

HCPC approval process report

Education provider	Metanoia Institute
Validating body	Middlesex University
Name of programme(s)	Doctorate in Counselling Psychology and Psychotherapy by Professional Studies (DCPsych), Part time
Approval visit date	26 - 27 June 2018
Case reference	CAS-12169-S3W1S5

Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	3
Section 4: Outcome from first review.....	4

Executive Summary

We are the Health and Care Professions Council (HCPC), a regulator set up to protect the public. We set standards for education and training, professional knowledge and skills, conduct, performance and ethics; keep a register of professionals who meet those standards; approve programmes which professionals must complete before they can register with us; and take action when professionals on our Register do not meet our standards.

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet our standards of education and training (referred to through this report as 'our standards'). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.

Section 1: Our regulatory approach

Our standards

We approve programmes that meet our education standards, which ensure individuals that complete the programmes meet proficiency standards. The proficiency standards set out what a registrant should know, understand and be able to do when they complete their education and training. The education standards are outcome focused, enabling education providers to deliver programmes in different ways, as long as individuals who complete the programme meet the relevant proficiency standards.

Programmes are normally [approved on an open-ended basis](#), subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed [on our website](#).

How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint [partner visitors](#) to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation of the visitors, inclusive of conditions and recommendations. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process reports, and any observations from education providers (if submitted). The Committee meets in public on a regular basis and their decisions are available to view [on our website](#).

HCPC panel

We always appoint at least one partner visitor from the profession (inclusive of modality and / or entitlement, where applicable) with which the assessment is concerned. We also ensure that visitors are supported in their assessment by a member of the HCPC executive team. Details of the HCPC panel for this assessment are as follows:

Jai Shree Adhyaru	Practitioner psychologist - Counselling psychologist
Prisha Shah	Lay
Linda Mutema	Radiographer - Diagnostic radiographer
Niall Gooch	HCPC executive

Other groups involved in the approval visit

There were other groups in attendance at the approval visit as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Karen Chetwynd	Independent chair (supplied by the education provider)	Metanoia Institute
Douglas Bertram	Secretary (supplied by the education provider)	Metanoia Institute

Section 2: Programme details

Programme name	Doctorate in Counselling Psychology and Psychotherapy by Professional Studies (DCPsych)
Mode of study	PT (Part time)
Profession	Practitioner psychologist
Modality	Counselling psychologist
First intake	01 January 2001
Maximum learner cohort	Up to 18
Intakes per year	1
Assessment reference	APP01787

We undertook this assessment via the approval process, which involves consideration of documentary evidence and an onsite approval visit, to consider whether the programme continues to meet our standards. We decided to assess the programme via the approval process due to the outcome of a previous assessment. The visitors in an annual monitoring audit process were not able to determine whether certain standards were met and so recommended a visit.

Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we require certain evidence and information from education providers. The following is a list of evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence, we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

Required documentation	Submitted
Programme specification	Yes
Module descriptor(s)	Yes
Handbook for learners	Yes
Handbook for practice based learning	Yes
Completed education standards mapping document	Yes
Completed proficiency standards mapping document	Yes
Curriculum vitae for relevant staff	Yes
External examiners' reports for the last two years, if applicable	Yes

We also expect to meet the following groups at approval visits:

Group	Met
Learners	Yes
Senior staff	Yes
Practice education providers	Yes

Service users and carers (and / or their representatives)	Yes
Programme team	Yes
Facilities and resources	Yes

Section 4: Outcome from first review

Recommendation of the visitors

In considering the evidence provided by the education provider as part of the initial submission and at the approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

Conditions

Conditions are requirements that must be met before programmes can be approved. We set conditions when there is insufficient evidence that standards are met. The visitors were satisfied that a number of the standards are met at this stage. However, the visitors were not satisfied that there is evidence that demonstrates that the following standards are met, for the reasons detailed below.

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 28 September 2018.

2.3 The admissions process must ensure that applicants have a good command of English.

Condition: The education provider must demonstrate how they will ensure that all applicants have a good command of written English.

Reason: The visitors reviewed the evidence provided for this standard, which included an overview of the selection process. During the programme team meeting it was mentioned that in a previous cohort one learner had left the programme, by mutual consent, because they were unable to write English in an academic style to an appropriate level to pass some of the assessments. There was no indication that this learner had been unsuitable for the programme in any other way, so the visitors considered that the issue was with how the education provider's admission process ensured that applicants have a good command of written English. From the documentation, the visitors could not see that the education provider had a process in place to prevent something similar happening again. They had seen an overview of the selection process but could not see a specific reference to a test of proficiency in academic writing. The visitors were therefore unable to determine whether the education provider had an effective process in place for assessing an applicant's command of English, for example a test or a process of sampling academic writing, which would ensure that learners were able to complete the programme successfully. They therefore require the education provider to demonstrate how they will ensure that all applicants have a good command of written English.

2.7 The education provider must ensure that there are equality and diversity policies in relation to applicants and that they are implemented and monitored.

Condition: The education provider must demonstrate how equality and diversity policies in relation to applicants are implemented.

Reason: The visitors reviewed the evidence provided for this standard, including the application form and a description of how equality and diversity policies relating to admissions were monitored. The visitors also discussed with the programme team how they approached equality and diversity issues relating to admissions. The programme team stated that they had had discussions about diversifying their applicant base, and had taken steps to do so by, for example, advertising in media targeted at underrepresented groups. The visitors considered that while these actions were helpful, they were not based on specific feedback, and it was not clear that there was a formal process in place for taking forward actions that resulted from equality and diversity monitoring. They were therefore not satisfied that equality and diversity policies relating to admissions were being implemented, as there had not seen evidence of a clear system for how particular issues arising from monitoring would be translated into action. They require the education provider to submit further evidence of how equality and diversity policies relating to applicants result in action where necessary.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must clarify their contingency plan for funding the programme if there is a high learner attrition rate.

Reason: The education provider stated in the mapping document that the programme was due for revalidation by Middlesex University in 2019, but did not provide further evidence about the sustainability of the programme. The visitors discussed this issue with the senior team. They were informed that the programme was designed as self-funding, as its costs were met by the tuition fees paid by learners. This was not an issue in itself, however the visitors were aware that in some years the attrition rate was quite high. For example in one year the programme had lost four learners for various reasons. As the programme was only approved for 18 learners, and sometimes had cohorts smaller than that, this was potentially a risk to the sustainability of the programme. The senior team clarified in discussion that they could manage this risk through reserves, but the visitors were not able to see a clear statement or policy regarding how this contingency would be managed. They therefore require the education provider to submit further evidence showing that there is a plan in place for sustaining the programme if funding from learners is insufficient to fund the programme for any reason.

3.3 The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.

Condition: The education provider must clarify the identity of the person with overall professional responsibility for the programme, and demonstrate that they have an effective process in place for identifying a suitable replacement if necessary.

Reason: The visitors reviewed the CV of Simon du Plock, Head of Faculty, submitted as evidence for this standard. They considered that he was suitable person to have overall professional responsibility for the programme, but from discussions at the visit it was not clear whether he was the person who was formally in a position of professional responsibility for the programme, and the visitors were not able to be sure about who did hold this position. Additionally, from discussions with the senior team it was not clear to the visitors whether there was a formal process in place for finding a new person for this role. The education provider had identified two leadership roles in the programme, Director of Studies and Director of Research, but it was not clear which of these had overall responsibility and it was not clear whether a formal process was in place to identify suitable new persons if necessary. The visitors therefore require the education provider to clarify who holds overall professional responsibility for the programme, and how the education provider will ensure that this person is suitable, and that there is an appropriate process to replace them if necessary.

3.5 There must be regular and effective collaboration between the education provider and practice education providers.

Condition: The education provider must demonstrate how they will ensure regular and effective collaboration between the education provider and practice education providers.

Reason: The visitors reviewed the evidence submitted for this standard. This included a section in the Programme Handbook outlining what learners should expect while on practice-based learning and a similar section in the Clinical Placements Handbook. It was not clear to the visitors from this evidence how the education maintained regular and effective collaboration with practice education providers, and they did not see any records of meetings between the education provider and practice education providers. From discussions with the programme team and senior staff members from practice-based learning providers, the visitors were not clear about whether there was regular and effective collaboration between the two groups. In these meetings the visitors were told about some long-standing relationships between the education provider and practice education providers, but it was not clear that this was the case with all practice education providers, and contact often appeared to be reactive rather than happening on a regular basis as part of an ongoing relationship. The visitors therefore require the education provider to demonstrate how they ensure regular and effective collaboration with all practice education providers. They considered that there was a connection between this condition and the conditions set under SET 5 dealing with monitoring of practice-based learning and the training, preparation and qualification of practice educators.

3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Condition: The education provider must demonstrate how they will ensure the availability and capacity of practice-based learning for all learners.

Reason: The visitors reviewed the evidence provided for this standard, including the Clinical Placements Handbook and the clinical requirements section of the Programme Handbook. They were also able to discuss with the programme team the process for ensuring availability and capacity of practice-based learning. From the evidence provided it was not clear to the visitors whether there was a process in place for ensuring availability and capacity. The programme team stated in discussions that they

had a wide range of practice-based learning partners, and that they were able to help learners find appropriate settings. However, the visitors were aware from discussions with the learners and from programme documentation that learners were expected to find their own practice-based learning, and that this could often take a long time, months or years. One learner reported having taken two years to locate an appropriate placement. Another learner stated that they considered themselves “lucky” to have obtained an appropriate placement. It was not clear to the visitors what formal input the programme team had into learners’ searching for practice-based learning. It was clear that some staff had helped learners find placements but this did not appear to be part of a process. The visitors were therefore not satisfied that an effective process was in place, and they require the education provider to submit further evidence demonstrating that they have such a process.

3.7 Service users and carers must be involved in the programme.

Condition: The education provider must demonstrate how they will ensure that service users and carers are involved in the programme.

Reason: The education provider did not submit any specific evidence for this standard, although they did state in their mapping document that they were developing relationships between service users and carers and the programme. The visitors were able to discuss service user and carer involvement with the programme team and with a service user who attended the meeting. They were aware from these discussions that the service user and carer involvement for the programme was at the planning stage. They could not see that there was currently an appropriate level of service user involvement, or how the education provider would monitor and evaluate service user and carer involvement in the programme. They were also not clear how the education provider had decided which service user and carer groups were the most appropriate and relevant to the programme. They therefore require the education provider to demonstrate that service users and carers will be appropriately involved in the programme, and how service users and carers will contribute to the continuous improvement of the programme.

3.11 An effective programme must be in place to ensure the continuing professional and academic development of educators, appropriate to their role in the programme.

Condition: The education provider must demonstrate how they will ensure that staff on the programme have appropriate access to continuing professional development.

Reason: The visitors reviewed the evidence provided for this standard, including the Programme Handbook. From this evidence it was not clear to the visitors what arrangements were in place for continuing professional and academic development for staff on the programme. In discussions with programme staff the visitors noted that while some appropriate development activity did take place for some staff, there was not a formal policy in place, which meant that there was a lack of transparency about what exactly different staff members might expect, and potentially a lack of equity in access. This meant that the visitors could not be satisfied that there was an effective programme in place to ensure the continuing professional and academic development of educators. They therefore require the education provider to demonstrate how they will ensure the continuing professional and academic development of educators.

3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.

Condition: The education provider must demonstrate how they monitor the use of resources to ensure that those resources continue to be effective and appropriate to the delivery of the programme, and accessible to all learners and educators.

Reason: The visitors reviewed the evidence provided for this standard, the Programme Handbook. It was not clear to them how the evidence provided supported this standard. They were able to discuss access to resources with the programme team and with learners. The learners and staff did not appear to have many concerns about access to resources. However, the visitors noted that the education provider did not appear to have a system for monitoring usage of resources, such as books in the library, and so they were unable to determine how the education provider would ensure that all necessary resources continued to be available in sufficient numbers, and were accessible to all learners and educators. For example, if there were particular books which were being heavily used, or books which were not being used, the education provider would not have a process to prompt a decision as to whether they should increase the supply, or review whether a particular resource was still appropriate. The visitors therefore require the education provider to demonstrate how they will monitor use of resources to ensure that resources to support learning in all settings are effective and appropriate, and accessible to all learners and educators.

3.14 The programme must implement and monitor equality and diversity policies in relation to learners.

Condition: The education provider must demonstrate how they monitor equality and diversity policies in relation to learners, and record actions taken as a result of such monitoring.

Reason: The visitors reviewed the evidence provided for this standard, including an Equality and Diversity manual and policy documents from the validating body Middlesex University. Although these policies were appropriate and the visitors considered that the programme team were committed to them, the visitors were not able to see evidence of how equality and diversity policies were monitored. In particular they could not see where actions taken as a result of, and in response to, equality and diversity policies were recorded. In the documentation provided for this standard it was not clear to them how the education provider would assess how progress was or was not being made under equality and diversity policies. They therefore require the education provider to demonstrate how equality and diversity policies are monitored.

4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.

Condition: The education provider must demonstrate how the learning outcomes on the programme enable learners to meet standard of proficiency for practitioner psychologists 13.19.

Reason: The visitors reviewed evidence related to this standard, including the Programme Handbook. From their review, and from discussions with the programme team and learners, they were not clear how the programme ensures that learners would

be enabled to meet SOP 13.19 in the standards of proficiency for practitioner psychologists, inclusive of counselling psychologists. This SOP states that counselling psychologists should “understand the philosophy, theory and practice of more than one evidence-based model of formal psychological therapy”. The visitors could not see where in the learning outcomes attached to the programme modules learners would be enabled to gain such an understanding of at least two different evidence-based models of formal psychological therapy. In the SOPs mapping document, under SOP 13.19, they were referred to parts of the Programme Handbook, but none of these references made it clear how the education provider would ensure that learners met the SOP. The visitors therefore require the education provider to demonstrate how the learning outcomes will ensure that learners gain the understanding referred to in SOP 13.19.

4.8 The delivery of the programme must support and develop evidence-based practice.

Condition: The education provider must demonstrate how the programme supports and develops evidence-based practice.

Reason: The visitors reviewed evidence provided for this standard, including the information provided in the Programme Handbook, and in module descriptors. They were also able to discuss with the programme team how the programme supported and developed evidence-based practice. In these discussions it was not clear to the visitors how the teaching of specific evidence-base therapies was integrated into the programme, and they could not see in the module descriptors where particular evidence-based therapies were covered. The programme team did describe how they introduced learners to evidence-based therapies but the visitors were not able to view evidence relating to this. They therefore require the education provider to submit further evidence demonstrating how the programme supports and develops evidence-based practice. They considered that there is a link between this condition and the condition set above under SET 4.1.

5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

Condition: The education provider must demonstrate how the range of practice-based learning supports the learners to achieve the standards of proficiency for counselling psychologists.

Reason: The visitors reviewed the evidence for this standard, a section in the Programme Handbook dealing with the philosophy of the programme, and were able to discuss practice-based learning with the programme team and learners. The programme team stated that practice-based learning on the programme took place in a wide variety of settings with a diverse range of organisations using different therapeutic approaches. The visitors were not clear from these discussions or from the evidence submitted how the education provider ensured that, given the diversity of practice-based learning on offer, all learners were supported to achieve all the standards of proficiency for counselling psychologists. In particular the visitors considered that it was not clear how the education provider would ensure that the SOPs from 13.18 to 13.25, which deal with the need for learners to understand a number of evidence-based therapeutic approaches, would be met by all learners. The visitors therefore require the education provider to demonstrate how they will ensure that all learners can meet the SOPs given the diversity of approach among practice-based learning settings.

5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Condition: The education provider must demonstrate how they maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Reason: The visitors reviewed the evidence provided for this standard and were able to discuss it with programme staff. They were aware that practice-based learning settings were reviewed annually in line with the requirements of the professional body. However, they were not clear how the feedback loop from these reviews was closed, that is to say they were not able to see examples of how actions resulting from the reviews were taken forward. They also noted that the only formal feedback meeting between learners and programme staff took place at the very end of practice-based learning placements, meaning that there were limited opportunities to resolve problems that arose for individual learners during placements. The visitors were also unable to see a sample of a completed audit of a practice-based learning placement. No practice educators attended the practice educators' meeting, only senior staff members from practice-based learning partners, and so the visitors were unable to explore the issue of audit detail in more depth. They were therefore unable to determine whether this standard was met, and require the education provider to submit further evidence demonstrating how they approve and ensure the quality of practice-based learning.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

Condition: The education provider must demonstrate how they monitor the knowledge, skills and experience of practice educators.

Reason: The visitors reviewed the evidence provided for this standard, which stated the practice education took place "within clinical supervision". The education provider did not provide detailed evidence about how they ensured that practice educators had relevant knowledge, skills and experience, and the visitors were not able to discuss the question with practice educators as they did not meet with any. Only senior staff members from practice-based learning partners attended the relevant meeting. In discussions the programme team explained the different kinds of supervision which learners would have in practice-based learning; some placements had a primary supervisor and others had what the education provider called "free supervision" where different individuals were involved in the supervision. It was not clear to the visitors how this system was overseen in practice. For example, they were not clear on the balance between free supervision and primary supervision, or which placements offered which forms of supervision. They could also not see evidence relating to the regularity of the education provider's contact with practice educators. The visitors were therefore not able to determine whether the education provider was in a position to ensure that practice educators had relevant knowledge, skills and experience to support safe and effective learning. They require the education provider to submit evidence demonstrating how they can ensure that practice educators have relevant knowledge, skills and experience.

5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

Condition: The education provider must demonstrate how they monitor the training status of all practice educators, and how they ensure that new practice educators are appropriately trained.

Reason: The visitors reviewed the evidence provided for this standard, including the Programme Handbook, which laid out the training and continuing professional development (CPD) requirements for practice educators. The visitors considered that these requirements were appropriate, but it was not clear either from this document or from discussions with the programme team how the requirements were monitored. For example, they could not see how the education provider would ensure that practice educators had updated skills as appropriate, or how the education provider would ensure that new practice educators were appropriately trained for their role. The visitors were not able to meet with practice educators, only senior staff members from practice-based learning partners, so did not have an opportunity to clarify some of these issues. They therefore require the education provider to demonstrate how they will ensure that all practice educators undertake regular training appropriate to their role, and that new practice educators receive training so that they can understand their role in delivering the programme learning outcomes.

5.8 Learners and practice educators must have the information they need in a timely manner in order to be prepared for practice-based learning.

Condition: The education provider must demonstrate how they ensure that practice educators have all the information they need in order to be prepared for practice-based learning.

Reason: The visitors reviewed the evidence provided for this standard, including the Programme Handbook. This evidence gave a narrative of how preparation for practice-based learning was intended to work, and this appeared to be appropriate, but the visitors were not clear how the education provider would ensure that all practice educators had access to all the information they needed. From discussions with the programme team they were aware that there was some contact between the education provider and practice educators, but there did not appear to be a system for ensuring that this occurred to an appropriate level before every placement. The visitors were not able to talk to practice educators, only senior staff members from practice-based learning partners, so were unable to clarify this issue from that perspective. Learners did not report any specific problems with the preparation of practice educators, but in the absence of a clear process the visitors could not be clear that the standard was met, and they therefore require the education provider to demonstrate how they will ensure that practice educators have all the information they need in a timely manner to be appropriately prepared.

6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.

Condition: The education provider must demonstrate how they ensure that assessments provide an objective, fair and reliable measure of learners' progression and achievement.

Reason: The visitors reviewed the evidence provided for this standard, including sections in the Programme Handbook dealing with progression and different forms of assessment. They also discussed with the programme team how they monitored the appropriateness of assessments. The programme stated that this was done via meetings, feedback from learners, and from the regular informal contacts within the programme team. However, the visitors were not able to view detailed information relating to monitoring of assessment, for example data on pass rates, attrition, and failures to progress. From discussions and from written evidence, it was not clear how this information was systematically gathered and stored, and the visitors were therefore unable to determine how the education provider ensures that assessment is fair, objective and reliable. They require the education provider to submit further evidence demonstrating how they do so.