

Performance review process report – Hidden Hearing Limited, 2020-21

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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.

This is a report on the performance review process undertaken by the HCPC to ensure that the programmes detailed in this report continue to meet our Standards of Education and Training (referred to through this report as ‘our standards’). The report details the process itself, evidence considered, outcomes and recommendations made regarding Institute of Biomedical Science and its programmes’ 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 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
- engage at the organisation, 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 performance review 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
- 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.

Provider and institution context

The education provider currently delivers one HCPC-approved programme. It received initial approval in 2013, and went through legacy¹ annual monitoring audits in 2015-16, 2017-18 and 2019-20. None of these audits highlighted serious issues with the way in which the programme met the standards of education and training. There were some relatively small curriculum amendments noted through these processes.

A major change was considered by the HCPC in 2015, focused on changes to the structure of practice-based learning. These changes were appropriately evidenced through the legacy major change process.

¹ The HCPC moved to a new model of Education quality assurance in September 2021. Quality assurance activities and processes from the previous model are referred to as legacy processes.

Institution performance scoring information

Data Point	Bench- mark	Value	Score	Executive Comments
Total intended learner numbers compared to total enrolment numbers	140	85	-0.06	The education provider reported through the portfolio that a cohort was not recruited for the 2020-21 academic year due to the Covid-19 pandemic.
Learners – Aggregation of percentage not continuing	N/A	N/A	N/A	We collect this data from the Higher Education Statistics Agency (HESA). HHL is not a Higher Education Institution, and therefore does not provide data to HESA, so these data points are not available.
Graduates – Aggregation of percentage in employment / further study	N/A	N/A	N/A	
Teaching Excellence Framework (TEF) award	N/A	N/A	N/A	HHL is not a Higher Education Institution, and therefore the TEF award does not apply.
National Student Survey (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. HHL is not a Higher Education Institution, and therefore these data points are not available.
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.
Overall score	N/A	N/A	Not available	When working with the education provider through the assessment, we attempted to gain the non-available data points directly from the provider, but due to the model of learning, they were not able to supply relevant data points in these areas.

				From the data sourced and supplied, we are unable to calculate an overall performance score, as the majority of the data points are not available for this education provider.
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The lack of available data points is discussed in the 'risks' section of this report.

The programme considered

Programme name	Award in Hearing Aid Dispensing Competence
Mode of study	WBL (Work based learning)
Profession	Hearing aid dispenser
First intake	01 October 2013
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	MC02520

Quality assurance assessment

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

Broad portfolio area	Specific area addressed
Institution self-reflection	Partnership arrangements
	Resourcing, including financial stability
	Academic and placement quality
	Interprofessional education
	Equality and diversity
	Horizon scanning
Thematic reflection	Impact of COVID-19
	Apprenticeships in England (if applicable)
	Use of technology: Changing learning, teaching and assessment methods
Profession specific reflection	Curriculum development
	Development to reflect changes in professional body guidance
Stakeholder feedback and actions	Service users and carers
	Learners (those engaging with an approved programme)
	Practice placement educators
	External examiners

The education provider's 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:

Elizabeth Ross	Hearing aid dispenser
Robert McKinnon	Hearing aid dispenser
Ian Hughes	Service user expert adviser
Niall Gooch	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:

Initial review:

- The visitors reviewed the evidence submitted and provided their feedback.
- Within their review, visitors did not identify any major risks. However, they had some questions to check for clarification. Following the finalisation of areas to explore the visitors decided to ask further clarification questions in a written form, requesting responses from the provider

Quality activity: Written request for further information

We design our assessment to be proportionate and appropriate to the issues identified and to seek input from relevant stakeholders when necessary.

The visitors explored the following themes as part of their quality activity:

- Governance and management
 - The detail and the planning for the involvement of a service user with the Curriculum Development Group
 - How various committees and groups within the education provider interact, and the definition of their remits and roles
 - How the education provider managed the programme lead transition process, and how they would appoint a new programme lead
- Curriculum delivery and assessment
 - What interactions take place with other professionals and learners outside of the education provider
 - How the programme's curriculum and assessment compare to other practice within the profession
 - The nature of the changes to OSCEs that had taken place
- Feedback
 - How external feedback is integrated into the programme
 - How the feedback loop is closed, and what opportunities learners have had available for reflection on the programme

Quality summary

Portfolio area	How was this area met?
Partnership arrangements	<p>HHL noted within their portfolio that they have been working closely with a variety of healthcare locations, including primary care and care homes. There are regular reviews of the ongoing suitability of these settings by a specific staff member. The visitors were satisfied that these arrangements were working appropriately.</p>
Resourcing, including financial stability	<p>The visitors saw evidence in the portfolio that the education provider had continued to be a healthy business, and that the structures connecting them to their large parent company continued to function, for example in giving the programme access to dedicated learning and teaching facilities.</p> <p>The visitors did note in connection with this area that the education provider had not recruited for a year because of the COVID-19 pandemic, but were in the process of recruitment currently. They did not consider that this was a major issue for the performance of the programme but it was a factor in their assessment of some of the programme risks (see 'Risks' section below).</p>
Academic and placement quality	<p>The education provider submitted evidence which showed that the Programme Steering Committee has been meeting and composed as intended and originally approved.</p> <p>There was evidence of service users giving input via the feedback / review process, and the visitors were satisfied that the placement monitoring had been working as intended.</p> <p>Based on what they had viewed in the portfolio the visitors considered that performance in this area was good.</p>
Interprofessional education	<p>The visitors could see from the evidence supplied that the education provider have a specialist "Business" module, and that they had been giving opportunities to learners to work alongside professionals who are likely to be working with them in future. Their current IPE mostly involves others within Hidden Hearing, but they also indicated that they were going to look into developing IPE over the next two to three years, to give their learners a broader experience, as they were aware that their learners did not gain a broad range of contacts outside the Hidden Hearing organisation.</p> <p>The visitors considered that the information about these future plans had been helpful in forming their picture, but did note that there was relatively little firm information about the plans included</p>

	<p>in the portfolio. They were aware that developments were ongoing (see 'Risks' section below).</p>
<p>Equality and diversity</p>	<p>The education provider's portfolio explained that they had continued to monitor both the admissions process and the programme itself in line with the equality and diversity policies. The corporate oversight of the policies and procedures was functioning appropriately, and there was evidence of actions being taken in response to the equality and diversity policies.</p> <p>The visitors did not identify any risks in this area and they considered that the programme was performing well.</p>
<p>Horizon scanning</p>	<p>The education provider stated that there were structures in place to identify and analyse changes within the profession, and gave examples of adaptations undertaken. For example, they had made some of the delivery of the programme remote to adapt to COVID-19 regulations. The visitors considered that these changes, such as online delivery and assessment, had worked well and that the education provider had generally worked well through the pandemic.</p> <p>The visitors also saw evidence that regular updating of programme team members about organisation-wide issues had continued appropriately. The visitors considered that performance in this area appeared to be good.</p> <p>No risks were identified around this theme.</p>
<p>Impact of COVID-19</p>	<p>The education provider gave a clear explanation, with examples, of their response to COVID-19. It was clear in general that they had been able to mitigate risks and adapt as necessary and were performing well.</p> <p>One area where the visitors did have a concern was around the suspension of recruitment during COVID-19. The visitors understood why this had occurred but had a concern about how it had affected the availability of certain expertise for the programme and how it would affect the programme delivery and performance going forward. This is explained in more detail in the 'Risks' section below.</p>
<p>Apprenticeships in England</p>	<p>The education provider indicated that they were working towards developing an apprenticeship and were closely involved with the national development plan for the profession. They have not yet been successful in becoming an approved training provider but are intending to apply again when possible.</p> <p>Given that the education provider had contributed to apprenticeship development and were aware of relevant developments, the visitors determined that no risks were present in this area.</p>

<p>Use of technology: Changing learning, teaching and assessment methods</p>	<p>The visitors were satisfied with the approach in this area as the response clarified that the education provider were very much engaged in developing new ways of working and teaching, and that they were investing in new technology.</p> <p>For example, they had been trialling new programme management software, and using new electronic assessment tools such as MS Forms and Sharepoint. This has helped the programme perform well during the COVID-19 pandemic by giving both learners and staff greater flexibility in teaching and assessment.</p> <p>The visitors did not identify any risks in this area.</p>
<p>Curriculum development</p>	<p>The education provider gave a clear account of the history of their curriculum development and the current situation. This included how they had originally developed the programme and how they were now working to evolve the programme further by talking to other providers in the profession, and by having internal discussions about the future direction of the profession.</p> <p>The visitors considered based on the evidence they had seen that performance was good.</p>
<p>Development to reflect changes in professional body guidance</p>	<p>From the portfolio the visitors were aware that changes could be made to the programme in line with the established process, and that these had been approved by Team Leaders or more senior colleagues as appropriate.</p> <p>The education provider did not give any examples of this but did give evidence showing that programme updating has been discussed in a programme team meeting, although no actions had been generated from this meeting.</p> <p>The visitors did not identify any particular risk around the workings of this process, although they did raise a concern about module leader workload and about how well the programme was able to keep up with professional benchmarking (see 'Risks' below).</p>
<p>Service users and carers</p>	<p>We brought in a service user expert advisor (SUEA) to consider the relevant evidence.</p> <p>The SUEA noted that the involvement of service users and carers was working as planned, with service users and carers involved in open days, teaching activities and the Curriculum Development Group. They considered that this involvement was appropriate, although they also mentioned that not many service users and carers were involved and their input was not as extensive as it might have been.</p> <p>Via their response to the quality activity the education provider made it clear that they had plans to expand and develop the</p>

	involvement in this area, and with this in mind the visitors considered that performance in this area was good.
Learners	<p>Within the initial portfolio the visitors were provided with evidence of actions taken in response to learner feedback, for example in amending the teaching calendar to better suit learners' travel needs, and in giving clearer guidance about assessment requirements.</p> <p>The visitors considered that this was sufficient evidence to show that learner feedback processes were operating effectively. They did not have any concerns about performance here as they had seen the approved process operating as intended.</p>
Practice placement educators	<p>In the portfolio the education provider laid out how they have been monitoring practice educators and their ongoing involvement with the programme. As an example of how they have changed in response to circumstances, they noted that during the COVID-19 pandemic practice educators were asked to take on more assessment responsibilities. They also indicated that they would review the changes to practice educator involvement to ensure ongoing effectiveness.</p> <p>The visitors were satisfied with this performance, as it showed a willingness to adapt and improve ways of working with practice educators. They did not identify any risks associated with this area.</p>
External examiners	<p>In the portfolio the education provider gave an example of how they had consulted with the external examiner about the amendments being made to assessment after the COVID-19. The suggested actions from the external examiner's report had been considered by the programme staff and there was a clear intent to integrate the recommendations into action.</p> <p>The visitors considered that there were no concerns with performance in this area, because clear engagement with the external examiner role, and responsiveness to feedback, had been demonstrated.</p>

Risks

Data

- The visitors noted that aspects of the portfolio had not been supported with data in certain areas, for example around the following topics: their planning for future learner numbers / recruitment; benchmarking the programme against comparable programmes elsewhere; and the sustainability and management of the programme.
- They considered that this created a risk that their understanding of the programme and its performance was less complete than it might otherwise

be, and dependent on qualitative rather than quantitative judgments. This in turn might lead to potential performance issues not being picked up.

- This was not a major area of concern as they considered that the programme overall was performing well, and that the evidence submitted was appropriate in helping them make an informed decision.
- However, they considered that in future it would be appropriate and helpful if the education provider supplied more data in relevant portfolio areas, to ensure that the performance review was as comprehensive as possible.

Learners not getting appropriate exposure to range of professional experience

- The visitors noted that the education provide recognise a possible lack of breadth in their interprofessional education (IPE), and that they are planning to evolve their IPE to address this.
- This would be helpful in ensuring that learners have a clear idea of the wider context of their role and the different areas in which they might find themselves working as registrants.
- However, this development was not complete and that it would take some time for its effectiveness to be fully evaluated.
- The visitors therefore considered that there was a small risk that SET 4.9 would not be met in the future, if the education provider's approach to IPE no longer reflected the kind of interprofessional skills and knowledge that learners would require.

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

- This risk can be mitigated by the education provider ensuring that they match changes in IPE to professional requirements. The education provider should submit an account of developments in this area during the next performance review process.

Education provider not fully understanding benchmarking requirements

- The visitors reviewed the narrative provided by the education provider, who noted in response to the quality activity that "There is no directly comparable employer-led work-based programme to benchmark against. We benchmark as much as possible with providers of Diploma in Audiology and FdSc programmes".
- The education provider also stated that as a trailblazer lead for apprenticeship development, they were well-positioned to share and develop best practice across the profession.
- However, the visitors noted that there were other broadly comparable programmes in the sector which the education provider could use for benchmarking purposes. Their view was that by not doing this kind of exercise the education provider risked not having a clear understanding of changes in the profession. For example, they did not see evidence that the education provider were in discussions about curriculum development to other providers involved in the apprenticeship trailblazer process.
- The visitors considered that in the absence of a clear approach to using benchmarking to amend the programme as necessary, there was a small risk that in future, standards in SET 4 related to curriculum updating might not be met. For example:

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

4.4 The curriculum must remain relevant to current practice.

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

- The risk can be mitigated by the education provider ensuring that they reflect on how to ensure best practice, and work with comparable providers on benchmarking, in the light of the standards noted above.

Module leaders having heavy responsibilities across different areas

- In the response to queries about how new staff would be prepared and how the necessary skills and knowledge would be transferred, the education provider noted that they had not yet completed their staff replacement process.
- The visitors considered that, depending on the outcome of the recruitment process, it was not yet clear how the staffing would continue to be sufficient and appropriate, and how necessary roles and functions would be delivered.
- In particular they noted that there appeared to be heavy learning and teaching loads on module leaders, as well as additional responsibilities such as clinical updating. This created a risk that standards around staffing might not be met in future, for example:

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

3.10 Subject areas must be delivered by educators with relevant specialist knowledge and expertise

- This risk can be mitigated by the education provider ensuring that they recruit appropriately and that their mechanisms for supporting staff continue to operate effectively.

Best practice

The visitors identified the following areas of good practice:

- HHL have made excellent use of technology as part of their adaptations to COVID-19
- HHL have a strong suite of professional and corporate policies and procedures to ensure an effective programme.
- HHL clearly take a proactive approach in areas such as horizon scanning and have been at the forefront of developing apprenticeships.

Recommendation

The visitors made the following recommendations 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 two years (the 2022-23 academic year)

Following documentary review and quality activity, the visitors were broadly satisfied across the areas reflected upon in the portfolio submission. There were no major risks to the education provider's approach to meeting the standards, which indicates adherence to standards and performance above our regulatory threshold.

However, the inclusion of performance data is important for the HCPC to understand how an education provider is performing on an ongoing basis, and allows us to remain confident in reducing the regularity of scrutiny through the performance review process. Without this data, the maximum length of time between submissions is two years.

This date for next portfolio submission will give the education provider a sufficient interval in which to follow through the programme and staff development intentions outlined through the quality activity, and for those changes to have had a sufficient period to become integrated into the programme when the HCPC next undertake a performance review. It will also enable them to establish ongoing data reporting to the HCPC, should they wish to.

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](#).

Decision on approval

We will record the decision of the Education and Training Committee here following their meeting on 7 December 2021.

Education provider observations in AEPM HHL 20-21

You have asked for any observations on the report or the process, however I would like you to view these against a backdrop of our acceptance of the report comments and recommendations and our agreement to the proposed timeline for the next portfolio. I also understand that this has been a pilot process and I am sure there has been considerable reflection made by the visitors as well as the education team, which led to the visitor training sessions that have been delivered recently.

My observation is that we have waited a long time to receive the feedback, given the dates on which we submitted the portfolio and the date on which we submitted responses to the visitor's questions. I have said on numerous occasions at pilot review meetings that education providers need to be given realistic expectations regarding the length of time to complete the process from the HCPC side. We have been left wondering and that creates uncertainty and concern (have we done something wrong in this process) which I know is not a HCPC intention.

The visitors mention of a lack of data in a number of places and I am confused by this statement. It could be my misunderstanding, however in specific conversations with Brendan throughout the pilot process it was suggested that our portfolio covered all the areas that HCPC agreed with Hidden Hearing, at the commencement of the project. The visitors didn't ask for data as I recall when further information was requested and I am left wondering, which specific data is being referred to that should be included next time. Perhaps someone can help advise on this please.

Overall, we remain entirely positive about this process and hope my comments are taken with the positive intent in which I write them.