

HCPC approval process report

Education provider	University of Cumbria
Name of programme(s)	<ul style="list-style-type: none"> • BSc (Hons) Paramedic Science - South Central Ambulance Service (SCAS), Work based learning • BSc (Hons) Paramedic Science - Isle of Wight (IoW), University of Cumbria, Work based learning • BSc (Hons) Paramedic Science - London Ambulance Service (LAS), Work based learning • BSc (Hons) Paramedic Science - South Western Ambulance Service (SWAS), Work based learning • BSc (Hons) Paramedic Science - South East Coast Ambulance Service (SECAMB), Work based learning • BSc (Hons) Paramedic Science - North West Ambulance Service (NWAS), Flexible
Approval visit date	03 June 2020
Case reference	CAS-15932-B6J9C0

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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:

Robert Fellows	Paramedic
Glyn Harding	Paramedic
Niall Gooch	HCPC executive

Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Steven Ogden	Independent chair (supplied by the education provider)	University of Cumbria
Caron Jackson	Secretary (supplied by the education provider)	University of Cumbria
Sharon Hardwick	External panel member	Birmingham City University
Alex Leek	Internal panel member	University of Cumbria
Mike Toyn	Internal panel member	University of Cumbria

Peter Train	Apprenticeship development manager	University of Cumbria
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Section 2: Programme details

Programme name	BSc (Hons) Paramedic Science - South Central Ambulance Service (SCAS)
Mode of study	WBL (Work based learning)
Profession	Paramedic
Proposed first intake	01 October 2020
Maximum learner cohort	Up to 30
Intakes per year	3
Assessment reference	APP02222

Programme name	BSc (Hons) Paramedic Science - Isle of Wight (IoW)
Mode of study	WBL (Work based learning)
Profession	Paramedic
Proposed first intake	01 October 2020
Maximum learner cohort	Up to 10
Intakes per year	2
Assessment reference	APP02223

Programme name	BSc (Hons) Paramedic Science - London Ambulance Service (LAS)
Mode of study	WBL (Work based learning)
Profession	Paramedic
Proposed first intake	01 October 2020
Maximum learner cohort	Up to 40
Intakes per year	3
Assessment reference	APP02224

Programme name	BSc (Hons) Paramedic Science - South Western Ambulance Service (SWAS)
Mode of study	WBL (Work based learning)
Profession	Paramedic
Proposed first intake	01 October 2020
Maximum learner cohort	Up to 40
Intakes per year	3
Assessment reference	APP02225

Programme name	BSc (Hons) Paramedic Science - South East Coast Ambulance Service (SECAMB)
Mode of study	WBL (Work based learning)
Profession	Paramedic
Proposed first intake	01 February 2021

Maximum learner cohort	Up to 40
Intakes per year	2
Assessment reference	APP02226

Programme name	BSc (Hons) Paramedic Science - North West Ambulance Service (NWAS)
Mode of study	FLX (Flexible)
Profession	Paramedic
Proposed first intake	01 October 2020
Maximum learner cohort	Up to 40
Intakes per year	3
Assessment reference	APP02227

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programmes meet our standards for the first time.

Although this is conceived as one single degree apprenticeship programme, we are recording it as six separate programmes. This is because it is being delivered by five different ambulance services – learners from IWAS, the Isle of Wight Ambulance Service, will be under the aegis of South Central Ambulance Service (SCAS).

This approach to recording means maximal clarity for the HCPC list of approved programmes, and because it will enable a more granular approach to annual monitoring audits, during which we may need to pick up different issues at different locations where the programme is delivered.

Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted
Completed education standards mapping document	Yes
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes
Descriptions of how the programme delivers and assesses learning	Yes
Proficiency standards mapping	Yes
Information provided to applicants and learners	Yes
Information for those involved with practice-based learning	Yes
Information that shows how staff resources are sufficient for the delivery of the programme	Yes

Internal quality monitoring documentation	Yes
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Due to the COVID-19 pandemic, the HCPC and the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Not Required	As it was a virtual visit and the HCPC panel had determined from documentation that they did not have specific concerns about learner involvement, we decided not to have a meeting specifically with learners.
Service users and carers (and / or their representatives)	Not Required	As it was a virtual visit and the HCPC panel had determined from documentation that they did not have specific concerns about service user and carer involvement, we decided not to have a meeting specifically with service users and carers.
Facilities and resources	Not Required	We discussed facilities and resources with the programme team, rather than having a specific meeting. See the condition under SET 3.12 below.
Senior staff	Yes	
Practice educators	Yes	A meeting was held with those involved with ambulance services, but these individuals were senior managers rather than operational-level educators. It was therefore difficult for the visitors to get a clear understanding of the operational-level picture.
Programme team	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 virtual 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 14 August 2020.

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 will ensure that suitable resources are available for the delivery of the programme in ambulance services.

Reason: In their evidence for these standards the education provider submitted staffing plans, correspondence with librarians, and information about placement audit. However, the visitors noted that there was likely to be significant variance in approach because of the geographical dispersal of the programme. This issue was discussed during the visit and the programme team gave verbal assurances that learners would be able to access University of Cumbria online resources appropriately, but it was not clear what specific process there was in place for them to ensure that individual ambulance services were able to provide appropriate resourcing, especially during practice-based learning. The visitors were therefore unable to determine whether the standard was met, and require further evidence demonstrating how the education provider will ensure access to effective and appropriate resources.

4.3 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Condition: The education provider must demonstrate how they will ensure that the programme reflects the skills and knowledge required of paramedics across all areas of their practice.

Reason: The visitors were aware from the programme documentation and from discussions with the programme team that the programme was heavily focused on the needs and operational imperatives of the partner ambulance services. However, the HCPC requirement is that paramedic programmes ensure that learners are enabled to understand the full scope and knowledge base of the profession, so that any registered paramedic is prepared to practise safely and effectively in any setting once they are a registered paramedic. From their review of the programme content the visitors considered that there was a lack of evidence relating to the opportunities that learners would have to learn about non-ambulance components of paramedic work, such as primary care, maternity or minor injury units. This raised the possibility that learners might not gain a full understanding of the paramedic role outside the ambulance setting.

The visitors additionally noted that answers given by ambulance managers at the visit indicated a strong focus on ambulance-based placements. Also, the visitors were aware that there was an issue with tariff funding for non-ambulance based placements. Although the education provider gave verbal assurances around these issues, the visitors considered that the above might affect whether the programme overall reflects

the skills and knowledge base as articulated in, for example, the College of Paramedics guidance.

The visitors therefore could not determine whether this standard is met and require further evidence to show how the education provider will ensure that all learners can practise safely and effectively across all areas of paramedic practice.

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must demonstrate how they will ensure that the programme takes account of and reflects current practice across the whole of the paramedic profession.

Reason: As noted in the condition under SET 4.3 above, the visitors were aware that the day-to-day programme delivery would take place in ambulance services, although by University of Cumbria staff. The education provider evidenced this SET by providing module descriptors, the programme handbook, and a briefing document. However, the visitors were not clear how the education provider intended to ensure that each ambulance service had effective means of ensuring that the delivery of the programme was informed by current practice, in order to remain relevant and effective in preparing learners to work safely and effectively as paramedics. In particular, linked to the condition under SET 4.1, they were not clear about how the programme team would ensure a relevant curriculum around non-ambulance practice, given that there appeared to be a very strong ambulance focus on the programme. For example, the non-ambulance placements section of their College of Paramedics curriculum mapping document had not been completed. The visitors therefore require further evidence to demonstrate that the education provider has effective mechanisms in place to ensure that learners are enabled to gain an understanding of current practice across the profession, where many paramedics do not work in ambulance services.

4.5 Integration of theory and practice must be central to the programme.

Condition: The education provider must demonstrate how they will ensure that both theory and practical elements relating to non-ambulance-based components of the programme are appropriately integrated

Reason: As noted in the conditions above, the visitors considered that it was not clear to them how the education provider intended to ensure that all learners had appropriate access to non-ambulance based practice-based learning. The education provider evidenced this standard through module descriptors and the programme handbook. However, this evidence did not show the visitors how the education provider would ensure that all the ambulance services would be able to deliver the full range of practice-based learning settings. They were therefore not clear how learners would be enabled to understand the connections between the theoretical learning about non-ambulance-based paramedicine and the practical components, and so could not determine whether the standard was met. They require further evidence demonstrating that all ambulance services will be able to integrate theory and practice comprehensively in a way that ensures learners understand all parts of paramedic practice.

4.9 The programme must ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Condition: The education provider must demonstrate how they will ensure that opportunities for learners to learn with and from learners and professionals in other relevant professions are formally integrated into the programme.

Reason: The education provider sought to meet this standard by providing documents including the programme handbook, the staffing plan, and sample ambulance service audits. The visitors understood that their intention was for the standard to be met principally by learners encountering other professionals and learners through their practice-based learning. They considered that this would certainly help some learners. However, they could not see how the education provider would ensure that all learners would have access to appropriate practice-based learning of the kind required by the standard, that was formally integrated into the programme and delivered in a structured and quantifiable way. For example, they could not see how all learners would be enabled to work in true multi-disciplinary teams. This was a particular issue because of the uncertainty over non-ambulance learning (see conditions above).

They noted also that the education provider did not need to deliver inter-professional education (IPE) only through practice-based learning, and that in their conditions response the education provider may wish to consider showing how IPE is delivered through other parts of the programme, such as those facilitated by the University of Cumbria. They therefore require further evidence demonstrating that learners will be able to learn with, and from, professionals and learners in other relevant professions, both in the taught parts of the programme **and** in the practice-based learning.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in 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 will ensure that the practice educators are adequately available for the delivery of the programme in ambulance services are sufficient in number, and how they will ensure that they are appropriately skilled, qualified and experienced.

Reason: In their evidence for these standards the education provider submitted staffing plans, information about placement audit and information about how assessment and supervision in placement would work. However, the visitors were not able to see from this evidence how the education provider intended to ensure that there would be a sufficient number of suitable practice educators available. This issue was discussed during the visit and the programme team gave verbal assurances that enough practice educators would be available. However, the visitors were not clear what mechanism the education provider had for ensuring that this was carried out appropriately. They were able to see audits for placement but these did not make it clear how the education provider would satisfy themselves that suitable practice educators would be available for all learners in placement. They therefore require further evidence to demonstrate that this can be done.

6.7 The education provider must ensure that at least one external examiner 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 demonstrate how they will ensure that the external examiner role is appropriately filled across the five ambulance service locations selected for training delivery.

Reason: The education provider submitted evidence showing the responsibilities of the external examiner and how the generic external examiner recruitment process would work, as well as generic regulations relating to external examiners. However, the visitors could not see, from this evidence, how the education provider intended to managed the challenges that would arise for external examiners given the structure of the programme. It was not clear, either from evidence or from discussions at the visit, whether the education provider intended to appoint an external examiner per ambulance service, or whether a small number of external examiners would work across different ambulance services. The visitors were also not clear from the answers given by the programme team about how they would ensure equity in the external examiners' approach. They therefore cannot determine that the standard is met and require further evidence about how the external examiners will be used on the programme, and the timescales for their recruitment.

University of Cumbria Official Observations

HCPC Validation 3rd June 2020

Paramedic Degree Apprenticeship

Please find below details of the University of Cumbria's official observations regarding the validation visit that took place on the 3rd of June 2020. This written reflection serves as the University's provision of feedback on the validation process.

My name is Tom Davidson and I am the Director of the university's Centre of Excellence in Paramedic Practice. My role within the University is to strategically lead the paramedic provision and I am the nominated professional lead for the universities HCPC paramedic apprenticeships. Since the validation, I have been in liaison with Niall Gooch, the HCPC's Education Officer, regarding the accuracy and fairness of the recent HCPC report, and the conditions stipulated therein. I first raised my concerns relating to those conditions with Niall directly; Niall then sought guidance from Brendon Edmonds. Since this initial correspondence, and in response to our concerns, the HCPC have rewritten the report several times. I have attached all versions of the report for reference. The continuing concerns the university have are based on the following:

- 1. Dictating to the programme team how to meet the SET 4.3/4.4/4.5/4.9 by mandating "non-ambulance placements" as a fundamental component of the course**
- 2. The HCPC enforcing measures requiring universities to continue to assess learning competence in every area of paramedic practice post-qualification**
- 3. Inconsistencies between the judgements of two HCPC visits to the university**
- 4. The university consistently being held to achieve a level beyond the HCPC threshold standard**

To address each of these concerns in turn:

- 1. Dictating to the programme team how to meet the SET 4.3/4.4/4.5/4.9 by mandating "non-ambulance placements" as a fundamental component of the course**

From previous experience with the HCPC, the conditions are set to ensure the SETs are met. They are normally written in general terms and it is up to the education provider to propose how these conditions are met. As you can see, when compared with the attached original report, the wording of this condition has been altered considerably. This has resulted in a report which is now more closely aligned with the expected approach of the HCPC.

However, we still have concerns that there is potential for the visitors to make a judgement based on the original rationale, which could penalise our programme for not following the prescribed and proscriptive format contained therein. Reassurance is therefore sought that approval of conditions being met will be assessed against the final and agreed amended validation report.

- 2. The HCPC enforcing measures requiring universities to continue to assess learning competence in every area of paramedic practice post-qualification**

The programme team were not aware that they had to prove to the HCPC that their programme assessed the learners' competence in every possible *setting* in which a paramedic could work post-qualification. The team were under the impression that the apprenticeship was to provide a programme that meets the HCPC SOPs and ensures that successful students are able to demonstrate competence in those SOPs and the SCPE. The report makes several mentions regarding this issue.

We are aware that students need an overview of other areas of practice, and we will provide this in a way that best suits our learners and our programme. We are confident we meet the SOPs which, in our opinion, ensures that the students can practice safely as registered paramedics.

4.3 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Condition: The education provider must demonstrate how they will ensure that the programme reflects the skills and knowledge required of paramedics across all areas of their practice.

Reason: The visitors were aware from the programme documentation and from discussions with the programme team that the programme was heavily focused on the needs and operational imperatives of the partner ambulance services. However, the HCPC requirement is that paramedic programmes ensure that learners are enabled to understand the full scope and knowledge base of the profession, so that any registered paramedic is prepared to practise safely and effectively in any setting once they are a registered paramedic...

...The visitors therefore could not determine whether this standard is met and require further evidence to show how the education provider will ensure that all learners can practise safely and effectively across all areas of paramedic practice...

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must demonstrate how they will ensure that the programme takes account of and reflects current practice across the whole of the paramedic profession.

...The visitors therefore require further evidence to demonstrate that the education provider has effective mechanisms in place to ensure that learners are enabled to gain an understanding of current practice across the profession, where many paramedics do not work in ambulance services.

3. Inconsistencies between the judgements of two HCPC visits to the university

In March 2020 the university hosted an HCPC visit for our open access undergraduate paramedic programme. This gained successful approval with only three conditions. That visit involved the same HCPC Education Officer as the recent apprenticeship visit.

The apprenticeship programme was largely based on our open access programme, with the same SOPs mapping document presented at both events. Crucially, at the first event the HCPC did not impose any conditions related to this mapping document. This would suggest that the original HCPC visiting panel was happy with the structure of the programme and its ability to meet the SOPs.

However, following the apprenticeship event, and despite no change being made to the SOPs mapping document, several of the conditions imposed were based on our programme not providing enough opportunities for the students to demonstrate competence across all SOPs.

The reasons for this and the resulting conditions imposed have changed considerably since the preparation of the attached original report, which heavily referenced the SOPs mapping and lack of "non-ambulance placements" as fundamental issues with the programme. The report has now been rewritten in such a way that it does not reference the SOPs at all. The programme team are

concerned that the visitors could potentially again make a judgement based on their original rationale and resulting in the programme being penalised for not following their prescribed format.

4. The university consistently being held to achieve a level beyond the HCPC threshold standard

Throughout all the reports produced, there were references to the need for university provision of "non-ambulance placements". This phrase has been used consistently within both the conditions and the reasons behind those conditions.

The original report was written in such a way that it would have been impossible for the university to answer the conditions without having to make provision for these kinds of placements. The programme team were attempting to use innovative methods by which to answer the SETs. There are a number of current paramedic programmes within the UK that do not have non-ambulance placements yet all of these have passed the HCPC's Annual Monitoring.

The phrase "non-ambulance placements" is not contained anywhere within any HCPC documentation, yet it is used frequently within the College of Paramedic Curriculum Guidance. The programme team feel that judgements relating to non-ambulance placements have been made in relation to the College of Paramedic standards, rather than the threshold standards of the HCPC, this is a critical and pivotal observation made of the event.

4.3-Although the education provider gave verbal assurances around these issues, the visitors considered that the above might affect whether the programme overall reflects the skills and knowledge base as articulated in, for example, the **College of Paramedics guidance**.

4.4-For example, the non-ambulance placements section of their **College of Paramedics** curriculum mapping document had not been completed.

4.5 Integration of theory and practice must be central to the programme.

Condition: The education provider must demonstrate how they will ensure that both theory and practical elements relating **to non-ambulance-based components** of the programme are appropriately integrated.

..However, this evidence did not show the visitors how the education provider would ensure that learners would be enabled to understand the connections between the theoretical learning about **the non-ambulance-based aspects** of paramedicine, and the practical components, and so could not determine whether the standard was met.

4.9- For example, they could not see how all learners would be enabled to work in true multi-disciplinary teams. This was a particular issue because of the uncertainty over **non-ambulance learning (see conditions above)**.

The programme team followed the HCPC SET guidance to create the programme structure. However, the constant references to the term "non-ambulance placements" in the report suggest the visitors' interpretation of this SET will, in future, force education providers to follow a mandated structure or national guidance other than that stipulated by the HCPC. To quote from the HCPC Standards of education and training guidance:

"We do not set requirements for the structure, length or range of practice-based learning that you must include in your programme to meet our standards of education and training." (2017; p 39)

The programme feel that they provided a response that completely reflects the philosophy, core values, skills and knowledge required by the HCPC, but this response was not accepted by the visiting team members.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read 'Tom Davidson', with a long, sweeping underline.

Tom Davidson

Director, Centre of Excellence for Paramedic Practice

11/08/2020

HCPC approval process report

Education provider	Queen Margaret University
Name of programme(s)	Master of SLT (MSLT), Full time BSc (Hons) Speech and Language Therapy, Full time
Approval visit date	02 June 2020
Case reference	CAS-15913-R6Y0K7

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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:

Catherine Mackenzie	Speech and language therapist
Clare Attrill	Speech and language therapist
Temilolu Odunaike	HCPC executive

Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Michael Stewart	Independent chair (supplied by the education provider)	Queen Margaret University
Jill Kelly	Secretary (supplied by the education provider)	Queen Margaret University
Kate Shobbrook	Professional body representative	The Royal College of Speech and Language Therapists (RCSLT)

Section 2: Programme details

Programme name	Master of SLT (MSLT)
Mode of study	FT (Full time)
Profession	Speech and language therapist
Proposed First intake	07 September 2020
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02214

Programme name	BSc (Hons) Speech and Language Therapy
Mode of study	FT (Full time)
Profession	Speech and language therapist
Proposed First intake	31 August 2020
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02259

We undertook this assessment of new programmes proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programmes meet our standards for the first time.

Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	

Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	The programmes are new and have not run.

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	No	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
Service users and carers (and / or their representatives)	No	As this was a virtual visit and, given the current situation around the Covid-19 pandemic, we decided that it was unnecessary to meet with this group
Facilities and resources	No	
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 July 2020.

2.1 The admissions process 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.

Condition: The education provider must ensure that appropriate information about the

programmes is provided to potential applicants, to allow them to make an informed decision about taking up a place on the programmes.

Reason: From the documentation provided, the visitors could not determine how the education provider ensures pertinent admissions information relating to the programmes will be communicated to potential applicants in order for them to make an informed choice about whether to take up a place on the programmes. The visitors noted that the evidence provided for this standard referred to entry criteria onto the Master of SLT programme. However, information such as placement travel and accommodation costs were not provided within the documentation. The visitors also noted that there was no explicit information within the documentation to explain that even though the programme is a Masters degree, learners would have the opportunity to opt out at BSc level; and that this also gives eligibility to apply to the HCPC Register.

At the visit, the visitors heard that prospective learners would be provided with information about the programme at an open day and visit day. The programme team explained that the open day would give applicants the opportunity to know about the topics they will learn and the visit day would be for those who have been offered a place to learn more about the programmes. The visitors considered that information such as the costs and exit award should be made available to potential applicants before they apply to the programme or before they attend the open day. Therefore, the visitors require the education provider to provide additional documentation, in particular the literature that would be made available to potential applicants to allow them to informatively decide on taking up a place on the programme. This should include:

- information about associated costs as identified above; and
- clarification around the BSc exit award that is available on the Masters programme.

This way the visitors will be able to determine whether this standard is met.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that there are plans in place to ensure the ongoing sustainability for the programmes.

Reason: From their documentation review, the visitors noted that the education provider had initially indicated that there will be 50 learners on the programme. The visitors could not see that there was commitment either from partner organisations or the education provider to provide sufficient resources to deliver the programme to all learners, as this was not provided in the documentation. In their pre-visit responses to the visitors' questions about learner numbers, the education provider explained that graduate numbers for the BSc programme in 2018 and 2019 were 12 and 13 respectively. The visitors therefore understood that there would be at least 12 additional learners. At the visit, the senior team clarified that there would be 25 learners on the Integrated Masters with the other 25 on the existing postgraduate diploma which was not considered at this visit. Based on this, the visitors understood that there would be additional learners across the speech and language therapy provision at this education provider. The visitors also understood that the existing BSc provision would be closing but they are uncertain when this will be.

In the practice educators' meeting, the visitors heard that the majority of the practice education providers do not have capacity for additional learners in practice-based learning. The visitors were also unclear how the education provider would ensure there

are sufficient teaching staff to support all learners, particularly in their dissertation supervision as this was not made clear within the documentation. As such, the visitors require the education provider to demonstrate that there would be sufficient teaching and practice based learning resources in place to ensure the programme is sustainable and can effectively support all learners.

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 that sufficient practice-based learning is available for all learners.

Reason: Through the documentary review and from discussions at the visit, the visitors were made aware that there is a Practice Placement Agreement (PPA) coordinated by NHS Education Scotland (NES) which ensures education providers in Scotland have sufficient practice-based learning capacity. The visitors noted that there was no breakdown provided of practice-based learning to assure them that there is currently sufficient practice-based learning capacity for these programmes. The visitors also did not see evidence of any shared practice-based learning database being maintained by NES (if this was the case) as it relates to these programmes. Given the education provider is responsible for ensuring availability and capacity of practice-based learning for all learners on their programmes, the visitors could not determine how the education provider uses the information provided by NES to ensure this.

The visitors also understood from their discussions with the practice educators that the majority of the practice education providers are already at full practice-based learning capacity and may struggle to take on additional learners. As such the visitors were unable to determine that there is an effective process in place for ensuring availability and capacity of practice-based learning. Therefore, they request that the education provider provide evidence showing how they will ensure the availability of sufficient practice-based learning for all learners.

3.9 There must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

Condition: The education provider must provide further evidence to demonstrate that there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

Reason: The visitors reviewed the staff section of the validation document as well as the staff curriculum vitae (CVs) as evidence for this standard. The visitors also noted that the SETs mapping document stated that there are 14 staff members on the programmes, 9 of whom are qualified speech and language therapists. The visitors noted that these were the same staff members that were delivering the existing programmes and there was no information about how they would manage the increased number of learners on the programmes. The visitors also noted that the external examiner picked up challenges in staffing on the outgoing BSc programme. However, the education provider had not demonstrated how they intend to overcome these challenges.

In their pre-visit responses to the visitors' questions about learner numbers, the education provider explained that graduate numbers for the BSc programme in 2018

and 2019 were 12 and 13 respectively. The visitors therefore understood that there would be at least 12 additional learners. At the visit, the senior team explained that there would be 25 learners on the Integrated Masters with another 25 on the existing postgraduate diploma (which was not considered at this visit). The visitors therefore understood that there will be additional learners across the speech and language therapy provision at this education provider. The visitors also understood that the existing BSc provision would be closing but they were unsure when this will be. As such, the visitors could not be certain that there would be adequate number of appropriately qualified and experienced staff in place to support all learners, particularly in their dissertation supervision. This is because the education provider did not provide the visitors with clear information on how the existing staff would be involved in delivering the different aspects of the programmes. Therefore, the education provider must provide additional information that demonstrates they have adequate staff in place to effectively deliver the new programmes and to manage and support all learners on the programmes.

4.10 The programme must include effective processes for obtaining appropriate consent from service users and learners.

Condition: The education provider must demonstrate they have a process in place for obtaining appropriate consent from learners when they take part as service users in practical and clinical teaching.

Reason: From reviewing the programme documentation, the visitors saw that the education provider has a process for obtaining consent from learners in practical and clinical teaching. However, the visitors noted that this was a broad consent which will be obtained at the start the programme and may not be applicable when learners take part in specific activities such as role plays. At the visit, the programme team explained that they make it clear to learners that some activities are optional and that they would support them if they wish to opt out of certain activities such as food tasting or role plays. The visitors noted that this information was not provided within the documentation so they were unable to determine how learners would be informed of this. As such, they could not determine that the education provider's process for obtaining consent was effective. They therefore request that the education provider submit further evidence that demonstrates their process for obtaining appropriate consent from learners when they take part as service users and carers in practical and clinical teaching.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

Condition: The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning for the number of learners on the programme.

Reason: The visitors were referred to the practice-based learning section of the validation document as evidence for this standard. The visitors noted that the information provided did not demonstrate how the education provider would ensure an adequate number of appropriately qualified and experienced staff in practice-based learning. In discussions with the practice educators, the visitors heard from two of the three that were present that they were full to capacity regarding staff available to support learners in practice-based learning. The third practice educator explained that

although they have staff in place, they were having challenges taking on learners due to their geographical location. As such, the visitors were unable to determine how the education provider will ensure that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning. Therefore, the visitors require the education provider to provide evidence that clearly outlines the process by which they will ensure there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning to support all learners on these programmes.

Recommendations

We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

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

Recommendation: The education provider should consider reviewing their strategy for service user and carer recruitment, with a view to diversifying the carer group.

Reason: The visitors were satisfied that this standard was met at threshold, as there were service users and carers involved in the programme development as well as its ongoing development and delivery. The visitors noted that limited information was provided about the involvement of parents or carers of children using or, that have used, speech and language therapy services, to demonstrate that this group are also involved in the programme. Given the adult and paediatric nature of the profession, the visitors considered that the education provider should consider broadening their carer recruitment to include this group as they could also contribute to the ongoing development and effective delivery of the programme.

4.2 The learning outcomes must ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Recommendation: The education provider should consider providing further guidance to practice educators on how to support learners in understanding and meeting the expectations of professional behaviour, including the standards of conduct, performance and ethics (SCPEs).

Reason: The visitors were satisfied that this standard was met at threshold level as they received evidence that demonstrated that learners would be given in-depth teaching on professional behaviour and the SCPEs by the teaching staff. However, the visitors noted that the practice educators only discuss the SCPEs at the beginning of practice-based learning experience. The visitors considered that it was important that learners, continue to learn throughout the programme and in all settings, which types of behaviour are appropriate for them as professionals and which are not. As such, the visitors recommend that the education provider considers providing the practice educators with more guidance on how to ensure that the SCPEs play a more prominent and structured role throughout practice-based learning.

4.6 The learning and teaching methods used must be appropriate to the effective delivery of the learning outcomes.

Recommendation: The education provider should consider reviewing the learning outcomes to ensure there is sufficient differentiation where the same module is taken in the BSc and Masters programme (level 10 and 11 respectively).

Reason: From the documentation provided and discussions with the programme team, it was clear that the teaching and learning methods used to deliver the programme were met at threshold. However, the visitors noted from their review of the module descriptors that there would be some modules that are delivered in both the BSc and Masters programmes but with different learning outcomes. The visitors considered that the programme documentation should demonstrate sufficient differentiation between the learning outcomes where the same module is taken by both sets of learners. They therefore recommend that the education provider review the learning outcomes where the same modules are delivered at levels 10 and 11 and make these explicitly clear so learners fully understand the differences.

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.

Recommendation: The education provider should consider different ways of delivering regular training to practice educators to support them in their role, in meeting learners' needs and for the delivery of the learning outcomes of the programme.

Reason: From the information provided prior to the visit and through discussions at the visit, the visitors were satisfied that practice educators have access to the training they need to be able to support learning and assess learners effectively and as such, they considered that the standard was met at threshold level. The visitors understood that there is a clear framework of training for practice educators in Scotland and the training is delivered four times a year. The practice educators also informed the visitors that there are regular trainings organised by the education provider for practice educators and that there are resources accessible to them to support them in their role. The visitors noted however, that some of the practice educators struggle to attend the training delivered by the education provider as these are usually delivered on the education provider's site. The practice educators told the visitors that they would be able to attend the training more regularly if it was delivered to them at their NHS Trusts rather than they having to undertake the training at the education provider's site. As such, the education provider should consider how they deliver training to practice educators so they can be sure that the practice educators continue to undertake regular training appropriate to their role, learners' needs and the delivery of the learning outcomes.

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

Recommendation: The education provider should consider reviewing the usefulness of the indicative mark used by practice educators to assess learners, to ensure they are objective, fair and reliable in assessing learners throughout the programme.

Reason: The visitors considered that this standard was met as the education provider's assessment strategy was laid out and comprehensible for learners. However the visitors noted that there is an additional indicative mark that practice educators are allowed to

give in practice-based learning assessments. The education provider explained that the indicative mark is important to learners as it provides them with an opportunity to know how well they are doing in practice, particularly for those that struggle with academic work but do very well in practice. The visitors understood the importance of the indicative mark to learners, however, they were unsure how practice educators would know how to grade this mark. The programme team explained that new practice educators would be supported by their more experienced peers and that there is guidance available to them. The team also explained that they have done a lot of work to support practice educators in understanding the learning objectives for each year. The visitors considered that the education provider should consider reviewing the usefulness of the indicative mark used by practice educators, in terms of its objectivity, fairness and reliability to ensure assessments are clear, realistic and consistent throughout the programme.

OBSERVATION

HCPC Approval Process QMU MSLT, July 2020.

The following of the visitors' conditions reference increased number of learners on the programmes at QMU and whether there will be sufficient resources to support additional learners.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that there are plans in place to ensure the ongoing sustainability for the programmes.

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 that sufficient practice-based learning is available for all learners.

3.9 There must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

Condition: The education provider must provide further evidence to demonstrate that there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

Condition: The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning for the number of learners on the programme.

Area of challenge and reason

We apologise that the information provided did not clarify that we are not increasing the number of learners on the programmes we deliver. The reason for this condition stems from the misunderstanding of the number of learners and the number of graduates. The panel made reference to the graduate numbers in 2018 and 2019 being 12 and 13 respectively. However, these numbers do not reflect the number of Level 4 learners that we catered for in these academic years, which were 17 in 2018 and 19 in 2019. The discrepancy in the number of learners versus graduates was due to an unusual number of extenuating circumstances and other personal circumstances affecting learners in the final year cohorts during this period. In the current academic year, we have 25 learners in Level 4 and we will have the same number in the academic year 2020-2021.

We currently deliver the BSc and PGDip/MSc programmes with an average intake of 50 entrants per year across both programmes. The table below outlines learners admitted to the programmes over the past 4 academic years.

	2016-2017	2017-2018	2018-2019	2019-2020
BSc (Hons)	27	23	16	18
PGDip/MSc	33	25	32	26
TOTAL	60	48	48	44

Average number of new entrants to BSc(Hons) and PGDip/Msc per year= 50

The table below shows expected numbers for undergraduate entry (MSLT/BSc (Hons) and postgraduate entry (PGDip/MSc).

	2020-2021	2021-2022	2022-2023	2023-2024
MSLT/BSc (Hons)	25 (+/-5)	25 (+/-5)	25 (+/-5)	25 (+/-5)
PGDip/MSc	25 (+/-5)	25 (+/-5)	25 (+/-5)	25 (+/-5)
TOTAL	50	50	50	50

The number of entrants into the MSLT/BSc (Hons) programme may be adjusted up or down depending on recruitment to the postgraduate pre-registration programme, but the overall total is dictated by the number of placements available through our Practice Placement Agreement.

An expectation of some fluctuation in the balance of numbers across programmes is built into our planning, and we are used to managing this as the proportion of undergraduate vs postgraduate numbers has varied over recent years. This flexibility helps to secure viability of programmes; if recruitment to the undergraduate programme is lower than expected in any given year, we can increase recruitment to the postgraduate programme, and vice versa.

For this reason, we are not seeking an increase in the number of learners but maintaining our current number. Therefore, there should be no implications for staffing levels. In fact, once the new programme is fully implemented, we expect to benefit from significant efficiencies in running the programmes, since the delivery pattern is designed to maximise shared learning and resources across undergraduate and postgraduate programmes.

The visitors were unclear when the current BSc would be closing. The students entering the BSc programme in 2019-20 will be the last cohort to be recruited to the current BSc programme. Students from 2020-21 onwards will be recruited to the new MSLT, with the option to exit with a BSc (Hons) instead, should they wish to do so.