### health professions council

### Visitors' report

Name of education provider	City University	
Programme name	Doctorate in Counselling Psychology (DPsych)	
Mode of delivery	Full time	
Relevant part of HPC Register	Practitioner psychologist	
Relevant modality / domain	Counselling psychologist	
Date of visit	30 June – 1 July 2010	

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#### **Executive summary**

The Health Professions Council (HPC) approve educational programmes in the UK which health professionals must complete before they can apply to be registered with us. The HPC is a health regulator and our main aim is to protect the public. The HPC currently regulates 15 professions. All of these professions have at least one professional title which is protected by law. This means that anyone using the title 'Practitioner psychologist' or 'Counselling psychologist' must be registered with us. The HPC keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

The visitors' report which follows outlines the recommended outcome made by the visitors on the ongoing approval of the programme. This recommended outcome was accepted by the Education and Training Committee (Committee) on 26 August 2010. At the Committee meeting on 12 December 2010, the ongoing approval of the programme was re-confirmed. This means that the education provider has met the condition(s) outlined in this report and that the programme meets our standards of education and training (SETs) and ensures that those who complete it meet our standards of proficiency (SOPs) for their part of the Register. The programme is now granted open ended approval, subject to satisfactory monitoring.

#### Introduction

The HPC visited the programme at the education provider as the practitioner psychology profession came onto the register in July 2009 and a decision was made by the Education and Training Committee to visit all existing programmes from this profession. This visit assessed the programme against the standards of education and training (SETs) and considered whether those who complete the programme meet the standards of proficiency (SOPs) for their part of the Register.

This visit was part of a joint event. The professional body considered their accreditation of the programme. The professional body and the HPC formed a joint panel, with an independent chair and secretary, supplied by the education provider. Whilst the joint panel participated in collaborative scrutiny of the programme and dialogue throughout the visit; this report covers the HPC's recommendations on the programme only. As an independent regulatory body, the HPC's recommended outcome is independent and impartial and based solely on the HPC's standards. A separate report, produced by the professional body, outlines their decisions on the programme's status.

Name of HPC visitors and profession	David Packwood (Counselling Psychologist)
	Andrew Richards (Educational Psychologist)
HPC executive officer(s) (in attendance)	Ruth Wood
Proposed student numbers	30 per cohort once a year
Initial approval	26 September 2005
Effective date that programme approval reconfirmed from	29 September 2010
Chair	Andrew Denis (City University)
Secretary	Louise Markes (City University)
Members of the joint panel	Laura Clarke (British Psychological Society)
	Lucy Kerry (British Psychological Society)
	Terry Hanley (British Psychological Society)
	Elena Manafi (British Psychological Society)
	Kimberley Wilson (British Psychological Society)

#### Visit details

#### Sources of evidence

Prior to the visit the HPC reviewed the documentation detailed below, sent by the education provider:

	Yes	No	N/A
Programme specification	$\bowtie$		
Descriptions of the modules	$\bowtie$		
Mapping document providing evidence of how the education provider has met the SETs	$\boxtimes$		
Mapping document providing evidence of how the education provider has met the SOPs	$\boxtimes$		
Practice placement handbook	$\boxtimes$		
Student handbook	$\boxtimes$		
Curriculum vitae for relevant staff	$\bowtie$		
External examiners' reports from the last two years		$\bowtie$	
Completed student feedback forms	$\bowtie$		
Additional programme information	$\bowtie$		
Programme management information	$\square$		
Feedback from Trainees as given to the BPS prior to the visit	$\square$		

The HPC did not review External examiners' reports from the last two years prior to the visit as the education provider did not submit it. However, they did provide two external examiners' reports for the last academic year.

During the visit the HPC saw the following groups or facilities:

	Yes	No	N/A
Senior managers of the education provider with responsibility for resources for the programme	$\boxtimes$		
Programme team	$\square$		
Placements providers and educators/mentors	$\square$		
Students	$\square$		
Learning resources	$\square$		
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	$\square$		

#### Recommended outcome

To recommend a programme for ongoing approval, the visitors must be assured that the programme meets all of the standards of education and training (SETs) and that those who complete the programme meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that a number of conditions are set on the programme, all of which must be met before the ongoing approval of the programme is reconfirmed.

The visitors agreed that 46 of the SETs have been met and that conditions should be set on the remaining 11 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for ongoing approval. Conditions are set when certain standards of education and training have not been met or there is insufficient evidence of the standard being met.

The visitors have also made a number of recommendations for the programme. Recommendations are observations on the programme or education provider which do not need to be met before the programme is recommended for ongoing approval. Recommendations are normally set to encourage further enhancements to the programme and are normally set when it is felt that the particular standard of education and training has been met at, or just above the threshold level.

The visitors did not make any commendations on the programme. Commendations are observations of innovative best practice by a programme or education provider.

#### Conditions

# 2.1 The admissions procedures must 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.

**Condition:** The education provider must revisit the advertising material to include information about the HPC alongside information about the BPS where appropriate.

**Reason:** The material provided on the education provider's website had a section about the programme with a statement that read –"The Professional Doctorate in Counselling Psychology is a professional training programme, accredited by the British Psychological Society (BPS). (www.city.ac.uk/psychology/counselling/3yr\_programme.html Date: 5 July 2010)". The visitors considered the profession has been statutory regulated by the HPC since July 2009 and as such, information about the HPC needs to be clearly articulated for all potential applicants alongside information about the BPS. The visitors therefore require the education provider to revisit the advertising materials (such as on the website and in any prospectuses) to include information about the HPC alongside information about the BPS where appropriate.

#### 3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.

**Condition:** The education provider must revisit the programme documentation to include clear and correct references to the HPC.

**Reason**: The visitors noted the programme documentation provided prior to the visit made no mention of the HPC in the taught academic content. Discussions with the trainees indicated they were aware of the HPC, but only in regards to certain aspects (the SOPs and the programme leading to eligibility to apply for the Register). The profession has been statutory regulated by the HPC since July 2009 and as such, information about the HPC needs to be clearly articulated for all trainees. Information about the new landscape of statutory regulation, the Register and all HPC standards is important for the trainees understanding of the HPC in relation to professional practice.

The visitors therefore require revised programme documentation which demonstrates clear and correct references to the HPC, to reflect the current landscape of statutory regulation and so facilitate the trainees understanding of the HPC in all supporting resources used for the required learning and teaching activities of the programme.

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

**Condition:** The education provider must provide further evidence that the programmes consent protocols are clearly articulated.

**Reason:** The documentation provided prior to the visit included a Practitioner Training Contract which included the requirement for trainees to - "Participate fully in all of my training components, including all elements of my taught modules, external personal development and clinical placements". The programme documentation did not provide any further information about consent or 'opting out' for trainees. Discussions with the programme team indicated they were fully aware of issues that could arise during the programme and had measures in place to turn to if trainees were unwilling to participate in particular areas of the programme (particular lectures, sessions, role play, etc). The measures discussed were those such as private meetings to discuss the issues, extended reading materials provided and the option to be present in the room but withdraw from the session. Discussions with the trainees indicated they were aware that it was possible to withdraw from particular topics being taught but they were not aware of any forms they had signed or protocols which clearly articulated this.

The visitors were satisfied in regards to there being a consent protocol in place. The visitors were not satisfied enough information was provided for the trainees regarding the consent aspect to the Practitioner Training Contract or the education providers approach to issues arising from specific areas of the teaching. The visitors therefore require the education provider to revisit the programme documentation to include information for the trainees regarding the approaches to be taken to issues arising from their personal concerns about specific areas of the teaching (such as expanding the Practitioner Training Contract or providing a guidance document about consent).

## 4.5 The curriculum must make sure that students understand the implications of the HPC's standards of conduct, performance and ethics.

**Condition:** The education provider must include references to the HPC's standards of conduct performance and ethics in all relevant programme documentation.

**Reason**: The visitors noted the programme documentation provided prior to the visit made no mention of the HPC's Standards of conduct, performance and ethics within the taught components of the programme. There was also a confusing reference to HPC standards in the programme handbook (p28) - "All trainees should be familiar with the HPC and BPS Codes of Conduct, Ethical Principles and Guidelines and Guidelines for the Professional Practice of Counselling Psychology, published by the Health Professions Council and the British Psychological Society." It was not clear which standards published by the HPC were being referred to.

The profession has been statutory regulated by the HPC since July 2009 and as such, information about the HPC, the Standards of conduct, performance and ethics and the Standards of proficiency, need to be clearly articulated for all trainees.

The visitors therefore require further evidence to demonstrate that the programme documentation includes specific references to HPC's Standards of conduct, performance and ethics wherever it is deemed appropriate to reflect the standards being taught within the programmes content in order to facilitate trainees understanding of the implications of the HPC's standards of conduct, performance and ethics.

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

**Condition:** The education provider must provide further evidence of how they maintain a thorough and effective system for approving and monitoring all placements.

**Reason:** The documentation provided and discussions at the visit detailed the processes for approving placements. The placement co-ordinator who had recently been recruited had taken a more involved approach to placement recruitment with the trainees. The initial approval conversations were held between the placements and the education provider and then a series of tasks were to be completed such as a health and safety check, curriculum vitae checks, placement supervisor registration checks and conversations around trainee working arrangements. Once these tasks had been completed and the placement had been approved the placement then received more detailed information about the placement and other associated information. The placement provider details were kept on the education provider records as being suitable to undertake trainees. A yearly audit was then carried out across all approved placements. After this initial check there was no further regular monitoring of the individual placements only the overarching audit of all placements. Additionally it was discussed that there was no regular structured communications between education provider and placement providers. All contact would be via the placement provider in cases of concern over trainees' performance.

The visitors were concerned that there was no way for the education provider to monitor the placement to maintain the safe and supportive environment for the trainees without a regular check on each individual placement. The visitors considered the yearly audit to be appropriate to identify substantial problems with placement running overall but not appropriate to monitor each individual placement's qualities over the running of the placement. Therefore the visitors require further evidence that the education provider has a system in place which thoroughly and effectively approves and monitors placements.

## 5.8 Practice placement educators must undertake appropriate practice placement educator training.

**Condition:** The education provider must provide evidence to show how they ensure placement supervisors have undertaken appropriate initial and refresher training.

**Reason:** From the documentation submitted by the education provider, the visitors judged that it was not clear how the education provider ensured that placement supervisors were appropriately trained prior to working with trainees or continued to maintain their skills for working with trainees. In discussions with the placement supervisors and programme team, it became evident that the programme team provided placements with information and forms to complete but no training was required to be undertaken either at the education provider or externally.

The visitors were aware there are difficulties in ensuring all placement supervisors are initially trained and then have undertaken follow up training. The initial training would be to prepare placement supervisors to work with trainees and secondary 'refresher' training would enable the education provider to keep placement supervisors up to date with any changes to the programme and refresh their skills at working with trainees. Training the placement supervisors helps prepare them to work with trainees in regards to assessment and education provider assessment protocols, protecting the public and trainees and ensuring the placement is a safe and effective environment.

It is the education provider's responsibility to ensure appropriate training of some kind – either run by the education provider directly, run by external training bodies or by other education providers using the same placements, has taken place and is monitored. Therefore, the visitors require that the education provider provides further evidence to show how this standard is met.

## 5.10 There must be regular and effective collaboration between the education provider and the practice placement provider.

**Condition:** The education provider must provide further evidence that there is regular and effective collaboration in place between the education provider and placement provider.

**Reason:** Discussions and documentation highlighted that there was no regular structured communications between education provider and placement providers. The initial communications were carried out to approve the placement in a format that could be face to face but did not need to be. Once the initial forms had been filled in by the placements and submitted to the education provider there was no other maintained contact between education provider and placement. There was the opportunity for placements to contact the education provider in the case of problems with trainees but there was no other continued contact encouraged.

The visitors were concerned by this lack of communication between the two parties. Communication in any form helps to facilitate a working relationship and is indicative of effective collaboration between the placement and the education provider. The communication (which could take the form of regular emails, meetings, training sessions, telephone calls, etc) is important for both the education provider and the placement. The communications can be used to ensure the placements are aware of any changes which may affect their trainees, to monitor the placement environments, to ensure both parties know the appropriate lines of communication, to give the placement the opportunity to feedback into the running and delivery of the programme or to allow feedback from trainees and placements to flow both ways, to enhance the placement experience for trainees.

The visitors therefore require further evidence that there is regular and effective collaboration in place between the education provider and placement provider outside of the initial approval system.

- 5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:
  - the learning outcomes to be achieved;
  - the timings and the duration of any placement experience and associated records to be maintained;
  - expectations of professional conduct;
  - the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and
  - communication and lines of responsibility.

**Condition:** The education provider must provide further documentation which clearly outlines how the learning outcomes for placements are consistently assessed.

**Reason:** The clinical placement documentation provided prior to the visit included the form which placement supervisors fill in to assess a trainee during and at the end of a placement (interim and final) (Placement Supervisor's Evaluation – PL6). This form had a choice of either a 'satisfactory' or 'not satisfactory' rating with a space to add comments if needed.

The visitors noted there were no guidance criteria which would differentiate between 'satisfactory' and 'not satisfactory'. The visitors also noted there were no requirements for placement supervisors to undertake training prior to working with trainees and there was no requirement for any structured contact between the education provider and the placement (such as a mandatory visit) prior to the trainee starting. The visitors were also aware that the evaluation form was to be completed on a biannual basis and was the only formal assessment of trainee skills taking place.

The visitors were not satisfied different placement supervisors would all use the same measures to assess a trainees' competencies without any clear criteria for what equals a 'satisfactory' or 'not satisfactory' rating. The visitors were also concerned by the fact the evaluation form was the only formal assessment and it was undertaken twice a year. This could pose a risk in that it is the only recorded way of determining any difficulties trainees may be having in meeting all learning outcomes and so needs to be completed by all placement supervisors in a standard method.

The visitors therefore require further evidence which clearly articulates how the education provider ensures learning outcomes for each placement are consistently assessed.

- 5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:
  - the learning outcomes to be achieved;
  - the timings and the duration of any placement experience and associated records to be maintained;
  - expectations of professional conduct;
  - the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and
  - communication and lines of responsibility.

**Condition:** The education provider must provide further documentation which clearly outlines how individual placement supervisors are fully prepared for each individual placement.

**Reason:** The placement documentation provided detailed information for the preparation of placements given to placement supervisors prior to undertaking any trainees. Whilst discussions at the visit detailed the processes further, it was apparent that the programme relied on the trainees to find their own placements, although the education provider had recently recruited a new placement co-ordinator who had taken a more involved approach to placement recruitment with the trainees.

The Placement Supervisor's Evaluation form is filled out by the placement supervisor at the end of the placement and it is here that goals for the next placement are addressed. It then falls solely to the trainee to take this information forward with their next placement supervisor. Discussions with the trainees, placements supervisors and programme team confirmed that prior to the placement there was no information which passed to the new placement supervisor regarding trainees apart from that passed on by the trainees themselves with the Placement Supervisor's Evaluation form from the last placement. Discussions with the programme team and placement supervisors additionally highlighted that it was only if there was a serious concern about a particular trainee's performance that the placement supervisor should alert the education provider who would then become involved.

The visitors noted that there was a risk of trainees failing to alert placement supervisors to their developmental needs at the beginning of placements. In these circumstances it would only be if the placement supervisor identified significant areas which need attention, through the interim Placement Supervisor's Evaluation form, where these areas would be considered. The lack of any placement supervisor training or structured contact throughout placement between the education provider and the education provider could pose a risk in that some learning outcomes may not be fully addressed by trainees or placement supervisors.

The visitors considered that to ensure all learning outcomes are addressed fully and in order to be fully prepared for placements, there must be some prior knowledge of the trainee before the placement starts (such as a mechanism which passes feedback between placement supervisors). The visitors therefore require further evidence which clearly articulates how the education provider ensures individual placement supervisors are fully prepared for each individual placement.

# 6.8 Assessment regulations, or other relevant policies, must clearly specify requirements for approved programmes being the only programmes which contain any reference to an HPC protected title or part of the Register in their named award.

**Condition:** The education provider must revisit the programme documentation to ensure it is clearly articulated that exit awards do not lead to the eligibility to apply for the HPC register.

**Reason:** The documentation provided prior to the visit made it clear that the programme award led to eligibility to apply to the HPC Register. It was also clear that there were a number of other exit awards to be granted for trainees who exited the programme at various points without completing the full programme – "It is possible for students to exit the programme at various stages and gain lower level qualifications such as the MSc, and PGDip and PGCert if certain aspects of the first year are successfully completed. (Programme specification document P1)" The visitors were concerned that while it was clear for trainees the full programme award led to eligibility to apply to the HPC Register it was not clear that these exit awards did not lead to eligibility to apply to the HPC Register. The information about the exit awards should be more clearly communicated to trainees once on the programme so they have all the information about their programme available. For clarity the visitors therefore require the programme documentation to be revised to clearly include this information.

## 6.9 Assessment regulations must clearly specify requirements for an aegrotat award not to provide eligibility for admission to the Register.

**Condition:** The education provider must revisit the programme documentation to include information regarding the aegrotat award policies in place.

**Reason:** The HPC Standards of education and training mapping document provided prior to the visit clearly stated that the programme does not advertise for aegrotat awards. Along with this, other documentation which was submitted did not make reference to aegrotat awards. The information about the aegrotat awards should be more clearly communicated to trainees once on the programme so they have all the information about their programme available. For clarity the visitors therefore require the programme documentation to be revised to clearly include this information.

# 6.11 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.

**Condition:** The education provider must revisit the programme documentation to clearly articulate the requirement for the appointment of at least one external

examiner who must be HPC registered unless alternate arrangements have been agreed with the HPC.

**Reason:** In the university assessment regulations submitted prior to the visit there was no mention of the arrangement that recruitment for the post of external examiner for the programme needed to meet this standard. The visitors were satisfied the external examiner at the time of the visit fulfilled this standard however were concerned this requirement was not communicated widely enough. The visitors were aware it is unlikely to be able to add a statement reflecting this standard into university wide assessment regulations but for clarity require the education provider to revise the programme documentation to include clear reference to this standard of education and training.

## 3.3 The programme must have regular monitoring and evaluation systems in place.

**Recommendation**: The education provider should consider implementing a system for obtaining anonymous feedback on the programme from trainees.

**Reason:** Discussions at the visit with the programme team indicated they felt the feedback process was working in that feedback gained from trainees was direct and they were able to act on it appropriately. Additional feedback information provided prior to the visit and discussions with the trainees at the visit indicated trainees were reluctant to give in-depth open feedback to the programme team because of concerns that they might be victimised for commenting negatively. The visitors felt that the feedback gained was from a minority of the overall 3 year programme but agreed named feedback could raise these issues. The visitors were content this standard was met but wish to note they support the collation of feedback as it is a valuable resource for the programme team. The visitors suggest the education provider consider implementing a system for obtaining anonymous feedback from trainees -such as asking for typed feedback to be submitted to an impartial administrator from another school who would anonymize data and send back to the programme, this would allow the programme team to have a better understanding of the feedback given and help them use it more effectively.

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

**Recommendation**: The education provider should continue with their developmental work in ensuring placement settings are safe and supportive.

**Reason**: The discussions at the visit revealed the education provider was making new developments to the ways in which it works with placements. They had recently recruited a new placement co-ordinator. This new person had implemented new procedures and schemes and was spoken very highly of by trainees and the placement supervisor at the meetings. The visitors were satisfied this standard was met and wish to support the new development to the placement processes and hope the education provider continues to develop the way the placements are worked with to ensure the placements continue to provide safe and supportive environments.

> David Packwood Andrew Richards