

HCPC approval process report

Education provider	University of Liverpool
Name of programme(s)	Medicine Exemptions for Orthoptists, Distance learning BSc (Hons) Orthoptics, Full time
Approval visit date	05 April 2018- 6 April 2018
Case reference	CAS-12223-V6Q6Y8

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Executive Summary

We are the Health and Care Professions Council (HCPC), a regulator set up to protect the public. We set standards for education and training, professional knowledge and skills, conduct, performance and ethics; keep a register of professionals who meet those standards; approve programmes which professionals must complete before they can register with us; and take action when professionals on our Register do not meet our standards.

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet the standards relevant to the programme (the standards of education and training, and the standards for the use by orthoptists of exemptions to sell and supply medicines (for education providers)) (referred to through this report as 'our standards'). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.

Section 1: Our regulatory approach

Our standards

We approve programmes that meet our education standards, which ensure individuals that complete the programmes meet proficiency standards. The proficiency standards set out what a registrant should know, understand and be able to do when they complete their education and training. The education standards are outcome focused, enabling education providers to deliver programmes in different ways, as long as individuals who complete the programme meet the relevant proficiency standards.

Programmes are normally [approved on an open-ended basis](#), subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed [on our website](#).

How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint [partner visitors](#) to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation of the visitors, inclusive of conditions and recommendations. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process reports, and any observations from education providers (if submitted). The Committee meets in public on a regular basis and their decisions are available to view [on our website](#).

HCPC panel

We always appoint at least one partner visitor from the profession (inclusive of modality and / or entitlement, where applicable) with which the assessment is concerned. We also ensure that visitors are supported in their assessment by a member of the HCPC executive team. Details of the HCPC panel for this assessment are as follows:

Claire Saha	Orthoptist
Angela Duxbury	Radiographer - Therapeutic radiographer
Joanne Watchman	Lay
Christine Timms	Orthoptist (observing)
Shaista Ahmad	HCPC executive

Section 2: Programme details

Programme name	BSc (Hons) Orthoptics
Mode of study	FT (Full time)
Profession	Orthoptist
Entitlement	Orthoptist exemptions
Proposed First intake	01 September 2018
Maximum learner cohort	Up to 45
Intakes per year	1

Assessment reference	APP01942
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We undertook this assessment of a new programme proposed by the education provider via the approval process. This involves consideration of documentary evidence and an onsite approval visit, to consider whether the programme:

- meets the standards of education and training;
- delivers the standards of proficiency for orthoptists; and
- delivers the standards for orthoptists using exemptions in legislation for the sale and supply of medicines.

The education provider informed the HCPC that their currently approved BSc (Hons) Orthoptics programme has taken its last intake. The learners from this programme will transfer onto the second year of the new programme subject to this programme being approved. As this programme has now taken the last intake, and as it was not being changed by the education provider, it was not assessed via this approval visit.

The proposed new programme is intended as a pre-registration programme for orthoptists, with a contained module to also allow for individuals who successfully complete the programme the orthoptist exemption annotation.

Programme name	Medicine Exemptions for Orthoptists
Mode of study	DL (Distance learning)
Entitlement	Orthoptist exemptions
Proposed First intake	01 January 2019
Maximum learner cohort	Up to 25
Intakes per year	1
Assessment reference	APP01905

We undertook this assessment of a new post-graduate module proposed by the education provider via the approval process. This involves consideration of documentary evidence and an onsite approval visit, to consider whether, within the standards for the use by orthoptists of exemptions to sell and supply medicines, the programme:

- meets the standards for education providers; and
- delivers the standards for orthoptists using exemptions in legislation for the sale and supply of medicines.

The module will be accessible to HCPC-registered Orthoptists who intend to train in the annotation, and integrated within the BSc (Hons) Orthoptics programme, as noted above.

Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we require certain evidence and information from education providers. The following is a list of evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence,

we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

Required documentation	Submitted
Programme specification	Yes
Module descriptor(s)	Yes
Handbook for learners	Yes
Handbook for practice based learning	Yes
Completed education standards mapping documents (standards of education and training, and the standards for education providers part of the standards for the use by orthoptists of exemptions to sell and supply medicines)	Yes
Completed proficiency standards mapping documents (SOPs for orthoptists, and standards for orthoptists using exemptions in legislation for the sale and supply of medicines)	Yes
Curriculum vitae for relevant staff	Yes
External examiners' reports for the last two years, if applicable	Yes

We also expect to meet the following groups at approval visits:

Group	Met
Learners	Yes
Senior staff	Yes
Practice education providers	Yes
Service users and carers (and / or their representatives)	Yes
Programme team	Yes
Facilities and resources	Yes

Section 4: Outcome from first review

Recommendation of the visitors

In considering the evidence provided by the education provider as part of the initial submission and at the approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

Conditions

Conditions are requirements that must be met before programmes can be approved. We set conditions when there is insufficient evidence that standards are met. The visitors were satisfied that a number of the standards are met at this stage. However, the visitors were not satisfied that there is evidence that demonstrates that the following standards are met, for the reasons detailed below.

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 14 June 2018.

2.1 The admissions process 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: For the BSc (Hons) Orthoptics programme, the education provider must ensure that appropriate information about the programme is provided to potential applicants, to ensure that they can make an informed choice about whether to take up a place on the programme.

Reason: From a review of the documentation, the visitors noted the prospective website does not convey to potential learners that on graduation successful learners will be able to have their HCPC registration annotated with orthoptist exemptions. In discussions with the programme team, the visitors were told that learners would be informed through open days held at the university, and that the programme specification will be updated to ensure accurate information is provided to learners. However, to be sure that this standard is met, the visitors need to see information that is clear about the annotation that will be available to potential applicants. In this way, the visitors will be able to determine how prospective applicants are able to make an informed choice about whether to apply for a place on the programme.

3.2 The programme must be effectively managed.

Condition: For the BSc (Hons) Orthoptics programme, the education provider must demonstrate that the transitional arrangements for current students transferring onto the second year of the new programme will be appropriate and effectively managed.

Reason: In discussions with the programme team, the visitors were informed that currently enrolled first year learners from the existing programme will transfer onto the second year of the new programme (subject to approval). In this way, they will be able to continue their studies until the final year so they can gain the BSc (Hons) Orthoptics award, and be eligible to apply for registration as an orthoptist, with the orthoptist exemptions annotation. At the visit, the visitors understood learners would be consulted in advance to ensure they are happy to transfer onto the new programme and support would be in place to allow learners to re-adjust to the new programme structure. However, as there was no information provided in the documentation to explain how transitional arrangements would support learners being phased into the second year of the programme the visitors will need evidence to demonstrate that this has been addressed. Therefore, the visitors require further information to ensure learner consultation has taken place, learners are happy to transfer onto the new programme, and the support is available to ensure the programme is effectively managed.

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

B.5 There must be an adequate number of appropriately qualified, experienced and, where required, registered staff in place to deliver an effective programme.

Condition: The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff in place to deliver the ophthalmic training element of module ORTH230.

Reason: From a review of the documentation, and from discussions at the visit, the visitors noted that the academic staff for this module include one prescriber, ophthalmologists and pharmacologists. However, from these conversations the visitors understood that the ophthalmologists and pharmacology staff were not currently in place. As there is a small number of staff involved in the teaching of this module, the visitors noted that the full range of skills and knowledge are necessary in order to deliver an effective programme. Therefore, the visitors require evidence, which demonstrates that the education provider will ensure there, is an adequate number of appropriately, qualified and experienced staff in place for the teaching of this module. Particularly, the visitors would expect to see that the education provider has plans in place to recruit to these roles, prior to the module commencing. In this way, the visitors can determine whether there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

3.10 Subject areas must be delivered by educators with relevant specialist knowledge and expertise.

B.6 Subject areas must be taught by staff with relevant specialist expertise and knowledge.

Condition: The education provider must demonstrate that relevant subject areas in the ORTH230 module are taught by staff with specialist knowledge and expertise in ophthalmology.

Reason: From a review of the documentation, the visitors were unable to see who would be providing the ophthalmic training in the ORTH230 module. In discussions with the programme team, the visitors learned that the education provider would recruit ophthalmologists and pharmacology staff to provide the specific ophthalmic training required for the teaching of this module. As there is a small number of staff involved in the teaching of this module, the visitors noted that the ophthalmologists and pharmacology staff are necessary in order to ensure that subject areas are delivered by educators with relevant specialist knowledge and expertise. Therefore, the visitors require evidence, which demonstrates that the education provider will ensure that subject areas are taught by staff with relevant specialist expertise and knowledge. Particularly, the visitors would expect to see that the education provider has plans in place to recruit to these roles prior to the module commencing. In this way, the visitors can determine whether staff have the requisite specialist knowledge and experience to deliver the specific ophthalmic training for this module.

3.18 The education provider must ensure learners, educators and others are aware that only successful completion of an approved programme leads to eligibility for admission to the Register.

Condition: For the BSc (Hons) Orthoptics programme, the education provider must demonstrate that learners, educators and others are aware that only successful completion of the programme leads to the eligibility to apply for admission onto the Register.

Reason: The visitors noted that there was some inaccurate information contained within the documentation provided regarding HCPC requirements. Within the programme specification on page 4, it states, "Successful completion of the programme results in the award of the BSc (Hons) Orthoptics degree, which allows graduates to

register with the Health and Care Professions Council (HCPC) and practise as an orthoptist". However, this is not accurate as successful completion of the programme gives the learner the eligibility to apply for registration, not the entitlement to register with the HCPC. Consequently, the visitors require that the documentation is amended to reflect the correct information. In this way, the visitors will be able to determine whether the resources available to support learning in all settings are accurate, consistent and reflective of the language associated with statutory regulation and the HCPC.

C.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards for orthoptists using exemptions in legislation for the sale, supply and administration of medicines.

- **Standard 10: Be able to demonstrate safe use of medicines**

Condition: The education provider must ensure that learners who successfully complete the programmes meet the standards for orthoptists using exemptions in legislation for the sale, supply and administration of medicines.

Reason: From a review of the documentation, the visitors noted that the list of medicines contained within the module descriptor ORTH 230 and 408 omitted proxymetacaine from the list of prescription only medicines and also omitted the teaching of pharmacy medicines allowed by exemptions. In discussions with the programme team, the visitors were told that learners would be taught about these medications in the programmes and this omission would be amended to reflect the accurate information is given to learners on the programmes. The visitors require evidence, which demonstrates that the education provider ensures that learners meet the standards for orthoptists using exemptions in legislation for the sale, supply and administration of medicines.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

Condition: For the BSc (Hons) Orthoptics programme, the education provider must demonstrate that practice educators have the relevant knowledge, skills and experience to support learners on the programme.

Reason: In discussions with the programme team, the visitors learned that at this time, there are no orthoptists with the exemptions annotation involved with the practice-based learning. This is because training in this area is only just being approved by the HCPC and therefore, currently no individuals have completed this training, and had their registration record annotated. In order for practice educators to be able to assess this module, the education provider must ensure they have the relevant knowledge, skills and experience to support safe and effective learning. This applies whether individuals have the orthoptist exception annotation or not. The visitors were unclear how the education provider was making this judgement, from the information provided and discussions at the visit. In order for the visitors to be able to make a judgement on whether this standard is met, the education provider must demonstrate they have practice educators in place that are appropriately qualified to support safe and effective learning.

6.4 Assessment policies must clearly specify requirements for progression and achievement within the programme.

Condition: For the BSc (Hons) Orthoptics programme, the education provider must demonstrate that the programme documentation reflects the changes made to the assessment policies as discussed at the approval visit.

Reason: From a review of the documentation, the visitors noted that in the programme specification, assessment of all clinical examinations and clinical placements must be passed with a minimum of forty per cent, and cannot be compensated by other assessments within a module. In discussions with the programme team, the visitors were informed that compensation would be allowed across three specific modules ORTH139, ORTH141 and ORTH238, as long as the learner achieves a minimum of thirty five per cent in each component. As the visitors were provided with conflicting information, they were unable to determine how learners would understand what is expected of them at each stage of the programme. Therefore, the visitors require evidence to determine the information has been amended to reflect accurate information about assessment policies and is available to learners and educators.

6.7 The education provider must ensure that at least one external examiner for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.

E.10 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 HCPC Register.

Condition: The education provider must ensure that the process in place for appointing an external examiner ensures individual(s) are appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.

Reason: From reviewing the documentation, the visitors noted the external examiner who has been appointed for this programme does not have the orthoptist exemptions annotation. As previously noted, no orthoptists currently have this annotation, and although we do not require the external examiner to have the orthoptist exemptions annotation, having knowledge of this area across external examiners is relevant to properly assess and quality assure the programme. The visitors could not ascertain how areas of this programme outside of the scope of knowledge of the external examiner would be externally moderated. Therefore, the visitors require evidence of the process used to appoint external examiners, and that this process ensures that their external examiner(s) have the full breadth of knowledge required to assess this programme.

Recommendations

We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

2.4 The admissions process must assess the suitability of applicants, including criminal conviction checks.

Recommendation: For the BSc (Hons) Orthoptics programme, the education provider should require prospective students to disclose if they have been subject to any convictions, cautions, reprimands or warnings.

Reason: From a review of the documentation, the visitors noted that learners underwent a Disclosure and Barring Service (DBS) check prior to admission onto the programme. The visitors noted that the education provider would be able to make a reasonable decision about the suitability of applicants using this information, and through other requirements of the admissions processes, and therefore this standard is met at a threshold level. However, the visitors considered that it may also be pertinent to ask for further information from applicants, to allow the education provider to make a decision based on a broader range of evidence. For example, the education provider could require applicants to disclose if they have previously been dismissed from employment, or whether they have been subject to any disciplinary processes or hearings. As such, the visitors recommend the education provider to consider asking applicants additional information to gain a deeper understanding of their suitability for the programme.

4.2 The learning outcomes must ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Recommendation: For the BSc (Hons) Orthoptics programme, the education provider should strengthen the way learners understand the standards of conduct, performance and ethics.

Reason: From a review of the documentation, the visitors noted that learners had the opportunity to learn about professional conduct and to demonstrate an understanding of which types of behaviour are appropriate for a professional and which are not. From discussions with the learners, the visitors noted that learners did not specifically know what the HCPC standards of conduct and performance and ethics (SCPEs) were, although they were able to give examples of the content included in the SCPEs. As such, the visitors recommend that the education provider strengthen references to this set of standards, so that learners understand and are able to use them as a working document. This will assist learners when working towards meeting the SCPEs as part of the programme, and will provide a good grounding in using the standards day-to-day once individuals who complete this programme are out in practice.