

# Performance review process report – Medway School of Pharmacy, January 2018 - 2021

Executive summary .....	1
Our standards .....	1
Our regulatory approach .....	2
The approved education provider monitoring process .....	2
Institution context .....	2
Previous engagement with HCPC processes .....	2
Institution performance scoring information .....	3
The programmes considered .....	4
Quality assurance assessment .....	5
Quality summary.....	6
Recommendation.....	11
Decision .....	11
How we make our decisions .....	11

## 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.

This is a report on the approved education provider monitoring process undertaken by the HCPC to ensure that the institution and programme(s) detailed in this report continue to meet our standards for prescribing (referred to through this report as ‘our standards’). The report details the process itself, evidence considered, outcomes and recommendations made regarding institution and programme ongoing approval.

## Our standards

We approve education providers and programmes that meet our education standards. Individuals who complete approved programmes will meet proficiency standards, which 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.

## Our regulatory approach

We are flexible, intelligent and data-led in our approach to the quality assurance of institutions and programmes. Through our processes, we:

- enable bespoke, proportionate and effective regulatory engagement with education providers;
- use data and intelligence to enable effective risk-based decision making; and
- engage at the organisational, profession and programme levels to enhance our ability to assess the impact of risks and issues on HCPC standards.

Providers and programmes are [approved on an open-ended basis](#), subject to ongoing monitoring. Programmes we have approved are listed [on our website](#).

## The approved education provider monitoring process

Once an institution is approved, we will take assurance it continues to meet standards through:

- regular assessment of key data points, supplied by the education provider and external organisations; and
- assessment of a self-reflective portfolio and evidence, supplied on a cyclical basis.

Through monitoring, we take assurance in a bespoke and flexible way, meaning that we will assess how an education provider is performing based on what we see, rather than by a one-size-fits-all approach. We take this assurance at the provider level wherever possible, and will delve into programme / profession level detail where we need to.

This report focuses on the assessment of the self-reflective portfolio and evidence.

## Institution context

The education provider currently delivers three HCPC-approved programmes across two post-registration entitlements. The education provider is a collaboration between the University of Greenwich and University of Kent. It provides undergraduate, postgraduate and short courses, all in the profession of pharmacy. This includes delivering post-registration areas for HCPC regulated professions which have access to prescribing rights.

## Previous engagement with HCPC processes

The education provider engaged with annual monitoring as required. We brought nothing forward from previous interactions to specifically consider through this process.

## Institution performance scoring information

Data point	Bench-mark	Value	Score	Executive comments
Total intended learner numbers compared to total enrolment numbers	180	180	0.00	
Aggregation of percentage not continuing	N/A	From their data, the education provider inform us they have an aggregate of 9.4 percent not continuing.	N/A	We collect this data from the Higher Education Statistics Agency (HESA). The education provider is not a Higher Education Institution, and therefore does not provide data to HESA, so these data points are not available.
Aggregation of percentage in employment / further study	N/A	N/A – all learners need to be in employment within the NHS or private practice as a requirement to attend	N/A	
TEF award	N/A	In 2017 the provider's University partners were awarded TEF as follows: <ul style="list-style-type: none"> <li>• University of Greenwich – Silver</li> <li>• University of Kent – Gold</li> </ul>	N/A	The education provider is not a Higher Education Institution, and therefore the TEF award does not apply. However, we can take confidence from the scores of the university partners in this area.
NSS overall satisfaction score (Q27)	N/A	N/A	N/A	We collect this data from the Office for Students (OfS), who run a survey for learners and graduates of undergraduate Higher Education. The programmes delivered by the education provider are at post-graduate level, and therefore these data points are not available.

Data point	Bench-mark	Value	Score	Executive comments
HCPC AEPM cycle length	N/A	N/A	N/A	This data point is not currently available, as will be decided through this performance review exercise.
<b>Overall score</b>	N/A	N/A	Not available	From the data sourced and supplied, we are unable to calculate an overall performance score. However, we have used this exercise to establish relevant data points from the provider where they are available, which we can use as a baseline in future assessments.

As we are not able to compare data points to benchmarks, we only considered the data points themselves (rather than using this data to arrive at a performance score) in this performance review process. The provider has reflected on data points supplied in their portfolio.

### The programmes considered

<b>Programme name</b>	Postgraduate Certificate in Independent and Supplementary Prescribing
<b>Programme reference</b>	MSP00813
<b>Mode of study</b>	Distance learning
<b>Entitlement</b>	Independent prescribing Supplementary Prescribing
<b>Proposed first intake</b>	01 January 2014
<b>Maximum learner cohort</b>	Up to 30
<b>Intakes per year</b>	2

<b>Programme name</b>	Postgraduate Certificate in Supplementary Prescribing
<b>Programme reference</b>	MSP01274
<b>Mode of study</b>	Distance learning
<b>Entitlement</b>	Supplementary prescribing
<b>Proposed first intake</b>	01 May 2006
<b>Maximum learner cohort</b>	Up to 20
<b>Intakes per year</b>	1

<b>Programme name</b>	Non-Medical Prescribing
<b>Programme reference</b>	MSP02407
<b>Mode of study</b>	Part time
<b>Entitlement</b>	Independent prescribing Supplementary Prescribing
<b>Proposed first intake</b>	01 October 2020
<b>Maximum learner cohort</b>	Up to 30
<b>Intakes per year</b>	5

## Quality assurance assessment

The education provider was asked to provide a self-reflective portfolio submission covering the following broad topics:

<b>Broad portfolio area</b>	<b>Specific area addressed</b>
<b>Institution self-reflection</b>	Partnership arrangements
	Resourcing, including financial stability
	Academic and placement quality
	Interprofessional education
	Equality and diversity
	Horizon scanning
<b>Thematic reflection</b>	Impact of COVID-19
	Use of technology: changing learning, teaching and assessment methods
<b>Sector body assessment reflection</b>	Assessments against the UK Quality Code for Higher Education
	External assessment of practice education providers
	Other professional regulators / professional bodies
<b>Profession specific reflection</b>	Curriculum development
	Development to reflect changes in professional body guidance
<b>Stakeholder feedback and actions</b>	Service users and carers
	Learners
	Practice placement educators
	External examiners
<b>Programme performance data</b>	Comments / self-reflection on data supplied through this portfolio

Their self-reflection was focused on challenges, developments, and successes related to each portfolio area. They also supplied data, supporting evidence and information.

We appointed the following panel to assess the above information:

James Pickard	Independent prescribing
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Alaster Rutherford	Independent prescribing
Prisha Shah	Service user expert advisor
John Archibald	Education officer

We undertook thematic performance review of the information provided, and worked with the education provider on our understanding of their portfolio. Based on our understanding, we defined and undertook the following quality assurance activities to take assurance that the education provider is performing well against our standards:

- email response to questions
- further documentary evidence

Issue / theme	QA activity	Why this was appropriate
The visitors sought assurances the education provider's internal monitoring processes were working effectively	Email response to questions and further documentary evidence	Education provider can respond with an appropriate level of detail and if necessary can back up their position with evidence
The visitors sought information about the next NMC accreditation to feed into their decision-making process	Further documentary evidence	Education provider can back up their position with evidence
The visitors sought more information about how service users / carers contribute to the overall quality and effectiveness of the programmes, and how they are supported	Email response to questions	Education provider can respond with an appropriate level of detail

## Quality summary

Portfolio area	How was this area met?
Partnership arrangements	Information provided through the portfolio showed that partnership arrangements with other organisations are productive and positive, to ensure strategic measures are in place meaning the provision is fit for purpose to deliver education in the port registration areas. The education provider has developed partnerships with Health Education England for funding and with Health Education London and the South East. The education provider also informed the visitors they had worked in the last year with colleagues at the University of Greenwich to provide a 40-credit module for NMP which constitutes part of the second year of the MSc in Advanced Clinical Practice.
Resourcing, including financial stability	The visitors recognised there have been challenges in resourcing and financial stability over the last year due to COVID, but saw that the education provider has responded

	<p>well by putting in mitigations (such as a move to online deliver) which have allowed for the programmes to continue to be delivered successfully.</p> <p>The visitors also note that the education provider has achieved their financial targets. The visitors reviewed the information provided and were satisfied that the education provider is financially stable and resourced to deliver their provision.</p>
Academic and placement quality	The visitors considered that the education provider strives to maintain the high quality of their provision and saw that changes made in 2020 were focused on improving the quality of provision. This means the provision remains fit for purpose, and that the provider is performing well in this portfolio area.
Interprofessional education	The visitors saw the education provider's approach to IPE and considered it appropriate for the prescribing professions.
Equality and diversity	<p>The visitors considered the education provider's information in this area showed that their approach to EDI is appropriate to their role in education.</p> <p>The visitors noted, and considered the education provider's development work on the themes of gender and LGBT, and that this was appropriate.</p>
Horizon scanning	The visitors recognised the education provider's work about teaching methods to be forward-thinking and expedient, and noted they are set up to horizon scan and respond to challenges well.
Impact of COVID-19	<p>The visitors reviewed changes applied due to COVID-19 such as, a change to teaching methods. They also noted that changes made were successful and that the education provider hoped to use them in the 'new normal'.</p> <p>The visitors were satisfied that the education provider responded to the challenges brought up with running education provision during the COVID-19 pandemic. They did this by developing their provision in ways which had no detriment to the delivery of learning.</p>
Use of technology: changing learning, teaching and assessment methods	The visitors considered the education provider's changing use of technology in teaching and monitoring, including their use of podcasts as learning materials, and were satisfied with their approaches.
Assessments against the UK Quality Code for Higher Education (by the relevant body in each home country)	The visitors reviewed the information provided about the support for learners, listening to learners / stakeholders, internal processes, accreditation and were satisfied with this information as markers of good alignment to the UK Quality Code.

External assessment of practice education providers	The visitors considered the wide means of assessing practice education extensive and comprehensive, and as being fit for purpose for the provision delivered.
Other professional regulators / professional bodies	<p>The visitors recognised that the programmes are accredited by both the Nursing and Midwifery Council (NMC) and General Pharmaceutical Council (GPhC), and have indefinite accreditation with NMC.</p> <p>Therefore, the visitors noted alignment with other regulatory bodies has been maintained as is needed to deliver prescribing qualification to professions not regulated by the HCPC.</p>
Curriculum development	<p>The visitors evaluated the information provided including the update to the programme with pharmacology elements, and considered these appropriate for the range of professions who can access the training. They also considered that the updated programme for paramedics strengthens critical thinking skills for this group.</p> <p>Therefore, the visitors noted the curriculum is appropriate to deliver prescribing training to HCPC registrants.</p>
Development to reflect changes in professional body guidance	The visitors assessed the information supplied and considered that programme documentation had been updated to reflect HCPC changes in standards meant the programme is developing alongside external guidance and therefore remains fit for purpose.
Service users and carers	<p>The visitors and our service user expert advisor (SUEA) partner reviewed the information provided relating to the involvement of service users and carers. We saw good practice in terms of the variety of activities carers are involved with.</p> <p>We also saw a risk that there appear to be a small number of carers involved across the whole provision (two) and no service users. This misses perspectives from people directly using services.</p> <p>Considering the above, the visitors considered that service user involvement is met at threshold level.</p>
Learners	The visitors reviewed the submission and considered the good feedback from student representatives, mainly in regards to how the provider dealt with COVID-19. This showed that the education provider is performing well in this portfolio area.
Practice placement educators	The visitors recognised the input of practice placement educators, and were satisfied with the increase in communications with this group to strengthen support. This showed that the education provider is has developed where it

	has needed to, and is therefore performing well in this portfolio area.
External examiners	<p>The visitors recognised the positive comments from external examiner and noted that the review covered the areas it needed to to add value for the provider. However, the visitors noted that the mechanisms for receiving comments from, and responding to, external examiners does not appear to be undertaken in a structured way. For example, external examiner reports were not in a standardised institutional format.</p> <p>This showed that the education provider is seeking external views on its provision, but that relevant areas may not always be covered by external examiners in their reporting.</p>
Comments / self-reflection on data supplied through this portfolio	The visitors considered the learner commitment to the programmes during COVID-19 highlighted by the education provider, and how the provider adapted its provision. The provider was able to ensure learners were able to continue to progress and qualify, and noted that this was a good outcome in challenging times.

## Risks

Data – The education provider is not included in data returned by HESA, TEF and the NSS:

- This presents a risk, as we rely on an understanding of performance from current data points to be confident in the interim period between portfolio submissions.
- An absence of data highlights its importance in the monitoring of the education provider's performance. Without the regular supply of data, the HCPC is not able to pick up changes in data which might impact on provider performance
- This risk can be mitigated in several ways:
  - We need to ensure the education provider is clear on its responsibilities to report any significant issues to HCPC, which can be considered throughout our focussed review process
  - We can establish bespoke performance data points with the education provider, which they can supply on a regular basis. These data points should be mapped to those normally expected in the performance scoring model wherever possible
  - We will start to run a survey to gather feedback from those graduates who have been in practice for at least a year. This will help us better understand if the training provided was of good quality, including if learning settings (academic and practise-based) prepared graduates for practice..
- With mitigations in place, the visitors considered this issue to be low risk
- However, all mitigations are not in place at this time, and therefore the visitors considered it possible that data points will not be available in the future. They noted this could directly impact on the HCPC's confidence that the provider is performing well in the interim period between portfolio submissions, and that

the risks associated with this could link to education standards being met and learner proficiency.

Involvement of service users – The education provider appears to involve two carers and no service users:

- This presents a risk as the provider is not currently taking into account perspectives from people directly using services. As their experiences and background could differ from that of a carer, the education provider risks not working with individuals with a broad range of experiences.
- In order to mitigate against this risk, through future reporting we can ask for more specific reflections from the following groups:
  - learners and other groups who come into contact with service users and carers through programme interactions, on the value of their engagement with this group
  - the education provider, to ensure they have considered and can justify the groups they have chosen as the most appropriate and relevant to the programmes
  - the service users and carers themselves
- With mitigations in place, the visitors considered this to be low risk as the issue was unlikely to reoccur, and would have a minor impact. The visitors consider the existing provision to meet our standards at threshold. The visitors consider that if there was a total absence of service user and carer involvement, the programme would not then meet the relevant HCPC standard. Given that the programme is intended to deliver a prescribing annotation, has a clearly structured nationally approved assessment framework, and service users and carers are not directly involved in the assessment, there is no wider risk to learners meeting competencies.

Mechanism for seeking external examiner feedback – The visitors noted that there was not a systematic and consistent approach to addressing issues within, or responding to, external examiner reports:

- This presents a risk that appropriate areas may not always be covered ifrom external examiner comments, which means there may be gaps in provider understanding of the external view of the provision
- If the education provider does not identify problems, this consequently may affect the quality and effectiveness of the provision. By not being aware of issues, the education provider may miss opportunities to continuously improve the programmes
- In order to mitigate against this risk, the education provider can develop their approach to become more systematic
- The visitors considered this issue was ongoing and so could reoccur in the future, and it could impact on education standards being met, which could mean learners do not meet proficiency standards
- The visitors recognised that external examiner reporting is one of the education provider's quality assurance mechanisms, but also noted that this is an important aspect of quality assurance and enhancement
- The visitors considered the education provider needs to ensure they have a formal approach to responding to external examiners comments. This would ensure the education provider is fully able to continuously gather information

on quality and effectiveness, as well as to respond to any identified risks, challenges or changes

## **Best practice**

The visitors identified the following area of good practice:

- The carers appear to be involved in a variety of activities such as assessment and placement planning meetings

## **Recommendation**

The visitors made the following recommendation to the Education and Training Committee:

- The institution and its programmes should remain approved
- The education provider's next engagement with the performance review process should be in three years (the 2023-24 academic year)

From their detailed documentary review and considering the responses to quality activity, the visitors were satisfied with the education provider's approaches in all areas reflected upon within the portfolio submission.

However, the visitors noted that there are risks in external examining of the programmes, which could impact on the ongoing quality of the provision. The visitors noted that the education provider should develop their external examiner process, so there is a method of consistent reporting across all relevant areas. They should also establish a formal mechanism for responding here to the external examiner

The visitors are recommending a three year review period, so the education provider is given sufficient time to further develop and implement external examiner reporting process, and for this process to complete a whole internal cycle. From start to finish, due to the length of the programme and retrospective nature of external examiner review, this could take two academic years. Following this period, the provider should be in a position to reflect upon the changes made and report this reflection through performance review.

## **Decision**

### **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 design quality assurance assessments and assess evidence and information relevant to the assessment. Visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make the 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 takes decisions through different levels depending on the routines and impact of the decision, and where appropriate meets in public. Their decisions are available to view [on our website](#).

# **medway** school of pharmacy

John Archibald  
Education Administrator  
Education Department  
The Health and Care Professions Council  
Park House, 184 Kennington Park Road, London, SE11 4BU

21/09/2021

Dear John

**Re: Medway School of Pharmacy (Universities of Greenwich and Kent) Non-medical prescribing programme – HCPC performance review process**

Thank you for sending copies of the prescribing performance review process.

In response to the risks identified in the report I would like to add the following comments.

**Data**

The Medway School of Pharmacy is jointly run by the Universities of Kent and Greenwich. HESA data is returned by both universities on behalf of the school. We are in discussions with the Office for Students as to how best to return data for both TEF and REF, as are other joint HEI organisations. Currently students are arbitrarily assigned to one university or another for returns which does not give the school its own signal. We would direct the HCPC to the returns for the two partner organisations.

We are happy to engage with the HCPC on any of the identified methods for mitigation of this perceived low risk. We will of course notify the HCPC if there is any progress in terms of returning the school as a single entity.

**Involvement of Service Users**

We would like to correct the statement that the school has two carers and no service users. We in fact have one carer and one service user who currently support the programme. We believe this affects the risk assessment and recommendations made and would like this to be taken into account in the finalise report if possible.

**Mechanism for seeking external examiner feedback**

The visitors highlighted a lack of standardisation in the reporting and feedback of external examiners. We believe this is because in the time period covered by the review, we changed between one external examiner system and another. Also, following consultation with the HCPC, we had to elect an HCPC registered adviser to the prescribing examination board (rather than a full

external) as we were unable to find an external who met the university requirements at the time. This meant that the appointed individual was not permitted to use the university official external examiner paperwork in the interim period. The paperwork may appear inconsistent however the process was robust with the advisor undertaking the duties of a full external alongside the Nursing and Midwifery Council registered external examiner to the prescribing programme.

We will be following the proscribed University of Greenwich external examiner process from now on and the situation with the HCPC registered advisor has resolved itself as we now have an HCPC registrant as an appointed external examiner. For all of these reasons I believe that going forward we will present consistent external examiner paperwork which will reflect the robust approach we take to external examiner involvement in the programme and the importance we place on their input.

I hope that these comments will be helpful for the HCPC Education Committee. Please do not hesitate to contact me should further clarification of these points be required.

Yours sincerely

A handwritten signature in black ink, appearing to read "Trudy Thomas".

Trudy Thomas  
Director of Taught Graduate Studies and Overall Prescribing Programmes Lead