

Professional Liaison Group for the review of the standards of education and training, 23 November 2015

Theme: Student involvement and feedback

Executive summary and recommendations

Introduction

The first phase of the standards of education and training (SETs) review has comprised a range of research and engagement activities to gather the views of stakeholders on the existing standards and accompanying guidance. This feedback has been synthesised into a number of key themes.

This paper focuses on the theme of student involvement and feedback on an approved programme, as part of design, monitoring and/or review. Some stakeholders have suggested that the SETs should include a requirement for education providers to seek and use student feedback in this way.

Decision

The PLG is invited to discuss this paper and to consider the Executive's recommendations in section 6 and further questions in section 7.

Background information

See paper.

The current versions of the SETs and supporting guidance have been supplied separately as documents to note.

Resource implications

None

Financial implications

None

Appendices

Appendix 1: Student involvement and feedback – Other regulatory standards

Date of paper

11 November 2015

Theme: Student involvement and feedback

1. Introduction

- 1.1 This paper explores the theme of student involvement and feedback on education and training programmes. It provides background information, a summary of stakeholder feedback on this theme and the approach taken by other regulators. The final sections set out recommendations from the Executive and some key points for the Group to consider.

2. Background

- 2.1 In planning for the SETs review, the Executive did not anticipate student involvement and feedback to be one of the key themes for consideration. However it has arisen through discussions with stakeholders.
- 2.2 We have approached this theme in a broad way. From stakeholder views and an examination of other regulatory standards (both outlined in the sections below), we have identified a few aspects within the theme which are included in this paper:
- Seeking and using student feedback as a mechanism for monitoring, review and continuous improvement of programmes;
 - Gathering student feedback as a way of supporting students, for example while they are on placement; and
 - The role of students in raising concerns about the safety of service users.

3. Current approach

- 3.1 There is currently no requirement in the SETs for education providers to seek involvement or feedback from students as part of the design, monitoring and/or review the programme. The SETs only require that service users and carers are involved in the programme (see SET 3.17).
- 3.2 SET 3.3 does require that programmes have 'regular monitoring and evaluation systems in place'. The supporting guidance suggests that possible evidence to demonstrate compliance could include 'an analysis of student feedback from module evaluations, placement evaluations, programme committees and staff-student liaison committees'.
- 3.3 Similarly, SET 5.4 requires education providers to maintain 'thorough and effective' systems for approving and monitoring practice placements. Although it is not part of the requirement contained in the standard, the supporting guidance does suggest that evidence to demonstrate how the education

provider is doing this could include an explanation of how they collect, analyse and act on feedback from students.

- 3.4 SET 3.12 relates to support for students: 'There must be a system of academic and pastoral student support in place.' The accompanying guidance suggests that education providers could show how they support students, including during placements.
- 3.5 SET 3.13 requires: 'There must be a student complaints process in place.' The guidance underneath states that the education provider should be able to demonstrate how students are informed about the complaints process and how they deal with students' concerns about the programme or a related service.

4. Summary of stakeholder feedback

- 4.1 Discussions with stakeholders during the first phase of the SETs review drew out a number of comments relating to student feedback and involvement in education and training programmes.
- 4.2 Attendees at the Academic Registrars Council supported the incorporation of student experience in the SETs. Particular reference was made to 'partnership in learning' frameworks which facilitate student engagement in higher education learning and teaching.¹
- 4.3 Attendees at a Higher Education Academy event in Wales on practice placements highlighted the importance of support for students, which can in part be given by listening, responding to and acting on student feedback. They stated that some students struggle when they attend practice placements full time whilst also completing academic modules or assessments. Furthermore, students who are performing well on their placements sometimes perceive that educators and practice placement providers dedicate more time and support to those students who are struggling or failing.
- 4.4 Service users and carers attending workshops during the review also emphasised the value of student feedback during practice placements, especially where it relates to concerns about the treatment or services provided or the wellbeing of service users. In particular, they reasoned that new learnings can sometimes 'get lost' in hierarchical service providers and so their concerns may not normally be heard.
- 4.5 Similarly, visitors at refresher training discussed student feedback in connection with raising concerns during practice placements. Some visitors suggested adding a new standard requiring education providers to put in place policies and clear procedures which allow students to raise concerns without prejudice.

¹ The Higher Education Academy have published guidance on the 'Framework for partnership in learning and teaching in higher education' (July 2014): <https://www.heacademy.ac.uk/students-partners-framework-action>

5. Other regulatory standards

- 5.1 Other health and social care regulators in the UK take a variety of different approaches to student feedback and involvement in education programmes. Some brief observations are outlined below, while the table at Appendix 1 provides further detail about the approach taken by each regulator.
- 5.2 The vast majority of the other regulatory standards examined (including the General Medical Council, General Dental Council, Nursing and Midwifery Council and others) do include requirements on education providers to incorporate feedback from students within quality assurance processes and/or when reviewing the structure, content and delivery of programmes. Often, student feedback is mentioned in these documents in conjunction with feedback from patients, service users and staff.
- 5.3 Four regulators also require that education providers make students aware of their obligation to raise concerns about risks to service users and that students must have access to mechanisms which facilitate the raising of concerns.
- 5.4 The documentation from one regulator does not include any mention of student involvement, feedback or raising of concerns.

6. Executive recommendations

- 6.1 The Executive recommends the inclusion of a requirement in the SETs for education providers to seek and use feedback from students as a way of reviewing and monitoring various aspects of a programme, potentially to include design and delivery, learning resources, curriculum, practice placements and assessments. This would bring the SETs more in line with education standards produced by other UK health and social care professional regulators, most of which require education providers to seek student feedback.
- 6.2 We would invite members of the PLG to share their reflections, comments and suggestions on this theme before we propose a specific amendment (see the questions at 7.1 below).
- 6.3 We are supportive of frameworks or mechanisms which view students as partners in education and as a valuable source of information for monitoring and evaluation of programmes. For example, student feedback is certainly a vital component in evaluating the effectiveness of teaching methods and learning resources on students' understanding. We also agree with stakeholders on the value of feedback from students who are completing practice placements; student feedback can be a vital source of information about the quality of placements, particularly where these take place at third party organisations.

- 6.4 The current requirement in SET 3.13 for a student complaints process does not ensure that feedback from students is collected and used in this way. Complaints, by their nature, are not proactively sought by the education provider and encompass only what students consider to be negative situations. It is the Executive's view that in order for student feedback to contribute to continuous improvement of a programme, providers should seek and encourage it on a regular basis.
- 6.5 Whilst we note that the guidance under SETs 3.3 and 5.4 includes the analysis of student feedback in a list of potential evidence for demonstrating compliance with these standards, the provision of such evidence is not intended as a requirement. Furthermore, as previously recommended to the PLG, the Executive intends to remove lists of potential evidence from the SETs guidance so as to remove unintended prescriptiveness (examples of evidence could instead be provided elsewhere, e.g. in a separate document on the HCPC website).
- 6.6 We are not recommending any additional requirements around students reporting concerns about safety and the wellbeing of service users while on practice placements. The obligation to report concerns about risks to service users is included in the revised standards of conduct, performance and ethics (SCPE)², which education providers must ensure that students understand. We also produce specific guidance on conduct and ethics for students³, which will reinforce this expectation of students.

7. PLG considerations

- 7.1 The PLG is invited to consider the following as part of their discussion on this topic:
- Do PLG members think that an additional standard is needed to require education providers to seek and act on student feedback?
 - If so, do members have any views on the specific requirements that should be included in a standard?
 - If an additional standard is not needed, does the PLG think there is a need to include requirements relating to student involvement and feedback in an existing standard(s)?
 - Does the PLG have any further thoughts, reflections or comments concerning student involvement and feedback on programmes?
- 7.2 These questions should be considered in light of the key principles behind development and use of the standards. In particular, the SETs should:

² The SCPE were recently amended following a review. The new standards, which have been approved by the Council are expected to be published in January 2016. They can be viewed here: <http://www.hcpc-uk.org/assets/documents/10004D38Enc06-OutcomesoftheconsultationonSCPE.pdf>

³ This guidance is currently undergoing a review in order to ensure consistency with the recently revised SCPE. It is available on our website here: <http://www.hcpc-uk.org/assets/documents/10002D1BGuidanceonconductandethicsforstudents.pdf>

- be set at the **threshold** level, to ensure that education and training programmes provide students with skills and understanding to practise safely and effectively and to meet the standards of proficiency for their profession;
- be **flexible**, in that we aim to minimise prescription and to enable education providers to meet the standards in the way they consider most effective and appropriate (given institutional and professional considerations);
- be **meaningful**, clear and useful to education providers and other stakeholders; and
- reflect **existing provision** within education and training programmes, or be realistic or reasonable as requirements.

Appendix 1: Student involvement and feedback – Other regulatory standards

Regulator	Current approach
General Medical Council (GMC)	<p>The GMC recently published ‘Promoting excellence: standards for medical education and training’, which will replace the current education standards in ‘Tomorrow’s Doctors’ from January 2016. These standards incorporate requirements for student feedback in the context of reporting concerns about patient safety. Requirement R1.1 states: ‘Organisations must demonstrate a culture that allows learners and educators to raise concerns about patient safety, and the standard of care or of education and training, openly and safely without fear of adverse consequences.’ Requirement R1.5 states: ‘Organisations must demonstrate a culture that both seeks and responds to feedback from learners and educators on compliance with standards of patient safety and care, and on education and training.’ In addition, there is a requirement in relation to governance for education providers to seek the views of learners (among others) when considering the impact on them of policies, systems or processes, and in particular when services are being redesigned (R2.3).</p> <p>See: http://www.gmc-uk.org/Promoting_excellence_standards_for_medical_education_and_training_0715.pdf 61939165.pdf</p>
Nursing and Midwifery Council (NMC)	<p>The NMC’s Standards for pre-registration nursing education are split into standards for competence and standards for education. Standard 1 (safeguarding the public), refers to reporting concerns by students in the context of risks to service users. R1.3.2 states ‘Programme providers must make sure that students understand their responsibilities and know how to raise concerns when they believe the safety of service users is at risk.’ Additionally under Standard 10 (quality assurance), there is a requirement for programme providers’ quality assurance processes to incorporate feedback from students. R10.1.1 states that education providers must ensure that ‘feedback from students and mentors is used to inform the programme and enhance the practice learning experience...’</p> <p>See: http://www.nmc.org.uk/standards/additional-standards/standards-for-pre-registration-nursing-education/</p>

	<p>The NMC produces separate Standards for pre-registration midwifery education. There are no specific references to seeking feedback from students.</p> <p>See: http://www.nmc.org.uk/standards/additional-standards/standards-for-pre-registration-midwifery-education/</p>
General Dental Council (GDC)	<p>The GDC has recently updated its Standards for education (May 2015). Standard 12 states that the provider must have effective systems in place to quality assure placements where students deliver treatment, which 'should include the regular collection of student and patient feedback relating to placements'. The standards also include requirements in respect of reporting concerns. Standard 6 states: 'Providers must ensure that students...are aware of their obligation to raise concerns if they identify any risks to patient safety... Providers must support those who do raise concerns and provide assurance that staff and students will not be penalised for doing so.'</p> <p>See: http://www.gdc-uk.org/Aboutus/education/Documents/Standards%20for%20Education%20(v2%20revised%202015).pdf</p>
General Osteopathic Council (GOsC)	<p>The Quality Assurance Agency (QAA) has developed a subject benchmark statement for osteopathy training in conjunction with the GOsC and the osteopathy training providers. There is no specific mention of seeking student feedback in the benchmark statement.</p> <p>See: http://www.qaa.ac.uk/en/Publications/Documents/SBS-consultation-osteopathy.pdf</p>
General Chiropractic Council (GCC)	<p>The GCC Degree Recognition Criteria state that 'the school must review the structure, content and delivery of the degree programme in the light of feedback from patients and students, and make improvements as a result of the review' (criterion 23). Accompanying guidance links this to the need to have in place systems and structures for assuring the quality of the learning experience and related aspects. Additionally, criterion 26 states: 'The school must have mechanisms that encourage and promote the involvement of staff and students.' Evidence is required on the process for involving staff and students, and how information gained via these routes is used to develop the programme.</p> <p>See: http://www.gcc-uk.org/UserFiles/Docs/DegreeRecCriteriaUPDATED2012.pdf</p>
General Optical Council (GOC)	<p>The GOC produces a series of handbooks with guidelines for the approval of training establishments, accompanied by core competencies for the optical professions. In the Optometrists handbook, among criteria relating to the student experience,</p>

	<p>it states that ‘students must have access to mechanisms to provide feedback and raise concerns’. Training providers need to evidence how student views have informed programme developments and improvements, for example using feedback to develop action plans. Additionally in relation to monitoring and evaluation (4.4): ‘The provider must have a clear framework for receiving feedback on programme quality from a variety of sources including patients, students, staff, supervisors and employers.’</p> <p>The handbooks for Dispensing Opticians and Contact Lens Opticians include a requirement under ‘Teaching Institution Monitoring and Evaluation’ for providers to have mechanisms in place for receiving feedback on programme quality from students and staff.</p> <p>See: https://www.optical.org/en/Education/core-competencies--core-curricula/index.cfm</p>
<p>General Pharmaceutical Council (GPhC)</p>	<p>The document ‘Future Pharmacists’ sets out requirements against which the GPhC approve education and training for student pharmacists and pre-registration trainee pharmacists. Standard 5 on curriculum delivery and the student experience requires that the curriculum must ensure students are able to practise safely and effectively. Among the evidence to be provided on this standard is evaluation and feedback from students.</p> <p>See: http://www.pharmacyregulation.org/sites/default/files/GPhC_Future_Pharmacists.pdf</p> <p>The GPhC also produces ‘Standards for the initial education and training of pharmacy technicians’. Standard 4 states that the quality of pharmacy technician education and training must be monitored, reviewed and evaluated in a systematic way. The criteria relating to this standard require that the procedures in place ‘must be monitored using a variety of methods and approaches such as staff appraisal, student feedback, patient feedback and peer review’.</p> <p>See: http://www.pharmacyregulation.org/sites/default/files/Standards%20for%20the%20initial%20education%20and%20training%20of%20pharmacy%20technicians.pdf</p>
<p>Pharmaceutical Society of Northern Ireland (PSNI)</p>	<p>The PSNI has adopted the GPhC’s ‘Future Pharmacists’ (see above) as the standards used to accredit education and training courses.</p> <p>See: http://www.psni.org.uk/education-2/</p>

<p>Care Council for Wales (CCW)</p>	<p>The CCW has published 'The Framework for the Degree in Social Work in Wales', which includes criteria for approval and quality assurance of social work programmes. Education providers must have arrangements for quality assurance of the programme in place, and these processes must involve students (as well as staff and users of social services). Furthermore the quality assurance process must at least annually seek and respond to the views of students, users of social services and carers, staff involved in teaching and assessment, and employers of social workers about the degree programme.</p> <p>See: http://www.ccwales.org.uk/regulation-of-training/</p>
<p>Northern Ireland Social Care Council (NISCC)</p>	<p>The NISCC 'Rules for the Approval of the Degree in Social Work' requires that a 'Degree Partnership' with responsibility for the development, monitoring and continuous improvement of key systems must seek formal and systematic input and feedback from students, as well as service users and carers. Similarly the standards for approval also require 'mechanisms to ensure the formal and systematic participation of students in the design, delivery and evaluation of course provision'.</p> <p>See: http://www.niscc.info/index.php/education-for-our-training-providers/regulating-training-standards-education</p>
<p>Scottish Social Care Council (SSSC)</p>	<p>The SSSC's Framework for Social Work education in Scotland encompasses the Scottish Requirements for Social Work Training and the Standards in Social Work Education (SiSWE). There is no requirement for degree programmes to seek feedback from students.</p> <p>See: http://www.gov.scot/Publications/2003/01/16202/17018</p>