

Visitors' report

<b>Name of education provider</b>	University of East London
<b>Programme name</b>	Professional Doctorate in Counselling Psychology
<b>Mode of delivery</b>	Part time
<b>Relevant part of HPC Register</b>	Practitioner psychologist
<b>Relevant modality / domain</b>	Counselling psychologist
<b>Date of visit</b>	17 – 18 April 2012

Contents

Contents.....	1
Executive summary.....	2
Introduction.....	3
Visit details.....	3
Sources of evidence.....	4
Recommended outcome.....	5
Conditions.....	6
Recommendations.....	23

## 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 4 December 2012. At the Committee meeting on 4 December 2012, 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.

## Visit details

Name of HPC visitors and profession	Allan Winthrop (Counselling psychologist) Nicola Bowes (Forensic psychologist)
HPC executive officer(s) (in attendance)	David Christopher
HPC observer	Paula Lescott
Proposed cohort number	26 per cohort once a year
First approved intake	January 2004
Effective date that programme approval reconfirmed from	September 2012
Chair	Dave Rowley (University of East London)
Secretary	Eno Udoumoren (University of East London)
Members of the joint panel	Owen Hughes (British Psychological Society) Ray Woolfe (British Psychological Society) Lucy Kerry (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 checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Business Plan - professional training in the School of Psychology	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

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"/>

## 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 28 of the SETs have been met and that conditions should be set on the remaining 29 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 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 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.

## 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 all programme documentation, including advertising materials, to ensure that the terminology used is accurate and is reflective of the language associated with statutory regulation and the HPC.

**Reason:** The documentation submitted by the education provider prior to the visit did not fully comply with the advertising guidance issued by HPC. The programme documentation stated that the programme was 'validated' and 'accredited' by the HPC. The HPC 'approves' programmes. The programme specification stated that "Chartered Counselling Status enables people to work as Counselling Psychologists". However, all students need to apply to the HPC Register after they have successfully completed an approved programme in order to use the protected title. The visitors require the education provider to revise all programme documentation, including advertising materials, to ensure that the terminology used is accurate, reflects the language associated with statutory regulation and avoids any potential confusion for applicants and students.

### **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 all programme documentation, including advertising materials, to ensure that potential applicants are made fully aware of all costs associated with the programme.

**Reason:** The visitors noted that the programme documentation submitted by the education provider provided little information about costs associated with the programme, for example, relating to the indemnity insurance required for practice placements, the need to pay for personal therapy and possibly also for clinical supervision. Discussions with students revealed that they had received some information about such matters, but greater clarity on the likely costs involved would be beneficial. Discussions with the programme team revealed that this information had previously been included in a programme leaflet, but this was no longer made available to applicants. Consequently, the programme team sought to make applicants aware of such costs during the application process. In order for potential applicants to have clear information about all costs associated with the programme, to inform decisions about applying for and accepting a place on the programme, the visitors require the education provider to revise the programme documentation and advertising materials to ensure that potential applicants are made fully aware of all costs associated with the programme.

### **2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.**

**Condition:** The education provider must revise the admissions procedures and programme documentation to clearly articulate the procedures for criminal convictions checks for the programme.

**Reason:** Documentation provided prior to the visit included information about the education provider's institution-wide Criminal Records Bureau (CRB) procedures and the need for applicants and students to disclose criminal convictions. The programme handbook (p155) stated that the programme team would consult the HPC and education provider's institution-wide policy in the case of a disclosure prior to making decisions, but did not clearly indicate the procedure in place, or who would make the decision. In discussions, the programme team indicated that offers had been withdrawn when convictions were disclosed and the procedures by which such cases would be considered. In order to ensure that this standard continues to be met the visitors require the education provider to provide evidence of the formal processes in place for dealing with an applicant who discloses a criminal conviction or a situation where the CRB status of a student changes as they progress through the programme. The visitors also require the programme documentation to be revised to make it clear that decisions about entry to the programme rest with the education provider, not the HPC.

### **2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.**

**Condition:** The education provider must revise the admissions procedures and programme documentation to articulate clearly the level of Criminal Records Bureau (CRB) checks required of applicants and students and to ensure that terminology used is up to date.

**Reason:** Documentation provided prior to the visit included information about the education provider's institution-wide CRB procedures and the need for applicants and students to disclose criminal convictions. However, although the institution-wide documentation stated that enhanced disclosure was required for the programme, this was not indicated clearly in the programme documentation. There was also an out of date reference to 'police checks' in the programme handbook. The visitors therefore require the programme documentation to be revised to ensure that the level of disclosure required is clear and to ensure that the terminology used is up to date.

### **2.4 The admissions procedures must apply selection and entry criteria, including compliance with any health requirements.**

**Condition:** The education provider must revise the admissions procedures and programme documentation to set out the health requirements for entry to the programme and the procedure for dealing with health issues.

**Reason:** Documentation provided prior to the visit included information about the education provider's institution-wide health screening procedure and the need for applicants to disclose any health issues. However, no clear health requirements were set out in the programme documentation and there was no information

about how health issues would be addressed. Visitors noted that the institution-wide procedures did not require applicants for the programme to undertake health screening. Discussions with the programme team revealed that a health screening questionnaire was being developed for the programme with the intention of using this during the application process. The programme handbook (p155) stated that the programme team would consult the HPC and education provider's institution-wide policy in the case of a health disclosure prior to making decisions, but did not clearly indicate the procedure in place, or who would make the decision.

In order that the health requirements for entry to the programme are made clear to applicants, the visitors require the admissions procedures and programme documentation to be revised. The documentation should set out the health requirements, the procedures for handling health issues and make it clear that decisions about entry to the programme rest with the education provider, not the HPC.

### **2.6 The admissions procedures must apply selection and entry criteria, including accreditation of prior (experiential) learning and other inclusion mechanisms.**

**Condition:** The education provider must revise the admissions procedures and programme documentation to articulate clearly the scheme for the accreditation of prior (experiential) learning (AP(E)L) or other inclusion mechanisms that are in place for programme entry.

**Reason:** From a review of the programme documentation the visitors noted that, while the website and programme handbook indicated that applicants could apply to enter stages of the programme and be admitted through an accreditation procedure, there was no detailed information about the scheme. Discussions with the programme team revealed that such cases were rare, but when they occurred the team considered how prior experience mapped onto the programme's learning outcomes and determined an appropriate entry point. In order to meet this standard, information about AP(E)L should be clearly articulated to potential applicants. The visitors therefore require the education provider to revise the admissions procedures and programme documentation to explain the process in place.

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

**Condition:** The education provider must provide evidence that the programme has a secure place in the education provider's business plan.

**Reason:** The documentation provided prior to the visit included a business plan for the School of Psychology indicating the education provider's ongoing support for the programme. This support was reiterated in the visitors' discussions with senior managers. However, as noted in the condition against SET 3.5, the visitors were concerned about the level of staffing for the programme and in particular the ability of the programme team to continue to provide support to students and to proactively plan the development of the programme. In addition, as noted in the conditions relating to SET 5, the visitors had concerns about the

ability of the programme team to approve and monitor practice placements, to provide training to practice placement educators and to ensure that students and practice placement educators were prepared for placements. The visitors therefore require further evidence of the programme's secure place in the business plan. This is to ensure that resources to develop the programme, to provide support for students and to manage practice placements effectively are in place and available to the programme team. In this way the visitors can be sure that the programme is secure and that this standard can be met.

### **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 provide further detailed information about the staffing levels for the programme so that the visitors can be assured there is an adequate number of qualified and experienced staff in place to deliver an effective programme.

**Reason:** From the documentation provided prior to the visit and discussions with the programme team, senior team and students, the visitors could not fully determine the staff resources that were in place for the programme. It was clear that there were full and part time members of the programme team, though there was uncertainty about the level of staffing (full time equivalent) that was in place.

The visitors noted several concerns raised in the programme documentation and through discussions at the visit in relation to staff resources. In particular, there had been a period of long term illness of one member of staff and the absence of a dedicated research director that had caused difficulties for the programme team. Students on the programme indicated concerns with the level of staff resources in relation to clinical supervision groups being too large and the pressure that staff were under resulting in inconsistency in the level of support available. Discussions with the senior team indicated that the programme team were supported by members of staff from other areas of the School and from external lecturers, and that measures were in place to provide additional cover when required. The visitors noted the education provider's requirement for the double marking of assessments. The visitors also noted that, because the practice placement coordinator held a part time contract, this limited their ability to visit practice placement providers and educators.

The visitors noted the efforts made by the programme team to ensure that students had a positive experience on the programme and were well supported. However, given the lack of clarity around staffing levels the visitors were concerned about the ability of the programme team to sustain the level of support provided and to run and develop the programme effectively. In addition, the visitors noted that the programme leader was planning a sabbatical period, which the education provider would need to manage to ensure that the programme team remains sufficiently resourced to run the programme effectively. The visitors therefore require clarification from the education provider concerning the staffing levels of the programme, to include details of the full and part time members of the programme team and their allocated areas of responsibility across the programme. The education provider should also provide information on any additional staffing resources (from the School and external sources) that are in place to support the delivery of an effective programme. The education provider

should detail how the staffing levels are reviewed in relation to the number of students on the programme and the education provider's strategy for ensuring that an adequate number of staff is in place to deliver the programme effectively.

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

**Condition:** The education provider must provide further evidence of the staff development policy in place that demonstrates that staff have the opportunity to develop and maintain their professional skills.

**Reason:** The documentation provided prior to the visit stated that members of the programme team were encouraged to maintain their professional profiles and were supported through staff development. Discussions with senior managers revealed that the education provider had a staff development policy as part of its staff performance review procedure. Visitors also noted that a new 'portfolio model' was being developed that would provide a number of protected hours for staff development, but that this was initially being trialled elsewhere in the School. Discussions with the programme team revealed that they found it difficult to take advantage of staff development opportunities, given the demands on their time arising from the programme and the fact that a number of them had part time contracts. The visitors require evidence of the staff development policy in place for the staff in relation to this programme that ensures that they have the opportunity to develop and maintain their professional skills.

### **3.8 The resources to support student learning in all settings must be effectively used.**

**Condition:** The education provider must revise the programme documentation to ensure that all references to HPC are clear, accurate and up to date.

**Reason:** The visitors reviewed the programme documentation prior to the visit and noted errors, inaccuracies and ambiguities in the terminology used and references made to the HPC and HPC publications. The programme handbook referred to 'membership' of the HPC (p154). There were a number of statements in the programme documentation such as 'HPC codes of ethics and conduct' and 'HPC standards of professional practice', which were inaccurate and unclear. The HPC has standards of conduct, performance and ethics and standards of proficiency. In addition, there was reference to the level of attendance expected of students in the assessment handbook, which incorrectly implied that the HPC expects students to attend at least 80% of a programme. There were also references to HPC documentation which were unclear, for example 'in line with HPC (2006) requirements' (placement and personal and professional development handbook) and 'ensure you are 'fit to practise' (HPC 2008)'. The visitors considered such references to be inaccurate and potentially misleading to students, and therefore require the documentation to be revised to remove any instances of incorrect, inaccurate or out of date terminology and references throughout.

### **3.12 There must be a system of academic and pastoral student support in place.**

**Condition:** The education provider must provide further information about the student support systems in place for the programme including the allocation of personal tutors to students, frequency of tutorials and the amount of time allocated to personal tutorials throughout the programme.

**Reason:** The documentation provided prior to the visit included information about the academic and pastoral support systems in place on the programme and the visitors noted that each student was allocated a personal, research and clinical skills tutor. Discussions with students revealed that the programme team was considered to be very supportive, but that there was some variability in the levels of support offered to students, possibly as a result of the staffing levels on the programme. Given the lack of clarity around staffing levels the visitors were concerned about the ability of the programme team to sustain the level of support provided and to run and develop the programme effectively. Discussions with the programme team revealed that staff devoted a lot of time and effort to supporting students, but inevitably their ability to meet all the demands placed upon them was limited. The visitors were concerned about the demands placed on the programme team in supporting students on a programme that involved practice placements, academic work and research elements, and hence about the sustainability and consistency of the support systems. The visitors therefore require further information about the student support systems in place, the allocation of students to personal tutors and the amount of time allocated to personal tutorials so they can be assured that student support is sustainable and can be delivered consistently.

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

**Condition:** The programme documentation must be revised to articulate clearly the process in place for obtaining student consent, including the procedures when consent is withheld.

**Reason:** The documentation submitted prior to the visit included a consent form to be completed by students. Discussions with students revealed that they were familiar with and used this form. The programme team explained that it was made clear during the application process that students were expected to participate as service users and the consent form was sent out with offers. Discussions with the programme team also explored the steps that were taken if a student wished to withhold consent for a particular session or more generally. The programme team gave examples of how they dealt with such requests. The visitors noted the steps that the programme team took to deal with such cases. The visitors require the processes to be clearly documented so that students understand the procedures. The visitors therefore require the education provider to revise the documentation to set out the process in place, how cases where consent is withheld are dealt with and how they ensure that all relevant areas of the programme are covered in such cases.

### **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 revise the programme documentation to set out clearly the procedures for identifying and addressing concerns about profession-related conduct.

**Reason:** The documentation provided prior to the visit included information about the education provider's 'University and Programme Suitability' and 'Fitness to Practice' procedures (placement and personal and professional development handbooks). Throughout the programme documentation there were references to professional behaviour and various codes of conduct. In discussions with senior management and the programme team the visitors noted that there were a series of engagements and remedial steps which the programme team, in liaison with practice placement providers and educators (as appropriate), conducted before instituting the formal procedures outlined in the documentation. The visitors require these steps to be articulated clearly in the documentation so that all parties understand how such cases are handled throughout. The visitors therefore require the education provider to revise the programme documentation in order to set out the measures that are taken to address profession-related conduct, including how the measures are applied, how decisions are made and by whom.

### **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 revise the programme documentation to clearly set out the procedures for identifying and addressing concerns about profession-related conduct, including ensuring that references to the HPC's standards of conduct, performance and ethics and guidance on conduct and ethics for students are clear and accurate within this process.

**Reason:** From a review of the programme documentation the visitors noted inaccurate references to HPC's standards of conduct, performance and ethics throughout. The programme handbook states that "trainees will be excluded from the Programme if they are found to be in breach of the HPC's standards of conduct, performance and ethics". The assessment handbook includes a statement that "The standards of conduct, performance and ethics (BPS and HPC) expected of you underpin personal and professional development and form the basis of trainees learning agreements". However, the HPC's standards of conduct, performance and ethics apply to registrants and those applying to the register, but not to students. The visitors therefore require the education provider to clearly articulate the profession-related conduct procedures and to ensure that references to the HPC's standards of conduct, performance and ethics and guidance on conduct and ethics for students are clear and accurate throughout.

#### **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 demonstrate how the learning outcomes ensure that students who complete the programme meet all the standards of proficiency for counselling psychologists.

**Reason:** The visitors noted that the documentation provided prior to the visit indicated that the following standard of proficiency had been flagged as not applicable by the programme team: **3a.1** understand the structure and function of the human body, relevant to their practice, together with knowledge of health, disease, disorder and dysfunction. At the visit the visitors pointed out that this standard was required of practitioner psychologists and needed to be evidenced. Discussions with the programme team revealed that there had been misunderstanding about the focus of this standard and that it was possible to provide evidence of where this standard was covered in the programme.

In addition, the evidence provided for standards of proficiency **2b.1** be able to conduct service evaluations and **2b.4** be able to conduct consultancy had indicated where students were given an understanding of these standards but had not provided evidence of where they could demonstrate their ability to meet them. In discussions, the visitors noted some examples where the programme provided sessions on consultation skills and service evaluation that had not been clearly identified in the documentation sent out prior to the visit. The visitors therefore require further evidence of how the programme's learning outcomes ensure that students who complete the programme meet these standards of proficiency to ensure that this standard continues to be met.

#### **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 demonstrate how the curriculum ensures that students understand the implications of the HPC's standards of conduct, performance and ethics.

**Reason:** From a review of the programme documentation the visitors noted references to various codes of conduct throughout. As already identified in the condition for SET 3.16 a number of references to HPC's standards of conduct, performance and ethics were inaccurate and need to be revised to avoid any confusion. The documentation provided prior to the visit also flagged up modules where reference to the standards were included. Discussions with students and the programme team indicated that there were specific sessions which focussed on ethics and in particular HPC standards and their application, which had not been evidenced in the documentation provided. The visitors therefore require additional evidence to identify how the education provider ensures that students on the programme understand the implications of the HPC's standards of conduct, performance and ethics.

## **5.1 Practice placements must be integral to the programme.**

**Condition:** The education provider must provide further evidence relating to practice placements to articulate clearly how they are integral to and integrated throughout the programme.

**Reason:** The documentation provided prior to the visit included a placement and personal professional development handbook. The programme handbook also included references to the practice placements. However, the level of collaboration and interaction with practice placement providers and educators was unclear, as was the extent to which they were encouraged to contribute to the development of the programme. Discussions with practice placement providers and educators revealed that those present were located close to the education provider, some had completed the programme themselves and many had longstanding relationships with the programme. They felt that there was a great deal of informal contact with the programme team and the opportunity to express views about the programme. Discussions with the programme team revealed that practice placements were integral to the programme and that the practice placement coordinator played an active role in liaising with and meeting placement providers and educators. However, it was not clear to the visitors that there were clearly articulated procedures to underpin the place of practice placements in the programme, or to ensure a consistent level of interaction with all practice placement providers and educators (including new providers or those located further from the education provider). The visitors therefore require the education provider to submit further evidence relating to practice placements to show how they are integral to the programme.

## **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 revise the programme documentation relating to practice placements to articulate clearly the number, duration and range of placements necessary to achieve the learning outcomes for the programme.

**Reason:** The documentation provided prior to the visit included a placement and personal professional development handbook, which included information about the minimum number of hours of supervised practice and requirements about the areas to be covered. The placement and personal professional development handbook also stated the type of practice placements that students might get in Years 1 and 2 and stated that students should have at least two practice placements over the 4 years to ensure breadth of training. However, the information was fragmented and it was difficult for the visitors to gain a clear understanding of the requirements relating to the placements that students must undertake. Discussions with practice placement providers and educators revealed at least one instance of a student remaining on the same placement for the entire programme.

The visitors require the education provider to clearly articulate the requirements relating to practice placements and set out clearly the requirements relating to the number, duration and range of practice placements that students must

undertake in order to achieve the programme's learning outcomes. This should include information of the client groups, formats and modalities that are minimum requirements for placements on the programme and therefore how the education provider ensures that the standards of proficiency are met through the placement experience.

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

**Condition:** The education provider must provide evidence that sets out the process for approving and monitoring practice placements to ensure they provide a safe and supportive environment.

**Reason:** The documentation provided prior to the visit included statements that required students to have access to their practice placement provider's health and safety policy. In addition, the Client Work Registration Form, which must be signed by the practice placement coordinator, asked whether the placement had a health and safety policy. However, the procedures through which the education provider monitored the existence and accessibility of such policies were unclear to the visitors. Discussions with the programme team and placement providers and educators revealed interaction between the education provider and practice placement providers and educators, including visits to potential new practice placement providers to assess the suitability of potential placements, which was not articulated in the documentation provided. In the absence of clearly documented procedures for checking the implementation of such policies the visitors could not be certain that a robust monitoring system was in place. The visitors therefore require further evidence that sets out how the education provider ensures that practice placement settings provide a safe and supportive environment.

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

**Condition:** The education provider must provide evidence of a thorough and effective system in place for approving and monitoring all practice placements.

**Reason:** The documentation provided prior to the visit included a placement and personal and professional development handbook, which provided some information concerning the organisation and management of practice placements within the programme. This document also included registration forms for practice placement educators. The programme handbook also indicated that a students' personal and professional development registration must be approved by the placement co-ordinator before any supervised clinical practice hours could be recorded, including the countersigning of the client work registration form by the practice placement coordinator. However, the visitors could not find a clearly articulated explanation of the procedures for approving practice placements before a student starts each placement. Discussions with students and practice placement educators indicated that the education provider liaised regularly with participants to gain feedback on practice placements. It was evident that good relationships and regular contact had been developed with longstanding practice placement providers, although the arrangements for dealing with newer placement providers and educators were less evident. Discussions with the

programme team and practice placement coordinator revealed the steps taken to approve new placements, including visits, and the attention paid to feedback in order to monitor the ongoing quality of practice placements. However, the procedures described were not clearly set out in the documentation. Furthermore, it was not evident whether any checks, including visits, would be carried out for practice placements unless concerns had been raised by a student. The visitors could not be certain that the system was robust and therefore require the education provider to provide further evidence that clearly states that the education provider takes overall responsibility for the placements on the programme, including the measures taken to approve and monitor practice placements, in order to ensure that a thorough and effective system is in place.

#### **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 provide evidence of how they ensure that equality and diversity policies are in place, implemented and monitored within practice placements.

**Reason:** The documentation provided prior to the visit included statements that required students to have access to their practice placement provider's equality and diversity policies. However, it was unclear how the education provider monitored whether such policies were in place and whether students had access to them. Discussions with the programme team indicated that if students raised concerns in this area these would be followed up with the practice placement provider, but it was not clear that the existence and implementation of such policies would be checked in the absence of any student concerns. In the absence of a clearly articulated procedure for checking the implementation of such policies visitors could not be certain that a robust system was in place. The visitors therefore require the education provider to provide further evidence that clearly states how the education provider ensures that equality and diversity policies are in place, implemented and monitored within practice placements.

#### **5.6 There must be an adequate number of appropriately qualified and experienced staff at the practice placement setting.**

**Condition:** The education provider must provide evidence outlining how they ensure an adequate number of appropriately qualified and experienced staff is in place in all practice placement settings.

**Reason:** The placement and personal and professional development handbook provided some information about the levels of supervision that a student must ensure were met. The programme handbook also included information about the ratio for supervision required by the education supervisor. The client work registration form, which the practice placement coordinator must countersign, also included a series of questions relating to arrangements for clinical supervision. Discussions with students and practice placement educators revealed that the programme's placement coordinator was proactive in addressing concerns raised by students about supervision and that the programme prepared students for practice placements through a session about

what students should expect in terms of supervision. Discussions with the programme team demonstrated that the practice placement coordinator was in contact with practice placement educators and addressed issues as and when they arose. However, the documentation did not accurately or fully reflect the practice as described to visitors and it was unclear that any checking of levels of supervision would be conducted unless an issue was raised by a student. The visitors were unclear as to how the programme team ensures that there are an adequate number of appropriately qualified and experienced staff in place at each practice placement. As such the visitors could not determine what criteria are used to decide if a practice placement has an adequate number of appropriately qualified and experienced staff or any process for dealing with a practice placement that does not meet these criteria. The visitors therefore require the education provider to provide further evidence that states how the education provider ensures an adequate number of appropriate staff at all practice placements.

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

**Condition:** The programme team must revise the programme documentation to provide evidence of how they ensure practice placement educators have relevant knowledge, skills and experience.

**Reason:** The visitors noted that the documentation included varying descriptions of the knowledge, skills and experience required of practice placement educators. For example, the placement and personal and professional development handbook stated 'It is expected that trainees will be mainly supervised by Counselling Psychologists, who hold chartered membership with the BPS...and are registered with the HPC' and 'Supervisors of trainees...must be practising Counselling or Clinical Psychologists registered with the HPC'. However, the programme handbook stated 'Each trainee must have a clinical supervisor who is a Chartered Counselling Psychologist/HPC registered psychologist with two years post qualification experience or, if this is not possible, a Chartered Clinical Psychologist with two years post qualification experience'. The visitors require the education provider to provide further evidence to ensure that the programme's requirements of practice placement educators are clearly and consistently articulated. Evidence should also be provided of how the education provider uses its approval and monitoring systems to ensure that this standard continues to be met.

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

**Condition:** The education provider must provide further evidence of the arrangements they use to ensure that all practice placement educators receive training, including refresher training, on the particular requirements of the programme in advance of receiving students.

**Reason:** The visitors noted that the placement and personal and professional development handbook included guidance for placement managers and educators. However, from the documentation provided prior to the visit it was not evident that there was a regular mandatory programme of training for new or

existing practice placement educators. Discussions with practice placement educators revealed that this was the case, but the programme's practice placement coordinator had regular informal liaison with practice placement educators. Most practice placement educators present felt that this system worked very well. Some said they would value the opportunity to meet up with colleagues, although they accepted that finding the time to do so would be difficult. However, the visitors noted some uncertainty amongst the practice placement educators present about the number of reports required from them for each placement and when these should be completed. Visitors also noted that those present had longstanding links with the programme and were located close to the education provider. It was therefore unclear what measures were in place to ensure that all practice placement educators were clear about the programme's requirements. Discussions with the programme team revealed that the education provider had previously offered training events, but had ceased to do so because take up had been poor. The practice placement coordinator now worked with placement educators to ensure that they were kept informed and up to date about the requirements of the programme. This usually took the form of telephone discussions or face to face meetings, although visits may be made to potential new practice placement providers and educators. The visitors noted the programme team's concerns about attendance at training events, however all practice placement educators must undertake educator training appropriate to the programme, including updates on any changes that are being introduced. The visitors require the education provider to provide further evidence of the arrangements that are in place to ensure that all practice placement educators, whether longstanding or new, are informed and kept up to date about the programme's requirements.

### **5.9 Practice placement educators must be appropriately registered, unless other arrangements are agreed.**

**Condition:** The education provider must revise the programme documentation relating to practice placements to set out clearly and consistently the requirements for practice placement educators and the steps taken to ensure that supervision for each student is undertaken by an HPC registered counselling psychologist for at least one practice placement in the programme.

**Reason:** The visitors noted that the programme documentation included varying descriptions of the knowledge, skills and experience required of practice placement educators. For example, the placement and personal and professional development handbook stated 'It is expected that trainees will be mainly supervised by Counselling Psychologists, who hold chartered membership with the BPS...and are registered with the HPC' and 'Supervisors of trainees...must be practising Counselling or Clinical Psychologists registered with the HPC'. However, the programme handbook stated 'Each trainee must have a clinical supervisor who is a Chartered Counselling Psychologist/HPC registered psychologist with two years post qualification experience or, if this is not possible, a Chartered Clinical Psychologist with two years post qualification experience'. The programme team explained that students and practice placement providers and educators were told that the preference was for supervision to be conducted by counselling psychologists registered with the HPC, but that it was only possible to achieve this in approximately 60% of cases. Where it was not possible to ensure that supervision was conducted by a counselling

psychologists registered with the HPC, supervision would be undertaken by a registered clinical psychologist. Discussions with students demonstrated that they were aware of the preference for clinical supervision to be conducted by counselling psychologists. However, from discussions with the programme team, the visitors were unclear about any measures in place to prevent a student from undertaking all practice placements without receiving supervision by a registered counselling psychologist. The visitors therefore require the education provider to provide further evidence to ensure that the programme's requirements for practice placement educators are clearly and consistently articulated and that sets out the means by which the education provider will ensure that no student is able to complete all practice placements throughout the programme without being supervised by a registered counselling psychologist.

#### **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 of the measures that are in place to ensure regular and effective collaboration with practice placement providers.

**Reason:** The visitors noted that the programme documentation provided prior to the visit included statements about the interaction between practice placement providers and the practice placement coordinator to support students' development and identify any concerns. However, it was not clear that there was a system in place, for example regular meetings between the education provider and practice placement providers and educators. The practice placement providers and educators whom the visitors met all felt they had sufficient contact with the programme team and were able to contribute to the programme's development. Discussions with the programme team revealed that the practice placement coordinator liaised with practice placement providers, but that contact was tailored to individual needs rather than there being a standardised procedure in place. The programme team also indicated practice placement providers were able to provide informal feedback on the programme and many did so. In the absence of clearly documented procedures for ensuring regular and effective collaboration with practice placement providers, including set requirements about the frequency and timings of contact, the visitors could not be certain that this standard continued to be met. The visitors therefore require the education provider to provide further evidence about the measures that are in place to ensure that there is regular and effective collaboration with practice placement providers.

#### **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 evidence about the steps taken to ensure that students, practice placement providers and educators are fully prepared for practice placements.

**Reason:** The documentation provided prior to the visit included the placement and personal and professional development handbook, which provided students and practice placement providers and educators with information about practice placements. Discussions with students revealed that there were some helpful sessions about supervision and practice placements which were not apparent in the documentation provided. Practice placement providers and educators also stated that there was good ongoing contact with the programme team through the practice placement coordinator, although there was no formal training. However, it was difficult for the visitors to gain a clear understanding of the number, duration and range of placements that students must undertake. The programme documentation provided no information about the training provided for practice placement educators and the process for ensuring that they understood the learning outcomes to be achieved, how student performance was monitored and student progression determined was unclear. In addition, the steps taken to ensure that practice placement educators are kept informed of changes to the programme were not evident. The visitors were therefore unable to make a clear judgement on whether students, practice placement providers and practice placement educators are fully prepared for placements. The visitors require further evidence that demonstrates that students, practice placement providers and practice placement educators are fully prepared for placements in terms of the learning outcomes to be achieved, the number, duration and range of placement experiences, the assessment procedures and the communication and lines of responsibility within 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 demonstrate how the assessment strategy and design ensure that students who complete the programme meet all the standards of proficiency for counselling psychologists.

**Reason:** In line with the visitors' concerns that are noted against SET 4.1, the visitors noted that the documentation provided prior to the visit indicated that the following standard of proficiency had been flagged as not applicable by the programme team: **3a.1** 'understand the structure and function of the human body, relevant to their practice, together with knowledge of health, disease, disorder and dysfunction.' In addition, the evidence provided for standards of proficiency **2b.1** be able to conduct service evaluations and standard **2b.4** be able to conduct consultancy had indicated where students were given an understanding of these proficiencies, but had not provided evidenced of where they could demonstrate their ability to meet them. The visitors therefore require further evidence of how the programme's assessment strategy and design ensures that students who complete the programme meet these standards of proficiency to ensure that this standard continues to be met.

## **6.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.**

**Condition:** The education provider must revise the programme documentation to set out clearly the arrangements that are in place for ensuring effective monitoring and evaluation mechanisms are in place in relation to practice placement assessments.

**Reason:** The programme documentation provided general information about practice placements and the role of practice placement educators. However, the visitors were unclear about arrangements for ensuring that student progression and assessment within practice placement elements of the programme was equitable. Discussions with practice placement educators revealed that any concerns at placements would first be raised with the student and then, if appropriate, with the practice placement coordinator. Where necessary, there would be a three-way discussion involving the practice placement educator, student and practice placement coordinator that would attempt to solve the problem and to identify any remedial action required. The programme team confirmed that they worked closely with practice placement educators where concerns about a student were identified and agreed remedial actions to be taken. Discussions raised at least one case where a student had failed a placement, but the programme team had worked closely with the practice placement educator concerned. The visitors noted the measures that were taken in the event of concerns being raised about the ability of a student to complete a placement and require these to be detailed in the programme documentation so that the procedure is clear to all parties involved. The visitors also require further evidence of how parity of assessment between placements is ensured by the education provider, including how the learning outcomes required are clearly indicated to all parties, and how regulations around student progression are clear with regard to placements.

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

**Condition:** The education provider must revise the programme documentation to articulate clearly the requirements for student progression, the processes in place to ensure parity of assessment and procedures for failing a student throughout the programme.

**Reason:** As already noted in the condition against SET 6.6, the visitors were unclear about the procedure by which the education provider would deal with student problems or determine failure at practice placements. The visitors require further evidence of the regulations and processes in place throughout the programme for dealing with concerns, the criteria for failure, progression and for ensuring that assessment criteria are applied consistently to students work.

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

**Condition:** The programme documentation must be revised to state that an aegrotat award does not provide eligibility to apply to the HPC Register.

**Reason:** The assessment regulations for the programme were included in the assessment handbook. These regulations included a statement that aegrotat and posthumous awards may be conferred in accordance with the education provider's Manual of General Regulations and Policies. The visitors noted that the assessment regulations did not explicitly state that an aegrotat award did not confer eligibility to apply to the HPC register. The visitors therefore require the education provider to amend the assessment regulations for the programme so that they state clearly that an aegrotat award does not confer eligibility to apply to the HPC Register to ensure that this standard continues to be met.

**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 programme documentation must be revised to include a clear statement that at least one external examiner for the programme will be from the relevant part of the Register, unless other arrangements are agreed.

**Reason:** The assessment regulations for the programme are included in the assessment handbook. These included reference to the involvement of external examiners, but did not indicate the knowledge, skills or expertise required of those undertaking this role. The programme handbook stated that the at least one of the external examiners 'will be an appropriately experienced and qualified counselling psychologist with active HPC Register 'practitioner psychologist' status'. The visitors were satisfied with the current external examiner but were concerned that the requirements relating to external examiners were not set out in the assessment regulations and did not stipulate the requirement to be registered with the HPC as a counselling psychologist. The visitors therefore require the education provider to revise the assessment regulations for the programme to include a clear statement that at least one external examiner for the programme will be from the relevant part of the Register (counselling psychologist), unless other arrangements are agreed, to demonstrate that this standard continues to be met.

## Recommendation

### **3.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to students and staff.**

**Recommendation:** The education provider should consider providing practice placement educators with access to the teaching and learning resources available for the programme.

**Reason:** The visitors were content that this standard was met. Discussions with practice placement educators indicated that they would welcome access to the education provider's library and other teaching and learning resources. The visitors suggested that the education provider should consider how access to teaching and learning resources could be made available to practice placement educators, for example through a dedicated web site. The visitors suggested that such a mechanism would also help in keeping practice placement educators informed about and up to date in relation to the programme's requirements.

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