Consultation outcome: Consultation on revisions to the standards of education and training

Analysis of responses to our consultation on the standards of education and training and our decisions as a result.

Contents

1. **Foreword** 2
2. **Introduction** 4
3. **Analysing your responses** 7
4. **Responses to consultation questions** 13
4 **Responses to EDI monitoring questions** 31

1. Foreword

We consulted on our standards between 17 November 2025 and 16 February 2026 and had 197 responses.

We informed a range of stakeholders about the consultation including professional bodies and employers, included information about the consultation on our website, on social media, and in our newsletter and also held public workshops on key themes of the review.

We are very grateful for all the responses we received to our consultation. Overall, the consultation proposals were well received, with most stakeholders expressing support for the proposed approach.

We would like to thank all those who took the time to respond to the consultation.

Executive summary

Following a review of our current standards, which included research, stakeholder engagement, and insights from our expert panels, we conducted a 13-week public consultation on a set of proposed changes to the standards. The consultation ran from November 2025 to February 2026. We received 197 responses.

We have now analysed responses to the consultation and considered the feedback from our stakeholders, which we have taken into account when developing the final revised standards. A detailed analysis of the consultation responses and our decisions is provided below in section 4.

In our consultation, we proposed five key areas of change to the standards. We took these proposals to Council, who agreed with our approach. An overview of the changes and our decisions following consultation is included below:

1. Key structural revisions

In the consultation we proposed formalising the institution and programme split within the standards to clearly distinguish where the standards sit, and to support accountability and implementation across different parts of the organisation. We also proposed creating new thematic groupings for the standards, reordering them and grouping them into themes that reflect a logical sequence based upon how programmes are developed and delivered.

In addition, we proposed introducing a new foreword to the standards which will complement them and help education providers interpret and apply them. The glossary was also been updated to reflect the proposed changes to the standards. We have updated the guidance to reflect any changes made.

Respondents were generally positive about these proposals, and expressed that the changes would make the standards clearer to understand, and bring clarity to who is accountable for them.

We have decided in response to this feedback to go ahead with our consultation proposals, with some small amendments to the glossary for further clarity.

2. Changes to SET 1

In the consultation, we proposed moving this standard to sit at programme level, and moving the list of “normally expected” qualifications from the body of the standard into the guidance to clarify the application of the standard that qualification level is not the sole determinant of approval. Further clarity was added by new criteria to determine equivalent qualifications, which will emphasise alignment with the standards of proficiency (SOPs) and assuring public protection. This will also help futureproof the standards.

However, we have received a lot of feedback on the proposals for this standard with respondents noting that this could be perceived as a dilution or removal of academic levels. After receiving this feedback on our proposals for this standard, we have decided to move the “normally expected” qualifications from the wording of this standard and moved it into an appendix instead of into separate guidance. We will keep the wording of the rest of the standard the same as we proposed in the consultation. This addresses the concerns raised during the consultation as the “normally expected” qualifications remain within the standards.

3. Strengthening our standards in relation to diverse education delivery models

We proposed in the consultation revisions to the standards which will apply equally across traditional or non-traditional programmes. We proposed not creating separate standards for specific models of learning. Instead, we proposed the revised SETs should embed expectations that are applicable across all contexts, supported by guidance and examples where needed.

Respondents were generally positive about these proposed changes, although some provided feedback that the standards could provide more detail on how to action these standards. In response to this, whilst we have not proposed significantly amending our proposals, we have published complementary guidance to be read alongside the SETs.

4. Clarifying our standards around technology usage

In the consultation, we proposed introducing new standards to frame our expectations around the appropriate, ethical, and effective use of technology as well as the need to monitor that usage. We also proposed amending existing standards to encourage the considered integration of technology in education.

On the whole, respondents were positive about these proposals although some expressed concerns about digital accessibility and inclusion and monitoring. We will not be significantly amending our approach to what we consulted on, but we have amended one of the proposed standards to add a requirement to review the effects of the standard, and we have updated our guidance in relation to this.

5. Embedding EDI within the standards

In the consultation, we proposed revising the standards with respect to creating a more active and directive approach to EDI issues in education and training. We proposed embedding EDI throughout the standards to ensure that EDI is not treated as a standalone issue but is embedded across the design, delivery, and culture of programmes.

Respondents were on the whole positive about these proposals, although some expressed that the proposals could go further and suggested there should be an addition of monitoring within the standards and some information about reasonable adjustments.

In response to this feedback, we have added further information into the guidance about reasonable adjustments and clarification on monitoring and reviewing the effectiveness of the standards.

We published the updated standards in September 2026 and a 12 month implementation period will follow after which the standards will take effect in September 2027.

The following document provides further detail of the consultation responses and the revisions that we have made as a result.

2. Introduction

About us

The Health and Care Professions Council (HCPC) is a statutory regulator of healthcare and psychological professions governed by the Health Professions Order 2001. We maintain a register of professionals, set standards for entry to our register, approve education and training programmes for registration and deal with concerns where a professional may not be fit to practise. Our role is to protect the public.

We regulate the members of 15 professions:

– Arts therapists

– Biomedical scientists

– Chiropodists / podiatrists

– Clinical scientists

– Dietitians

– Hearing aid dispensers

– Occupational therapists

– Operating department practitioners

– Orthoptists

– Paramedics

– Physiotherapists

– Practitioner psychologists

– Prosthetists / orthotists

– Radiographers

– Speech and language therapists

About the standards of education and training

The Health and Care Professions Council (HCPC)'s standards of education and training (SETs) are central to ensuring high-quality education and training across the 15 professions we regulate. The implementation of these standards and our corresponding quality assurance activity form a core part of how we protect the public.

The standards also ensure that education programmes are properly organised, outcome-focused, and aligned with public protection. Through education providers ensuring learners meet our professional standards we are able to help prevent unsafe or ineffective care in the future.

Regular review of the SETs is essential to ensure they reflect current practice in education and training, support innovation in education, and align with our strategic priorities — including those set out in our corporate strategy and equality, diversity and inclusion (EDI) Strategy. The last review of the SETs was completed in 2017. In March 2024, we began the current review of the SETs as part of our wider programme of standards development and improvement and to also respond to developments in technology, and the increasing diversity of education delivery models.

About the consultation

We keep the standards under regular review to ensure that they remain up to date, and we began our most recent review in March 2024.The aims of this review were:

- Identify ways to strengthen the standards to enable education providers to prepare learners for professional practice effectively
- Ensure alignment across the HCPC standards
- Identify changes to current practice and reflect these in the standards if appropriate

- Ensure that education providers can implement any changes effectively.

We consulted on proposed revisions to the standards of education and training between 17 November 2025 and 16 February 2026. The proposed revisions to the standards were based on evidence gathered from desk- based research, and extensive pre-consultation stakeholder engagement.

We informed and engaged a wide range of stakeholders about the consultation including professional bodies, employers, trade unions and education and training providers. We also advertised the consultation on our website and on social media.

To support the consultation period, we hosted five public workshops in total. These explored different key themes of the consultation and were aimed at the following stakeholders: education providers, professional bodies, service users and learners. We also held a workshop with the HCPC education team, who provided their views on how the standards would work in practice.

We held two workshops aimed at the general public, including learners and service users. These contained a general overview on what the SETs are and how they function, an overview of our proposed changes, and how the consultation process would work.

We held three separate workshops aimed at professional bodies and education providers. Considering the familiarity of this group with the standards, these workshops were thematic. They covered:

- SET 1 and structural changes
- EDI and data
- AI and emerging technology.

The aims of these five workshops were to communicate our rationale for the proposed changes and inform stakeholders on how they could engage with the consultation process. In total, we had 368 people attend across the five public workshops.

The 10 consultation questions were based around key themes of the review and were intended to test the proposals that we published. This included questions on the revised structure, equality diversity and inclusion, use of technology such as AI, applicability of the standards to different models of learning and the clarity of expectations around partnerships. We also included questions on the needs of our stakeholders during the implementation phase, to aid us in preparing for any changes to the standards to come into effect smoothly.

About this document

This document summarises the responses we received to the consultation, and our decisions as a result.

- Section two explains how we handled and analysed the responses we received and provides the overall statistics relating to the responses.
- Section three adopts a thematic approach and outlines the general comments we received on the draft standards document and our responses to those comments received.
- Section four provides an overview of the responses we received to our EDI monitoring questions.

In this document, “we”, “us”, and “our” are references to the HCPC; “you” or “your” are references to respondents to the consultation.

3. Analysing your responses

We have analysed all the written and survey responses we received in response to the consultation.

Method of recording and analysis

The majority of respondents used our online survey tool to respond to the consultation. They self-selected whether their response was an individual or an organisation response, and, where answered, selected their response to each question (e.g., “yes”, “no”, “partly”, or “don’t know”).

Where we received responses by email or by letter, we recorded each response in a similar format.

When deciding what information to include in this document, we assessed the frequency of the comments made and identified themes. This document summarises the common themes across all responses and indicates the frequency of arguments and comments made by respondents.

Quantitative analysis

We received 197 responses to the consultation. This was across different stakeholder groups – registrants (85 responses, 43%), education provider (41 responses, 21%), learners (21 responses, 11%), professional bodies (20 responses,

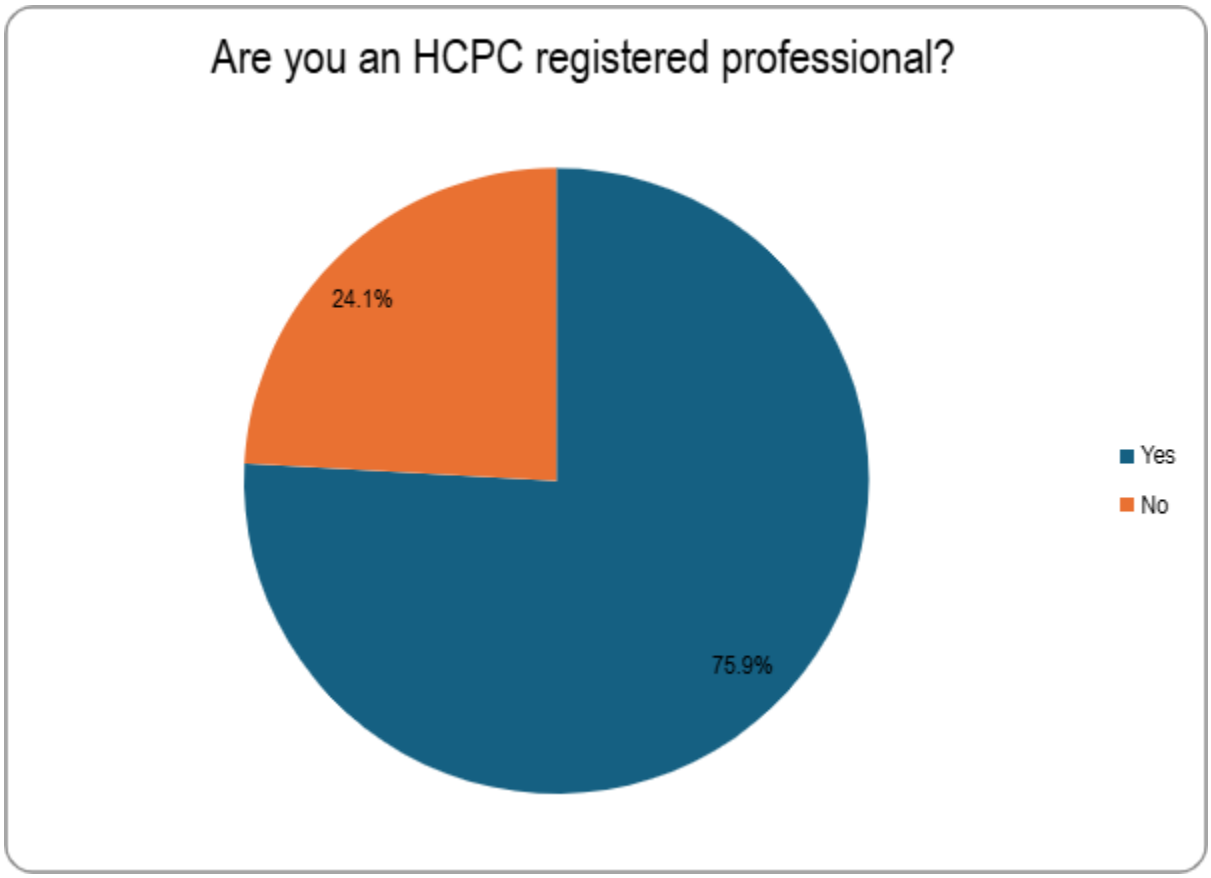
10%) employer (16 responses, 8%) other (14 responses, 7%).

Respondents were asked whether they were responding to the consultation on behalf of an organisation, and based upon their answer they were asked the following questions about the stakeholder group they represented:

1. Please tell us the full name of your organisation.
2. Please select which category best describes your organisation (Professional body, Advocacy group, Public body, Employer, Education provider, Other (please specify)
3. Where is your organisation active?
4. Are you an HCPC registered professional?
5. What is your registered profession?
6. Where is your regular place of work or activity?

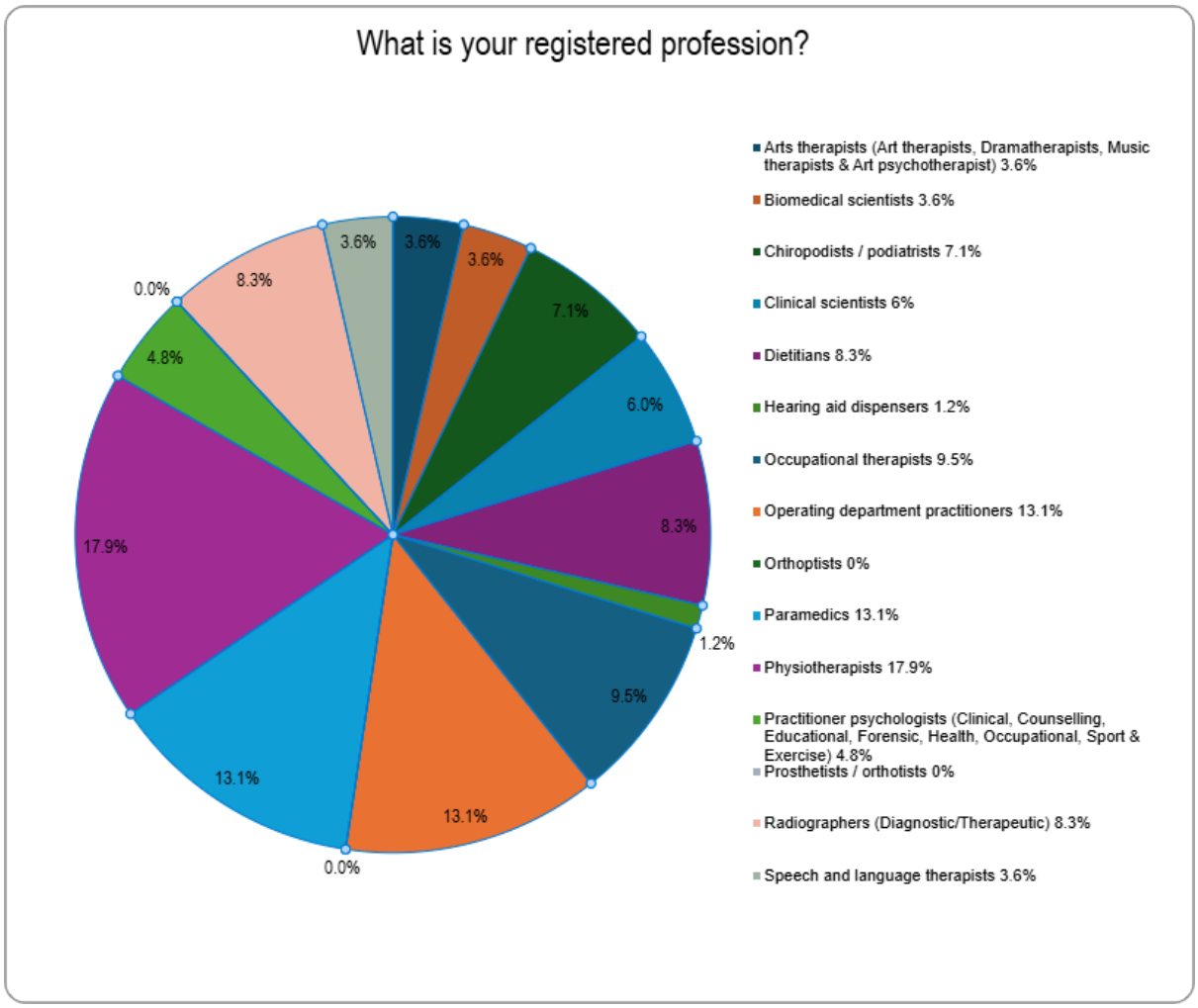
Graph 1 – Breakdown of individual respondents

We asked those who were not responding on behalf of an organisation whether they were a HCPC registrant.



Graph 2 – Breakdown of registrant respondents

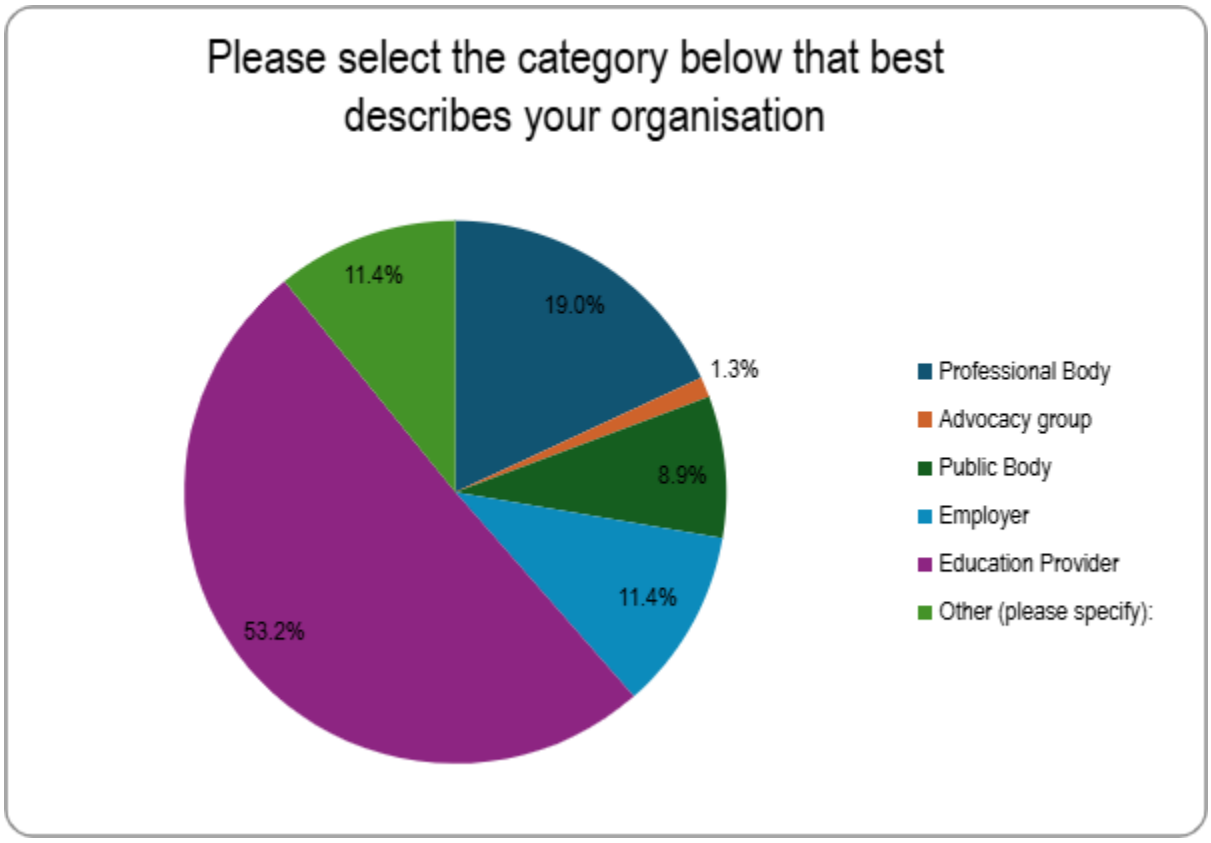
Respondents who answered that they were a HCPC registrant were asked which profession they were registered as. The breakdown of responses is as follows: Arts therapists (3 respondents) Biomedical scientists (3 respondents), Chiropodists/Podiatrists (6 respondents, Clinical scientists (5 respondents), Dietitians (7 respondents), Hearing aid dispensers (1 respondent), Occupational therapists (8 respondents), ODPs (11 respondents), Orthoptists (0 respondents), Paramedics (11 respondents), Physiotherapists (15 respondents), Practitioner psychologists (4 respondents), Prosthetists/orthotists (0 respondents), Radiographers (7 respondents), and Speech and language therapists (3 respondents).



Graph 3 – Breakdown of organisation respondents

Respondents who answered that they were responding on behalf of an organisation were asked to select the category that best described them. The respondents who

selected “other” identified themselves as two trade unions, another health care professional regulator, and a civil service group.



Our consultation questions allowed for a mixture of quantitative and qualitative responses to be provided. The tables below provide some indicative statistics for the answers to the consultation queries. Where answers are only of a qualitative nature, the question on the table has been greyed out.

Table 1 – Breakdown of responses by question

	Support	No change/ Neutral	Oppose	Don’t know
Q1: *What effect has the revised structure (including the institution/programme split and glossary) had on the accessibility and understanding of the standards? Please explain your reasons as to*	58.7%	19.6%	7.4%	14.3%

why things have improved or not.				
Q2: *How well do the revised standards support the embedding of equality, diversity and inclusion across all aspects of education and training, and where could further improvements be made?*	62.2%	28.2%	4.3%	5.3%
Q3: *Do the revised standards take the right approach to supporting inclusive education and training and addressing barriers to access, participation, and course completion? Please explain your reasoning.*	52.7%	26.3%	10.8%	10.2%
Q4: *Do the revised standards set out sufficient expectations for providers on the appropriate role of technology in education? How could they be further improved?*	47.3%	34.6%	11.5%	6.6%
Q5: *Are the revised standards applicable to all models of learning, including apprenticeships, blended learning, and employer-led programmes? Please explain any gaps you believe to be present.*	Applicable to all (only Q5)	Applicable to some (only Q5)	Applicable to none (only Q5)	
	58.7%	38.5%	2.8%	
Q6: *Are the expectations around partnership working and shared governance clear and appropriate for all settings where programmes are delivered? What could be improved?*	47.3%	30.4%	10.9%	11.4%

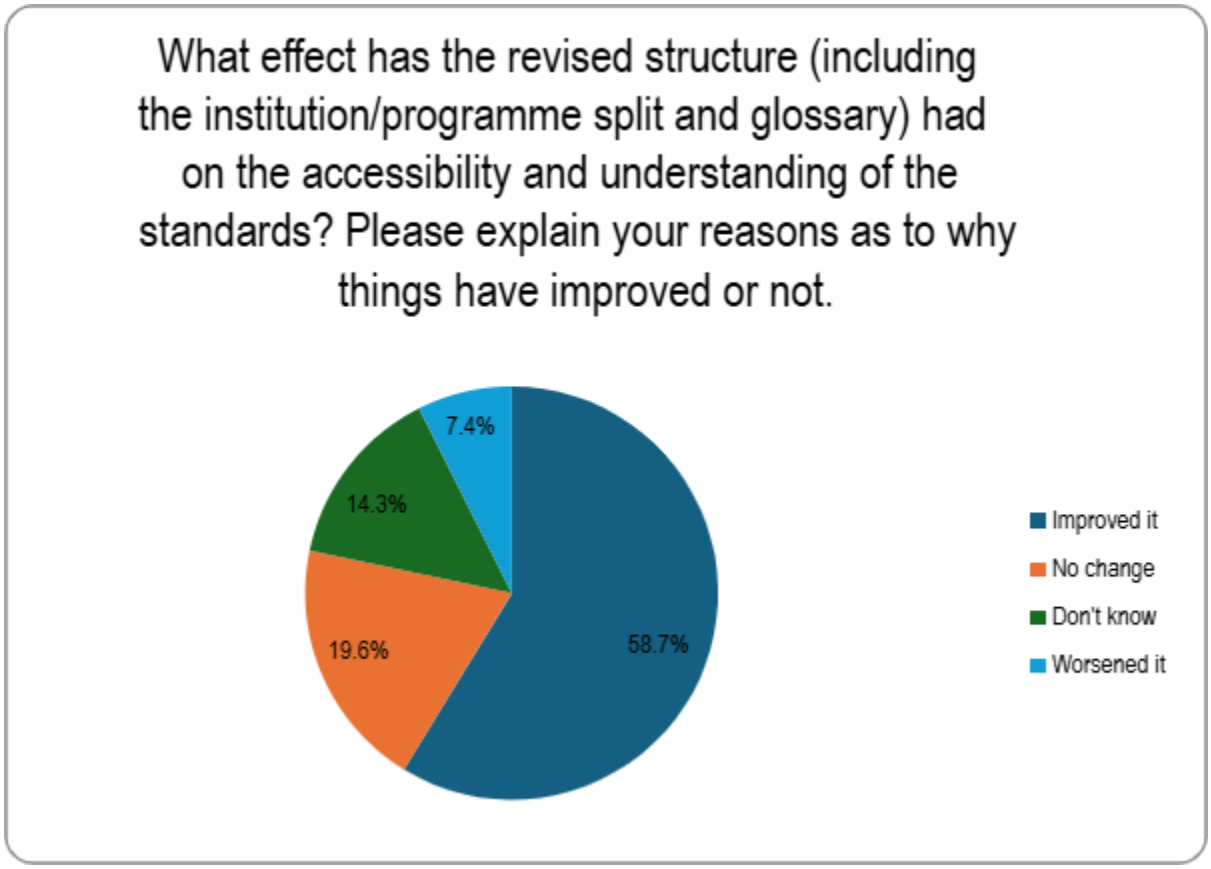
Q7: *Are there any aspects of the revised standards that could result in equality and diversity implications for groups or individuals based on protected characteristics, as defined by the Equality Act 2010?*				
Q8: *What challenges, if any, do you foresee in implementing the proposed revised standards within your organisation or sector?*				
Q9: *Once any changes to the standards are finalised, how long would your organisation need to implement the changes?*				
Q10: *Do you have additional comments, concerns, or recommendations about the proposed revisions to the standards of education and training not already discussed above?*				

- Percentages in the tables above have been rounded to the nearest whole number and therefore may not add up to 100 per cent.

4. Responses to consultation questions

This section provides an analysis of responses to questions on the revised standards of education and training.

Question 1: What effect has the revised structure (including the institution/programme split and glossary) had on the accessibility and understanding of the standards? Please explain your reasons as to why things have improved or not.



190 respondents answered this question. Most respondents (58.7%) agreed that the proposed changes improved the accessibility and understanding of the standards.

There were 138 further comments provided in response to this question, with the following themes present:

Structure

There were 88 comments that made reference to the improved structure of the standards. These referred to the positive impact that the formalised split of programme and institution level standards had on the accessibility and

understanding of the standards in relation to lines of accountability. Comments noted that the split will enable staff members to identify which elements of approval are aligned to them, which was noted as being particularly helpful across different models of learning. Overall, respondents commented that the standards had become "more intuitive to navigate".

Glossary

A number of respondents (22) made mention of the glossary in their response. They reported that the addition of the glossary clarified key terms used in the SETs, aided understanding, and reduced "variation in interpretation".

Some of these respondents (8) liked the glossary, but suggested some terms that they thought should be included, such as emerging concepts like 'digital learning', and 'blended learning'. We considered this feedback, but for clarity, wanted to ensure that our glossary only contains terms that are relevant to our standards. For example, some respondents also noted the inclusion of 'apology' in the glossary when we do not use that term in the wording of the standards. As such, we have removed 'apology' from the updated glossary.

Some respondents also noted environmental terms that they felt should be included such as "carbon literacy" and "planetary health". In the review of the standards, we did consider how we might feature sustainability. We decided against having a specific focus on environmental sustainability within our standards as this could drift into setting curriculum content or learning requirements around sustainability which is outside of the scope of this review. Therefore, we have decided against including these suggested terms in our glossary.

Clarity and Guidance

There were 16 comments that made reference to the clarity of the standards. 8 of these comments praised the revised wording of many of the standards as bringing about further clarity on what the standards mean and their application.

However, 12 of these comments either wished for improved or further clarity. Many of them mentioned the importance of the accompanying guidance to aid meaning and understanding of what the standards were saying. One comment noted that the standards were vague and too open to interpretation. The standards are supported by complementary guidance and this has been updated and published alongside the revised standards.

SET 1

There were 10 comments that referenced the proposed changes to SET 1 in answering this question. Concerns noted that changes to this standard, such as bringing the list of "normally expected" qualifications into the accompanying guidance may add confusion as to what qualifications are expected, and so may have a knock-on impact on the understanding of other standards. Other concerns also raised that the proposed change to the standard could be perceived to weaken entry requirements onto the Register

In the consultation, we proposed moving the list of qualifications into guidance rather than including them in the main body of the standard. The intention behind this was to recognise the increasingly varied delivery models in health and care education and allow for flexibility to accommodate innovation and difference while ensuring public protection. We also wanted to explicitly tie this standard to the level of qualification enabling delivery of the standards of proficiency and making it truly outcome-focused. Many respondents expressed concerns about this approach, stating their view that this could signal a perceived dilution of academic levels, and that moving the list into guidance could imply that the standard is optional.

We are not of the view that this proposal would have weakened entry requirements to the Register or diluted academic levels, as the application of the standard has remained the same. However, we recognise the strength of feeling shown in responses to our proposals around SET 1 which was also reflected in responses to other questions and in our stakeholder engagement sessions during the consultation. With this in mind we have decided to amend our approach in revising this standard. In the updated standards we have instead move the list of qualifications into an appendix to the standards, instead of moving them into a separate guidance document. This will allow us the original intended flexibility of the standard, whilst signalling that the list of “normally expected” qualifications is important. We believe this will mitigate the risk that the changes may be perceived as a lowering of our standards in terms of academic level of achievement for qualifications leading to registration with the HCPC.

No change

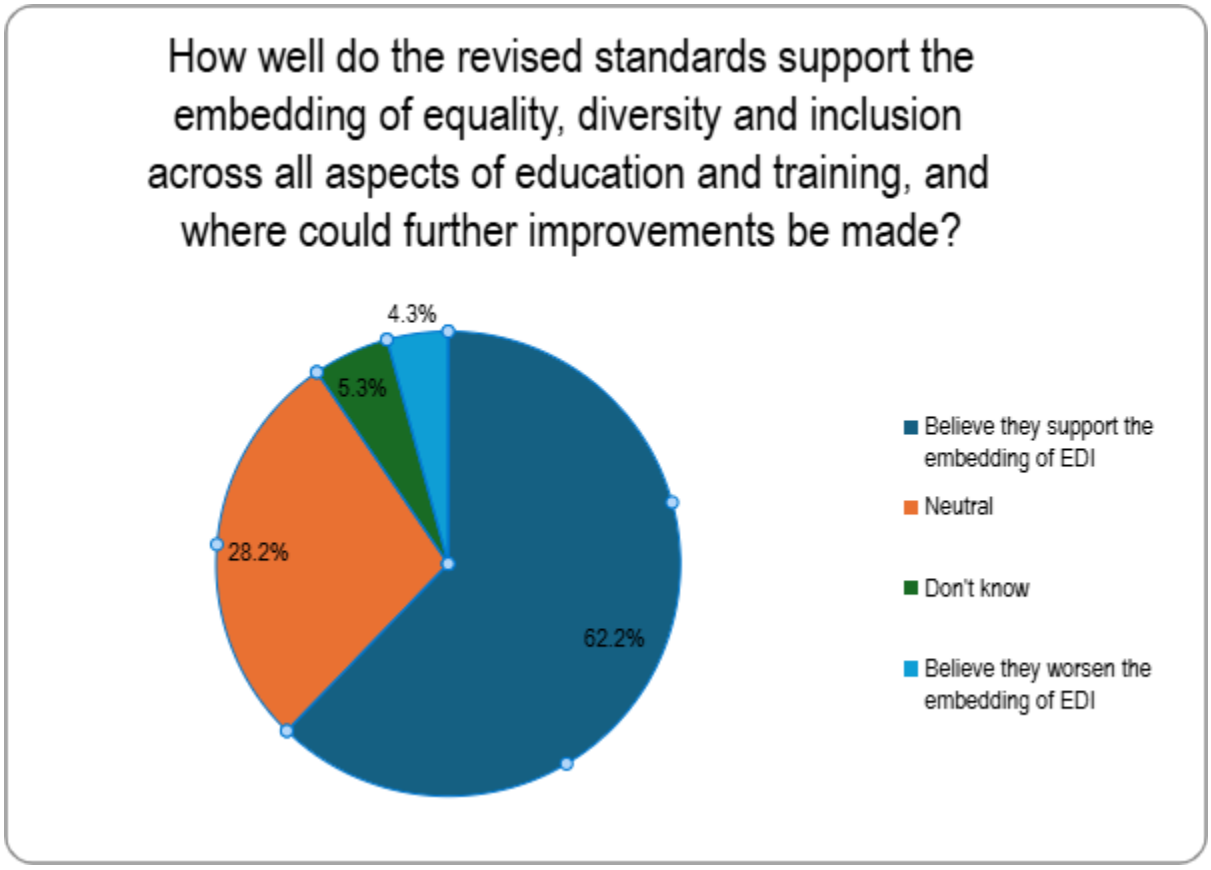
A small number of respondents (7) noted in their comments that they did not recognise any change in the proposals for changing the structure. They noted that they either were not previously familiar with the standards, or that they did not see how the standards had changed.

Introduction and foreword

There were 3 respondents who mentioned the inclusion of the foreword and introduction to the standards. One respondent welcomed the inclusion of the information on how the HCPC works with professional bodies but noted that this may need to be further clarified to talk about how professional bodies shape the application of the standards.

In response to this feedback, we have updated our introduction to expand further on our work with education providers, and our work with professional bodies.

Question 2: How well do the revised standards support the embedding of equality, diversity and inclusion across all aspects of education and training, and where could further improvements be made?



189 respondents answered this question. The majority of respondents (62%) agreed that the revised standards support the embedding of equality, diversity and inclusion across all aspects of education and training.

There were 133 further comments made in relation to this question. The following themes were present in those comments:

Strengthened

There were 50 comments that praised the proposals for the strengthening and alignment of the proposed standards. Respondents referred to the clearer expectations and active language of the standards, and were positive about the holistic approach to EDI in embedding it throughout the SETs. Some respondents also recognised this strengthening as an alignment with the HCPC's other standards, as the standards of proficiency and standards of conduct, performance and ethics have both been reviewed with an emphasis on strengthening EDI.

A large portion of respondents (29) also expressed that the standards could be strengthened further. Some felt that the standards could be more explicit in their requirements and cited using examples and guidance as potential ways to achieve this. We will be drafting the complementary guidance alongside the final standards which will provide some further clarification.

Monitoring

This was the second most prevalent theme from respondents answering this question, with 21 respondents noting that introducing mechanisms for measuring EDI outcomes in education training programmes could strengthen accountability and ensure that they understand what "success looks like" in implementing the standards. The complementary guidance is available alongside the final standards and provides some further clarification on what should be monitored and with specific examples and details on the standards.

Diversity and health inequalities

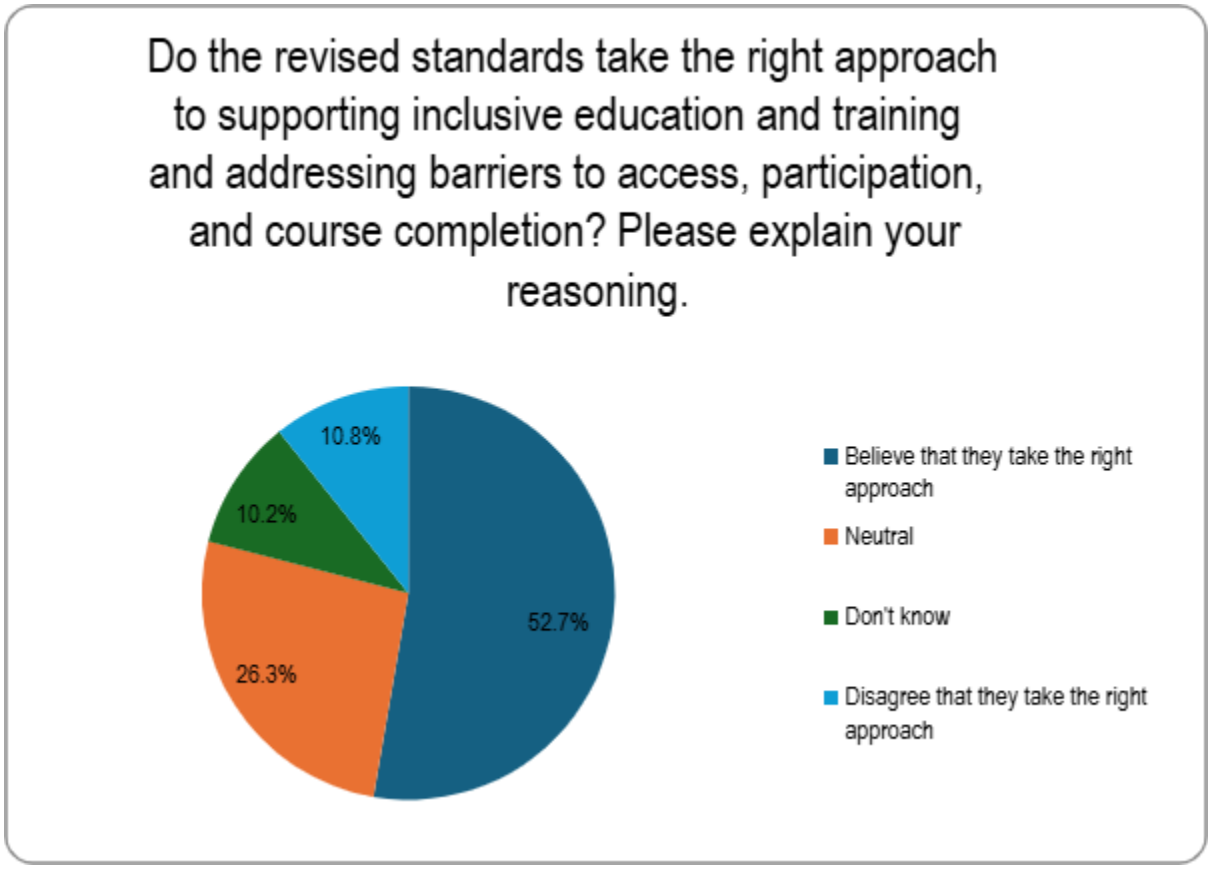
We received several comments noting that the standards should address how programmes prepare learners to meet the needs of a diverse population and how health inequalities can affect how particular groups access care. We recognise that this is an important topic, however including these requirements would go beyond the remit of the SETs. Our standards of proficiency set out our expectations for professionals to respond appropriately to the needs of all groups and individuals in practice, and to recognise the impact of culture, equality and diversity in practice and practise in a non-discriminatory and inclusive manner (standards of proficiency, 5.1 – 5.7). This also includes a requirement to recognise the characteristics and consequences of barriers to inclusion, and to actively challenge these barriers. The SETs act to ensure that learners are able to meet their standards of proficiency, and so we would not expand our EDI focused SETs to address these issues.

Our standards of conduct, performance and ethics also set out the expectation for registrants to challenge discrimination (standards 1.5, 1.6 and 1.7). This includes the expectation for registrants to take action to ensure that their own personal values, biases and beliefs do not lead them to discriminate against service users, carers or colleagues, and to raise concerns if colleagues are treating people unfairly on the basis of their personal values, beliefs and biases.

Over-emphasis

A small number of respondents felt that the proposed standards and approach placed too much emphasis on EDI as a theme. Whilst we acknowledge this feedback, we are committed to furthering EDI in our standards and ensuring our registrants' practice is inclusive and non-discriminatory. EDI has been a key part of the recent reviews of the standards of proficiency and the standards of conduct, performance and ethics and so we felt it was important to include it in this review to align these sets of standards.

Question 3: Do the revised standards take the right approach to supporting inclusive education and training and addressing barriers to access, participation, and course completion? Please explain your reasoning.



187 respondents answered this question. The majority of respondents (52.7%) answered that they believed the revised standards take the right approach in supporting inclusive education and training and addressing barriers to access, participation and course completion.

There were 121 further comments answering this question.

Accessibility

This was the most common theme, with 21 comments that mentioned accessibility in their response to this question. These comments included concerns about digital accessibility (8) and implementing reasonable adjustments (15) in programmes and institutions. We have provided more clarity in the complementary guidance around our expectations for providers to offer reasonable adjustments, and setting out links to relevant legislation.

Clarity

The next most prevalent theme was clarity, with 17 responses noting a need for clarity or more specific language in the standards. This included a need for strengthening standards or guidance in areas such as identifying and monitoring differential outcomes across learner groups. Some respondents picked out specific standards in their responses such as standard 2.3, standard 3.1, standard 3.2, standard 3.5

Respondents felt that without this clarity there was a risk of inconsistent implementation of the standards, which may lead to education providers entering into difficulties “when there is a lack of explanation of process to deliver the outcome required”. We are comfortable with our approach in the clarity of the standards as we have purposefully left them outcome focused and flexible in order to work across different models of learning. However, there is complementary guidance that has been published alongside the SETs and provides further detail on how the standard should be applied. We also have published our EDI quality indicators which also provide further guidance for education providers when implementing the SETs.

Admissions and standard 4.3

There were 16 comments that noted a change in admissions in the standards, with respondents highlighting positive changes such as recognition of prior learning and flexible delivery which would reduce barriers in education programmes and support entry for a diverse range of learners. Some comments noted that some of the terms used in these standards should be further clarified in the guidance.

There were also a few comments within this theme which specifically mentioned standard 4.3, where the proposal set out the removal of the explicit requirement to undertake criminal checks on learners. Some respondents were concerned this removal would potentially leave a gap in public protection.

In response to these concerns, we have put back this explicit requirement to undertake criminal checks back into the standard. The complementary guidance also includes all the same detail that supported the original three standards, including clarification around ‘conduct and character’ in relation to criminal convictions.

Wellbeing

There were 11 comments in response to this question relating to the introduction of our proposed standards on wellbeing, with respondents noting this as a positive change to the standards and that it could have a positive impact upon staff retention and recruitment onto programmes. Some comments suggested that these standards may wish to go further, and we have addressed this by adding some extra detail in the accompanying guidance.

SET 1

There were 6 comments in response to this question that referenced the changes to SET 1 (new standard 7.1) and noted concerns around the changes to the standard and its impact upon inclusive education and training. Concerns noted that the proposed changes could create variability across the sector, and may create ambiguity and confusion around what level of qualification is needed, which could then lead to barriers in learners being able to access programmes.

We have responded to these concerns by amending our approach, as set out above regarding Question 1.

Standard 2.4

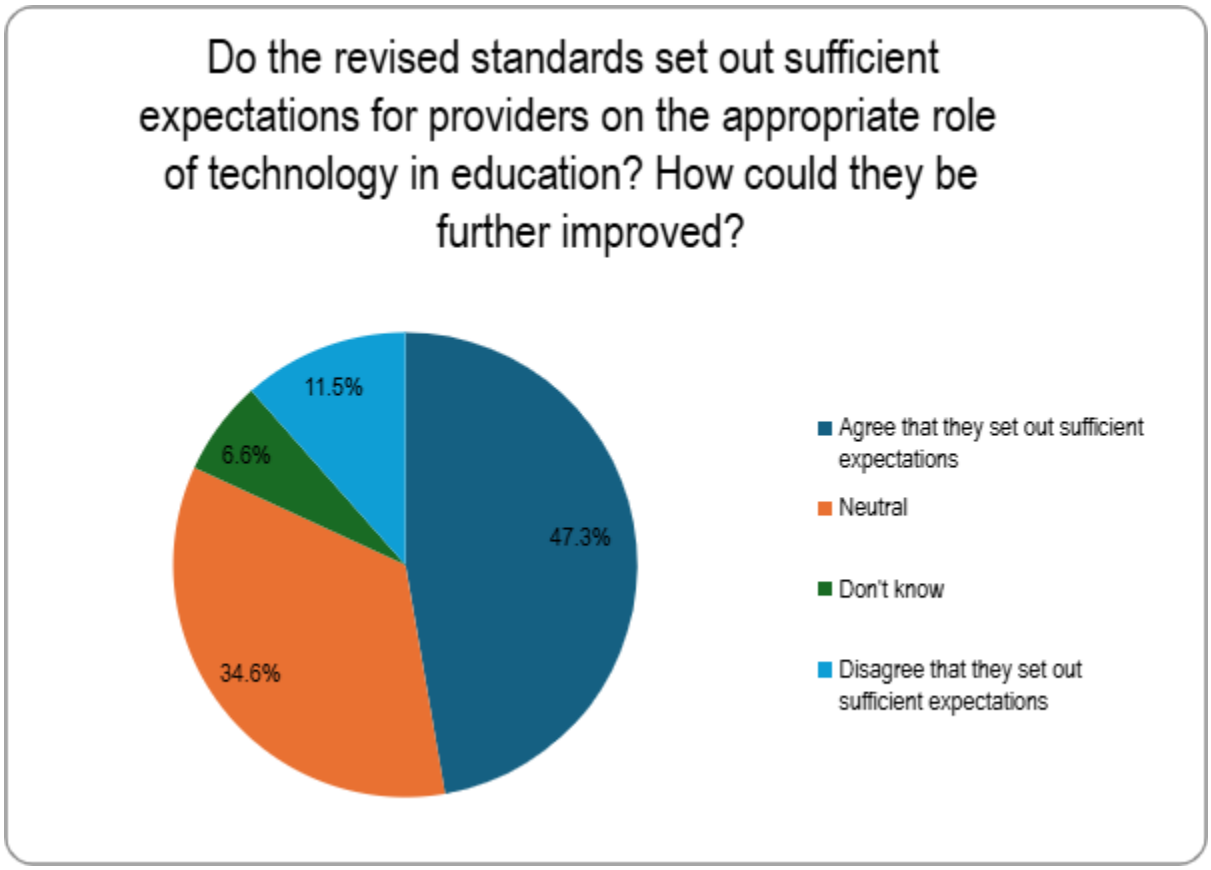
Three respondents made mention of the changes to standard 2.4 (previously standard 3.3). In the consultation we proposed removing the reference to individuals being on the relevant part of the register to align with the current application of the standard, as set out in existing guidance. The intention behind this was to simplify the wording and move away from the negative framing. However, some respondents noted concerns about a perceived dilution of professional oversight.

In response to these comments, we have set out in the guidance what "suitably qualified" means, and clarified that it can mean being on the appropriate part of the Register.

Minimum attendance requirements

Two comments mentioned including minimum attendance requirements in the standards, and this is a comment that was reflected in answers to some of the other consultation questions. We would not include these kinds of inputs – they are prescriptive and so not in line with the outcome focused nature of the SETs.

Question 4: Do the revised standards set out sufficient expectations for providers on the appropriate role of technology in education? How could they be further improved?



183 respondents answered this question. The majority of respondents (47.3%) answered that they agree that the revised standards set out sufficient expectations for providers on the appropriate role of technology in education.

There were 120 further comments answering this question.

Strengthening

Almost half of respondents (57) mentioned in their comments that they felt the move towards creating some technology-specific standards in the SETs was a positive one, as it signalled a shift in the growing importance of digital skills and reflected how important using technology has become within education and training programmes.

A large number of respondents (40) also called for these standards to be further strengthened, with some (6) suggesting technologies such as artificial intelligence (AI) should be specified within the standards. This is not something that we would look to introduce within the standards, as naming any particular technology in the standard here would date it quickly, and would potentially curtail education providers. Instead, we have an outcome based approach in our standards which frames our broader expectations around appropriate ethical and effective uses of technology. This reflects the approach we have taken in our standards of proficiency and standards of conduct, performance and ethics. We will, however, keep monitoring the situation for consideration in future reviews to ensure that this approach is still the right one.

Digital accessibility

Digital inclusion and accessibility was a key theme in responses to this question with 16 respondents noting this in their answer. This included some comments noting that the standards should have further guidance to clarify how technology can be used to improve accessibility and flexibility without compromising quality. Whilst the standards are published with complementary guidance alongside it, including information on how technology should be used would be outside the scope of the standards as the standards take an outcome focused approach, and allow for flexibility.

Some other comments noted that with the new standards, there was also a risk of digital exclusion and commented that the standards should provide guidance and clarity on how to address those barriers and support learners, this is something we have considered in our updated guidance.

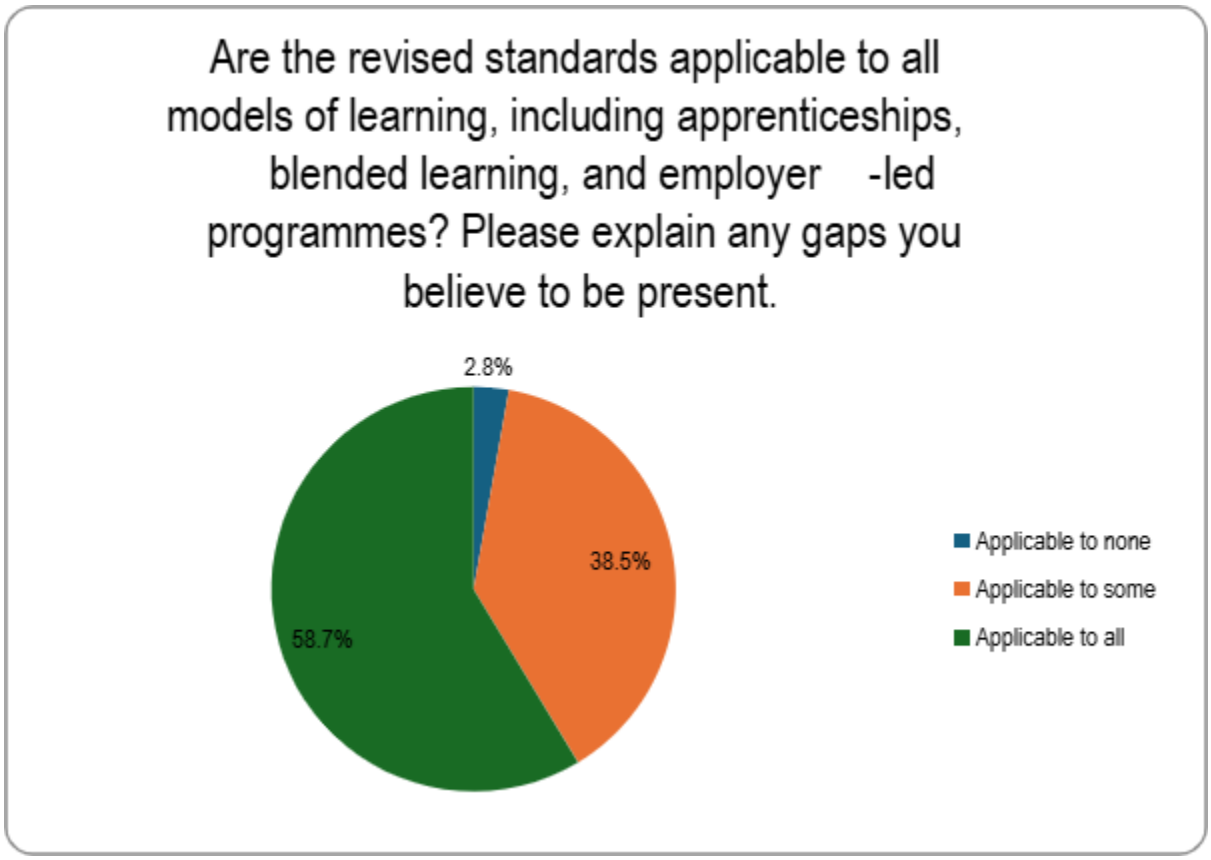
Standard 5.5

Some respondents (11) noted concerns that the new technology based standards did not require education providers to monitor the use of technology.

In response to these comments, we have decided to reword the standard to clarify the meaning and application of it. We have added ‘ethical’ and ‘assessment’ to the standard to signify that this is a key part of the purpose of the standard. We have also added the requirement to embed and review the use of technology once it has been communicated to demonstrate that providers will need to ensure that the

expectations they set are being followed and are being regularly reviewed with policies updated to keep pace. There will also be further information in the complementary guidance which will outline that monitoring may play a role in providers' evidencing that the expectations are embedded

Question 5: Are the revised standards applicable to all models of learning, including apprenticeships, blended learning, and employer-led programmes? Please explain any gaps you believe to be present.



180 respondents answered this question. Respondents were largely in favour of our proposals, with 58.7% of respondents agreeing that the revised standards were appliable to all models of learning. There were 106 further comments in relation to this question.

Flexibility

Many respondents (18) praised the flexibility of the standards and how they would be applicable to different models of learning, one noting that they were "inclusive and worded in a clearer way". A further 9 specifically noted the clearer language of the new standards, saying that the clearer language and flexibility ensured that providers could apply the same core principles across different models of learning in an effective way.

Employer-led models

There were 9 respondents who noted difficulties and concerns around employer-led models of learning. Comments noted that different employers and practice-based learning opportunities can offer different learning experiences and support, and that the revised standards do not require providers to actively monitor and mitigate to ensure equitable outcomes for all learners. Other comments felt that whilst the standards were now flexible, they were still largely centred towards formal educational programmes, and that there was a risk of inconsistency unless some measurable requirements were introduced.

However, we remain confident that our flexible and outcome focussed approach remains right for the SETs. We have revised the terminology in standard 6.2 (previously standard 6.7) to remove the requirement to have an “external examiner” and now require “external scrutiny” for programmes. This strengthens expectations for effective external scrutiny, but moves away from HEI-focused language. This supports flexibility whilst maintaining quality assurance.

Through our education QA assessments, we ensure that the education provider has systems in place to ensure practice-based learning supports the deliver of the programme’s learning outcomes, ensure learners and service users are safe, and actively monitor and address any problems that arise. We would expect equitable support for learners through practice-based learning, and our standards require monitoring of practice-based learning.

Accountability

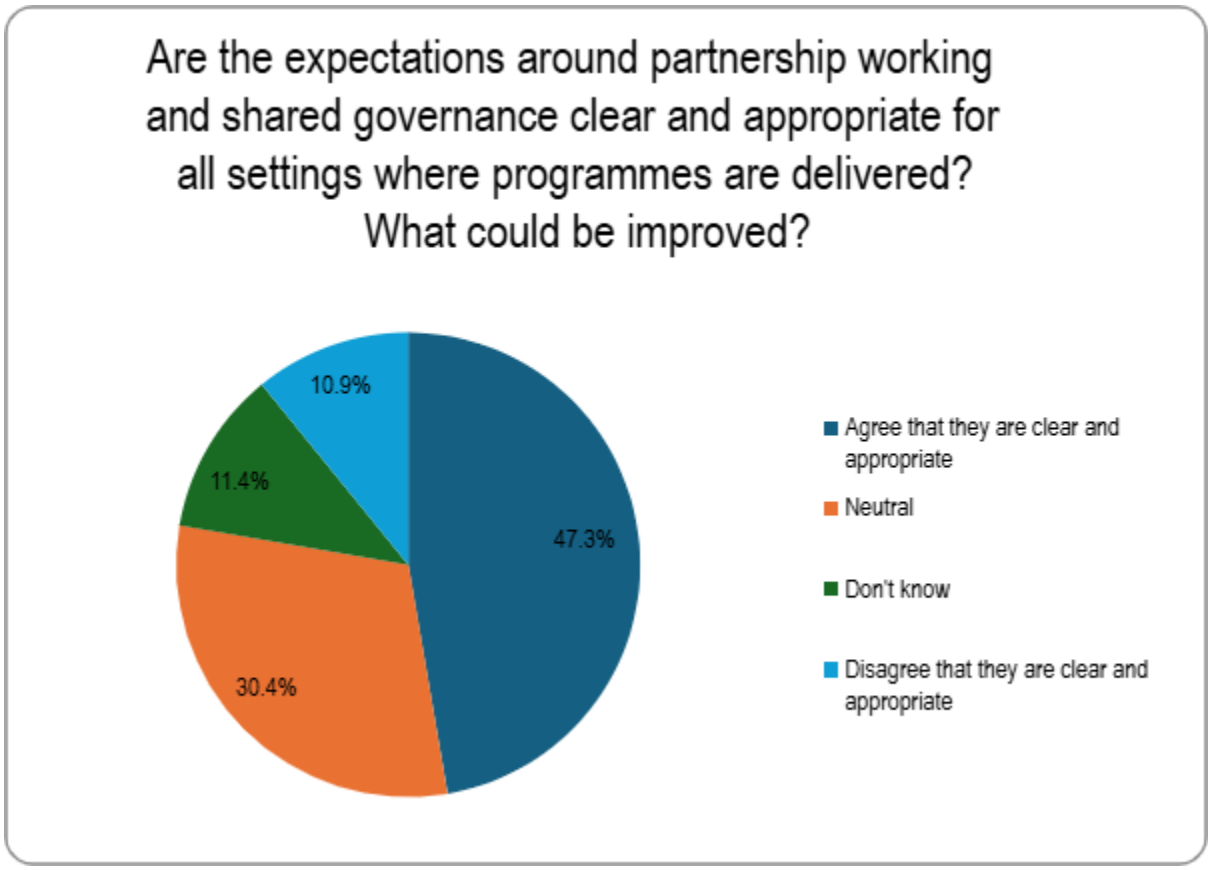
There were 6 respondents who noted concerns about a potential gap or confusion in knowing where accountability for programmes lies. This was particularly prominent in employer-led models and more complex programmes, such as service-commissioned programmes. We consider that it remains clear that the education provider retains overall responsibility for their programmes and meeting and maintaining all standards.

Professional bodies

There were 2 comments that made mention of the importance of professional bodies and that they should be further reflected in the wording of the standards. One of the comments suggested adding in detail of each of the professional bodies for each of the 15 different professions that we regulate and deferring to their professional standards. This is not something that we would look to do, as it is not in line with our outcome focused approach, and may quickly date the standards as professional standards change. As a regulator, we also would not look to defer to professional bodies standards alone, although we accept they are an important tool.

Another comment also noted the proposed changes to standard 8.3 in removing the reference to professional body’s curriculum guidance. We have done this to make the standard more flexible and applicable to all the different professions, some of which do not have professional bodies that produce curricula. We will add some further information in the complementary guidance to clarify that “external reference points” can mean, amongst other things, curriculum guidance set by professional bodies.

Question 6: Are the expectations around partnership working and shared governance clear and appropriate for all settings where programmes are delivered? What could be improved?



185 respondents answered this question. The majority of those who answered this question (47.3%) agreed that expectations in the standards around partnership working and shared governance were clear and appropriate for all setting. However, a large proportion of respondents (30.4%) gave a neutral response to this question. There were 93 comments raised in response to this question.

Guidance

A number of respondents (15) mentioned the need for some further guidance in their response to this question, particularly in relation to roles, responsibilities, safeguarding and escalation. Some respondents also expressed a wish to see clearer guidance on how expectations should be operationalised across different settings.

Accountability

The next most common theme was accountability and responsibility, with many respondents (14) expressing a need for there to be clearer lines of accountability across partnerships and a risk of "diffusing responsibility". One comment made mention of standard 1.1 which references financial sustainability when setting up a

programme, and noted a risk where is it unclear who is responsible when financial, workforce, or operational pressures arise. Several comments noted a tension between shared versus ultimate accountability when applying and implementing the standards.

Stakeholders

There were 13 respondents who made mention of different stakeholders within their comments. Many comments were very supportive of the emphasis on learner and service user voice throughout the standards but noted some concerns on how this could be done meaningfully. For example, one respondent noted that whilst service users and carers should be involved, it was unreasonable to expect them to evaluate certain training programmes without specialist knowledge of the profession. A couple of comments also questioned what would count as meaningful involvement. We have set out in the accompanying guidance what we mean by meaningful involvement.

Some respondents also raised the issue of professional body involvement. One respondent was concerned that the information in the introduction of the standards about our work with professional bodies was incorrect. Another respondent noted that whilst the information in the introduction was welcomed, it was not meaningfully integrated into the standards. Within these comments, there was also concern noted around changes to standard 8.7 which no longer references curriculum guidance, but instead “relevant external reference points”. This was a change updating expectations for curriculum content to ensure it reflects the philosophy, core values, skills, and knowledge base of the profession, rather than only those articulated in curriculum guidance. Our proposed change in the wording of the standard acknowledges the different reference points that may be reflected in programme content as well as the differences across professional bodies, whether reference points are termed “curriculum guidance” or otherwise, but the application of the standard remains the same.

Governance structure

This theme was identified in 8 comments, where respondents spoke about governance and the need for there to be frameworks in place for complex partnerships. Some respondents suggested that there was a need for practical examples of governance models for multi-partner arrangements. Three of these comments also made mention of digital governance expectations, with one saying they should be “embedded” to “ensure shared accountability and consistent learner experience”.

Question 7: Are there any aspects of the revised standards that could result in equality and diversity implications for groups or individuals based on protected characteristics, as defined by the Equality Act 2010?

104 respondents answered this question, however 46 of these felt that they did not understand the question, answered that they did not know, or that they thought there were no implications with no further comment.

Reasonable adjustments

This was the most common theme with 9 respondents mentioning it in their answer to this question. Many were concerned that the wording of the proposed standards did not require providers to make reasonable adjustments for learners with varying needs. There are concerns that this could lead some learners to be at a systemic disadvantage in terms of access to assessments, practice-based learning and opportunities.

We would expect all providers to provide reasonable adjustments to their learners as set out in legislation, so it would not be something we would explicitly lay out in the standards. Our standards are also outcome focused and flexible, and so with this approach we would be unable to provide guidance on every aspect of implementing reasonable adjustments. However, we have heard these concerns and so we will provide some further clarification through our complementary guidance on our expectations around reasonable adjustments

Digital inclusion

This was a prominent theme with 8 respondents mentioning it in their responses. There were some concerns in the comments that a reliance on technology due to different models of learning could place some learners at a disadvantage if they were lacking digital resources.

Monitoring

There were 7 respondents who mentioned the importance of monitoring in their response, highlighting how monitoring the impact of the standards could have an effect on differential attainment and ensuring mechanisms are in place to identify and respond to disparities. We undertake regular monitoring through our performance review exercise where there is a portfolio area on EDI. We also listen to any concerns and take action where there is an impact on our standards.

Lack of clarity

Some respondents (5) felt that the standards were not always fully clear in terms of language used. The use of broader terminology in the standards to create more flexible and usable standards sometimes created some confusion and some respondents felt there was sometimes a risk with this. For example, one respondent commented that standard 4.4 may create a risk in taking out the explicit requirement to carry out criminal conviction checks. In response to concerns around this standard, we have now added that explicit requirement back into the wording of the standard as outlined above (now standard 4.3). We have responded to these concerns more fully under question 3.

Question 8: What challenges, if any, do you foresee in implementing the proposed revised standards within your organisation or sector?

137 respondents providing answers to this question in although 28 of those respondents either answered that they could not foresee any challenges or that they believed themselves to already be compliant with the proposed standards. In the remaining comments, the following themes were present:

Guidance

There were 27 respondents who mentioned the need for further guidance and clarity in their response. This included expressing a need for further case studies and FAQs during the implementation period. The SETs has complementary guidance that has been updated alongside the final standards.

Staffing

There were 22 respondents who noted the burden on staffing and resources in implementing the revised standards, with 5 of those respondents commenting on the need for further staff education and to develop their staff's skillsets.

Technology

Some responses (20) spoke about technology and how the introduction of new technology themed standards would create a challenge in implementation. This included the need for further staff training in certain areas and the cost of ensuring that technology was implemented as the standards required.

EDI

There were 8 responses that spoke about the importance of EDI and the challenges reflected on implementation of the standards. Primarily, it was around ensuring that the resource demands in embedding the new focus on EDI were met, with respondents reporting that ensuring EDI was embedded in a "meaningful way" through programmes would require planning, resourcing and support.

SET 1

Some responses (7) noted concerns around the proposed changes to SET 1 as a challenge in implementing the standards. Comments noted that they perceived the standard to be a dilution or removal of academic levels, and concerns around the impact this standard could have on quality thresholds.

We have responded to these concerns by amending our approach, as set out underneath Question 1.

Monitoring

There were 7 respondents who spoke about monitoring as a challenge in their response. This included some positive comments around how the revised structure would aid education providers in carrying out monitoring of the new standards and some comments noting concerns that the new standards would require more extensive systems to monitor the outcomes in relation to standards on EDI and

technology. All of these comments, however, did recognise the importance of monitoring within the standards to ensure compliance and outcomes across programmes.

Accountability and responsibility

A small number of responses (6) talked about shared accountability in their answer. This included ensuring that responsibility for implementing the standards was shared across institutional and programme levels, and ensuring it enabled "coherent and collaborative" delivery of the standards.

Practice-based learning variability

There were also a small number of responses (5) that were concerned with the variability of practice-based learning opportunities and settings and that there could be challenges implementing the standards to ensure both the availability of quality practice-based learning opportunities, and also the consistency of accessibility and support in those placement settings.

Standard 6.3 and standard 2.4

A small number (5) of concerns were expressed around proposed changes to these standards and the changing of the wording to remove the words "on the relevant part of the register" from the standard and replacing it with "suitably qualified". Some respondents commented that this removes minimum qualification or experience requirements and has created a vague standard. We removed the reference to individuals being on the relevant part of the register to align with the current application of the standard as set out in existing guidance. Removing the wording in this way maintains the current application of the standard whilst removing complex and negative wording. Both standards now focus on the responsible person being appropriately qualified and experienced for the role, and align with broader EDI principles and stakeholder feedback on flexibility in staffing.

We have responded to these concerns under question 3.

Standard 8.7

There were also a small number (3) of comments around the changes to this standard noting perceived concerns about a shift away from aligning with professional body curriculum guidance and a weakening of the standard. Following consideration of the feedback, we have decided to maintain our proposed approach. Opening up the wording to state "relevant external reference points" instead of "relevant curriculum guidance" makes the standard more flexible as not every professional body provides curriculum guidance. The updated guidance will further clarify what relevant external points means, and that it can include professional bodies and curriculum guidance.

Question 9: Once any changes to the standards are finalised, how long would your organisation need to implement the changes?

We had 133 responses to this question.

Time span for implementation	Number of responses	Percentage
3 – 5 years	3	4%
12 – 24 months	16	20%
3 - 12 months/ within next academic year	48	61%
Immediately/ less than 3 months	6	8%
Within next review cycle	4	5%
Depends on changes	2	3%

The majority of respondents supported a timeline for implementation between 3 -12 months, with the second most popular response being 12-24 months. We consider that on balance a 12 month timeframe would be the most suitable. This would allow education providers to implement the revisions in a timely manner whilst giving them enough time to understand and embed the new standards in an effective way. Giving education providers a 12 month timetable would also align with how education providers' internal governance and quality assurance mechanisms usually work, which would ease some of the resourcing burden and risk to quality that a shorter implementation timeframe could cause.

Respondents who answered this question mentioned in their answers that this timeframe would allow them to deliver the relevant training, align partnership agreements, and update any programme materials.

Question 10: Do you have additional comments, concerns, or recommendations about the proposed revisions to the standards of education and training not already discussed above?

There were 118 respondents who answered this question, although 32 of these were simply responding that they had no additional comments or concerns. A further 23 respondents thanked the HCPC for the changes to the standards, 10 of these made mention of needing some further guidance upon implementation of the standards. There is complementary guidance which has been drafted alongside the final standards.

SET 1

This was the most common concern raised in response this question with 11 respondents mentioning it in their answers. Comments noted concerns that the proposed changes to the standard may allow 'back-door' approval of programmes".

We have responded to these concerns by amending our approach, as set out above in relation to Question 1.

Clarity and Guidance

There were 10 responses to this question that suggested having further clarity through guidance and examples to sit alongside the standards. As noted above, we have updated our accompanying guidance to provide further clarify on a number of the issues raised in the consultation.

EDI

Comments (5) were generally positive about changes we had made around EDI and strengthening it through our revised standards. However, some respondents commented that there should be further guidance on how to implement these standards and how to ensure that reasonable adjustments are consistent throughout the standards.

We have heard these concerns, and our approach to reasonable adjustments is set out above in response to question 7.

Technology

Generally, comments (5) were supportive of our proposals around strengthening the technology and digital focus in our standards. However, some respondents noted that we could have gone further in our proposals, with some suggestions of including expectations around education providers' own use of "digital technologies and resources to support high-quality, contemporary teaching and learning".

Sustainability

There were 3 responses that made mention of this theme in their answer. One of them was in relation to environmental sustainability, noting that this should have been a key area to provide a future focused view of practice. During the review, we considered having a standard on environmental sustainability and, after consideration and discussion with the Education and Training Committee and Council, decided against it. Including a sustainability focused programme level standard would be regulatory overreach as it would drift into setting curriculum content. Having a standard at institutional level would also be beyond the scope of the standards, as we cannot prescribe how the institution should run. Therefore, we are comfortable with our approach in not having an environmental sustainability standard.

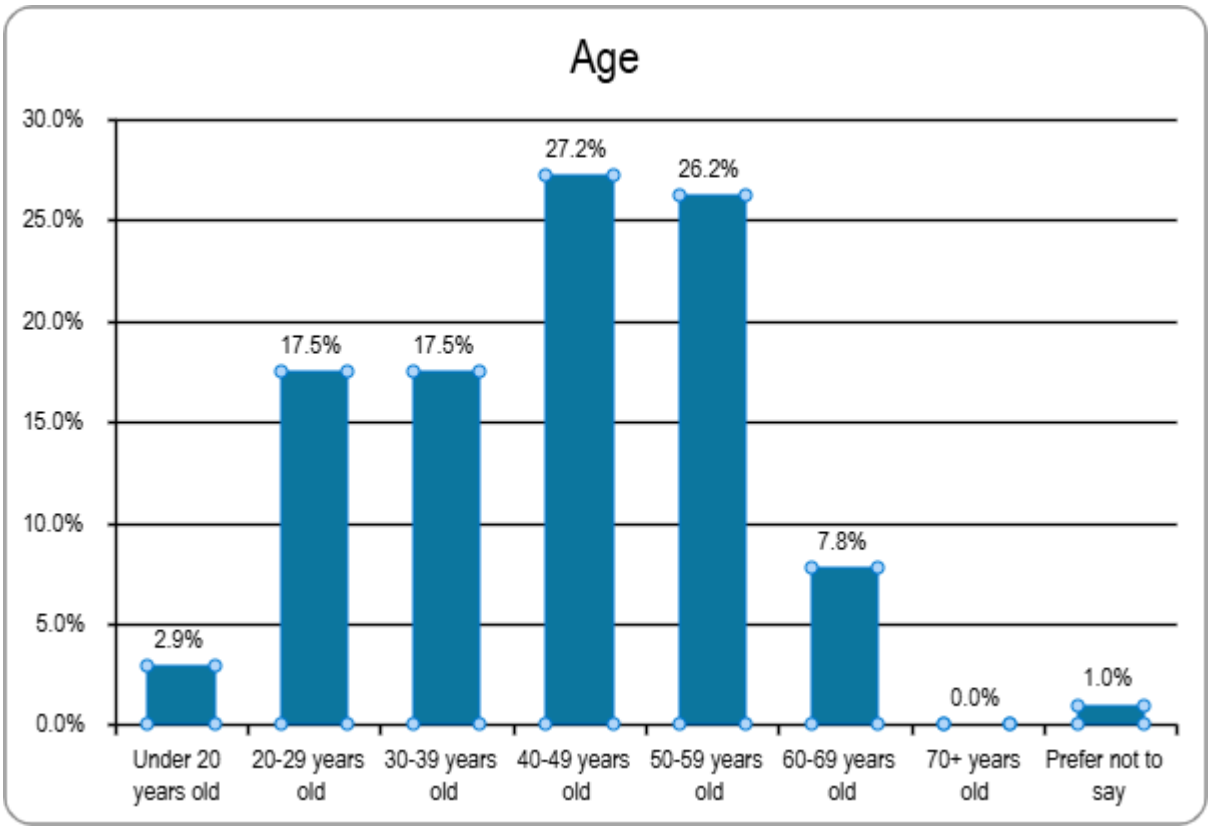
Other comments were around ensuring financial and workforce sustainability in implementing the standards, and asked for clarity on what that means. This is something that we can expand upon in the complementary guidance.

Implementation

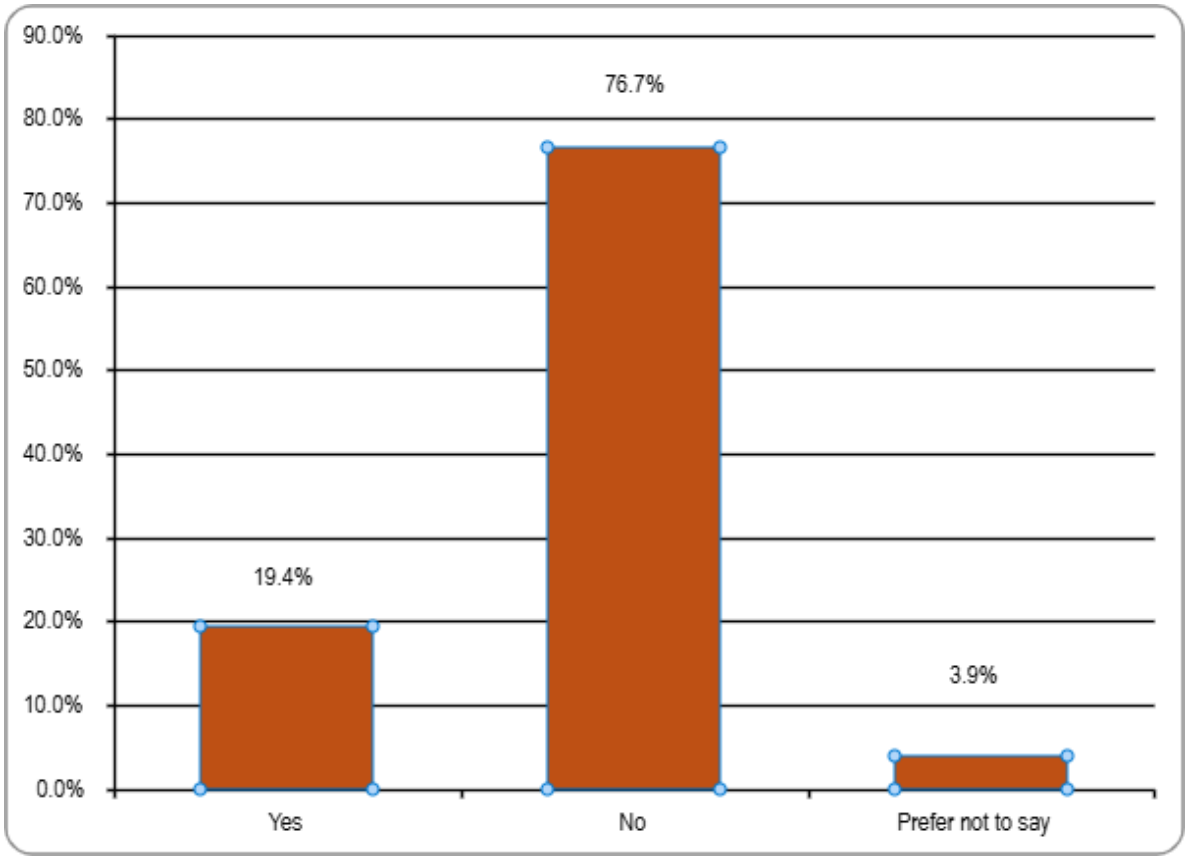
Two responses mentioned implementation and suggested resources such as mapping tools and gap analysis documents to support it. We will consider including these in our implementation plan.

4 Responses to EDI monitoring questions

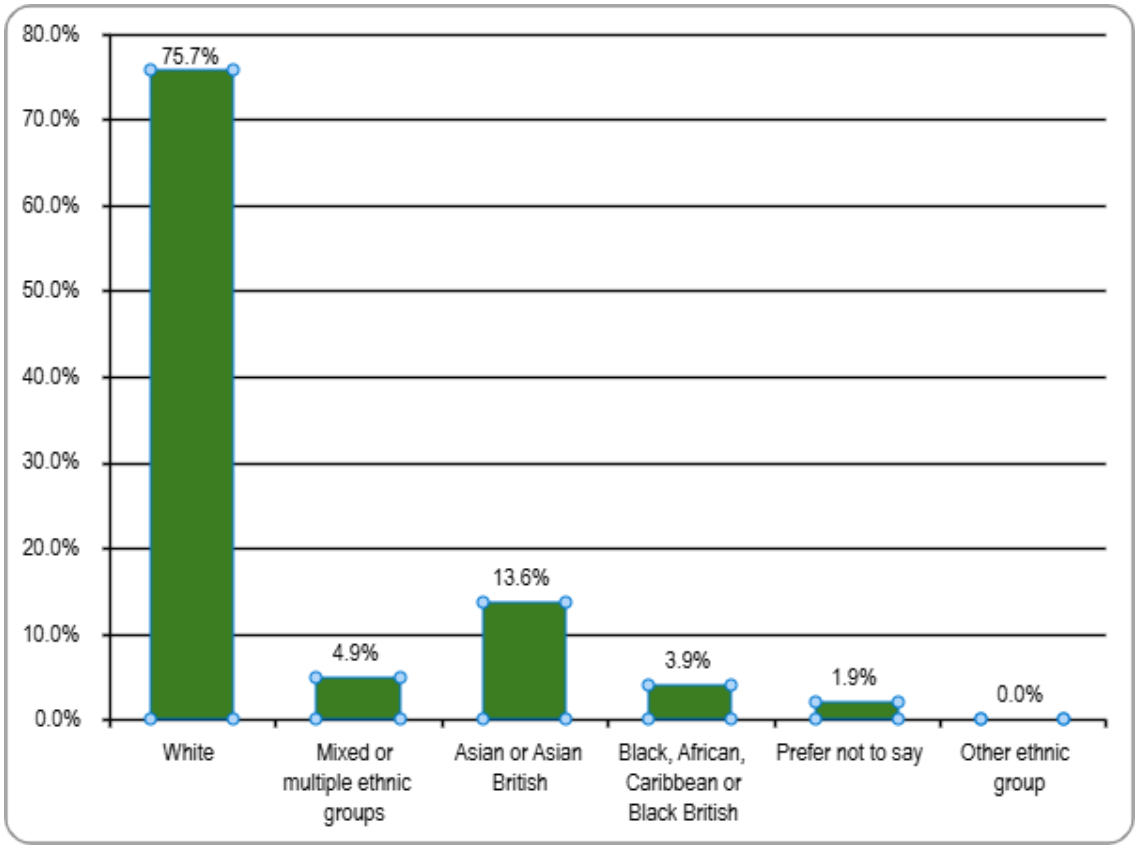
1. Which age group do you belong to?



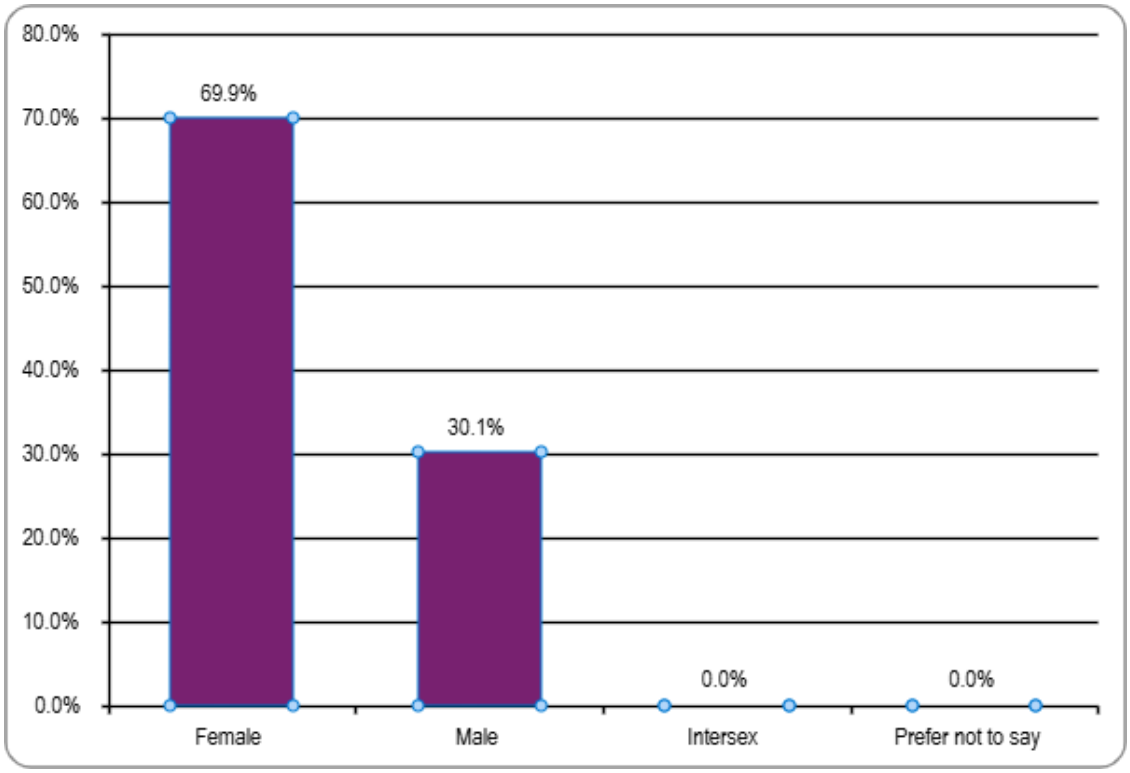
2. Do you consider yourself to have a disability or to be a disabled person? In the UK, a disability is defined as "a physical or mental impairment which has a substantial and long-term (meaning impact has lasted, or is expected to last, for 12 months or more) adverse effect on a person's ability to carry out normal day-to-day activities" You may have none, one, or more conditions that you believe are covered by this definition. Please answer how you feel this definition applies to you.



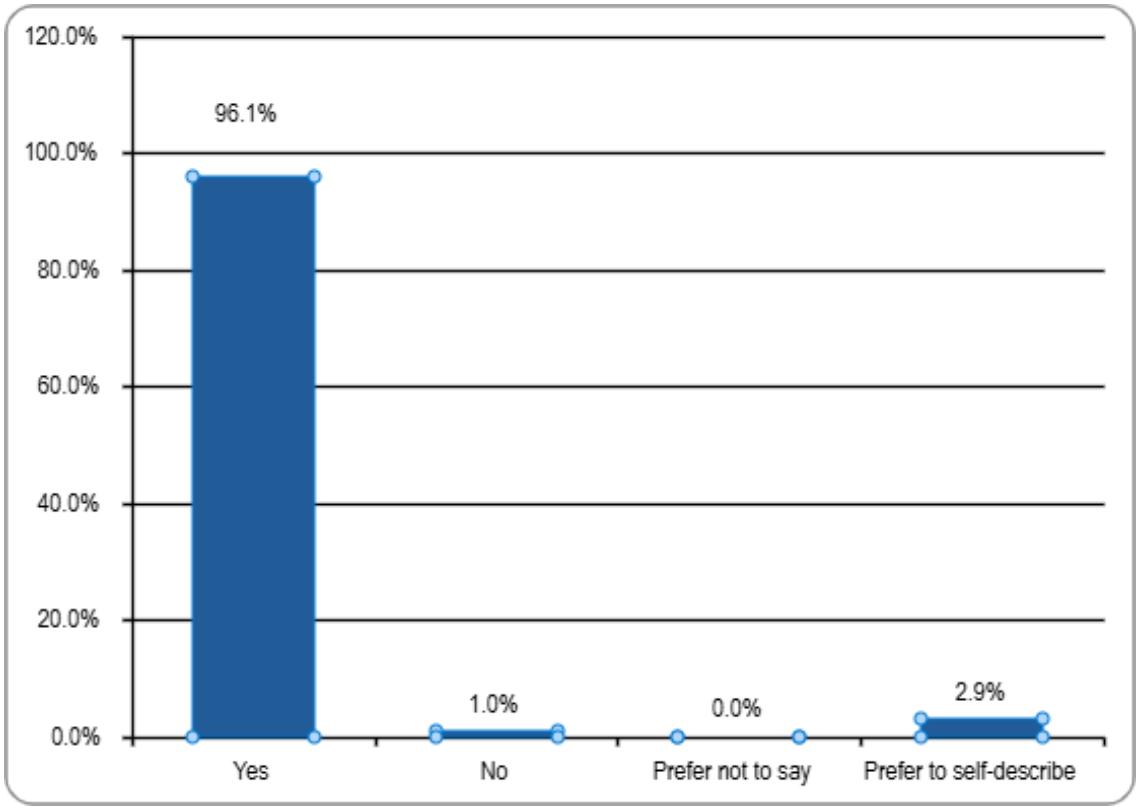
3. Which of the following best describes your ethnic origin? (Ethnicity is defined as including colour, ethnic or national origin, or nationality. Please choose whichever answer best reflects how you think of yourself.)



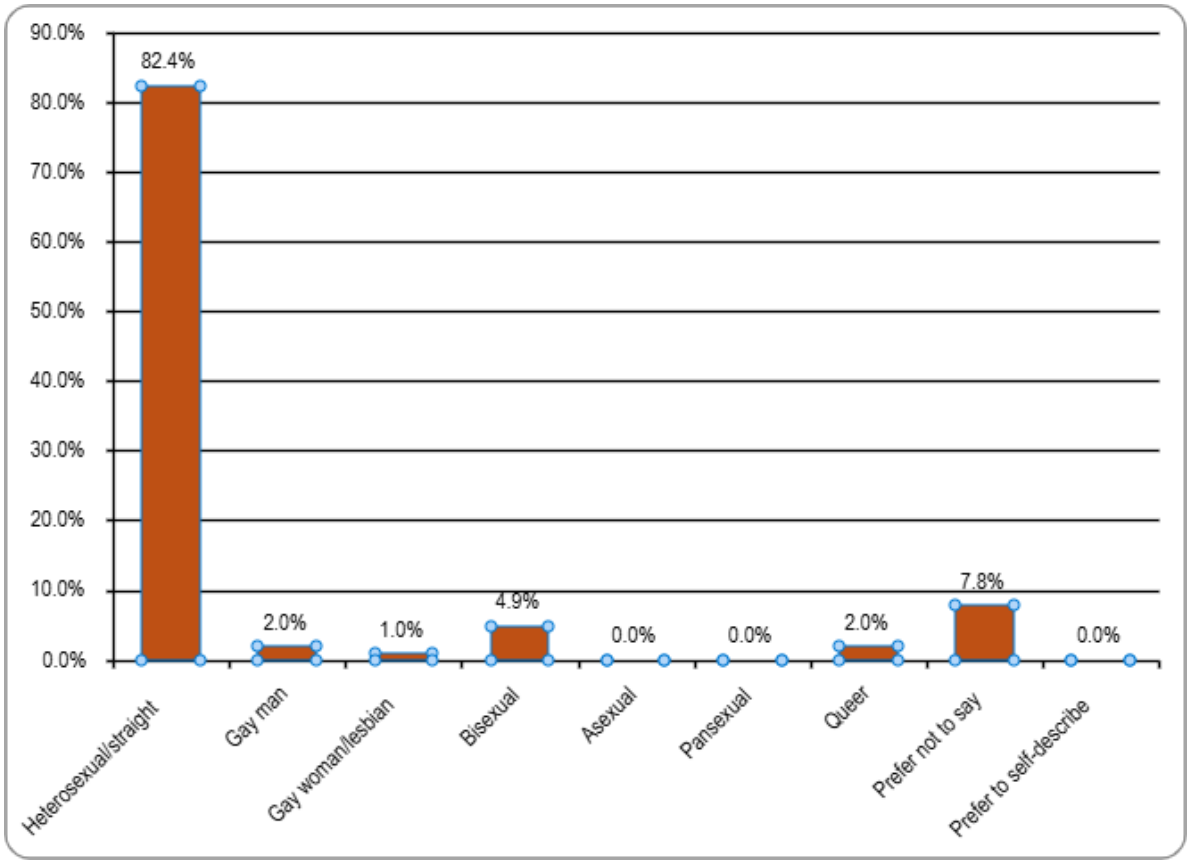
4. What is your sex? For births registered in the UK, this will either be male or female. However, some other countries may include 'intersex' as an option.



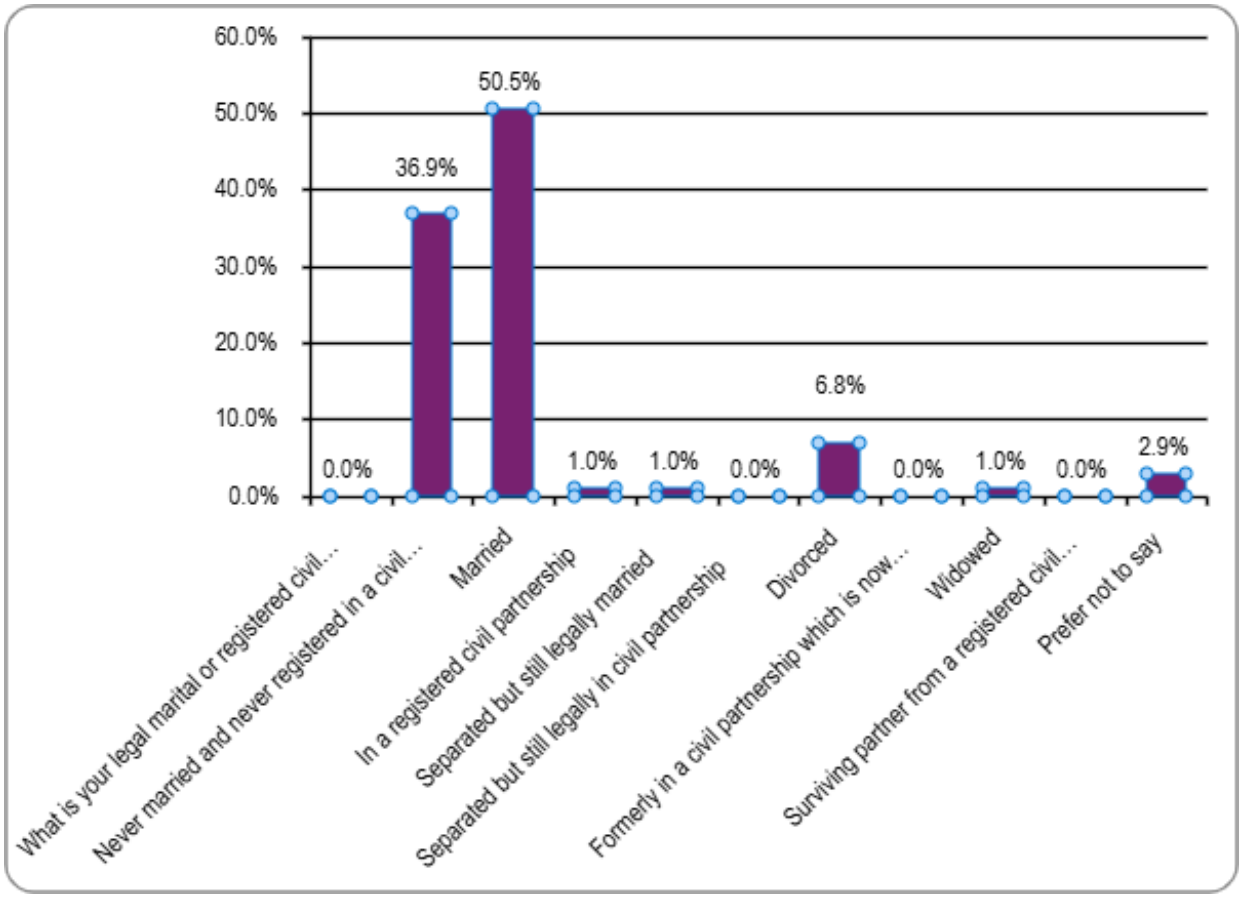
5. Is the gender you identify with the same as your sex registered at birth? Your gender identity may be the same as your assigned sex, but it may be different. You may identify as the opposite gender to your assigned sex, you may identify with neither, or with a self-described gender identity.



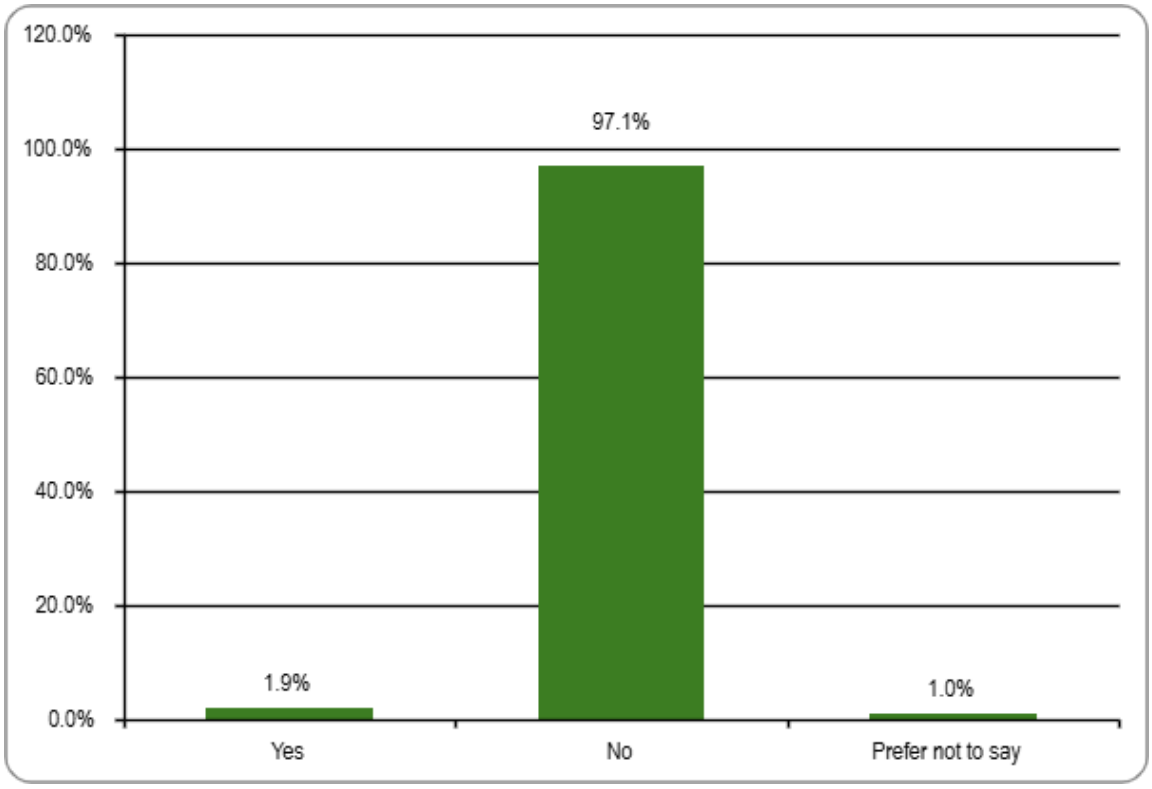
6. Which of the following best describes your sexual orientation?



7. What is your legal marital or registered civil partnership status?



8. Do you consider yourself to fall under the protected characteristic of 'pregnancy & maternity' as per the Equality Act 2010? 'Pregnancy' refers to the condition of being pregnant or expecting a baby, and 'maternity' refers to the period of 26 weeks after birth. The Equality Act 2010 protections also cover a someone who has had a miscarriage.


120.0%
100.0%
80.0%
60.0%
40.0%
20.0%
0.0%
97.1%
1.9%
1.0%
Yes
No
Prefer not to say