HCPC approval process report

Education provider	University of Reading
Name of programme(s)	MSci Speech and Language Therapy, Full time
Approval visit date	06 February 2018
Case reference	CAS-12186-Y3F8N7

health & care professions council

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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 our standards of education and training (referred to through this report as 'our standards'). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.

Through undertaking this process, we have noted areas that may need to be considered as part of future HCPC assessment processes in section 6 of this report.

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 <u>approved on an open-ended basis</u>, subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed <u>on our website</u>.

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 <u>partner visitors</u> 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 <u>on our website</u>.

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:

Susanne Roff	Lay
Caroline Sykes	Speech and language therapist
Jenny Ford	Speech and language therapist
Niall Gooch	HCPC executive

Other groups involved in the approval visit

There were other groups in attendance at the approval visit as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Matthew Almond	Independent chair (supplied by the education provider)	University of Reading
Eve Davey	Secretary (supplied by the education provider)	University of Reading
Lorette Porter	Education representative	Royal College of Speech and Language Therapists – professional body

Section 2: Programme details

Programme name	MSci Speech and Language Therapy	
Mode of study	FT (Full time)	
Profession	Speech and language therapist	
Proposed first intake	01 September 2018	
Maximum learner	Up to 44	
cohort		
Intakes per year	1	
Assessment reference	APP01806	

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 meet our standards for the first time.

The proposed programme is a development of the existing HCPC-approved BSc (Hons) Speech and Language Therapy.

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	Yes
learning	
Completed education standards	Yes
mapping document	
Completed proficiency standards	Yes
mapping document	
Curriculum vitae for relevant staff	Yes
External examiners' reports for the	Yes
last two years, if applicable	

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

Group	Met	Notes
Learners	Yes	The programme has not started yet so we met with learners from the existing HCPC-approved BSc (Hons) Speech and Language Therapy programme
Senior staff	Yes	
Practice education providers and educators	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 03 April 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: The education provider must ensure that the following are clear to applicants:

- who pays for the Disclosure and Barring Service check
- the prerequisites for working as a speech and language therapist
- what kind of relevant experience is required of applicants

Reason: The visitors reviewed the programme webpage, which the education provider had provided as evidence for the information available to applicants. The 'Additional requirements' section of this page gave applicants information about the requirement for

a Disclosure and Barring Service (DBS) check, and also the requirement for them to have gained some relevant experience before admission to the programme. The page notes that a DBS check is "arranged through the University", but the visitors considered that it might not be clear to applicants who would pay for this check, which might mean that applicants were not be able to make an informed choice about whether to take up an offer of a place on the programme. The visitors also noted that the programme website stated that "As a graduate of this course you can apply to work as a speech and language therapist". They considered that this was potentially unclear to applicants as it did not mention the requirement for HCPC registration before working as a speech and language therapist, and so might prevent an applicant from making an informed choice. The visitors were not able to see how the phrasing of the requirement for relevant experience would be clear to applicants. The page states that "all candidates" must show evidence of either having observed speech and language therapists (SLTs) in clinical settings or working with children or adults". The visitors took this to mean that all applicants must have observed SLTs. However, in discussion at the visit they were informed that this was not the case, and that the requirement was for the applicant to have either observed an SLT in a clinical setting, or worked with children or adults in some kind of health or care-related context. As it can be difficult to arrange observations of SLTs, the visitors considered that applicants who understood the requirement as they had initially understood it might be prevented from making an informed choice about whether to take up a place on the programme. They therefore require the education provider to ensure that all information available to applicants about DBS checking, and about the requirements for working as an SLT, is unambiguous, and that it is clear to applicants that their own health or care-related working with adults or children meets the requirements for admission.

3.3 The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.

Condition: The education provider must demonstrate how they will ensure that the person with overall professional responsibility for the programme are appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.

Reason: The visitors were able to view a "Programme Director Role Description" as part of the documentation. This was a generic University of Reading document, rather than one produced specifically for this programme. It did not specify what would be regarded as appropriate qualifications and experience for the director of a speech and language therapy programme, or describe whether, and under what circumstances, the education provider might ever waive the requirement for HCPC registration. The visitors were therefore unable to be clear that the process for appointing an appropriate person to the role of programme director was effective, and require further evidence demonstrating that an effective process is in place.

3.7 Service users and carers must be involved in the programme.

Condition: The education provider must demonstrate that service users and carers are formally and explicitly integrated into the programme, and that their involvement is sustainable.

Reason: The visitors were able to view evidence of service user and carer involvement. including minutes of meetings of an Experts by Experience panel, and to meet with service users and carers who had been involved with the existing BSc (Hons) Speech and Language Therapy programme. The visitors noted that service users and carers were involved with the existing programme in a number of ways, for example in admissions and in giving talks to learners based on their own experiences. However, it was not clear to the visitors how service user and carer input would be formally integrated into this programme, or how it would be evaluated. This meant that they were not able to see how the education provider had processes in place to plan, monitor and evaluate service user and carer involvement. The visitors were also not clear how the education provider had selected the service users and carers to ensure that they were appropriate and relevant for the programme. They could not see what planning had taken place to ensure that the current level of service user and carer involvement was sustainable. For example, it was not clear what was being done to find new service users, or to broaden the skills, background and experience base of the Experts by Experience (EbE) group. The visitors therefore require further evidence of how the education provider ensures that service user and carer involvement is appropriately evaluated, planned and monitored, and how they ensure that it is sustainable.

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: The education provider must demonstrate how it will ensure that applicants and learners understand that the step-off BSc does not provide eligibility to apply for registration as a speech and language therapist with the HCPC.

Reason: The visitors reviewed the information for applicants and learners made available on the website and in the programme specification, learner handbooks and placement documentation. They noted that all of the documentation stated that completion of this new MSci programme would result in eligibility to apply for HCPC registration. However, it was not clear to the visitors, either from their review or from discussions with the programme team, where the education provider had stated explicitly that the step-off BSc, which will be awarded if learners complete three years rather than four, would not provide such eligibility. They considered that this was especially important to state explicitly, in case learners did not understand that only successful completion of the approved MSci leads to eligibility for admission to the Register.

4.3 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Condition: The education provider must demonstrate that the programme reflects the philosophy, core values, skills and knowledge base articulated in any relevant curriculum guidance.

Reason: The visitors reviewed the evidence provided under this standard, including the programme Business Plan, the university's curriculum framework, and the school mission statement. The programme documentation referred to a mapping to the updated curriculum guidance from the professional body, the Royal College of Speech and Language Therapists (RCSLT), but this did not appear in the standards of education and training (SETs) mapping document. This mapping exercise was also

mentioned in discussions with the programme team. The visitors were aware from these discussions, and the documentation, that adherence to the guidance was part of the education provider's curriculum design strategy for ensuring that learners who successfully complete the programme are able to practise safely and effectively as speech and language therapists. However, they were not able to see a copy of the mapping exercise. They were therefore unable to make a judgment about the effectiveness of the education provider's strategy for ensuring that future graduates would be able to practise in line with the philosophy, core values, skills and knowledge base of speech and language therapy.

4.9 The programme must ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Condition: The education provider must demonstrate how they will ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Reason: The visitors reviewed evidence of how learners on the existing BSc (Hons) Speech and Language Therapy programme are prepared for interprofessional learning (IPL), and were able to discuss the issue with the programme team. They were told that at present speech and language therapy learners have the opportunity for IPL with learners on pharmacy and nursing programmes, and that learners are encouraged to seek opportunities for IPL during practice-based learning. The programme team also stated that the education provider is planning how to expand this IPL to other relevant professions. However, the visitors were not able to view evidence relating to these plans for expansion, so it was not clear how the education provider intended to bring other relevant professions into their IPL provision. They could not see how encouraging learners to gain IPL via practice-based learning would ensure consistent experience for all learners without a structured approach to ensuring that IPL took place in placement. They were also not clear about the reasons for the education provider's choice of which other professions to involve in IPL on the programme. They therefore require further evidence demonstrating how the education provider will ensure that learners on the programme are able to learn with and from professionals and learners in other relevant professions, and how they make judgments about which professions are most suitable.

4.10 The programme must include effective processes for obtaining appropriate consent from service users and learners.

Condition: The education provider must demonstrate how they ensure that appropriate consent is obtained from service users when students work with service users as part of practice based learning.

Reason: The visitors reviewed a narrative provided by the education provider stating that all learners and placement educators understood the importance of consent, and that this was part of placement educators' professionalism and part of learners' responsibilities under the HCPC standards of conduct, performance and ethics. They were also able to discuss consent with the programme team, who reiterated that learners and practice educators were well-prepared to obtain appropriate consent. However, it was not clear to the visitors whether there was a process in place through which the education provider could ensure that appropriate consent was being obtained when learners were on practice-based learning. They therefore require the education provider to provide further evidence demonstrating how they do this.

4.11 The education provider must identify and communicate to learners the parts of the programme where attendance is mandatory, and must have associated monitoring processes in place.

Condition: The education provider must demonstrate how they ensure that attendance at taught sessions is effectively monitored, and how they ensure that learners who miss mandatory teaching and learning activities are enabled to cover the missed subject(s).

Reason: The visitors reviewed a narrative from the documentation explaining that attendance was compulsory in all the Clinical Studies modules across the programme, and that non-attendance would be followed up, and escalated to senior programme tutors if absences continue. In discussions with learners on the existing BSc (Hons) Speech and Language Therapy, learners stated that attendance at teaching and learning activities was monitored through sign-up sheets, but that this appeared to them to be inconsistent. From this information, and from discussions with the programme team, the visitors were not clear that there was an effective monitoring process in place for attendance for those parts of the programme, or an effective process to ensure that learners who had missed mandatory teaching and learning activities would still be able to achieve the learning outcomes for those sessions. They therefore require further evidence to demonstrate the effectiveness of monitoring processes.

6.2 Assessment throughout the programme must ensure that learners demonstrate they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Condition: The education provider must demonstrate how they ensure that learners demonstrate that they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Reason: The visitors reviewed the module descriptors for the programme, which the education provider had provided as evidence for this standard. They noted that expectations of professional behaviour were threaded through the curriculum, and the HCPC standards of conduct, performance and ethics were referred to throughout the programme content. However, in the year four modules, it was not clear to the visitors how the assessment methods used would appropriately ensure that learners could meet the expectations of professional behaviour. The year four modules have a pass mark, rather than being pass/fail. The visitors could not see in any of the modules an explicit requirement that learners demonstrate that they are able to meet all the expectations of professional behaviour before the module can be passed. They therefore considered that it was possible that learners might complete the programme without having demonstrated that they are able to meet the expectations of professional behaviour. They therefore require the education provider to demonstrate how their assessment strategy will ensure that learners demonstrate their ability to meet the expectations of professional behaviour.

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

Condition: The education provider must ensure that all programme documentation clearly specifies requirements for progression and achievement within the programme.

Reason: The visitors reviewed the module descriptors for Clinical Studies 2 and Clinical Studies 3, and noted that it appeared to be possible to carry over assessments from Year 2 in to Year 3. The programme team clarified in discussions that this was not correct and that learners would not be able to carry over any assessments between years of the programme. The visitors therefore require that any relevant programme documentation be reviewed to avoid similar potentially misleading errors concerning progression and achievement within the programme.

Section 5: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, the visitors are satisfied that the conditions are met and recommend that the programme(s) are approved.

This report, including the recommendation of the visitors, will be considered at the 24 May 2018 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available <u>on our website</u>.

Section 6: Future considerations for the programme(s)

We include this section to note areas that may need to be considered as part of future HCPC assessment processes. Education providers do not need to respond to these areas through this assessment, but should consider how to engage with the HCPC around these areas in the future, for example through the monitoring processes. When this programme is next assessed against our standards, visitors will have access to this report, and will consider this section when making their recommendation on continuing programme approval.

The visitors were satisfied that SET 4.9 was met at threshold level. The evidence submitted for this standard by the education provider showed that the programme would include opportunities for learners to learn with and from learners and professionals from other relevant professions. This evidence included a narrative description of their plans for doing so, and a table showing the different opportunities for inter-professional education at different stages of the year. The education provider has also provided a rationale for why it chose particular professions.

The visitors did note that it was not clear whether some of the sessions included in the education provider's response would involve learning "with and from" relevant professionals and learners, rather than being joint learning or teaching, in the form of observations of other professions' activities or shared lectures. They were also not clear about some of the detail of the planned co-operation with the Institute of Education that would enable inter-professional learning with teaching learners.

They therefore suggest that in future monitoring processes visitors should ensure that they consider the inter-professional learning on the programme, in particular whether the education provider has ensured that the inter-professional education on the programme continues to be true inter-professional education (for example interactive small group learning with learners from other professions), not just joint teaching and learning or learning about inter-professional work from other professionals.