visitors were therefore unclear as to what regular monitoring and evaluation mechanisms have been put in place at the education provider to ensure that the programme is being delivered at the standard stated by the education provider.

Additional evidence: Further information to show how monitoring and evaluation will be undertaken with the change from external body to internal auditing by the education provider. . In particular the visitors require further information as to how the education provider will continue to ensure that the programme will continue to be delivered and students assessed at, or equivalent to, the HND level expected by the education provider. Additionally, with the second external examiner in place, the visitors will need to understand the process of using two examiners, who they will report to, and what joint/separate monitoring and evaluation they will undertake.

6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.

Reason: The visitors were clear, from the information provided, that the education provider will no longer be seeking validation from Edexcel and instead be awarding their own certificate. The visitors were also clear that the education provider intends to apply the same assessment regulations as the previous HND. However, students studying for the HND would have had a clear progression route through the programme according to the national standards which govern the award. From the

evidence provided the visitors were not clear how will be expected to progress through the certificate awarded by the education provider and if there would be any academic credit assigned to the different elements of the programme. As such the visitors were unclear as to how the education provider will inform students of the progression routes through the programme and how they will ensure that students are aware of what they need to achieve to be awarded the certificate.

Additional evidence: Further evidence as to how the education provider will expect students to be assessed and achieve to ensure that they continue to progress within the programme. This evidence should also demonstrate how the education provider will ensure that students can understand what is expected of them at every stage of the programme.

6.9 Assessment regulations must clearly specify requirements for an aegrotat award not to provide eligibility for admission to the Register.

Reason: From the evidence provided the visitors noted that that the education provider will no longer be seeking validation from Edexcel and instead be awarding their own certificate. Nonetheless, previously the education provider adopted Edexcel's policies on the aegrotat awards. From the evidence provided the visitors could not determine what the education provider's policies on aegrotat are and are therefore unclear on what information will be available to students to inform them that an aegrotat award would not confer eligibility to apply to the Register.

Additional evidence: Further evidence outlining the education provider's policy on the awarding of aegrotat awards and how the eligibility implications for this type of award would be communicated to students.

6.10 Assessment regulations must clearly specify requirements for a procedure for the right of appeal for students.

Reason: Previously, the education provider had a two tier system for their appeals process. Students who 'wished to take make an appeal normally did so under the education provider's procedures' and when the procedures at the education provider had 'been exhausted students were then referred to the awarding body'. From the evidence provided the visitors were made aware that the education provider will now use their own internal processes to deal with appeals. Due to the removal of the validating bodies' role in the appeals process, the visitors are unclear as to how the education provider will deal with an appeal, particularly if there is not a resolution to the appeal.

Additional evidence: Further evidence of a formal student appeals process in place, how the education provider will inform students about this process and what recourse, if any, students may have if the complaint is not resolved at the education provider.

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.

Reason: From the documentation the visitors are aware that there is a continuation with the previous external examiner for the programme. However, form the information

provided the visitors are aware that that the education provider will no longer be seeking validation from Edexcel and instead be awarding their own certificate. Therefore the assessment regulations of the previous validating body will no longer be used and instead the education providers' assessment regulations will be used instead. However, from the information provided the visitors were unclear of what processes the education provider has in place to ensure the recruitment of appropriately qualified and experienced external examiners in the future. In particular the visitors were unclear as to what criteria the education provider will use to appoint any external examiner and why this criteria has been set to ensure that any external examiner is appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register

Additional evidence: Further evidence of the policy, processes and criteria that the education provider has in place to ensure that any external examiner is appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.

Section four: Recommendation of the visitors

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 have demonstrated an ability to meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that:

- There is sufficient evidence to show the programme continues to meet the standards of education and training and that those who complete the programme will continue to demonstrate an ability to meet the standards of proficiency.
- There is insufficient evidence to determine if or how the programme continues to meet the standards of education and training listed. Therefore, a visit is recommended to gather more evidence and if required place conditions on ongoing approval of the programme.

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.

Reason: From the initial evidence provided, the visitors could not determine what information about the proposed changes to the programme would be communicated to potential applicants looking to apply and requested further evidence to support this. In response, the education provider directed the visitors to Appendix C, D and E. The email supporting the content of the HAA Flyer. The education provider stated that the flyer previously published online on the Mary Hare website had been adapted from the HND programme. Appendix E is a letter of offer to applicants explaining to them why EdExcel is no longer the validating body and the certificate that will now be offered to students. Therefore some of the issues about the information provided for applicants were addressed. However, after a review of the student handbook and the Appendices, the visitors could not locate any information about the credit rating for the new programme, indicating the level of the Certificate that would be awarded after successful completion of the programme. In addition to this the visitors noted that the Mary Hare Certificate is not benchmarked. As such the visitors identified that the information provided, including the credit bearing of modules and the level of the qualification they receive could potentially be misunderstood by applicants. Therefore the visitors were unable to determine that the admissions procedures provides students with the information about the programme that they would require to make an informed choice about whether to take up an offer of a place on a programme. Considering the issues raised and the evidence provided to support this standard, the visitors consider there to be outstanding issues. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

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.

From the additional documentation the visitors noted that in the Student handbook there were various references which stated that the completion of all credits on the programme will lead to the 'eligibility to register with the HCPC' as a hearing aid dispenser. The visitors noted that this statement could be misleading to applicants as students are only eligible to apply to the HCPC Register and will not automatically fulfil HCPC requirements. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

3.1 The programme must have a secure place in the education provider's business plan

Reason: The visitors had not originally identified any particular issues regarding how the programme met this standard. However, after a review of the additional documentation the visitors noted that the reason why EdExcel will no longer be the validating the programme due to the low levels of student numbers. As such, the visitors are would need information which demonstrates that the Mary Hare Certificate has a secure place in the education provider's business plan. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

4.4 The curriculum must remain relevant to current practice.

Reason: From the initial evidence provided, the visitors could not determine the processes and procedures the education provider has in place to ensure that the curriculum will remain relevant to current practice as the Mary Hare becomes the sole education provider. The visitors noted that as part of this process the external frameworks, which formerly undertook the regular independent review of the curriculum to ensure that it remains relevant to current practice, would be removed. As such the visitors were unclear as to what regular review systems were in place to ensure the currency of the curriculum, and how a degree of independent scrutiny could be maintained through such processes. In response to the visitors' concerns the education provider stated that the 'The role of the HCPC external assessor would continue to be to examine the syllabus and evidence of revision to reflect currency in the curriculum.' However the visitors could not determine how effective this system would be and how it might work in practice. Furthermore, the visitors noted that the some of the resources to deliver the curriculum were already outdated (of particular note was 'Katz J (2004) Handbook of Clinical Audiology' for example, has a 2014 edition as part of the reading list). The visitors therefore could not determine based on the evidence provided that there will be effective mechanisms in place to ensure that the curriculum remains current. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

6.2 All assessments must provide a rigorous and effective process by which compliance with external-reference frameworks can be measured.

Reason: From the initial evidence provided, the visitors were unclear as to how the education provider will continue to have policies in place to monitor, evaluate and review the programme replacing those of the external organisation who have previously validated this programme. In particular they were unclear as to how the education provider will ensure that there will continue to be an effective process which ensures compliance with external reference frameworks around the level of the certificate award. In addition, the visitors could not see in the additional documentation how the Mary Hare Certificate would be benchmarked against external frameworks. Furthermore, the visitors could not see any evidence to support how the involvement of the HCPC registered external examiners would ensure that this compliance with external frameworks is maintained. In response, the education provider stated that their “internal quality assurance policies and processes are updated to comply with external education agencies and are updated”. Although the education provider has stated that their internal processes are updated to comply with external-reference frameworks, from the additional evidence the visitors were still unclear as to what these internal processes were to ensure compliance with external-reference frameworks and how these frameworks could be measured to meet the requirements of the Mary Hare Certificate. Considering the issues raised and the evidence provided to support this standard, the visitors could not determine how this standard continues to be met. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.

Reason: From the initial evidence provided the visitors could not determine the requirements for student progression throughout the programme and if there would be any academic credit assigned to the different elements of the programme. In addition to this the visitors were unclear as to how students would be made aware of the requirements for student progression and achievement throughout the programme. In response to the visitors’ concerns the education provider directed the visitors to the student handbook which outlined a series of assessment regulations regarding student progression and achievement.

Although the visitors were broadly satisfied with progression within the programme, the visitors were concerned with the different timescales for readmission on to the course, outlined in the student handbook regarding withdrawal or deferment. For example on page 28 of the student handbook, it states that students that “a student may be permitted to suspend registration for a determined period. Normally this period should not be longer than one calendar year from the date of intermission, nor should it be so long as to require more than two years from entry to completion date of the award” However on page 9 of the Student handbook it says that “If a student chooses to leave the programme at the end of the first year, but have successfully achieved assessment criteria for the Level 4 Units, they will be eligible to defer the completion of the course for up to four more years, provided they have remained working within the sector“ The visitors were therefore, unclear as to how the education provider ensures that the assessment regulations makes it clear to students on how they assess them to make sure that they continue to progress within the programme as the information currently

available to students is not consistent. Considering the issues raised and the evidence provided to support this standard, the visitors consider there to be outstanding issues. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

6.9 Assessment regulations must clearly specify requirements for an aegrotat award not to provide eligibility for admission to the Register.

Reason: From the initial evidence provided the visitors could not determine what the requirements for an aegrotat award would be as Mary Hare becomes the sole education provider. From a review of the education provider's response the visitors still could not determine what the aegrotat policies were and what information will be available to students to inform them about the requirements of an aegrotat award. Furthermore, the visitors could not see how students would be made aware that an aegrotat award would not confer eligibility to apply to the Register. Considering the issues raised and the evidence provided to support this standard, the visitors consider there to be outstanding issues. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.