

Standards of Education and Training review meeting, 18 February
2008: Revised standards of education and training and guidance

Executive summary and recommendations

Introduction

Article 15 (1) of the Health Professions Order 2001 (“the order”) provides that:

The Council shall from time to time establish—

- (a) the standards of education and training necessary to achieve the standards of proficiency it has established under article 5(2)*

The attached paper sets out the agreed and suggested revisions to the standards of education and training (SETs) and the guidance from the professional liaison group (PLG) and other stakeholders at the previous PLG meetings.

Decision

This paper is for discussion.

Background information

None

Resource implications

N/A

Financial implications

N/A

Appendices

None

Date of paper

6 February 2008

Date	Ver.	Dept/Cmte	Doc Type	Title	Status	Int. Aud.
2008-02-06	a	POL	PPR	Revised SETs and guidance coversheet	Draft DD: None	Public RD: None

Introduction to this document

The following paper sets out in detail the draft updated version of the standards of education and training. It has been updated in light of the discussions and recommendations made at the PLG meetings on the 13 September 2007, 22 November 2007 and 15 January 2008.

This paper is the first draft of the revised standards of education and training (SETs) guidance. Any amendments proposed and agreed in previous PLG meetings have been incorporated into the relevant section. In each section, the proposed standard and guidance is given. Any proposed changes are then detailed, together with a commentary and a recommendation.

Any alterations to the SETs and guidance that have not been agreed or discussed previously by the PLG are shown with a strikethrough or italics. Comments and suggestions have only been added when there has been a discussion but no firm recommendation was made by the whole group. When the issue has not been resolved, or where work is required to reach a consensus comments and recommendations have been added to help inform the future decisions of the group.

The following paper should be viewed as the first draft of the revised SETs guidance and will be subject to change by the PLG on 18 February 2008 and any future consultation. This paper includes the introduction to the guidance and the revised standards and guidance.

Revised standards of education and training and guidance

Introduction

About us (the HPC)

We are the Health Professions Council. We are a health regulator, and we were set up to protect the public. To do this, we keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

We currently regulate 13 health professions.

- Arts therapists;
- Biomedical scientists;
- Chiropodists and podiatrists;
- Clinical scientists;
- Dietitians;
- Occupational therapists;
- Operating department practitioners;
- Orthoptists;
- Paramedics;
- Physiotherapists;
- Prosthetists and orthotists;
- Radiographers; and
- Speech and language therapists.

We may regulate other professions in the future. For an up-to-date list of the professions we regulate, please see our website at www.hpc-uk.org

Our Register is available on our website for anyone to search, so that they can check the registration of their health professional.

Our key functions

In order to protect the public, we:

- set standards for the education and training, professional skills, conduct, performance, ethics, and health of registrants;
- keep a Register of health professionals who meet those standards;
- approve programmes which health professionals must complete in order to register with us; and
- take action when health professionals on our Register do not meet our standards.

The Health Professions Order says that we must set our standards to protect the public, and that we must set standards which are necessary for safe and effective practice. This is why our standards are set at a 'threshold' level.

When you are developing your programme, you may also want to refer to documents published by other organisations which take a role in developing good practice, for example, professional bodies, and the Quality Assurance Agency (QAA).

About this document

We have written this document to supplement our *approvals and monitoring process for education programmes* ~~approvals process~~. It provides guidance on our standards of education and training, to give you more information about how visitors will assess you against our standards.

The document is written for education providers who are preparing for an approvals visit. It will also be useful for education providers who are preparing information to tell us about a major change to their programme, or as background information for education providers preparing their submission for HPC annual monitoring. *This document will also be useful for practice placement providers whom education providers work in collaboration with.*

Throughout the document, 'we' refers to the Health Professions Council, and 'you' refers to staff working on an approved programme, or a programme that you want to be approved. Where we use the abbreviation 'SET' followed by a number, this refers to a specific standard of education and training.

Guidance on our standards

This document provides guidance on our standards of education and training, which are the standards a programme must meet before we can approve it. The detail that it contains against each standard gives suggestions of how you could show that you meet the standards.

Although you do not have to use this document to have your programme approved, we recommend that you do so, as it has been put together to give you advice on the evidence you will need to refer to.

Preparing for a visit

Before the visit, we will send you two documents for cross-referencing. One of these contains the standards of education and training, and the other contains the standards of proficiency for the relevant profession.

~~We strongly recommend that~~ *require you to* fill in the cross-referencing documents to show how your programme meets our standards. Doing this will save both your programme team and the HPC visitors' time on the day of the

visit. The visitors will *then* be able to refer easily to the information you've provided.

We recommend that you do not use phrases such as 'implicit through entire programme' or 'throughout'. If you say exactly where the visitors can find evidence to show how you meet the standards, this will help the visit go more smoothly.

Documents published by other organisations

For your information, throughout this document we have mentioned other documents that may be useful to you in providing extra information. This does not mean that we have 'approved' these documents, but they may still be helpful when you are collecting evidence to show how you meet our standards.

Working with professional bodies

Professional bodies for the professions we regulate have had important input into drafting this document.

Professional bodies have an important role in promoting and representing their professions. In particular, professional bodies may develop the learning and curriculum frameworks for their profession. In this document, we have referenced the curriculum documents published by professional bodies which will provide useful information, background and context.

The structure of this document

We have divided up the main part of this document into six parts, to reflect the six sections of our standards of education and training.

Under the title of each standard is a summary, which summarises the areas that the standard is concerned with. There is then a section called 'Overall guidance' which gives guidance for the whole of that standard, including information about how you can show that you meet this standard – the documents you should provide, or the people whom the visitors may want to meet. This is followed by a section called 'More information'. Here we mention any other documents which may be useful to education providers in finding more information related to the whole of the standard. Certain documents, like the professional body curriculum, may have relevant information in them which relates to so many standards that, in order to save space, we have not referenced them every time, but instead have given a list at the end.

We have also provided a list of 'Example questions'. These are questions that the visitors might ask at an approvals visit, and can also be used as questions when you are putting together evidence for your documents, or considering your annual monitoring or a major or minor change to your programme. Visitors will not normally ask all of these questions, and may not use the example questions

at all, but we have provided them to give you an idea of the sorts of questions that may arise during a visit. Please note that the list of questions is not a complete list, and the visitors may ask other questions that they feel are necessary to make sure that the standards are being met.

The final and most substantial section is called 'Detailed guidance'. Here, we have broken down each standard of education and training into its individual, numbered parts. Each part is in a table like the one below.

1 This box contains the standard title, for example, 'Assessment standards'
1. 1 This box contains the full text of the relevant standard of education and training.
<p>Guidance This box contains guidance on the standard.</p>
<p>Other sources of guidance This box lists other documents which may contain more background information on possible ways of meeting the standard.</p> <p>Here, as with the 'more information' for the whole of the standard, you will find that certain documents may have relevant information in them which relates to so many standards that we have not referenced them against each one separately, but instead have given a list at the end.</p>

SET 1: Level of qualification for entry to the Register

Summary

This standard is concerned with the qualifications needed to be eligible to apply to register with us.

Overall guidance

This does not apply.

More information

- Quality Assurance Agency for Higher Education, Qualifications framework for England, Wales and Northern Ireland
- Quality Assurance Agency for Higher Education, Qualifications framework for Scotland
- College of Radiographers, Handbook of the joint validation committee (Radiography)
 - 3.4 Registerable qualification (see note below)¹
 - Appendix two – Guidance for the development and approval of M level programmes with eligibility for registration
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Chartered Society of Physiotherapy, Expectations of Master's level programmes within qualifying physiotherapy education

Example questions

How is the MA different from the PG Dip?

Is there an exit route other than BSc or MA?

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:

- chiropody or podiatry;
- dietetics;
- occupational therapy;
- orthoptics;
- physiotherapy;
- prosthetics and orthotics;
- radiography;
- speech and language therapy; and

Note: The Joint Validation Committee of the Radiographers Board no longer exists, so a lot of this document has been replaced by HPC or Society of Radiographers guidance. However, this section is still relevant.

- biomedical science (with the Certificate of Competence awarded by the Institute of Biomedical Science, or equivalent).

1.1.2 Masters degree for the arts therapies.

1.1.3 Masters degree for the clinical sciences (with the Certificate of Attainment awarded by the Association of Clinical Scientists', or equivalent).

1.1.4 Diploma of Higher Education for operating department practitioners.

1.1.5 Equivalent to Certificate of Higher Education for paramedics.

Guidance

We expect that most of the programmes on our approved list will be at the standard which we have outlined above, but we realise that there may be some exceptions. We have set the level above for each profession, based on what we think is needed for people who successfully complete the programme to meet all of the standards of proficiency.

This standard contains the word 'normally', to show that you may be able to design a programme which leads to a different qualification from that above, but which meets the rest of the standards of education and training, and the standards of proficiency, so can still be approved by us.

Commentary

No changes were suggested by the Group.

Recommendations

None.

SET 2: Programme admissions

Summary

This standard is about the admissions procedures for your programme, including the selection procedure and the information provided to those involved.

Overall guidance

Examples of the kinds of information that you could provide under this standard could include the information that is sent to students when they apply to you, information handed out at open days or interviews, any welcome or information pack sent in the post to successful applicants, or a copy of your section of the university prospectus.

The visitors will want to be assured that you are reviewing your admission procedures to assess how effective they are. So, you may want to provide information about how you analyse application and admission patterns.

It is important that your admissions staff and your applicants understand that, when you assess applications, you are checking that person's suitability to do your programme, and that you are not assessing or giving any assurances about whether they will eventually be registered. This particularly applies to the sections of this standard which refer to criminal conviction checks, and health requirements.

Admissions staff, and applicants, should be aware that the offer of a place is not a guarantee of registration at the end of the programme. ~~neither is it an opinion from the institution as to the likelihood of eventually being registered.~~

When someone applies to us for registration, we will look at their application individually, and make a decision about their registration based on their own individual circumstances. We cannot offer future guarantees of registration, or decide that a future application for registration would definitely not be successful.

More information

- Health Professions Council, Standards of conduct, performance and ethics
- Health Professions Council, A disabled person's guide to becoming a health professional
- Health Professions Council, Information about the health reference
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education: Recruitment and admissions

- Quality Assurance Agency for Higher Education, Guidelines on the accreditation of prior learning

Example questions

How much information do students get before they apply to register?
 What information do you give to applicants about the programme, and in what format?
 How do you make sure that students reach International English Language Testing System (IELTS) 7.0 when they graduate?
 What are your English language requirements?
 Have you explained your criminal records check?
 How do you make sure that overseas applicants go through the same relevant checks as students from the European Union?
 What arrangements do you have to make initial health checks and any immunisations that are needed?
 Do you give credit to applicants with Accredited Prior (Experiential) Learning (AP(E)L)?
 What is the process for assessing an applicant's AP(E)L? How often do you do it?
 How do you monitor your equality and diversity policies?
 How do you tell applicants and students about your equality and diversity policies?

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 take up or make an offer of a place on a programme.

Guidance

All of your entry requirements should be clearly set out in the information you send to interested applicants, with contact details of your admissions tutor or someone similar.

You may want to provide information to show how you tell students about accommodation costs and any other costs, such as personal therapy (for therapists), driving tests (for paramedics), criminal record checks, health checks, immunisations and any other costs that students will need to meet, including the length and possible location of their placements, whether they will need to stay away from the university, their travel, and how this is funded.

The visitors will want to know what information you request from an applicant and your reasons for requesting that information. We do not specify detailed information that you must request from an applicant, it is for you to decide what information you require to make an offer of a place on a programme.

You should make sure that your documents clearly tell students that completing the programme means they are 'eligible to apply' for registration with us. Phrases like 'completing this programme entitles you to be registered with the HPC' or 'once you have completed this programme, you will be registered' ~~could be~~ *are* misleading, as all students need to apply to register after they have completed their programme.

See the guidance under SET 2.2 and SET 2.3 to make sure students understand that an offer of a place does not show that they automatically meet our standards, or that they will be registered with us in the future.

Commentary

The following changes have been made in line with the Group's discussions:

- The SET is amended to follow the order of the parties in the first part of the sentence, with the second part to read '...about whether to take up or make an offer of a place on a programme.'
- The guidance refers to the need for the education provider to gather information to make a decision on whether to offer a place.
- The guidance makes clear that it is misleading to state that a programme automatically entitled students to be registered by the HPC.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

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;

Guidance

You are not required to interview applicants to your programme, however, visitors will want to see that your selection and entry criteria contains a rigorous process to assess oral and written skills so that students can take full advantage of a programme from the start.

Please also see SET 4.1, which says that everyone who successfully completes your programme must be able to meet the standards of proficiency. This means that any English language requirements you set at the beginning of the programme should take account of the fact that at the end of the programme, all students must meet the required level of English ability for the standards of proficiency for their profession.

Those students whose first language is English will not normally need to provide

evidence of meeting an IELTS standard or equivalent, but may be required by the education provider to have passed English at GCSE or equivalent.

Commentary

The following change has been made in line with the Group's discussions:

- The guidance includes a new paragraph on reading, writing and spoken English.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

2 Programme admissions

The admissions procedures must:

2.2 apply selection and entry criteria, including:

2.2.2 criminal convictions checks;

Guidance

You will probably run checks on your students through the Criminal Records Bureau, the Scottish Criminal Record Office or the Police Service of Northern Ireland, and we would expect that this would be 'enhanced' disclosure or equivalent, due to the positions of responsibility in which health professionals are placed.

See the comments above in the general guidance for this standard, about the role of your staff in assessing applicants for your programme, and not for registration.

We will want to see what you would do if you received a positive criminal conviction declaration from an applicant. If you are considering an application from someone who has a criminal conviction, you may find it helpful to refer to our standards of conduct, performance and ethics, and consider if any criminal conviction might affect that person's ability to meet those standards.

You may also find it helpful to consult your practice placement educators to find out if they would be willing to offer the applicant a place. We will want to see what procedures you have in place if practice placement educators are not willing to offer a student a place after you have already accepted the student.

~~You may also have a procedure for monitoring criminal records during the programme, such as an annual self-declaration form that students sign, which you can give to the visitors.~~

Commentary

The following change has been made in line with the Group's discussions:

- The removal of the last paragraph of guidance.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

2 Programme admissions

The admissions procedures must:

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

Guidance

Our guidance document, 'A disabled person's guide to becoming a health professional' is available, with information for disabled people applying to approved programmes, and for admissions staff ~~on~~ considering applications from disabled people.

We have also published a document called 'Information about the health reference' with information for applicants and doctors about the health reference.

See the comments above in the general guidance for this standard, about the role of your staff in assessing applicants for your programme, and not for registration.

You should give candidates information about any preparation needed before their practice placement starts, for example, vaccinations.

Requirements vary across the professions and we will want to see that you give students clear information. For example, some programmes will need students to have immunisations while others will not. It is your responsibility to make sure all reasonable steps have been taken to comply with any health requirements.

Commentary

The Executive proposes to add the DRC report in to the reference section at the end of the document.

Recommendations

None.

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; *and*
 - 2.2.5 Accreditation of Prior (*Experiential*) Learning and other inclusion mechanisms.

Guidance

The visitors will want to be assured of your academic and professional entry standards, for example those regarding literacy and numeracy, and also how you tell applicants about these standards and how they are applied.

You must also show that you have a system for inclusion mechanisms (*such as Access, Foundation Degrees, Baccalaureate, HND and HNC*), and show how you do this. You may want to show how you explain your inclusion policies to applicants, including any details of charges that education providers may make for this administrative work (this information may also be relevant to show how you meet SET 2.1). You should also make sure that students who are eligible for AP(E)L are able to meet the standards of proficiency for their profession when they successfully complete the programme.

The visitors will need to be assured that students' prior learning is mapped against the learning outcomes for a programme or individual modules. You will need to show what the upper limit for AP(E)L is and how you decide this.

Commentary

The following change has been made in line with the Group's discussions:

- The guidance includes new examples of 'other inclusion mechanisms'.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

2 Programme admissions

The admissions procedures must:

2.3 ensure that the education provider has equality and diversity policies in relation to candidates and students, together with an indication of how these will be implemented and monitored.

Guidance

The visitors will need to be assured that you have equality and diversity policies.

Your department, school or programme may have separate equality and diversity policies, or your university may have policies that apply to you. The visitors will want to have enough evidence to show that you have these policies in place and that they are put into practice and monitored at a school or department level.

The visitors will also want to see that information that you give to students (for example, a student handbook) includes this policy, with information about the procedure to follow if a student feels that they have been discriminated against. You may also want to show what information you give students about the policies relating to placements.

Commentary
No changes were suggested by the Group.
Recommendations
None.

SET 3: Programme management and resource standards

Summary

This standard is about managing the programme, and the resources available to the academic and support staff, and to the students on the programme.

Overall guidance

Visitors will usually take note of the on-site resources available during their tour of the library and facilities. Notes taken on this tour may help to show the visitors how you meet this standard. You might want to use the tour to tell them about facilities which you feel meet the standards particularly effectively.

Visitors will also want to ask the programme team questions about how well the policies and procedures that you outline in your documents are working in practice. Questions that the visitors ask the practice placement educators about how placements are managed, and the resources available during placements, may be relevant to this standard as well.

Visitors will also ask senior managers (for example, the head of faculty) questions about the whole of SET 3.

More information

- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in Higher Education
- ~~Department of Health, Partnership framework for quality assurance of healthcare education~~

Example questions

Do you use visiting lecturers? If so, how do you quality assure them?

Do you have staff appraisals every year?

Do you do peer observation as part of staff development? If so, do you include these comments in staff appraisals?

Do students participate as service users in teaching? If so, how do you get their consent?

How do you monitor student attendance?

If students don't attend, how will you deal with this?

Can students access information technology and library resources off campus or at weekends?

3 Programme management and resource standards

3.1 The programme must have a secure place in the education provider's business plan.

Guidance

The visitors would normally need to see a business plan, to make sure that the programme was secure within the institution, not under any threat, and that it had enough support.

A 'secure place' means that:

- the education provider is committed to providing enough resources to deliver the programme;
- the risks or threats to delivering the programme are *currently* minimal; and
- there is a ~~long-term~~ *continuing* future for the programme.

The questions for this SET will be directed mainly at senior managers. There must be clear information about partnerships with other education providers.

As part of your documents, you may want to include university planning statements as returned to HEFCE, SHEFC, HEFCW and Department of Health Commissioners, if appropriate.

You could, for example:

- explain the context of your programme, for example, in terms of how it fits with its research profile and strategy;
- show how you manage programmes with providers of practice-based learning, to make sure that they are effectively developed, delivered and reviewed; and
- explain your processes for reviewing the way your programme is delivered and the related need for development.

Commentary

The following change has been made in line with the Group's discussions:

- The guidance defining 'a secure place' has been amended.

Recommendations

The Group is invited to discuss and agree the amendments to the guidance.

3 Programme management and resource standards

3.2 The programme must be *effectively* managed ~~effectively~~.

Guidance

The visitors will ask the senior managers (for example, head of faculty, Dean and Strategic Health Authority (SHA) planners) questions to make sure that this standard is being met.

Evidence you could provide that would help to show you meet this standard might include:

- external examiners' reports and your response to these reports;
- a critical review of current arrangements;
- analysis of student feedback through module evaluations, placement evaluations, programme committees, and staff student liaison committees;
- feedback through placement audits and evaluations, and partnership meetings;
- analysis of tutor feedback through module evaluations, programme committees, and annual reports;
- quality audits of practice placements; and
- clear action plans and evidence of the action taken.

The visitors will want to see evidence of the programme management structure including the lines of responsibility and the links to the practice placement management, highlighting the roles and responsibilities of all parties.

If the programme proposal is new, the visitor must be convinced that there are effective systems in place to manage the programme and that individuals involved have the skills and expertise they need to work within these systems.

If there is a partnership with another person or organisation to deliver the academic content of the programme (for example, another education provider, or where a trust employs the academic staff as well as the practice placement educators), visitors will ask to see the partnership agreement and find out which regulations and disciplinary procedures apply to students and staff. The visitors will want to be assured that there are clear procedures to deal with any problems in this area, and these should be clearly written into any partnership agreement.

Commentary

The following change has been made in line with the Group's discussions:

- The guidance stresses the importance of clear lines of communication and clear definitions of responsibility.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

3 Programme management and resource standards

3.3 The programme must have *regular* ~~an effective~~ monitoring and evaluation systems in place.

Guidance

The visitors will want to see that the monitoring and evaluation systems (for example, internal quality audits, external examiner reports, and student feedback) are appropriate to, and effective for, the programme. It is our intention for you to show that you use the systems you currently have in place, rather than developing new systems. To ensure there is no duplication made in the information that you may use the same documentation you use for internal processes or give to other bodies .

We will use the documents from the monitoring and evaluation system (including internal and external evaluations) in the annual monitoring of the programme.

Commentary

The following changes have been made in line with the Group's discussions:

- The word 'effective' has been removed from the SET.
- The guidance makes it clear that the monitoring and evaluation system should be effective.
- The guidance explains that documents from the monitoring and evaluation system will be used by the HPC in the annual monitoring of programmes.

The Executive feels it is possible that an education programme uses a number of monitoring and evaluation systems. We therefore propose that the standard and guidance should refer to 'systems'.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

3 Programme management and resource standards

3.4 There must be a named person 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.

Guidance

You ~~will probably want to provide the CV of~~ *must show how* the named person with overall *professional* responsibility for the programme, ~~to show how you consider them to be~~ *is* 'appropriately qualified and experienced'.

We expect that this person will normally be registered with us. However, we recognise that it may be possible for a programme to be led by someone who is not registered in the relevant part of the register. If this is the case, you should show more detail about their qualifications, and their experience. If they are not registered, you must make sure that their job title does not give the impression that they are registered by using a protected title.

If the named person with overall responsibility for the programme is not registered

in the relevant profession with us, the visitors will want to see information about how you make profession-specific information available to support them in their role.

The information that you can give the visitors might include:

- *their CV;*
- evidence of their previous effective programme leadership;
- an ability to effectively organise the delivery of the programme;
- a professional qualification; or
- an educational qualification.

Commentary

The Group felt the SET should be amended to require that the named person should be 'either on the relevant part of the HPC Register and appropriately qualified and experienced, or otherwise appropriately qualified and experienced.'

The purpose of this SET is that the person with overall responsibility for the programme is appropriately qualified and experienced; this will usually mean they are also on the HPC Register. However, it is not necessary for them to be on the Register and the Executive proposes therefore that for clarity the SET should be amended to read: 'There must be a named person who has overall responsibility for the programme and who should be appropriately qualified and experienced'. We stress in the guidance that we would normally expect the person to be on the Register. The SET should be as clear as possible on the requirements we make.

If the Group wants the SET to make specific reference to being on the HPC Register, the Executive suggest the following wording: 'There must be a named person who has overall responsibility for the programme who should be appropriately qualified and experienced; and unless other arrangements are agreed, be on the relevant part of the HPC Register.'

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

3 Programme management and resource standards

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

Guidance

We do not set staff / student ratios, so by 'adequate' we mean that our visitors will want to be sure that the number of staff is appropriate for the effective delivery of the programme. The visitors will want to look at the staffing within the overall context of your education provision; for example, involving your staff in other

programmes in the same profession, your expected research, or your inter-professional learning and teaching, might all affect the staff available for the programme being considered. *Visitors will also want to make sure that there is a provision for contingencies (for example, long-term absence) and that the staffing levels are responsive to changes in the cohort size.*

Visitors will need information on what administrative, *pastoral, management* or technical staff are in place to support the programme, and their experience and qualifications if appropriate.

You will probably want to take account of the practical requirements of your programme, and the possible need for teaching in small groups, when deciding how many staff are needed. You may also want your staff to have clinical as well as academic experience.

The information that you give the visitors about staffing at your placements (SET 5.2) will also be relevant to this standard.

See the guidance under SET 3.2.

Commentary

The following changes have been made in line with the Group's discussions:

- The guidance mentions pastoral and management staff.
- Further guidance on staffing levels has been added

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

3 Programme management and resource standards

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

Guidance

Your staff CVs will probably cover this SET.

The programme team must show us that the staff on the team, and any other people who help to deliver the programme (such as sessional lecturers), are qualified to deliver the programme. We do not specify the precise expertise and knowledge which are needed to deliver certain aspects of your programme, as we feel that this may change as good practice develops.

Visitors will also consider the input from specialist visiting lecturers and the expertise and knowledge that they bring to the programme balanced against the quality of delivery and continuity of students' experience. If visiting lecturers

teach on your programme, the visitors will want to know how you guarantee their teaching quality.

Commentary

No changes were suggested by the Group.

Recommendations

None.

3 Programme management and resource standards

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

Guidance

It is important that all staff, including part-time staff, practice placement educators and visiting lecturers, have the opportunity to develop and maintain their professional skills, especially those that are appropriate to their role, to make sure that they continue to deliver the programme effectively.

The visitors will want to be assured that there is a staff development policy. This could be supported by:

- departmental planning documents;
- staff development strategies;
- CVs;
- staff appraisal systems;
- staff profiles;
- professional development portfolios; and
- keeping up-to-date with professional body guidance.

The visitors will want to ask members of your programme team about how this works, and how accessible and available staff development is. They may ask your practice placement educators about how you support them in their development. They will also want to know about any peer observation or mentoring schemes that are run and what training is available to new lecturers.

Commentary

No changes were suggested by the Group.

Recommendations

None.

3 Programme management and resource standards

3.8 The resources to support student learning in all settings:

- 3.8.1 must be ~~used~~ effectively *used*; and
- 3.8.2 must adequately support the required learning and teaching activities of the programme.

Guidance

'Resources' in this context may include:

- student handbooks and module guides;
- information technology (IT), visual learning environments and other specialist *programmes*;
- academic and support staff;
- buildings;
- ~~books~~ *texts and journals*;
- equipment; and
- materials.

This standard means that resources must not only be available and appropriate for the delivery of the programme, but should also be used effectively. You could provide information about the resources students have access to, including how equipment booking systems are used, or how laboratory resources are used. During the tour of facilities, you should show the visitors evidence of resources, which may include *IT facilities*, lecture theatres, tutorial rooms, presentation equipment, specialist labs, *skills labs* and equipment.

'All settings' could refer to, for example, a second site where parts of the programme are delivered, ~~or to resources that are available to students on practice placements, or where programmes are delivered by a franchise arrangement.~~ *In all of these cases, visitors will need to see evidence of the resources that are available to students.* (The visitors will look separately at your library provision – see SET ~~3.12-3.10~~).

The visitors will want to see how students who are employed, studying part-time or doing post-registration qualifications are catered for in their placements or place of work.

The visitors will want to see evidence of how you assess the effectiveness and use of the resources in your quality assurance procedures and reports.

Commentary

The following changes have been made in line with the Group's discussions:

- The phrase 'books' is replaced by 'texts and journals'.
- The guidance makes it clear that visitors should be shown IT facilities (including arrangements for remote access) and might wish to see lecture rooms and other resources such as skills laboratories.
- The guidance notes that where programmes are delivered by franchise

arrangements, visitors will need to see evidence of provision of resources

Recommendations

The Group is invited to discuss and agree the amendments to the guidance.

3 Programme management and resource standards

3.9 There must be:

- 3.9.1 adequate and accessible facilities to ensure the welfare and well-being of students *in all settings*; ~~and~~
- 3.9.2 a system of academic and pastoral student support in place; *and*
- 3.9.3 a student complaints process in place.

Revised guidance

To meet ~~this~~ *these* standards, you will need to provide evidence of the facilities available for student support, how students are informed about these, and how accessible they are. Visitors will need assurance that appropriate support facilities are in place, and these could include counselling, a health centre, medical advice and so on.

Visitors will want to see how your systems can support students, for example, *mature students, disabled students, those studying part-time, on in-service or work based learning, or those with caring responsibilities.* ~~those on part-time, in-service or work based learning, or mature, or disabled students.~~

If you use a personal tutor system, you will probably want to provide information on how this works to show how you meet this standard. You could also show how you support students with learning difficulties, including how they are supported during their placements. Visitors will also ask students about how well they feel the support systems are working.

You should provide evidence to show the support you provide for students during periods of sick leave, ~~or~~ carers' leave, or any other *planned or* unexpected leave the student has to take. You may also like to detail financial help available, counselling and specialist teaching or learning facilities.

The visitors will also want to see that there is a formal student complaints process in place and how the students are informed about the process. This process would normally be institution wide.

See SET 5 about support for students on practice placement.

Commentary

The following changes have been made in line with the Group's discussions:

- An additional SET has been added and the guidance amended accordingly.

- Students with ‘caring responsibilities’ has been added to the examples.
- Students with ‘learning disabilities’ replaces ‘students with dyslexia’
- The guidance refers to ‘planned or unexpected leave’.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

3 Programme management and resource standards

~~3.12~~ 3.10 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.

Guidance

You should provide information in your documents about the learning resources provided for students and for staff, and you may also want to point out the learning resources to the visitors during the course of the tour of the library and facilities, including information technology (IT) facilities and any profession-specific resources.

The visitors will want to check the quantity, accessibility and currency of resources. They will want to be assured that stocks are kept up to date, that there is enough money to replace them, that there are enough core texts available (or that arrangements are made such as reserving certain titles for reference only, or short-term loan, or similar), and that opening hours ~~and so on~~ mean that the facilities are available to students and staff. *The visitors will want to know how the students will be able to access the learning resources wherever their learning is based.*

You may want to cross-reference your evidence under this standard to the information in SET 4.4 ‘The curriculum must be relevant to current practice’, to show how your resources remain up to date with developments in the programme and your profession.

As well as your library facilities, the visitors will also need to make sure that your IT facilities are appropriate and readily available. They may ask the students how easy they found it to access computers, and whether they considered the number of computers available to be suitable for their needs. If you are using a visual learning environment such as WebCT or Blackboard, it can be helpful to the visitors to see how this is used during the tour of the library or the IT suites.

Commentary

No changes were suggested by the Group.

Recommendations

None.

3 Programme management and resource standards

3.10-3.11 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.

Guidance

This standard is mainly concerned with preventing injuries and emotional distress, and helps to make sure that education and placement providers acknowledge risk factors. The level of involvement of students will vary between programmes, and from profession to profession. Professional bodies will have information about this.

Examples of activities where you will need to have guidelines for gaining students' consent include:

- disclosure of personal information;
- role play;
- bio-mechanical assessments of the arms and legs;
- patient positioning through manipulation of bony anatomical landmarks; and
- practising profession-specific techniques; and
- *experiential groups*.

You should tell candidates how much they are expected to get involved in the programme, taking account of, for example, cultural differences or the personal medical health of the individual. In your cross-referencing document, you could explain to the visitors how and where this is made clear in the programme documents, or student handbook, and included in the programme recruitment and admissions procedures, for example.

The visitors will want to check that there are systems in place for gaining students' consent. When necessary, we will want to see evidence, such as a copy of a consent form. Visitors will need to be provided with a copy of relevant guidelines, and they may also ask questions about this during their meetings with students or placement providers.

Other sources of guidance

- Chartered Society of Physiotherapy, Guidelines of Good Practice – Student consent, information for Higher Education Institutions (HEI) physiotherapy programmes and physiotherapy students

Commentary

The following change has been made in line with the Group's discussions:

- Experiential groups added to the list of examples.

Recommendations

The Group is invited to discuss and agree the amendments to the guidance.

3 Programme management and resource standards

3.11-3.12 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.

Guidance

You should provide information to the visitors to show when attendance is compulsory, and when it is not. You should show the visitors how you monitor attendance, for example, by a lecture register. You must show the systems you have in place for doing this, for example, the action that you will take if students do not go to the compulsory parts of the programme. Where attendance is linked to assessment, you must explain the systems in place for monitoring assessments.

The visitors will want to make sure that all students can meet all of the standards of proficiency to be able to practise safely and effectively. This means, for example, that aspects of the programme which are essential to make sure that students met the standards of proficiency will need to be compulsory, with attendance monitored, and lack of attendance followed up to make sure that students gain this knowledge before they complete the programme.

The visitors will want to be assured that your requirements, and any consequences of missing compulsory teaching, are clearly communicated to students, for example, in a student handbook or equivalent.

See the guidance under SET ~~5.5~~ 5.10.

Commentary

No changes were suggested by the Group.

Recommendations

None.

3 Programme management and resource standards

3.13 A fitness to practise process must be in place throughout the programme.

Guidance

The purpose of this standard is to add to public protection, so that education providers play a role in identifying students who may not be fit to practise. A

fitness to practise process should consider issues of professional conduct which could prevent a student from becoming registered but may not impact upon their ability to obtain an academic qualification.

Visitors will want to see evidence to support your choice of process, which must be appropriate to the programme and its delivery. It is important that there is accountability for any decision made in a fitness to practise process and that the process is fair and transparent. You will also need to show the mechanisms and processes you have in place regarding matters relating to conduct; this also includes providing evidence of the possible sanctions that may be placed upon a student.

The visitors will want to see the process of communication between you, practice placement providers and practice placement educators. It will be important that you show that the process is fair and all attempts at mediation have been exhausted before a student is subject to any fitness to practise process.

The fitness to practise process could lead to a range of sanctions and these must be appropriate to the programme and the delivery of the programme. Visitors will want to make sure that you have made all attempts to allow a student to address any issues of conduct and that a clear rationale is shown for all decisions made.

If a student has been found to be unfit to practise, it must be made clear to the student that they are not eligible to apply for registration. To show that you meet this standard, you could refer the visitors to where this policy is laid out, and how students are informed, for example on your website or in your student handbook.

Commentary

The group agreed to the wording of the SET and asked the Executive to provide guidance.

Recommendations

The Group is invited to discuss and agree the guidance.

SET 4: Curriculum standards

Summary

This part of the standards is about the curriculum, making sure that graduates meet our standards for their professional skills and knowledge, and are fit to practise. We have created a set of curriculum standards which will allow you to design your own programme. You may choose to do this by following a curriculum framework document produced by a professional body, where this is available.

Overall guidance

Professional bodies may be involved in designing curriculum frameworks. We do not set more detailed standards for developing a curriculum or about the content of programmes and how they are delivered.

Different professional bodies are at different stages in relation to curriculum frameworks. Some have been involved in this for some time, certain professional bodies are beginning to develop this, and some professional bodies may not get involved in this area. For a list of documents, please see the back of this document, or our website.

More information

- Health Professions Council, standards of proficiency
- Professional body:
 - curriculum outlines; and
 - codes of professional conduct.See the back of this document for a list of publications.
- Department of Health, Partnership framework for quality assurance of healthcare education
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education

Example questions

What drives the design of your curriculum?

How would you explain the overall programme and how a student progresses from day one to graduation?

Can you explain how the learning outcomes of the programme meet the standards of proficiency?

Would you explain how your students will be able to use a range of approaches in their practice after they qualify?

What teaching methods do you use, and why?

Would you explain the reasons for the programme content and the balance between the number of hours for different subjects covered?
How do you make sure your curriculum stays relevant to current practice?

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.

Guidance

This is one of the most crucial standards, and one that we advise you to consider by completing the standards of proficiency cross-referencing document that we provide. Please make sure that you cross-reference against the generic, and also the profession-specific, parts of the standards.

You should refer the visitors to the module descriptors, or their equivalent, learning outcomes and module assessments which show how all of the standards of proficiency are covered by successfully completing the programme.

The visitors will want to make sure that every student completing the programme can meet all of the standards of proficiency, no matter what option modules they choose, or if they have postponed their study.

As well as the cross-referencing document we will send you, you can download a copy of the standards of proficiency for your profession from our website, in the publications section.

You should also be aware that in considering how your students can meet the standards of proficiency at the end of their programme, you can take into account any reasonable adjustments you have made to the way that you deliver the programme to disabled students.

When the visitors meet students, they are likely to ask them if they are aware of the standards of proficiency, and therefore we recommend you include these in your reading lists.

Other sources of guidance

- Health Professions Council, A disabled person's guide to becoming a health professional
- Health Professions Council, The standards of proficiency

Commentary

No changes were suggested by the Group.

Recommendations

None.

4 Curriculum standards

4.2 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in ~~the~~ any curriculum guidance for the profession.

Guidance

The area of curriculum guidance (or curriculum outline or framework) is one where *many of* the professional bodies for each profession are particularly involved. Professional bodies may be involved in designing curriculum or similar detailed work around the philosophy, values, skills and knowledge for their profession (see also the overall guidance for this section, above).

The programme does not have to adhere completely to the curriculum guidance. If visitors felt graduates were not safe and effective, then we would need to gather evidence about how you feel the students completing your programme are safe and effective without following curriculum guidance.

In meeting this standard, you may refer to any relevant documents *such as those produced by professional bodies and the QAA benchmark statements for the profession. The visitors will want to see how any guidance is reflected in the programme.* ~~produced by professional bodies. If your professional body does not produce any relevant document, you may refer to the QAA subject benchmark statements for your profession.~~

Other sources of guidance

Profession-specific sources of guidance may include professional bodies':

- curriculum frameworks;
- practice placement standards;
- good-practice guidelines;
- clinical guidelines; and
- codes of practice.

Examples of multi-professional reference frameworks could include the following.

Education and quality

- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education
- Quality Assurance Agency for Higher Education, Qualifications framework for England, Wales and Northern Ireland
- Quality Assurance Agency for Higher Education, Qualifications framework for Scotland

Legislation

- Disability Discrimination Act 1995
- Human Rights Act 1998
- Health and Safety at Work Act and associated regulations, for example:
 - Ionising Radiation Regulations 1999
 - Ionising Radiation (Medical Exposure) Regulations 2000
- The Children Act 1989

Health and social care policy

- National Service Frameworks
- National Occupational Standards
- Knowledge and Skills Framework (Department of Health 2003)

See the list at the back of this document for a list of publications which you may find useful.

Commentary

The following changes have been made in line with the Group's discussions:

- The SET has been amended to '...any curriculum guidance for the profession', instead of 'the curriculum guidance'.
- The guidance makes clear that some professions produce curriculum guidance, whilst others do not.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

4 Curriculum standards

4.3 Integration of theory and practice must be central to the curriculum.

Guidance

The visitors will be looking for evidence within your curriculum documents that theory and practice are combined within both the academic and practice placements.

You could show how you meet this standard specifically through your programme design. Also, your quality control systems may provide evidence of how you meet this standard, and you could highlight specific aspects of your programme.

See the guidance under SET 5.1 and SET ~~5.5~~ 5.10.

Commentary

No alterations were suggested by the group.

Recommendations

None.

4 Curriculum standards

4.4 The curriculum must remain relevant to current practice.

Guidance

Examples of the kinds of evidence you could refer to in order to show how you meet this standard could include:

- regular contact with employers;
- staff CVs, which might include information about how you maintain the relevance of the curriculum through the ongoing clinical or research experience, or professional activity of members of the programme team;
- evidence of where research and scholarly activity affect the programme, and programme development;
- peer-reviewed journals used in the curriculum;
- QAA major review reports;
- evidence of the contribution that stakeholders (placement educators, employers, practitioners, past and present students, service users, and strategic health authorities) make in the programme planning process; and
- evidence of how changes in policy and health and social care developments affect your programme's development.

You may want to provide information about how current frameworks influence the profession, and so influence the education and training that you provide, and how your programme design and delivery:

- predict or reflect change in health and social care and its organisation, changes in the law, and in service user need;
- reflect developments in a profession's research base and technological advances; and
- develop students' ability to respond to changes in practice.

Commentary

The Group agreed that guidance should make it clear that current practice would lead to future developments in the profession and that programmes should therefore keep up-to-date with professional developments. The Executive would like to stress that the guidance must reflect the standard and should not be aspirational, therefore, the current guidance adequately addresses keeping up-to-date with professional developments.

Recommendations

No changes.

4 Curriculum standards

4.8 4.5 The curriculum must make sure that students ~~are aware of~~ *understand the HPC's* standards of conduct, performance and ethics, and their impact on practice.

Guidance

The standards of conduct performance and ethics are broad, ~~non-profession specific~~ *generic* standards that all people registered by the HPC ~~us~~ must adhere to. These standards will be ~~being~~ met and taught throughout a programme, for example, as part of a module on ethics but also through other parts of the curriculum.

Visitors will want to see that the curriculum makes specific reference to the standards of conduct, performance and ethics, and that students are aware of, and keep to, these standards throughout the programme.

When the visitors meet students, they are likely to ask them if they are aware of the standards of conduct, performance and ethics, and therefore we recommend you include these in your reading lists.

Other sources of guidance

- Health Professions Council, Standards of conduct, performance and ethics

Commentary

The following changes have been made in line with the Group's discussions:

- 'and their impact on practice' has been added to the SET.
- The guidance has been amended to explain that the SCPEs are 'broad, generic standards' which all people registered by the HPC had to adhere to.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

4 Curriculum standards

4.5 4.6 The delivery of the programme must:

- ~~4.5.1~~ 4.6.1 support and develop autonomous and reflective thinking: and
- ~~4.5.2~~ 4.6.2 encourage evidence based practice.

Guidance

Most questions about this SET will be directed to the programme team and students. Students should be encouraged to consider their own practice, the limits of their safe and effective practice, and their responsibility to make sure that they are safe practitioners when they graduate.

The visitors will look for evidence of *autonomous and* reflective thinking and evidence-based practice through student-centred and independent learning, teaching and assessment strategies. The evidence that you could refer to in order to show how you meet this standard could include:

- self-appraisal with planning and writing action plans;
- discussion groups;
- workshops;
- practice simulation and debriefing;
- reflective diaries or logs;
- professional development portfolios or personal development plans; and
- practice placement reviews.

Students do not have to write a dissertation to meet this standard. Evidence-based practice could be demonstrated, for example, by a research methods course, or by producing a research proposal.

Other sources of guidance

- Professional body:
 - codes of ethics; and
 - guidance on reflective practice.

See the back of this document for a list of publications.

Commentary

The following change has been made in line with the Group's discussions:

- Autonomous thinking has been added to the guidance.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

4 Curriculum standards

4.6 4.7 The range of learning and teaching approaches used must be appropriate to the effective delivery of the curriculum.

Guidance

~~In this standard, the term 'subjects'~~ *This standard includes both the academic environment and practice placements*, so the information that you provide here may also be used to show how you meet SET 5, which is concerned with practice placements.

'Appropriate' means appropriate to the learning outcomes needed, both theoretical knowledge and the practical skills needed in professional practice.

Meeting this standard means that you will need to show that you use a 'range' of learning and teaching approaches in delivering the programme. We do not

specify how many approaches you should adopt, but it is unlikely that a programme which relied on only one learning and teaching approach would be able to give evidence to show that it met this standard.

This standard will also influence SETs 4.3, 4.4 and ~~4.5~~ 4.6.

Other sources of guidance

- The Higher Education Academy website – www.hea.ac.uk

Commentary

The following change has been made in line with the Group's discussions:

- The term 'subjects' has been removed from the guidance.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

4 Curriculum standards

~~4.7~~ 4.8 When there is inter-professional learning the profession specific skills and knowledge of each professional group must be adequately addressed.

Guidance

We recognise that successful inter-professional learning can develop students' ability to communicate *and work* with others. ~~members of the health and social care team, which will help them to work effectively with others. Opportunities for inter-professional learning should be actively sought and promoted where,~~ *Where inter-professional learning does exist, you must make sure that* the learning of profession specific skills and knowledge of each professional group are not compromised.

However, we also recognise that you may not be able to offer inter-professional learning, because of factors beyond your direct control and therefore we don't require it. So, if your programme includes inter-professional learning, you must make sure that you consider the skills and knowledge of each separate professional group.

To show how you meet this standard, you might provide information about which parts of the curriculum are shared, and which are not, with the reasons behind this, and the ways that you see inter-professional education developing in your institution, and how it benefits those groups which are involved.

Other sources of guidance

- UK Centre for the Advancement of Interprofessional Education, Interprofessional education (CAIPE) – www.caipe.org.uk
- Creating an Interprofessional Workforce – www.cipw.co.uk

Commentary

The following change has been made in line with the Group's discussions:

- The guidance should be amended to refer to students' ability to '...communicate and work with others', instead of '...other members of the health and social care team'.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

SET 5: Practice placements standards

Summary

This section of the standards is about your practice placements. We do not normally need to approve individual practice placements, but we may visit practice placements if specific questions have been raised about whether your placements meet our standards.

The education provider is responsible for the quality of the placement. We will want to see what systems *the education provider has put are* in place for monitoring placements. If you share practice placement arrangements with another education provider, you will both need to separately show the approval and ongoing quality assurance of placements. You should also have arrangements in place to make sure that students can still achieve your own learning outcomes.

We need to see evidence of how you:

- manage your placements;
- manage assessments in placements;
- provide support;
- provide information to your students and practice placement providers; and
- monitor the placements to make sure that they continue to meet our standards.

Overall guidance

To make sure that you meet all of the standards for practice placements, the visitors will normally want to see:

- a practice placement handbook for students; and
- a practice placement handbook for practice placement educators and co-ordinators.

You may produce documents which have a different title, or this information may be published in some other form, with other documents, or on-line. This is not necessarily a problem, as long as in doing so you can show that you can meet all of the standards below.

The visitors would normally also meet practice placement educators, and they may ask questions about the information in the documents you have provided, or any standards which raised queries.

Please note that we do not have specific guidelines for the length, structure, organisation or timing of placements. Other organisations may have set requirements of a certain number of hours of clinical contact, or a number of weeks that a placement must last. While you may want to meet these, you should be aware that these are not compulsory and you do not necessarily have to meet these for us to approve your programme. However, you must show that whatever structures you have in place meet the SETs and standards of proficiency. See SET 5.2 for more information on this.

The visitors will want to make sure that there is evidence of clinical governance within the practice placements. This will normally be through the three main themes of:

- improving patient care – informed choice, philosophy of care, managing risk;
- professional development of staff – continuing professional development (CPD), education and training (lifelong learning) and investment in staff; and
- organisational development – showing evidence-based practice (research basis of care planning and delivery) and examples of good practice (making changes).

Overall clinical governance should be seen as a process for reviewing and improving patient care. So, the visitors will need to make sure that there is evidence of a quality assurance system to support both the student and the patient within the practice placement.

Example questions

~~Questions that the visitors ask may include areas such as:~~

- ~~• student progression;~~
- ~~• visits to placements;~~
- ~~• quality assurance; and~~
- ~~• support of practice placement educators.~~

More information

- Health Professions Council, Standards of conduct, performance and ethics
- Professional body practice placement guidelines (where available)
- NHS Education for Scotland, The development of quality standards for practice placements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education: placement learning
- Department of Health, Placements in focus: guidance for education in practice for health care professions
- Northern Ireland Department of Health, Social Services and Public Safety, Review of clinical placements for the allied health professions

- Making practice-based learning work, Case studies in dietetics, occupational therapy, physiotherapy and radiography

5 Practice placements standards
5.1 Practice placements must be integral to the programme.
<p>Guidance</p> <p>The structure of your programme must show that practice placements are an important part of the programme. You could show this by referring to:</p> <ul style="list-style-type: none"> • your ongoing partnership arrangements with your practice placement educators; • the way that they are supported and encouraged to take part in developing programmes; • the way that the practice placement learning outcomes and progression are in line with the rest of the programme; and • your reasons for your placement structure. <p>See the guidance under SET 3.1 and SET 4.3.</p>
<p>Commentary</p> <p>No changes were suggested by the Group.</p>
<p>Recommendations</p> <p>None.</p>

5 Practice placements standards
5.2 The number, duration and range of placements must be appropriate to <i>support the delivery of the programme and the achievement of the learning outcomes.</i>
<p>Guidance</p> <p>Visitors will want to be sure that there are clear reasons for the chosen number, length and range of placements. We do not set the number, length or range of placements that you must include in your programme to meet our standards. <i>However, you will show that there are an adequate number of placements available to support the delivery of the programme.</i></p> <p>Visitors will want to see that all students gain access to a wide range of learning experiences in a variety of practice environments which reflect the nature of modern practice and practice settings of the profession which they are preparing to enter. You may want to provide information about how you support students in recording how their learning in practice environments relates to the main areas of practice of that profession.</p> <p>The visitors will also want to know how students are expected to progress in</p>

terms of their clinical skills during the placements, and how the learning outcomes for the first placement are different from those of the final one. Evidence that could be provided might include a map of the programme and details of assessment.

Commentary

The Group agreed that a new standard should be added, requiring that an adequate number of placements 'must be available to support the delivery of the programme.' It is important that all programmes being delivered, and those being developed, have an adequate number of placements available. The Executive feels that this can be addressed by amending the current SET and including additional guidance.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

5 Practice placements standards

5.4 5.3 The practice placement settings must provide a safe *and supportive* environment.

Guidance

A safe environment means one where staff and students have carried out relevant assessments of risk within the area of practice and where safety policies and procedures are in place. In showing how you meet this standard, you may show the visitors evidence of how you consider issues such as:

- physical risk from equipment;
- manual handling;
- risk from substances hazardous to health;
- radiation risk;
- fire safety;
- infection control;
- *aggression;*
- *emotional stress; and*
- *psychological stress.*

Placement induction processes should explain how students will be told about risks and safety issues.

Placements should follow all elements of clinical governance to protect the public.

You could also provide information about how you check the quality of your placements, including whether, as part of this, your placement providers must give you information about their health and safety policies. Information that you have provided for SET 3 about student support may also be relevant to how you

meet this standard, and you may want to cross-reference it here.

You could also show how you help students to assess risk in clinical situations, and to make professional decisions. (This kind of evidence may also be relevant in showing how you meet SET 4.5 4.6).

See the guidance under SET 5.7 5.8.

Other sources of guidance

Any health and safety documents produced by:

- education providers;
- professional bodies;
- the NHS; *and*
- the IHCD (Awarding Body services for the Ambulance Service Association); ~~and~~
- ~~the Institute of Biomedical Science.~~

(where available).

Commentary

The following changes have been made in line with the Group's discussions:

- 'and supportive environment' has been added to the SET.
- Examples have been added to the list of safety issues.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

5 Practice placements standards

~~5.6~~ 5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.

Guidance

To show how you meet this standard, you will need to give the visitors information about how you approve placements before you use them, ~~and also~~ how they are subsequently monitored. ~~Practice placements are your responsibility and visitors will want to see evidence that they are monitored on a regular basis and also~~ have links to the management of the programme. The visitors will also want to see that you have policies in place to respond appropriately when any difficulties arise.

We do not normally visit placements, and give open-ended approval to programmes subject to annual monitoring. If the placement is with another organisation, you will need to show that you assess this effectively. *Visitors will want to see evidence of collaborative working between yourselves and placement*

providers.

The evidence to support this could include:

- policies and processes for approving placements;
- examples of how these are put into practice;
- systems for ongoing monitoring and assessing placements;
- how feedback from students is collected, analysed and acted on;
- how you gain feedback from practice placement educators and co-ordinators, and make sure that channels of communication are clear;
- how you feed this information back into your processes; and
- policies or processes for how you deal with placements where difficulties arise.

See the guidance under SET 3.9.

Commentary

The following changes have been made in line with the Group's discussions:

- The statement that practice placements are the education provider's responsibility has been removed.
- To demonstrate collaborative working between the education provider and placement provider has been added to the guidance.

Recommendations

The Group is invited to discuss and agree the amendments to the guidance.

5 Practice placements standards

~~5.14~~ 5.5 The placement providers must have equality and diversity policies in relation to students, together with an indication of how these will be implemented and monitored.

Guidance

To show that you meet this standard, you will need to give the visitors information about how you make sure that these policies are in place. The students on placement will need to know how they can access these policies and what they should do if they feel that they have been discriminated against. You will have an audit monitoring process for your placements and this will be part of that process. It is your responsibility to monitor any placements supported and co-ordinated by another education provider.

Other sources of guidance

- ~~Chartered Society of Physiotherapy, Supporting disabled physiotherapy students on clinical placement~~
- ~~College of Occupational Therapy, Guidance on disability and learning~~
- *Disability Discrimination Act, 1995*
- *The Commission for Equality and Human Rights (CEHR) -*

Commentary

The following change has been made in line with the Group's discussions:

- The Disability Discrimination Act has been added to other sources of guidance.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

5 Practice placements standards

5.3 5.6 There must be an adequate number of appropriately qualified and experienced staff at the placement.

Guidance

The visitors will want to make sure that there are enough members of staff to support the students in their learning in a safe practice environment. However, we do not say how many staff must be present at each placement (nor that those staff must be registered with us) as we realise that there are different models of practice-based learning.

If the staff present at certain placements are not registered with us, you may want to provide information about their professional qualifications (and their registration with other regulators or organisations, if appropriate) and also to show how their qualifications are appropriate to the placement, and to the learning outcomes. The visitors may want to see job descriptions and recruitment policies of the placements so that they can see how they are qualified to teach or supervise students.

We are aware that different professions practise different models of practice placement, including the relationship with the practice educator and supervisor. For example, a one-to-one relationship may be ideal for many professions whereas there may be four or five students to one supervisor in others. The visitors will look for evidence in documents, and at meetings with the programme team and placement educators, that you have clearly justified what you consider to be enough staff. *This will include whether the number of staff is appropriate for the size of the student cohort.* This may vary according to the level of support needed by the student.

Other sources of guidance

Possible definitions of the terms 'qualified and experienced', with specific suggestions for ways to meet this requirement, may be found in professional body curriculum documents.

Commentary

The following change has been made in line with the Group's discussions:

- The guidance clarifies that staffing levels will be considered in line with the size of the student cohort.

Recommendations

The Group is invited to discuss and agree the amendments to the guidance.

5 Practice placements standards

~~5.8~~ ~~5.7~~ ~~Unless other arrangements are agreed,~~ Practice placement educators must:

- ~~5.8.1~~ ~~5.7.1~~ must have relevant knowledge, skills and experience;
- ~~5.8.2~~ ~~5.7.2~~ unless other arrangements are agreed, must be appropriately registered; and

Guidance

Visitors will want to be sure that your practice placement educators have the knowledge, skills and experience they need to support students and to make sure that they have a safe environment for effective learning. We do not set specific requirements about the qualifications and experience that they must have.

~~Your professional body~~ *Professional bodies* may offer an accreditation schemes for practice placement educators (for example, the College of Occupational Therapists, and the Chartered Society of Physiotherapy offer these types of scheme). If you take part in one of these schemes, you could give the visitors information about how it works and how you make sure that each placement has been approved.

Normally, your practice placement educators will be registered with us in the relevant profession. However, ~~it is reasonable to assume that there are other~~ entirely appropriate practice placement educators who do not have a profession-specific background which matches that of the student. For example, occupational therapists may supervise physiotherapy students in areas such as hand therapy, and nurses may supervise radiographers in aseptic techniques. If you choose this, you will probably want to give the visitors more information about the practice placement educator's experience, qualifications and training, and how this is relevant to the placement, and how this helps your students to learn.

See the guidance under SET ~~5.3~~ ~~5.6~~ and SET ~~5.5~~-~~5.10~~.

Commentary

The following change has been made in line with the Group's discussions:

- 'and supportive environment' has been added to the SET.

The SET has been reworded so that it is clear that practice placement educators must have relevant knowledge, skills and experience.

Recommendations

The Group is invited to discuss and agree the amendments to the SETs and guidance.

5 Practice placements standards

- ~~5.8~~ ~~5.7~~ ~~Unless other arrangements are agreed, p~~ Practice placement educators *must*:
- ~~5.8.3~~ ~~5.7.3~~ ~~must unless other arrangements are agreed,~~ undertake appropriate practice placement educator training.

Guidance

We expect that you will want to train all of your practice placement educators, and to follow this up with regular refresher training, as well as making arrangements for training new practice placement educators.

We do not set specific requirements for this training, either in length or content, as we feel that this level of detail is best decided by individual education providers. There may be best practice in other organisations, or advice published by other organisations about the content that you will want to cover. Your training may take a variety of forms, for example, attendance at the education provider institution, training in the workplace, on-line support, written support, and peer support through workshops and meetings.

Visitors will want to see evidence of training for placement providers involved in either formative or summative assessment to make sure assessed standards are consistent across all placements (also see SET 6). *They will also want to see the broad learning outcomes for all practice placement educator training*

The visitors will also want to see how you give information to your practice placement educators, to make sure that you meet SETs ~~5.4~~ ~~5.3~~, ~~5.6~~-~~5.4~~ and ~~5.7~~ ~~5.8~~.

If you do not think you will meet this standard, please contact the education officer organising your visit, who can send information to the visitors for their comment.

Commentary

- The following change has been made in line with the Group's discussions:
- Evidence of broad learning outcomes has been added to the guidance.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

5 Practice placements standards

- ~~5.7~~ ~~5.8~~ Students, practice placement providers and practice placement educators must

be fully prepared for placement which will include information about, and understanding of, the following:

- 5.7.1 5.8.1 the learning outcomes to be achieved;
- 5.7.2 5.8.2 the timings and the duration of any placement experience and associated records to be maintained;
- 5.7.3 5.8.3 expectations of professional conduct;
- 5.7.4 5.8.4 the assessment procedures including the implications of, and any action to be taken in the case of failure; and
- 5.7.5 5.8.5 communication and lines of responsibility.

Guidance

To show the visitors how you meet this standard, you will need to show not only that this information is provided to students, practice placement providers and to practice placement educators, but also that this information is accessible to them, in an appropriate format, and that it is provided with enough time to answer any questions they have.

You might want to show how the information is provided, and also how you make sure that all parties have understood the information that you have given. This might be through follow-up training, teaching, or opportunities for discussion. This could be in your student handbook, practice placement handbook, or equivalent. The visitors will ask questions during their meeting with the students or with the practice placement educators to find out how well-informed they feel about what is expected of them and their responsibilities during a placement. It would be good practice that wherever possible you have a formal arrangement with placement providers.

Examples of necessary information to provide to students could include:

- *dates, times and venues;*
- *placement induction materials; and*
- *location details, such as maps.*

See the guidance under SET 5.9.

Commentary

The following change has been made in line with the Group's discussions:

- The list of necessary information for students has become a list of examples.

Recommendations

The Group is invited to discuss and agree the amendments to the guidance.

5 Practice placements standards

5.9 There must be collaboration between the education provider and practice placement providers.

Guidance

Visitors will need to be sure that you regularly work together with your practice placement providers. *It is vital that the collaboration and communication clearly happens in both directions.* This might take the form of regular meetings or channels of communication with your practice placement providers, or systems where they comment on their experience of supervising students on placement, or ways in which placement providers influence the structure of the placements or programme planning and design. Any information that you can provide which shows a partnership and ongoing relationship, and not one that only happens around the time of programme approval and quality monitoring, will help to show the visitors how you meet this standard.

See the guidance under SET ~~5.8~~ 5.7.

Commentary

The following changes have been made in line with the Group's discussions:

- The SET has been amended to refer to practice placement.
- Guidance has been added to stress the nature of the partnership between the education establishment and practice placement.

Recommendations

The Group is invited to discuss and agree the amendments to the SET and guidance.

5 Practice placements standards

~~5.5~~ 5.10 Learning, teaching and supervision must encourage safe and effective practice, independent learning and professional conduct.

Guidance

The visitors will want to be sure that your placements prepare your students for entry into their profession. You should provide evidence about how your programme prepares your students for independent learning on their placement, and how they are equipped with the resources and skills to work more independently. Visitors will want to see information about how students learn about the behaviour expected of them on their placement. You could relate this to any teaching about our standards.

The evidence that you could refer to might include:

- reflective logs or diaries;
- professional development portfolios;
- tutorial records; and
- placement reports.

This kind of information could also be relevant to showing how you meet SET 4.5 4.6 and SET 5.5 5.10.

Other sources of guidance

- Health Professions Council, Standards of conduct, performance and ethics
- *Health Professions Council, Standards for CPD*
- Professional body standards of conduct and codes of ethics

Commentary

No changes were suggested by the Group.

Recommendations

None.

5 Practice placements standards

~~5.10~~ 5.11 A range of learning and teaching methods that respect the rights and needs of service users and colleagues must be in place throughout practice placements.

Guidance

Students may learn on placement in different ways, and different practice placement educators may structure the learning and teaching according to their own preferences and experience, or the individual needs of the students. It is important that whatever the range used, these must respect the needs of service users, and also colleagues as laid out above.

The visitor will want to see evidence that you have a system in place which makes sure that, wherever possible, service users are aware that students are involved in their care.

Commentary

No changes were suggested by the group.

Recommendations

None.

SET 6: Assessment standards

Summary

This part of the standards of education and training is about how you assess your students, to make sure that they meet the requirements of your programme, that they meet our standards of proficiency, and that they are assessed fairly and consistently.

Overall guidance

You may want to give the visitors a copy of your institution's assessment strategy, or equivalent, as well as any other information about assessing your programme.

The visitors will need to see how you make sure that assessment of practice placements is thorough, consistent and fair. So, information about how you train practice placement educators, and how marks are moderated, may also be relevant here. You may want to refer to this information in your cross-referencing document, both in section 5 (practice placements) and here, in the assessment standards section.

Example questions

Why have you chosen the particular types of assessment for each module?
What is your policy on resits, for both academic and placement components?
How does your assessment meet external reference frameworks?
Is there a system for continuous assessment and ongoing feedback for students on a placement?
What happens if a student is failing placements but is doing well in academic subjects?
How does your assessment design produce students who are fit to practise?
Do you have the option to award an aegrotat award? If so, do you make it clear that an aegrotat means you cannot register with us?
Without special circumstances, do students still have the right of appeal?
Who is the external examiner? Is the external examiner registered with us?

More information

- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education, assessment of students
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Qualifications framework for England and Wales
- Northern Ireland Quality Assurance Agency for Higher Education

- Quality Assurance Agency for Higher Education, Qualifications framework for Scotland

6 Assessment standards

6.1 The assessment strategy and design must ensure that the student can achieve the Standards of proficiency *for their part of the Register*.

Guidance

When you assess a student, you must make sure that you are testing not only academic and theoretical learning and knowledge, but also the practical application of skills for the student to practise their profession safely and effectively.

The visitors will want to make sure that in order to complete the programme students have met the standards of proficiency and so gained the skills and knowledge they need to become ~~independent~~ *registered* members of their profession.

The visitors will want to make sure that your programme specification clearly sets out your assessment strategy and includes direct reference to the learning outcomes and associated assessment methods. This provides a direct link to fitness to practise. Each module outline should explain the assessment methods for that module.

The visitors will need to see information about your regulations on issues such as:

- number of resit attempts allowed (and within what period of time);
- number of module resits allowed within any one year;
- maximum number of resits allowed every year for practice placement modules;
- compensation and condonement regulations;
- the maximum length of a programme; and
- the maximum registration period.

Although we do not set limits on, for example, the number of resit attempts allowed, you should show the visitors how your policy on resits strikes a suitable balance between the need to support students, and the need to make sure that those who successfully complete the programme achieve the standards of proficiency.

Commentary

For consistency with other SETs (e.g. 4.1) 'for their part of the Register' has been added to the SET.

Recommendations

The Group is invited to discuss and agree the amendment to the SET.

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6 Assessment standards
6.2 Professional aspects of practice must be integral to the assessment procedures in both the education setting and practice placement.
<p>Current guidance</p> <p>‘Professional aspects of practice’ may include, for example, the students’ familiarity with the ideas of autonomy and accountability, values and ethics, or their understanding of the nature of professional regulation, and the responsibilities this involves.</p> <p>To show how you meet this standard, you could provide information to the visitors about how your assessment procedures assess this. For example, you may have a specific module which covers professional issues, with information about how this is assessed, or this information may be included in the placement handbook, learning log and other relevant parts of the curriculum.</p>
<p>Other sources of guidance</p> <ul style="list-style-type: none"> • Health Professions Council, Standards of conduct, performance and ethics (2003)
<p>Commentary</p> <p>No changes were suggested by the Group.</p>
<p>Recommendations</p> <p>None.</p>

6 Assessment standards
6.3 Assessment methods must be employed that measure the learning outcomes and skills required to practise safely and effectively.
<p>Guidance</p> <p>To show how you meet this standard, you might want to provide information about your assessment methods, your reasons for using the different assessment methods that are used for different parts of the programme, and how the methods are in line with the learning outcomes in each module. The visitors will need to be assured that, whatever method of assessment applies, it makes sure that those who successfully complete the programme can practise safely and effectively. leads to safe and effective practice.</p>
<p>Commentary</p> <p>No changes were suggested by the Group.</p>
<p>Recommendations</p>

None.

6 Assessment standards

6.4 All assessments must provide a rigorous and effective process by which compliance with external reference frameworks can be measured.

Guidance

You should provide information about how your assessment methods are thorough and effective, and also about how your programme meets any relevant external reference frameworks. An example of this would be if your programme is a pre-registration Masters programme: showing how your programme meets the requirements of a Masters programme as well as meeting the standards of proficiency, could be part of the evidence for this standard.

Other sources of guidance

- Any relevant institution regulations
- Professional body guidelines
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education, assessment of students
- Knowledge and Skills Framework (Department of Health 2003)

See the list at the back of this document for a list of publications which you may find useful.

Commentary

No changes were suggested by the Group.

Approvals and monitoring have highlighted that this SET checks the fitness for academic award rather than fitness to practise. Therefore, it cannot be required if all the other SETs and SoPs are met. The Executive suggests that this SET should be removed because it adds nothing to the other SETs.

Recommendations

The Group is invited to discuss and agree the removal of the SET.

6 Assessment standards

6.5 The objective measurement of student performance must be an integral part of the wider process of monitoring and evaluation.

Guidance

The visitors will want to see information about how you monitor student

performance, and what criteria you use to assess students who are at different stages in their learning.

Your assessment strategy may contain information about the criteria used for assessment. Also, the moderation of marks, and the way that students are assessed on their placement, may all be relevant information to give to the visitors.

When visitors meet students, they often ask them about the level of feedback they receive on their assignments and whether the students feel it is enough. However, we do not normally expect to see samples of students' work.

Commentary

No changes were suggested by the Group.

Recommendations

None.

6 Assessment standards

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

Guidance

Under this standard, you will need to provide information about how your programme is assessed, for example, by your university validation process (if this applies), or comments from your external examiner in their report. Visitors will want to be assured that your criteria are consistently applied, and that they are also appropriate for:

- your programme;
- the students' progression; and
- making sure that students can meet the standards of proficiency when they complete the programme.

The visitors will want to see that internal and external moderation are carried out. You could give the visitors the external examiner's reports and responses to these reports as part of an audit. ~~The visitors will want to see figures about drop-out and failure rates, these should be contained in the examiner's report~~ *The visitors will want to see the details of your attrition rates which are normally contained in your own internal monitoring documents.*

The visitors will use CVs and staff profiles to assess where educators from the programme team have experience in assessment. (For example, where staff act or have acted as external examiners at other education provider institutions.) The visitors will then be able to see how internal moderation systems of the education provider compare with external standards.

Commentary

The following change has been made in line with the Group's discussions:

- The guidance has been amended to read 'The visitors will want to see figures about attrition rates.'

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:

- 6.7.1 student progression and achievement within the programme;

Guidance

Your assessment regulations must make it clear how you assess students to make sure of and recognise their continuing progression within the programme. These must be clear so students can understand what is expected of them at each stage of the programme, and also that staff can apply assessment criteria consistently to students' work. The visitors will also want to see how you decide what ~~stops~~ *prevents* a student from progressing and the options that are available for a failing student.

Commentary

The following changes have been made in line with the Group's discussions:

- 'Stops' has been replaced by 'prevents' in the guidance.

Recommendations

The Group is invited to discuss and agree the amendment to the guidance.

6 Assessment standards

6.7 Assessment regulations must clearly specify requirements for:

- 6.7.2 *approved* programmes ~~which provide eligibility for inclusion on the Register should being~~ the only programmes which contain any reference to an HPC protected title in their named award;

Guidance

It is important that there is no confusion about which programmes are approved by us, and which are not. Under this standard, students who are not eligible to apply for registration should not be given an award which makes a reference to an approved title. Some education providers give these students awards with titles like 'Healthcare studies' which reflects the academic content achieved, but does not give the impression that they are eligible to apply for registration. The visitors will want to see that programme titles are clear, that applicants, students, staff and the public understand who is eligible to apply for registration with us,

and who is not.

Commentary

In previous meetings it was agreed by the Group that the SET required alteration to remove the double negative. The Group then felt that the current wording was too long and asked the Executive to try to shorten the SET.

Recommendations

The Group is invited to discuss and agree the rewording of the SET.

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;

Guidance

It must be clear to students and to staff that students who are awarded an aegrotat degree are not eligible to apply for registration. To show that you meet this standard, you could refer the visitors to where this policy is laid out, and how students are informed, for example on your website or in your student handbook.

Commentary

No changes were suggested by the group.

Recommendations

None.

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

Current guidance

You may give the visitors information about the appeal procedure, and also information about how students are told about this. Visitors would normally expect to find this in a student handbook, or equivalent, and in your institution's regulations for examinations. This should contain information about how the procedure works, and how it is judged, and by whom.

Visitors will also expect to see clear information for students about where they should go for advice on your institution's appeals process.

Commentary

No changes were suggested by the group.

Recommendations

None.

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6 Assessment standards
<p>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.</p>
<p>Guidance This standard means that assessment regulations must require at least one external examiner (who must be registered in the relevant part of the register) for each programme unless any other arrangements have been agreed with the HPC in advance. The visitors will want to be sure that there is an appropriate reason for appointing an examiner who is not from the relevant part of the register, and that they were <i>the person is</i> appropriately experienced and qualified. However, we do not play any part in the in their appointment.</p> <p>You may not currently have an external examiner in place <i>at the time of our visit</i>. If so, our visitors will want to be sure that your regulations show that one will be appointed.</p>
<p>Commentary No changes were suggested by the group.</p>
<p>Recommendations None.</p>