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The Health Professions Council

Chief Executive and Registrar: Mr Marc Seale

Park House
184 Kennington Park Road
London SE11 4BU
Telephone: +44 020 7840 9710
Fax: +44 020 7840 9807
e-mail: colin.bendall@hpc-uk.org

MINUTES of the first meeting of the Professional Liaison Group to Review the Standards of Education and Training held on **Thursday 13 September 2007** at Avonmouth House, 6 Avonmouth Street, London SE1 6NX.

Present: Professor C Lloyd (Chairman)
Ms A Burge
Ms H Davis
Professor T Hazell
Mr I Henderson (in place of Professor M Lovegrove)
Mr J Petter (items 3-5 inclusive)
Ms S Shandley (items 3-5 inclusive)
Mrs B Stuart
Professor A Turner
Professor D Waller
Mr N Willis

In attendance: (From item 3.4 unless indicated)
Ms M Anderson-Warren, British Association of Dramatherapists
Ms R Auld, British and Irish Orthoptic Society
Mr R Beattie, Institute of Chiropodists and Podiatrists
Mr C Bendall, Secretary to the Group (items 1-5 inclusive)
Ms M Embleton, Society of Radiographers
Dr W Foxe, Society of Chiropodists and Podiatrists
Mr M Guthrie, Policy Manager (items 1-5 inclusive)
Ms V Huet, British Association of Arts Therapists
Ms R Hussein, Royal College of Speech and Language Therapists
Ms P Joyce, College of Operating Department Practitioners
Mr N Kirk, Institute of Biomedical Science
Mr S Mars, Policy Officer (items 1-5 inclusive)
Mr S Mottram, British Association of Prosthetists and Orthotists
Mr K Reel, College of Occupational Therapists
Mr G Ross-Sampson, Director of Operations (items 1-3.3 inclusive)
Mr M J Seale, Chief Executive and Registrar (items 1-3.3 inclusive)
Miss J Smith, Association of Clinical Scientists
Ms K Sobey, Association of Professional Music Therapists
Mr J Tarrant, Association for Perioperative Practice

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Item 1.07/1 Apologies for absence, welcome and introduction

- 1.1 Apologies for absence were received from Ms J Farmer and Ms L Hughes. The Group noted that Professor Lovegrove was unable to attend and that Mr Henderson was attending in her place.
- 1.2 The Chairman welcomed everyone to the meeting and members introduced themselves. The Chairman explained the workplan for the Group. The Group noted that the Standards of Education and Training (SETs) needed to meet the following requirements:
 - applicable for all professions currently regulated by the HPC and which might become regulated;
 - applicable to all four home countries of the UK;
 - flexible for different forms of programme provision;
 - easy to follow for users and, where possible, related to other systems for approving education programmes; and
 - set at a threshold level to ensure safe and effective practice.
- 1.3 The Group agreed that it should also consider whether any amendments were required to the guidance on the SETs.
- 1.4 The Group noted that, at its next meeting, it would consider feedback on the SETs from education providers, students and Visitors. The Group noted that the HPC would seek the views of representatives of service users and other regulators. Members of the Group suggested that the HPC should also seek views from:
 - healthcare commissioners;
 - the Association of Community Health Councils in Wales and the equivalent organisation in Northern Ireland; and
 - the social care, education and voluntary sectors.
- 1.5 The Group felt that the overall structure of the SETs was appropriate.
- 1.6 The Group noted that the guidance should be worded to ensure that terminology was applicable to all home countries of the United Kingdom - for example, the current guidance referred to strategic health authorities, which only existed in England.

Item 2.07/2 Approval of agenda

- 2.1 The Group approved the agenda.

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Item 3.07/3 Issues to consider and suggested changes to the standards of education and training

- 3.1 The Group received a paper for discussion from the Executive.
- 3.2 The Group noted that the paper set out some of the principles behind the standards and the main issues which had been suggested by stakeholders in response.
- 3.3 The Group discussed each SET and possible changes to the standards and guidance.
- 3.4 Representatives of professional bodies joined the meeting and discussed the SETs in groups. The discussion at item 3.3 and feedback from the discussion groups are summarised in the appendix to these minutes.

Item 4.07/4 Any other business

- 4.1 The Chairman thanked members and representatives of professional bodies for their contributions.

Item 5.07/5 Date and time of next meeting

- 5.1 The next meeting of the Group would be held at 10.30 am on Thursday 22 November 2007.
- 5.2 Subsequent meetings would be held at 10.30 am on:
Tuesday 15 January 2008
Monday 18 February 2008

Chairman

Date

Review of the Standards of Education and Training Professional Liaison Group - First meeting 13 September 2007

Appendix to the minutes

This appendix indicates comments and suggested amendments which were made during the meeting on 13 September 2007.

SET 1: Level of qualification for entry to the Register

1 Level of qualification for entry to the Register	
1. 1	The Council normally expects that the threshold entry routes to the Register will be the following: 1. 1. 1. Bachelor degree with honours for the following professions: <ul style="list-style-type: none">- chiropody or podiatry;- dietetics;- occupational therapy;- orthoptics;- physiotherapy;- prosthetics and orthotics;- radiography;- speech and language therapy;- biomedical science (with the Certificate of Competence awarded by the Institute of Biomedical Science (IBMS), or equivalent if appropriate); and
1.1.2	Masters degree for the arts therapies.
1.1.3	Masters degree for the clinical sciences (with the award of the Association of Clinical Scientists' Certificate of Attainment, or equivalent).
1.1.4	Equivalent to Certificate of Higher Education for paramedics.
1.1.5	Diploma of Higher Education in operating department practice for operating department practitioners.
Suggested changes:	
<p>The Group did not feel that it was appropriate for qualifications to be referred to as levels 4, 5 and 6 as there was not uniformity in using these descriptions across the four home countries.</p> <p>The Group did not feel that it was appropriate for higher level qualifications to be listed first and that it would be more appropriate to list the professions according to their size.</p>	

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The Group noted that inclusion of 'normally' in SET 1 was a safeguard against the unlawful fettering of the Council's discretion as, if a programme which was provided in a form other than one of the awards set out in SET 1 was nonetheless capable of delivering the Standards of Proficiency and the remaining SETs, the Council could not refuse to approve it solely on the basis of the form of award.

The Group felt that the guidance to the SETs should clarify the meaning of 'or equivalent' in SET 1.1.1

The Group felt that SET 1.1.4 and 1.1.5 should be rearranged so that the professions were listed alphabetically and that 1.1.5 should be reworded to delete the words 'for operating department practitioners', as the wording was unnecessary.

The Group noted that paramedic education was now moving into higher education, although the HPC would need to clarify the situation in all of the home countries. The Group agreed that the guidance on the SETs could reflect this change, but that the SETs could not reflect a profession's aspiration to a particular level of qualification. The Group noted that the SETs indicated the threshold level for entry to the Register.

The Group did not agree with a suggestion that the level of qualification for chiropodists and podiatrists should be set at a level that also allowed for regulation for pedicurists, assistant practitioners and footcare clinicians, as these groups were not currently regulated by the HPC.

The Group noted that programmes in perioperative practice (instead of operating department practice) were now emerging and it was possible that a new profession title was emerging. The Group noted that, if that was the case, the HPC should consider whether to protect the title.

Representatives of the professional bodies who attended the meeting had no comments on this standard.

SET 2: Programme admissions

Representatives of professional bodies felt that guidance on this SET should give clear advice on the HPC's health and character requirements and be linked to the HPC's guidance on those issues.

2 Programme admissions
The admissions procedures must: 2.1. give both the applicant and the education provider the information they require to make an informed choice about whether to make or take up the offer of a place on a programme;
The Group felt that the guidance could perhaps encourage Visitors and other stakeholders to focus on both parts of the standard, namely education providers making an offer and prospective students taking up the offer.

2 Programme admissions
The admissions procedures must: 2.2 apply selection and entry criteria, including: 2.2.1 evidence of a good command of written and spoken English;
The Group noted that students would need to understand English to a level which would enable them to understand delivery of the programme. The Group noted that this was not made clear in the guidance. The Group noted that students on paramedic programmes would perhaps not be employable if they were unable to drive on completion of the programme. The Group felt that this could perhaps be indicated in the guidance on the standards.

2 Programme admissions
The admissions procedures must: 2.2 apply selection and entry criteria, including: 2.2.2 criminal convictions checks;
The Group noted that, if an education provider offered a place to a student with criminal convictions who would ultimately not meet the HPC's character requirements for registration, then the education provider could potentially be wasting resources to train that individual. The Group noted that the Fitness to Practise department often received enquiries from education providers about this issue. The Group noted that the Education and Training Committee had approved a workplan for the review of the HPC's health and character procedures.

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2 Programme admissions

The admissions procedures must:

- 2.2 apply selection and entry criteria, including:
 - 2.2.3 compliance with any health requirements;

The Group noted a suggestion that health and character checks should be maintained during the course. The Group felt that this might be included under SET 3.

2 Programme admissions

The admissions procedures must:

- 2.2 apply selection and entry criteria, including:
 - 2.2.4 appropriate academic and/or professional entry standards;

The Group had no comments on this standard.

2 Programme admissions

The admissions procedures must:

- 2.2 apply selection and entry criteria, including:
 - 2.2.5 Accreditation of Prior Learning and other inclusion mechanisms.

The Group noted that terminology was evolving and that this area was sometimes known as credit transfer. Accreditation of prior learning was assessed through a portfolio system, although these assessments could be highly variable and their application varied between providers. The Group noted that the guidance might need to be amended to reflect these issues.

2 Programme admissions

The admissions procedures must:

- 2.3 ensure that the education provider has an equal opportunities and anti-discriminatory policy in relation to candidates and students, together with an indication of how this will be implemented and monitored.

SET 3: Programme management and resource standards

The Group noted a suggestion that there would be advantages in requiring the programme leader to have regular contact with the registration body. The Group felt that this would not be appropriate for inclusion in the SETs.

The Group noted that the SETs simply required that the programme should have a secure place in the education provider's business plan and did not feel that this could be amended to reflect different funding arrangements in different home countries.

3 Programme management and resource standards
3.1 The programme must have a secure place in the education provider's business plan.
Representatives of professional bodies felt that the guidance should refer to differential funding and sources of funding.

3 Programme management and resource standards
3.2 The programme must be managed effectively.
<p>The Group noted a suggestion that the standard should refer to quality assurance processes being in place. The Group felt that, if this was included in the standard, it should also refer to governance arrangements and require the programme to show how it received and responded to feedback from students.</p> <p>The Group noted that some programmes were delivered by two education providers in partnership, or by franchise arrangements. The Group felt that the guidance should clarify the respective roles for the awarding and delivering institutions.</p> <p>Representatives of professional bodies felt that there should be a clearer statement about expectations of quality and that the standard should mention requirements for quality audit. Some education providers would require such guidance as they were establishing new programmes, or had no previous experience of programmes which required HPC approval.</p> <p>It was also felt that the HPC should acknowledge different approaches to validation within education providers and the franchising of programmes.</p>

3 Programme management and resource standards
3.3 There must be a named programme leader who has overall responsibility for

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the programme and who should be either on the relevant part of the HPC Register or otherwise appropriately qualified and experienced.

The Group noted that programme leaders did not necessarily have to be registered with the HPC. The Group felt that the guidance on the standard should be clear and that the standard could perhaps be reworded along the lines of:

'There must be a named programme leader who has overall responsibility for the programme and who should be either on the relevant part of the HPC Register and appropriately qualified and experienced or otherwise appropriately qualified and experienced.'

The Group felt that the terminology might need to be revised. For example, programme leaders were also known as team leaders and psychology programmes had training committees. It was suggested that the standard could refer to the person(s) with overall responsibility for the programme.

Representatives of professional bodies felt that the standard should require a registrant programme leader to be suitably qualified.

Representatives also felt that the guidance should make a politically neutral reference to professional bodies.

3 Programme management and resource standards

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

3 Programme management and resource standards

3.5 Subject areas must be taught by staff with relevant specialist expertise and knowledge.

The Group noted a suggestion that subject areas should be taught by staff with 'current and up-to-date' specialist expertise and knowledge. The Group felt that this might be implied in the present wording of the standard, but would consider whether to amend it.

The Group discussed whether the standard could be amended to read '...appropriate specialist expertise and knowledge.'

Representatives of professional bodies suggested that the standard might refer to

'appropriate and current' (or 'relevant') expertise and knowledge. They felt that there should be particular guidance on clinical specialisms, possibly with case studies. It was also suggested that the guidance should indicate how programme staff would provide back-up when specialisms were delivered by visiting lecturers.

3 Programme management and resource standards

3.6 A programme for staff development must be in place to ensure continuing professional and research development.

The Group felt the guidance on this standard could mention the HPC's standards for continuing professional development.

Representatives of professional bodies had no comments on this standard.

3 Programme management and resource standards

3.7 The resources to support student learning in all settings must be used effectively.

The Group noted a suggestion that this standard should be combined with 3.12. The Group noted that SETs 3.7 - 3.12 could perhaps be reordered into a more logical order, with the standards relating to resources being grouped together. Representative of professional bodies agreed that issues relating to the programme should be grouped together and issues relating to the students should be grouped separately.

Representatives of professional bodies felt that SETs 3.7 and 3.12 could be merged.

3 Programme management and resource standards

3.8 The facilities needed to ensure the welfare and well-being of students must be both adequate and accessible.

The Group noted a suggestion that this standard could be combined with 3.10. The Group felt that SET 3.8 related more to students' general wellbeing.

Representatives of professional bodies felt that this standard should require facilities to be adequate and accessible 'wherever the student is' to reflect onsite and offsite learning environments. It was also suggested that 3.8 and 3.10 should

be switched in order and that the guidance should be clear about the difference between the standards.

3 Programme management and resource standards

3.9 Where students participate as patients or clients in practical and clinical teaching, appropriate protocols must be used to obtain their consent.

The Group felt that this standard should be retained.

Representatives of professional bodies noted that there was variation in practice within education providers and felt that the guidance on the standards should address this.

3 Programme management and resource standards

3.10 A system of academic and pastoral student support must be in place.

The Group noted a suggestion that this standard could be combined with 3.8. The Group felt that SET 3.10 dealt more with academic support rather than students' general wellbeing.

Representatives of professional bodies felt this standard should include the phrase 'wherever the student is'. They also suggested combining this SET with 3.8 and felt the guidance could be altered accordingly.

3 Programme management and resource standards

3.11 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.

The Group noted a suggestion that Visitors should seek assurances that administration of the course, in terms of teaching rooms and attendance of teaching staff, was of a good standard and would not prevent trainees from meeting the mandatory aspect of their course.

Representatives of professional bodies felt that the last section of the guidance on this standard should read 'The visitors will want to be assured that your requirements...' rather than 'probably want to be assured'. They also noted that some professional bodies had concerns about staff being absent on sick leave. They also felt that the guidance should make reference to the professional bodies.

3 Programme management and resource standards
3.12 The resources provided, both on and off site, must adequately support the required learning and teaching activities of the programme.
The Group noted a suggestion that this standard should be combined with 3.7.

3 Programme management and resource standards
3.13 The learning resources, including the stock of periodicals and subject books, and IT facilities, including internet access, must be appropriate to the curriculum and must be readily available to students and staff.
<p>The Group noted that students would require IT support and support for their wellbeing whilst on placements.</p> <p>Representatives of professional bodies felt the term 'IT facilities' was out of date and should be replaced with another term, such as 'e-learning', 'appropriate technology' or 'ICT'.</p> <p>Representatives of professional bodies suggested that the standards should also require that facilities should be able to be used effectively.</p>

SET 4: Curriculum standards

4 Curriculum standards
4.1 The learning outcomes must ensure that those who successfully complete the programme meet the Standards of Proficiency for their part of the Register.
Representatives of professional bodies had no comments on this standard.

4 Curriculum standards
4.2 The programme must reflect the philosophy, values, skills and knowledge base as articulated in the curriculum guidance for the profession.
<p>The Group noted a suggestion that the wording should be changed from 'must' to 'should'. The Group felt that it needed more information before making a decision.</p> <p>It was suggested that the curriculum should require the students to be aware of the HPC's Standards of Conduct, Performance and Ethics and the Group felt that this could be an additional standard in SET 4.</p> <p>Representatives of professional bodies noted that not all bodies produced curriculum guidance, although some did so and others aspired to provide this. It was suggested that the guidance on the standards should also refer to guidance from Skills for Health and the NHS Knowledge and Skills Framework.</p> <p>Representatives of professional bodies also felt that the HPC's guidance should require education providers to use documents produced by professional bodies, instead of making this optional. They also felt that specific reference should be made to the standards of conduct, performance and ethics should be made here or as a separate standard.</p>

4 Curriculum standards
4.3 Integration of theory and practice must be central to the curriculum to enable safe and effective practice.
<p>The Group felt that the meaning of the standard was unclear and noted a suggestion that the standard should refer to 'Effective integration...' It was also noted that the words 'to enable safe and effective practice' were unnecessary.</p> <p>Representatives of professional bodies felt that the standard should instead refer to 'effective learning' to enable 'the development of safe and effective practice'.</p>

They also felt that 'Ensure' should be added at the start of the standard.

4 Curriculum standards

4.4 The curriculum must remain relevant to current practice.

Representative of professional bodies felt that the standard should require education providers to demonstrate and make evident how the curriculum would be of ongoing relevance. It was suggested that the guidance could be expanded. It was also suggested that it might be appropriate to refer to collaboration in relation to curriculum development.

4 Curriculum standards

4.5 The delivery of the programme must assist autonomous and reflective thinking, and evidence based practice.

The Group noted that the terminology in the standard could be revised to refer to 'evidence informed practice'.

The Group also noted that the standard may need to be made into two separate requirements, because evidence based practice was different to autonomous and reflective thinking.

Representatives of professional bodies felt the standard should be amended to read '...must encourage autonomous and reflective thinking...'. Rather than '...must assist...'

4 Curriculum standards

4.6 The range of learning and teaching approaches used must be appropriate to the subjects in the curriculum.

Representatives of professional bodies felt that the standard should be amended to refer to '...must be appropriate to the effective delivery of the curriculum.'

4 Curriculum standards

4.7 Where there is inter-professional learning the profession-specific skills and knowledge of each professional group must be adequately addressed.

The Group noted a suggestion that the standard should stress that opportunities for inter-professional learning should be actively sought and promoted, where the learning of profession specific skills and knowledge of each professional group were not compromised. The Group felt that this was not possible in the standard itself, although the guidance might be revised.

Representatives of professional bodies felt that inter-professional learning should be reinforced in the guidance.

SET 5: Practice placements standards

Representatives of professional bodies noted that there were considerable variations in the duration of placements for different professions. They noted that the most recent approvals and monitoring annual report by the HPC had indicated that many conditions were imposed against the SET. It was thought that the guidance might need to be strengthened accordingly.

In discussion, it was suggested that the guidance should require evidence of adequate and appropriate provision of placements.

5 Practice placements standards

5.1 Practice placements must be integral to the programme.

The Group noted a suggestion that the standard should require a formal agreement between the placement provider and the education provider, so that there was a clear understanding between the parties. It was possible that such a requirement could be indicated in the guidance or under SET 5.7.

Representatives of professional bodies felt that the wording of the guidance was unclear where it referred to 'the way that they are supported...'

5 Practice placements standards

5.2 There must be an adequate number of appropriately qualified and experienced staff at the placement.

Representatives of professional bodies made no comments.

5 Practice placements standards

5.3 The practice placement settings must provide:
5.3.1 a safe environment;

Representatives of professional bodies made no comments.

5 Practice placements standards

5.3 The practice placement settings must provide:
5.3.2 safe and effective practice.

The Group felt that consideration should be given to changing the wording to 'an environment that allows students to learn'.

Representatives of professional bodies felt that there should be discussion about combining SETs 5.3.2 and 5.4, although the first related to clinical risk and the second related more to the individual.

5 Practice placements standards

5.4 Learning, teaching and supervision must be designed to encourage safe and effective practice, independent learning and professional conduct.

Representatives of professional bodies felt that there should be discussion about combining SETs 5.3.2 and 5.4, although the first related to clinical risk and the second related more to the individual.

5 Practice placements standards

5.5 The number, duration and range of placements must be appropriate to the achievement of the learning outcomes.

Representatives of professional bodies made no comments.

5 Practice placements standards

5.6 The education provider must maintain a thorough and effective system for approving and monitoring all placements.

Representatives of professional bodies felt that the guidance should emphasise regular monitoring of all placements and that the HPC should strengthen the guidance about policies for dealing with placements where difficulties arose.

5 Practice placements standards

5.7 Students and practice placement educators must be fully prepared for

placement which will include information about and understanding of the following:

- 5.7.1 the learning outcomes to be achieved;
- 5.7.2 timings and the duration of any placement experience and associated records to be maintained;
- 5.7.3 expectations of professional conduct;
- 5.7.4 the assessment procedures including the implications of, and any action to be taken in the case of failure; and
- 5.7.5 communication and lines of responsibility.

Representatives of professional bodies made no comments.

5 Practice placements standards

5.8 Unless other arrangements are agreed, practice placement educators:

5.8.1 must have relevant qualifications and experience;

Representatives of professional bodies felt that SET 5.8.1 and 5.8.3 were related. There was also concern that small professions would find it difficult to meet particular requirements for qualifications for practice placement educators.

5 Practice placements standards

Unless other arrangements are agreed, practice placement educators:

5.8.2 must be appropriately registered;

Representatives of professional bodies felt that the phrase 'other arrangements' should be clarified.

5 Practice placements standards

Unless other arrangements are agreed, practice placement educators:

5.8.3 must undertake appropriate practice placement educator training.

Representatives of professional bodies felt that SET 5.8.1 and 5.8.3 were related.

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SET 6: Assessment standards

Representatives of professional bodies felt that the standard should be structured more clearly to separate requirements for assessment of students and the requirements for assessment regulations.

6	Assessment standards
6.1	The assessment design and procedures must assure that the student can demonstrate fitness to practise.
	<p>The Group agreed that 'assure' should read 'ensure'.</p> <p>The Group noted that this standard linked with SET 4.1. The Group suggested that the standard could refer to 'strategy' instead of 'design and procedures'. Representatives of professional bodies suggested that the standard could refer to 'assessment strategy and design'.</p>

6	Assessment standards
6.2	Assessment methods must be employed that measure the learning outcomes and skills that are required to practise safely and effectively.
	<p>Representatives of professional bodies suggested that the standard should refer to 'Assessment procedures and methods...' and that the second line of the guidance should read '...different assessment methods used for different parts...' instead of 'different assessment methods that are used for different parts...'</p>

6	Assessment standards
6.3	All assessments must provide a rigorous and effective process by which compliance with external reference frameworks can be measured.
	<p>The Group noted that the guidance might also refer to how the programme mapped against the Knowledge and Skills and Framework.</p> <p>Representatives of professional bodies noted that it would not always be easy to demonstrate compliance with external reference frameworks. It was also felt that there should be a cross-reference to SET 3.</p>

6 Assessment standards

6.4 The measurement of student performance and progression must be an integral part of the wider process of monitoring and evaluation, and use objective criteria.

The Group noted that there might sometimes be issues about marking being objective and timely.

The Group felt that it should be added into the guidance that the education provider should also have guidelines for objective criteria when education was provided across institutions.

Representatives of professional bodies felt that the standard should refer to 'The objective measurement of student performance and progression...'

6 Assessment standards

6.5 There must be effective mechanisms in place to assure appropriate standards in the assessment.

The Group noted a suggestion that Visitors might ask to see figures about drop-out and failure rates and that high levels of both should be examined. Representatives of professional bodies noted that the examiner's report should contain this information.

6 Assessment standards

6.6 Professional aspects of practice must be integral to the assessment procedures in both the education setting and practice placement.

The Group noted a suggestion that this standard might be combined with 6.1 and 6.2.

6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:
6.7.1 student progression and achievement within the programme;

The Group noted a suggestion that the HPC should impose requirements including the number of permitted fails in theory and practice. However, the Group felt that the HPC could not impose this, as different education providers had different requirements.

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6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:
6.7.2 awards which do not provide eligibility for inclusion onto the Register not to contain any reference to an HPC protected title in their title;

Representatives of professional bodies felt that the wording of the standard was a double negative and should be reworded along the lines of 'only programmes which provide eligibility for inclusion on the Register should contain any reference to an HPC protected title in their title'

6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:
6.7.3 an aegrotat award not to provide eligibility for admission to the Register;

6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:
6.7.4 a procedure for the right of appeal for students; and

6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:
6.7.5 the appointment of at least one external examiner from the relevant part of the Register, unless other arrangements are agreed.

The Group noted that this standard had been revised following a recent consultation.