

## HCPC approval process report

Education provider	University of Sheffield
Name of programme(s)	MMedSci Vision and Strabismus, Distance learning PG Exemptions Course, Distance learning BMed Sci (Hons) Orthoptics, Full time
Approval visit date	27-28 March 2018
Case reference	CAS-12233-D4V3V8

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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 and our 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
Gordon Burrow	Chiropodist / podiatrist (Prescription only medicines – administration)
Susanne Roff	Lay
Eloise O'Connell	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.

Patty Cowell	Independent chair (supplied by the education provider)	University of Sheffield
Steph Allen	Secretary (supplied by the education provider)	University of Sheffield

## Section 2: Programme details

Programme name	BMed Sci (Hons) Orthoptics
Mode of study	FT (Full time)
Profession	Orthoptist
Entitlement	Orthoptist exemptions
Proposed First intake	01 September 2017 This intake date pre-dates the visit date (27-28 March 2018) in order to include those learners who will transfer on to the new programme in year two of their studies. These learners will be assessed to meet the standards for orthoptists using exemptions for the sale and supply of medicines in the third and final year of the new programme. This will enable learners from the 2017 intake on the old programme, who successfully complete and graduate from 2020 onwards, to apply for the annotation on the register.
Maximum learner cohort	Up to 45
Intakes per year	1
Assessment reference	APP01941

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 our standards of education and training, standards of proficiency for Orthoptists and the Standards for the use by orthoptists of exemptions to sell and supply medicines, for the first time.

The proposed new programme is intended as a pre-registration programme for Orthoptists, with a contained module to allow for the entitlement of 'Orthoptist exemptions' on completion of the programme.

Programme name	MMedSci Vision and Strabismus
Mode of study	DL (Distance learning)
Entitlement	Orthoptist exemptions
Proposed First intake	01 September 2018
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP01812

Programme name	PG Exemptions Course
Mode of study	DL (Distance learning)
Entitlement	Orthoptist exemptions
Proposed First intake	01 September 2018
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP01821

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 the programme

meets the Standards for the use by orthoptists of exemptions to sell and supply medicines for the first time. The module will be a shared module, which will be offered to registered Orthoptists, as both stand-alone and contained within the MMedSci Vision and Strabismus programme.

As mentioned in the tables above, the education provider are proposing the following:

- Postgraduate orthoptist exemption module to be included in the current non-HCPC approved MMedSci Vision and Strabismus programme.
- Standalone postgraduate orthoptist exemption module for registered Orthoptists
- New BMedSci (Hons) Orthoptics with an Orthoptist exemption module

### 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 document	Yes
Completed proficiency standards mapping document	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	Comments
Learners	Yes	We met with learners and graduates of the current HCPC approved BMedSci (Orthoptics) and graduates of the non-HCPC approved MMedSci (Vision and Strabismus).
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 23 May 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.**

#### **A.1 The admissions procedures must give both the applicant and 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 demonstrate that admission information is accurate and consistent, in order to give applicants the information they require so that they can make an informed choice about whether they take up the offer of a place on the programme.

**Reason:** On review of the documentation prior to the visit, the visitors found inconsistent information in relation to the interview process for applicants. The visitors read across the documentation that there will be three mini interviews, however noted that page 2 of 'Appendix 4 – Admissions Interviewing procedures and Questions' suggests four mini interviews, stating that "An individual candidate may start at any of the three stations and will rotate through all three in 20 minutes. In addition, there will be a further assessment where students guides will be asked to rate the candidates..." At the visit, the programme team clarified that the interview process has three mini interviews and two mini interviews for international applicants. The visitors noted that the documentation provided could cause confusion for potential applicants, and therefore the visitors require the education provider to revise the documentation to ensure clarity and consistency in the information provided to applicants.

#### **A.2 The admissions procedures must apply selection and entry criteria, including appropriate academic and professional entry standards.**

**Condition:** The education provider must revise documentation to demonstrate that the admissions procedures apply appropriate academic and professional entry standards.

**Reason:** For the postgraduate module for orthoptist exemptions, the visitors were not clear how applicants were made aware that successful completion of the exemptions module contained within the MMedSci Vision and Strabismus, would only allow

registered Orthoptists to be eligible to apply for an annotation on the HCPC register. The visitors note on 'Appendix 2 – Exemptions E1 Module Form' states special restrictions on who is permitted to take this module "Restricted to students on OPHT01 or as stand-alone modules by qualified Orthoptists / eye-care practitioners." Therefore, the visitors were not clear how learners would be aware that successful completion of the exemptions module would only lead to registered Orthoptists, and no other learners such as other "eye-care professionals" being eligible to apply for an annotation on the HCPC register. As such, the visitors require the education provider to amend programme documentation, to accurately reflect the entry requirements (special restrictions) that apply to the orthoptist exemption 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:** The education provider must revise documentation to ensure that learners, educators and others are aware that only successful completion of an approved programme leads to eligibility for admission to the Register.

**Reason:** The visitors were not clear from the documentation where the exit points were for learners on the BMedSci programme, and how applicants were made aware that only successful completion of the entire programme would lead to eligibility for admission to the Register. For example, the programme specification for the BMedSci, states under "Intermediate Qualification(s)" – "Not applicable". However, page 7 of the programme specification states, "If a candidate fails to achieve honours the degree of BMedSci (Ocular Studies) will be awarded. This exit degree may be awarded without the candidate being successful in the Clinical Orthoptics part of the final examination provided all other components are successfully completed." Page 23 of the student handbook states "Where a 'pass' degree is awarded this shall be BMedSci (Ocular Studies). This is not an honours degree". Due to the disparity in the information provided, the visitors were unclear at what point learners would be awarded this exit award. Additionally, the documentation does not explicitly state that this exit qualification does not lead to eligibility for admission to the Register. As such, the visitors could not determine that applicants are made aware that a BMedSci (Ocular Studies) would not lead to eligibility for admission to the Register. The visitors therefore require further evidence from the education provider to demonstrate how learners are made aware at which point they may receive an exit award and that the exit award does not lead to eligibility to apply for Registration, to determine whether this standard is met.

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

**Condition:** The education provider must demonstrate that there are effective processes in place for obtaining appropriate consent from learners in the academic setting.

**Reason:** On review of the documentation, the visitors noted that the education provider referenced the 'BMedSci (Orthoptics) Entry agreement' form for obtaining consent for learners. The entry agreement includes a statement about learners agreeing to participate in practising clinical examinations on other learners and being willing to allow other learners to examine them. However, the visitors were not clear how this relates to obtaining consent for peer examination in training rooms for example, in the academic setting, as the visitors have not seen an explicit process for obtaining consent from

learners in this setting. At the visit, the visitors asked the learners about their experience with consent procedures. It was the learners' understanding that consent is implied, by going along to the sessions and agreeing to be on the programme, and that explicit consent giving was not necessary, as the testing is non-invasive. However, the visitors were not clear how implied consent or consenting through an entry agreement would demonstrate an effective process for obtaining appropriate consent from learners in the academic setting. As the visitors have not seen a consent procedure beyond the entry agreement for the programme, the visitors were not clear how learners are made fully aware of the implications of consenting and their options for choosing not to consent. Therefore, the visitors require further evidence in order to make a judgement as to whether this standard has been met.

#### **D.6 Practice placement educators must have relevant knowledge, skills and experience.**

**Condition:** The education provider must demonstrate how they ensure that practice placement educators for the orthoptist exemption module have the relevant knowledge, skills and experience.

**Reason:** On review of the information provided, the visitors read that learners are required to ascertain the support and signature of a primary exemptions tutor, who will be a person who is currently able to supply and administer the medications exempted for orthoptists. The documentation states that this person will mentor and support the learner during the programme, and once qualified. At the visit, the visitors heard that the education provider will use ophthalmologists as the practice placement educators, until there are registered Orthoptists who have completed the qualification. However, the visitors were not clear what process the education provider has in place to ensure that the practice placement educators are appropriately registered, with the relevant knowledge, skills and experience. The visitors note that a learner signs a declaration that states they have an appropriately qualified practice placement educator, however the visitors are not clear how the education provider will quality assure this. In addition, the visitors were not clear if the practice educators for the orthoptist exemption module would undergo the education provider's training plan for practice educators. As such, the visitors were not clear how the education provider would train or quality assure the practice educators for the orthoptist exemption module to ensure that they have the relevant knowledge, skills and experience to assess learners on placement. As such, the visitors require further evidence to determine whether this standard is met.

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

#### **E.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.**

**Condition:** The education provider must clearly specify the requirements for progression and achievement within the programme.

**Reason:** On review of the documentation, the visitors were not clear how many attempts at assessment a learner would have on the BMedSci programme. In some of the documentation, it is stated that learners will have five or more attempts, and elsewhere it is mentioned in the documentation that learners could have four attempts. In the external examiner guidance document, it is noted that where there are five fails, this can be referred to a student review. However, the visitors were not clear if that

meant five fails on one subject, one academic year, or five fails on the programme in total. At the visit, the programme team clarified that the number of attempts learners have for each year, and that there is a “5-fail rule” over the period of the whole programme. However, due to the disparity in the information provided within the documentation the visitors could not see where this information is specified in the documentation provided, and therefore could not determine how learners would know the requirements for progression and achievement throughout the programme. As such, the visitors require further evidence of how this information is documented within the assessment policies in order to make a judgement about whether this standard is met.

For the postgraduate and undergraduate module for orthoptist exemptions, the visitors were not clear from the documentation if learners are required to pass all of the assessments in order to successfully complete the module. The visitors noted that ‘Appendix 15 - Standalone handbook’ states that if a module is failed, a learner has the opportunity to resit once. However, the visitors were not clear from the information provided whether a learner has to individually pass each assessment in order to pass the module. At the visit, the programme team clarified that as a learner must be competent in all areas, the learners are required to pass all of the assessments to complete the module. The visitors were satisfied by this response, however as this is not clear in the documentation, the visitors require further evidence to show how this is documented within the assessment regulations in order to make a judgement as to whether the standards are met.

**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 demonstrate that assessment regulations clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified.

**Reason:** The visitors note that under current arrangements for the BSc (Hons) Orthoptics programme, the education provider currently has arrangements in place for appointing an external examiner who is appropriately experienced, qualified and, unless other arrangements are agreed, is from the relevant part of the HCPC Register. However, as the education provider will now provide a module for orthoptist exemptions, the visitors were unable to see how the assessment regulations specify the requirement for the appointment of an external examiner appropriate to the programme considering the new module for orthoptist exemptions. As such, the visitors require further evidence from the education provider to demonstrate their requirements for the appointment of an external examiner who is appropriately qualified and experienced, in consideration of the new 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.



**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.**

**Recommendation:** The education provider could strengthen specialist knowledge and expertise of current Orthoptist staff on the programme, in relation to the use by orthoptists of exemptions to sell and supply medicines.

**Reason:** On review of the documentation, the visitors note that the staff providing the teaching on the BMedSci and postgraduate module for orthoptist exemptions; will be taught by an Optometrist and an Ophthalmologist would provide practice education. The visitors agree that this is appropriate, however note that there is limited staff on the programme with the relevant specialist expertise and knowledge of orthoptist exemptions, as there are currently no Orthoptists staff on the programme with the entitlement. As such, the visitors recommend that the education provider consider how to increase relevant specialist knowledge and expertise of the staff team in relation to orthoptist exemptions.

## Section 5: Outcome from second review

### **Second response to conditions required**

The education provider responded to the conditions set out in section 4. Following their consideration of this response, the visitors were satisfied that the conditions for several of the standards were met. However, they were not satisfied that the following conditions were met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following conditions are met, they require further evidence.

**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.**

**A.1 The admissions procedures must give both the applicant and 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 demonstrate that admission information is accurate and consistent, in order to give applicants the information they require so that they can make an informed choice about whether they take up the offer of a place on the programme.

**Reason condition not met at this time:** In response to this condition, the education provider provided 'Appendix 4' which states that there are three interviews for applicants, and highlighted that the website contains information about the selection process, but does not state specifically the number of mini-interview stations. The visitors note that the extract from the website states, "suitable applicants will be invited to attend a departmental open day which will include mini interviews to explore your suitability to study the orthoptic degree..." From this information, the visitors were not clear how an applicant would know that in order to be interviewed for their place on a programme they must attend the open day, as the education provider states "invited to

attend”, rather than suggesting that attendance would be a mandatory requirement. As such, the visitors could not determine that the applicants have the accurate information they require so that they can make an informed choice about whether to take up an offer of a place on the programme.

In addition, the education provider states that a reduced number of mini-interview stations is offered to overseas applicants due to the difficulty in achieving this via skype or virtual technology. The education provider has highlighted they do not specifically state the number of mini-interview stations that an overseas applicant would need to complete, on the website. As such, the visitors were not clear how applicants would be made aware of the different requirements for UK and overseas applicants. As such, the visitors could not determine that all applicants have the information they require to make an informed choice about whether to take up the offer of a place on the programme.

**Suggested documentation:** Revised documentation that demonstrates applicants must attend the open day in order to be interviewed, and that it is made clear to applicants there is a different application procedure for overseas applicants.

### **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 revise documentation to ensure that learners, educators and others are aware that only successful completion of an approved programme leads to eligibility for admission to the Register.

**Reason condition not met at this time:** In response to this condition, the education provider provided a revised programme specification for the BMedSci programme, where the ‘BMedSci Ocular Studies’ has been added as a final qualification to section 5. Section 13 of the revised programme specification lists the HCPC as the ‘Accrediting Professional of Statutory Body’. From reading this, it could appear that both the BMedSci (Hons) and the BMedSci Ocular studies are approved HCPC programmes, which would be incorrect as the BMedSci Ocular Studies is not HCPC approved. In addition to this, the visitors note that on the revised programme specification, section 15 ‘Background to the programme and subject area’ refers to the BMedSci (Orthoptics) and that completion of this programme will lead to eligibility for admission to the Register. However, this section does not include any information about the BMedSci Ocular studies, which is now listed as a final qualification. The visitors considered that this may be misleading for learners as only one of the final qualifications is referred to in this section. The visitors considered that if this section does not make a distinction between the two programmes, and whether they are registerable qualifications, learners may not understand the difference between the two programmes. The visitors note that it is stated further down in the programme specification that the BMedSci (Ocular studies) is an exit award and does not lead to eligibility for admission to the Register, however as it is not made clear in section 15 this could cause confusion, as it is listed as a final qualification. As such, the visitors could not determine that it was clear that only the final qualification of BMedSci (Orthoptics) would lead to eligibility to apply to the Register, as there is no mention of the other final qualification in section 15 of the programme specification.

**Suggested documentation:** Revised programme specification to clearly identify that the BMedSci Ocular studies is not an HCPC approve programme, and does not lead to eligibility for admission to the Register.

#### **D.6 Practice placement educators must have relevant knowledge, skills and experience.**

**Condition:** The education provider must demonstrate how they ensure that practice placement educators for the orthoptist exemption module have the relevant knowledge, skills and experience.

**Reason condition not met at this time:** In response to this condition, the education provider has stated that once a primary exemptions tutor (PET) support form has been submitted for an accepted applicant, the programme administrators will check that the PET has appropriate registration with the relevant regulatory body. The education provider demonstrated that this requirement has been added to relevant documentation. From the information provided, the visitors could not determine that the education provider has addressed all of the points raised in the initial condition. From the first review, the visitors were not clear how the education provider would train or quality assure the practice educators for the orthoptist exemption module to ensure that they have the relevant knowledge, skills and experience to assess learners on placement. In their response, the education provider has not addressed how a PET is trained, in some form to ensure that a PET is prepared to undertake the role, and has the necessary information to know what is expected of them as a PET for the programme. From the information provided, the visitors could not determine how the education provider ensures that the PET has the relevant knowledge, skills and experience to undertake the role. In regards to quality assurance, the visitors note that the education provider will ensure the PET is appropriately registered. However, the visitors have not seen that the education provider has a plan to quality assure the PET's assessment of learners on placement, for example a process whereby the education provider could accept or decline the PET's recommendation that a learner can practice independently. As such, the visitors require further information as to how the education provider ensures that a PET has the necessary information to be prepared to undertake the role (training), and how they ensure that PET's will undertake the role effectively (quality assurance).

**Suggested documentation:** Evidence on how the education provider will ensure that PETs receive appropriate training, such as receiving necessary information to prepare them to undertake the role, and how they quality assure the PET's, such as a logbook completed by the PET and learner to demonstrate the mentoring and assessment that took place.

### **Section 6: Visitors' recommendation**

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 5, 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 23 August 2018 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).