

Visitors' report

Name of education provider	Regent's College
Validating body / Awarding body	The Open University
Programme name	Practitioner Doctorate in Existential Phenomenological Counselling Psychology (DPsych)
Mode of delivery	Full time
Relevant part of HPC Register	Practitioner psychologist
Relevant modality / domain	Counselling psychologist
Date of visit	27 – 28 January 2011

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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 approval of the programme. This recommended outcome was accepted by the Education and Training Committee (Committee) on 12 May 2011. At the Committee meeting on 25 August 2011 the programme was approved. 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 it was a new programme which was seeking HPC approval for the first time. 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.

Visit details

Name of HPC visitors and profession	Ewan Gillon (Counselling Psychologist) David Packwood (Counselling Psychologist)
HPC executive officer(s) (in attendance)	Mandy Hargood
HPC observer	Tracey Samuel-Smith
Proposed student numbers	16-20
Proposed start date of programme approval	September 2011
Chair	Alan Jones (Regent's College)
Secretary	Katy Bangs (Regent's College)
Members of the joint panel	Molly Ross (British Psychological Society) Nichola Hart (British Psychological Society) John Waite (British Psychological Society)

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Descriptions of the modules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SETs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SOPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Practice placement handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Curriculum vitae for relevant staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
External examiners' reports from the last two years	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

The HPC did not review external examiners reports for the last two years prior to the visit as there is currently no external examiner as the programme is new.

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	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programme team	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Placements providers and educators/mentors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Learning resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

The HPC met with students from the Doctorate in Counselling Psychology (DCounsPsy), as the programme seeking approval currently does not have any students enrolled on it.

Recommended outcome

To recommend a programme for 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 programme can be approved.

The visitors agreed that 39 of the SETs have been met and that conditions should be set on the remaining 18 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for 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 recommendation 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 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 revise the admissions documentation to remove any erroneous references to the HPC and to ensure that all costs that are known are available so as to enable applicants to make an informed choice to take up a place on the programme.

Reason: During their reading prior to the visit the visitors noted that there were erroneous references regarding the HPC, made in the admissions documentation that an applicant would receive when making an application to the programme. For example, attributing HPC's entry requirements to the Register to the standards of education and training (SETs). The SETs do not require an education provider to undertake a health and character reference as part of a programme's admissions procedure. In addition, HPC has removed the requirement for a health reference upon application to the Register. In terms of fees, it was not clear in the application information what the known total costs would be for the programme. For example there was no reference made that an applicant might need to pay for an updated criminal record bureau check before going on placement.

During the meeting with the programme team the visitors discussed the erroneous references to the HPC and the costs for the programme. The team said that the application documentation had been written to reflect the HPC website. The team had not realised that for example the health reference was no longer a requirement for applying to the Register with the HPC. The team were happy to correct the erroneous references made to the HPC within the admissions documentation.

With regards to the full costs for the programme, the fees had yet to be set for the programme and therefore the total costs were not available. However the team said that once the fees and the add-on costs were available they would be published accordingly.

In order for the visitors to be satisfied that applicants receive the required information to make an informed choice to take up a place on the programme they would like to receive revised admissions documentation that removes erroneous references to the HPC and an indication of the proposed costs of the programme.

2.7 The admissions procedures must ensure that the education provider has equality and diversity policies in relation to applicants and students, together with an indication of how these will be implemented and monitored.

Condition: The education provider must provide evidence to show how the equality and diversity policy is monitored in relation to admissions to the programme.

Reason: During their reading of the documentation prior to the visit the visitors could not see evidence of how the education provider's equality and diversity policy was monitored in relation to applicants to the programme.

During the meeting with the programme team the visitors discussed the education provider's equality and diversity policy and received from the team verbal confirmation that the policy was monitored to ensure that all applications are treated equitably. Staff are trained in current trends in equality and diversity and whilst the majority of the work remains with the Registry, so that statistics can be produced, the final check to ensure the policy is applied and monitored remains with the department.

The visitors would therefore like to receive revised documentation that articulates how the education provider monitors the equality and diversity policy in relation to admissions for the programme.

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

Condition: The education provider must ensure that there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

Reason: From the discussions with the senior and programme teams, it was clear that there was a core programme team. Added to this, the education provider uses visiting lecturers to deliver salient parts of the programme. However it was not clear as to how many counselling psychologists and visiting lecturers taught on the programme or their commitment to this and other programmes within the education provider's portfolio of psychology programmes. It was also unclear as to the amount of academic and pastoral support undertaken by the Programme Director, and the nature of any succession planning processes linked to these.

The senior team and the programme team informed the visitors that they were confident that the proposed levels of staffing along with the visiting lecturer complement would be sufficient to deliver an effective programme.

For the visitors to be assured that this SET is met, they would like to receive clearly articulated documentation that indicates the core staff and visiting lecturers and their commitment to this and other programmes within the education provider's portfolio of psychology programmes. This documentation should also make reference to succession planning processes linked to all core roles on the programme.

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

Condition: The education provider must ensure that subject areas are taught by staff with relevant specialist expertise and knowledge.

Reason: From the discussions with the senior and programme teams, it was clear that there was a core programme team. Added to this, the education provider uses visiting lecturers to deliver salient parts of the programme. However it was not clear as to which areas of the programme were taught by the counselling psychologists and visiting lecturers or their commitment to this and other programmes within the education provider's portfolio of psychology programmes. The senior and programme teams informed the visitors that they were confident that the proposed staffing complement would have the specialist expertise and knowledge to deliver the programme.

For the visitors to be assured that the subject areas are taught by staff with relevant specialist expertise and knowledge they would like to receive clearly articulated documentation which indicates which areas of the programme are taught by the core staff and which by the visiting lecturers, and their commitment to this and other programmes within the education provider's portfolio of psychology programmes.

3.13 There must be a student complaints process in place.

Condition: The education provider must ensure that the complaints process is clearly articulated to trainees.

Reason: The visitors received the complaints procedure in the documentation prior to the visit. However in the meeting with the trainees it became clear that, whilst they had not had to use such a policy, the trainees were not aware a written policy existed. The trainees did say that if they had any issues they would immediately go to the programme team and usually matters were dealt with quickly. In the meeting with the programme team the visitors were informed that there was a formal procedure which was managed through the School of Psychotherapy and Counselling Psychology.

The visitors would therefore like to receive clarification of how the education provider will ensure that the complaints process is clearly articulated to trainees.

3.16 There must be a process in place throughout the programme for dealing with concerns about students' profession-related conduct.

Condition: The education provider must implement a formal fitness to practice process to deal with concerns regarding trainees profession-related conduct.

Reason: From the documentation and in discussion with the programme team, the visitors identified that there was no formal process in place for dealing with concerns about trainees profession-related conduct. They did note that concerns could be raised about a trainees conduct and that those concerns would be dealt with via various meetings to include the trainee, the clinical supervisor and the practice placement educator if required. Measures were then put in place to deal with the conduct of the trainee and these measures would be reviewed at the regular meetings, which the trainee would attend to allow them to reflect on the issues. If a trainee was deemed as not fit to practice they would be asked to leave the programme.

The visitors therefore require evidence of a formal process to objectively and consistently deal with concerns regarding trainees profession-related conduct to ensure that this standard is met.

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.

Condition: The education provider must clearly articulate how the standards of proficiency (SOPs) are ensured through the practice placement.

Reason: Through their reading of the documentation the visitors were unable to determine how the SOPs were to be delivered and met on placement. For example, the Trainee evaluation report required practice placement educators to grade trainees on a scale of 1 – 5, with level 3 being ‘at the level expected’ and overall as ‘satisfactory’ or ‘unsatisfactory’. There was no direct training or guidance which provided the practice placement educators with information about the learning outcomes, marking the trainees objectively or criteria against what a trainee should be marked and assessed on. It was therefore unclear to the visitors if the practice placement educators would interpret the learning outcomes equally and consistently across all trainees and they were concerned that this could lead to the inability of some trainees to meet the SOPs.

In the meeting with the programme team a discussion took place around placement learning outcomes and assessment and the training of practice placement educators in marking trainees to ensure they are able to practice. The programme team reported that there will be a clearer system of marking for practice placement educators that will allow a qualitative marking system to be used. Practice placement educators will be able to use a full range of marks to record a trainee’s performance on placement.

To ensure that this standard is met the visitors would like to receive revised documentation that clearly shows how practice placement educators are informed about how to interpret and mark the learning outcomes to ensure that the SOPs are met.

5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

Condition: The education provider must ensure that there is a mechanism in place so that if a student is unable to secure an NHS placement, they can undertake an equivalent practice placement experience.

Reason: During the meeting with the programme team the visitors discussed with them the practice placements that could be undertaken by trainees. The team were asked if it was possible for a trainee to miss the third year placement within the NHS. The team said that this was possible especially in the light of current economic conditions where cuts on placements could be made.

The Practice placement handbook clearly states that the NHS placement must be undertaken in year three. However the trainee would have the responsibility of obtaining their own placement via the list of placements that is held by the practice placement co-ordinator. The visitors explored with the programme team the possible issues that could arise if a trainee could not obtain the requisite NHS placement in year three. The programme team said that there would be support for trainees to ensure that the requisite placements could be obtained.

In order to be assured that a trainee will receive the number, duration and range of practice placements appropriate to support the delivery of the programme and the achievement of the learning outcomes, the visitors would like to be assured of the mechanism which ensures an equivalent placement experience if a trainee is unable to secure a suitable NHS placement.

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

Condition: The education provider must ensure that there is a thorough and effective system of monitoring placements.

Reason: The visitors received as part of the visit documentation an Application and agreement form used to audit practice placements. However there was no indication as how the placements would be monitored once they had been approved.

In the meeting with the programme team the visitors were informed that a placement co-ordinator would be appointed to the programme and the role would include the monitoring of approved placements. This would include visiting the placements and trainees and collating the feedback received to ensure that the placement continues to meet the needs of trainees.

In order to be assured that this standard is met the visitors would like to receive documentation that specifies how the monitoring of approved placements will

continue after the placement has been approved along with any associated forms for completion.

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.

Condition: The education provider must ensure that equality and diversity policies in relation to trainees on placement will be put in place, implemented and monitored.

Reason: Although the visitors received an Application and agreement form and Health and safety checklist used to audit practice placements in the documentation prior to the visit, there was no reference in these documents to the equality and diversity policies of practice placement providers. In the meeting with the programme team the visitors were informed that a placement co-ordinator would be appointed to the programme and the role would include the monitoring of approved placements. This would include the monitoring of all policies in relation to trainees at the placement areas.

The visitors would like to receive revised documentation that shows how the education provider ensures that equality and diversity policies are in place, implemented and monitored at practice placement providers.

5.7 Practice placement educators must have relevant knowledge, skills and experience.

Condition: The education provider must ensure that practice placement educators must have the relevant knowledge, skills and experience to offer supervision around programme learning outcomes.

Reason: During their meeting with the programme team the visitors discussed the way in which practice placement educators supervised and assessed the trainees whilst on placement. It was discussed that practice placement educators appointed to undertake trainees for placement must be accredited with the British Psychological Society and have at least three years' experience. However, there was no guidance for ensuring that a practice placement educator had the relevant knowledge, skills and experience to be able to supervise a trainee around the programme specific learning outcomes. For example the Trainee evaluation report required practice placement educators to grade trainees on a scale of 1 – 5, with level 3 being 'at the level expected'. The visitors were unsure where practice placement educators learnt about the level expected.

The visitors would like to receive documentation that clearly identifies how the education provider will ensure that practice placement educators will have the relevant knowledge and experience to offer supervision around programme specific learning outcomes.

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

Condition: The education provider must provide evidence to show how they ensure practice placement educators have undertaken appropriate initial and refresher training to ensure that they are clear about the education providers learning outcomes and assessment procedures.

Reason: From the documentation submitted by the education provider, the visitors judged that it was not clear how the education provider ensured that practice placement educators would undertake appropriate training prior to working with trainees or continued to undertake any secondary training once working with trainees. In discussions with the programme team, it became evident that the programme team would offer initial and refresher training by holding open days, but it would not be mandatory and they would not monitor training attendance.

The visitors were aware there are difficulties in ensuring all practice placement educators are initially trained and then have undertaken follow up training. However the visitors considered that there were ways of ensuring that practice placement educators were trained to ensure that they could be clear on learning outcomes and assessment procedures. The visitors considered that training was an important role for the education provider and therefore the education provider should consider ways in which practice placement educators could receive training to ensure that they are able to understand the learning outcomes and assessment procedures of the education provider.

Therefore the visitors would like to receive further documentation to indicate how the education provider will train practice placement educators to ensure that they understand the learning outcomes and assessment procedures for the programme.

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 articulate how all practice placement educators understand the assessment procedures for the programme and their relation to the learning outcomes relevant to the placement.

Reason: From the documentation submitted by the education provider, the visitors judged that it was not clear how the education provider ensured that practice placement educators understand the assessment procedures for the programme and how these related to the learning outcomes for the programme. For example the Trainee Evaluation Report required practice placement educators to grade trainees on a scale of 1 – 5, with level 3 being ‘at the level expected’. The visitors were unsure where practice placement educators learnt about the level expected. In discussions with the programme team, it became evident that the programme team would offer initial and refresher training by holding open days, but it would not be mandatory and they would not monitor training attendance.

Therefore the visitors would like to receive further documentation to indicate how the education provider will ensure that practice placement educators understand the learning outcomes and assessment procedures for the programme.

6.1 The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.

Condition: The education provider must ensure that the assessment for practice placements ensures that trainees who successfully complete the programme have met the SOPs for their part of the register.

Reason: Through their reading of the documentation the visitors were unable to determine how the SOPs were to be met on placement. For example, the Trainee evaluation report required practice placement educators to grade trainees on a scale of 1 – 5, with level 3 being ‘at the level expected’ and overall as ‘satisfactory’ or ‘unsatisfactory’. There was no direct training or guidance which provided the practice placement educators with information on marking the trainees objectively or criteria against what a trainee should be marked and assessed on. It was therefore unclear to the visitors if the practice placement educators would be marking equally and consistently across all trainees.

In the meeting with the programme team a discussion took place around placement assessment and the training of practice placement educators in marking trainees to ensure they are able to practice. The programme team reported that there will be a clearer system of marking for practice placement educators that will allow a qualitative marking system to be used. Practice placement educators will be able to use a full range of marks to record a trainee’s performance on placement.

To ensure that this standard is met the visitors would like to receive revised documentation that clearly shows how practice placement educators will assess trainees on placement to ensure that the SOPs are met.

6.4 Assessment methods must be employed that measure the learning outcomes.

Condition: The education provider must ensure that the assessment methods employed articulate the levels of the learning outcomes for the programme.

Reason: From the visitors reading of the assessment documentation prior to the visit, they found it difficult to understand the reasoning for the different level of assessments at Masters and Doctoral level.

During the meeting with the programme team the visitors discussed the different assessment levels and the fact that aspects at each level could be open to interpretation. The visitors considered that the differentiation between the Masters and the Doctoral level in terms of assessment was not clear and therefore it was difficult to determine how the learning at each level is assessed. This could result in both assessors and students being unclear as to level of competence that is required to meet any specific learning outcome, leading to inconsistent assessment processes.

In order for the visitors to be assured that the assessment methods employed do successfully measure the learning outcomes for the programme they would like to receive revised documentation to illustrate that this standard is met.

6.5 The measurement of student performance must be objective and ensure fitness to practise.

Condition: The education provider must ensure that student performance is objective for the assessment of the practice placement to ensure that the trainee is fit to practice.

Reason: Through their reading of the documentation the visitors were unable to determine how the SOPs were to be met on placement. For example, the Trainee evaluation report required practice placement educators to grade trainees on a scale of 1 – 5, with level 3 being 'at the level expected' and overall as 'satisfactory' or 'unsatisfactory'. There was no direct training or guidance which provided the practice placement educators with information on marking the trainees objectively or criteria against what a trainee should be marked and assessed on. It was therefore unclear to the visitors if the practice placement educators would be marking equally and consistently across all trainees.

In the meeting with the programme team a discussion took place around placement assessment and the training of practice placement educators in marking trainees to ensure they are able to practice. The programme team reported that there will be a clearer system of marking for practice placement educators that will allow a qualitative marking system to be used. Practice placement educators will be able to use a full range of marks to record a trainee's performance on placement.

To ensure that this standard is met the visitors would like to receive revised documentation that clearly shows how practice placement educators will mark trainees on placement to ensure that the trainee is fit to practice.

6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.

Condition: The education provider must articulate how practice placement assessments are monitored and evaluated with regard to appropriate standards to assure the trainee's progression and achievement within the programme.

Reason: Through their reading of the documentation the visitors were unable to determine how the SOPs were to be met on placement. For example, the Trainee evaluation report required practice placement educators to grade trainees on a scale of 1 – 5, with level 3 being 'at the level expected' and overall as 'satisfactory' or 'unsatisfactory'. There was no direct training or guidance which provided the practice placement educators with information on marking the trainees objectively or criteria against what a trainee should be marked and assessed on. It was therefore unclear to the visitors if the practice placement educators would be marking equally and consistently across all trainees.

In the meeting with the programme team a discussion took place around placement assessment and the training of practice placement educators in marking trainees to ensure they are able to practice. The programme team reported that there will be a clearer system of marking for practice placement educators that will allow a qualitative marking system to be used. Practice placement educators will be able to use a full range of marks to record a trainee's performance on placement.

To ensure that this standard is met the visitors would like to receive revised documentation that clearly shows how practice placement educators will mark trainees on placement that the trainee progresses appropriately within the programme.

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 clearly articulate the policy on aegrotat awards to state that they do not provide eligibility for inclusion onto the Register, and demonstrate how this information is clearly communicated to the trainees.

Reason: From the documentation provided the visitors found it difficult to determine the assessment regulations for the programme and how these are conveyed to trainees so that it is clear that aegrotat awards would not enable students to be eligible to apply to the Register.

In the meeting with the programme team they stated that they did not have an aegrotat award. However the regulations for the validating body do allow for an award. If the validating body regulations are implemented and apply to this programme, then a clear assessment regulation needs to be in place to ensure that aegrotat awards do not provide eligibility to the register.

In order for the visitors to be assured that any aegrotat award offered does not provide eligibility for admissions to the Register they would like to receive clear documentation to indicate the assessment regulation relating to aegrotat awards.

Recommendations

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.

Recommendation: The education provider should standardise, for transparency reasons, the application of its entry and selection procedures to the programme.

Reason: The visitors were content that this standard was met in terms of how the education provider invokes its entry and selection process for the programme. However they considered that to make it transparent and open to all those who apply to the programme the education provider should make it clear in all documentation and the website how this process occurs.

In the meeting with the programme team, the programme team clearly described the way the system for entry and selection occurs and the feedback given to applicants as part of this process.

The visitors considered that the education provider could enhance the selection and entry criteria by clearly setting out the feedback given to applicants in terms of enhancing the transparency of the procedure and allowing applicants to make an informed choice to take up a place on the programme.

Ewan Gillon
David Packwood