

Health Professions Council
The Council, 31st May 2007

**Standards of Education and Training - SET 6.7.5 – Consultation responses
document**

Executive Summary and Recommendations

Introduction

We consulted on the ‘Standards of Education and Training - SET 6.7.5’ from 2nd October 2006 to 16th February 2007.

Standard 6.7.5 currently requires that:

‘Assessment regulations must clearly specify requirements for the appointment of at least one external examiner from the relevant part of the HPC Register.’

We decided to consult on the standard having received feedback about the standard which suggested that it was causing difficulties to some approved programmes, and was not suitably flexible to meet the needs of the education sector.

On the 28th March 2007 the Education and Training Committee agreed the text of the consultation response document and recommended its approval by Council.

Decision

The Council is invited to:

- Agree the text of the consultation responses document.

- Agree the wording of SET 6.7.5.

SET 6.7.5 should now read:

‘Assessment regulations must clearly specify requirements for the appointment of at least one external examiner from the relevant part of the HPC Register, unless other arrangements are agreed.’

- Agree that the required changes will be made to the standards of education and training and the SETs guidance so they are effective from the start of the next academic year

Background information

The Education and Training Committee agreed to consult on an alteration to SET 6.7.5 on the 13th June 2006, Council ratified this decision on 6th July 2006.

Resource implications

None

Financial implications

None

Background papers

None

Appendices

None

Date of paper

17th May 2007

Date
2007-05-17

Ver.
a

Dept/Cmte
POL

Doc Type
PPR

Title
SET 6.7.5 Consultation responses
document Council coversheet

Status
Final
DD: None

Int. Aud.
Public
RD: None

Standards of education and training - SET 6.7.5

Responses to our consultation

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Introduction

We consulted on the ‘Standards of Education and Training - SET 6.7.5’ from 2nd October 2006 to 16th February 2007.

Standard 6.7.5 currently requires that:

‘Assessment regulations must clearly specify requirements for the appointment of at least one external examiner from the relevant part of the HPC Register.’

We proposed in light of feedback we received that standard 6.7.5 should read:

‘Assessment regulations must clearly specify requirements for the appointment of at least one external examiner from the relevant part of the HPC Register, unless other arrangements are agreed.’

You can download the original consultation letter from our website:

<http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=35>

This document

In this document, we firstly consider the responses to the consultation. We then go on to explain the decision we have made as a result of those responses.

Your responses

The consultation letter was sent to a variety of different stakeholders including professional bodies and education providers. A list of those who responded can be found at the end of the document.

We would like to thank all those who responded to this consultation for their comments.

Key Themes

The majority of the responses received were in agreement with our proposal and few made any specific comments. Those who were particularly positive were often involved in multi-professional and multi-disciplinary programmes and those professions where there is currently a small number of academic staff who are practising the profession. The Department of Health in England said they were in support of the proposed amendment and said it would “*allow joint or common training to be approved in collaboration between parts of the Register and also with other health professions regulators*”.

The original stipulation is so limiting as to be virtually unworkable – individual response

However, one respondent expressed strong dissatisfaction and said: “*...to protect the public...this standard should not be relaxed.*” and that the proposed alteration did not improve or even maintain the Standards of Education and Training. In contrast, the General Optical Council stated that the amendment to the standard provides the HPC

with “greater flexibility, without compromising public protection or the quality of the programmes”.

The Society & College of Radiographers expressed concern that the wording in the proposed change was “vague and open to interpretation” and felt that there was insufficient guidance as to the amount of time any arrangements would be in place. They also noted that in most circumstances the external examiner will be from the relevant part of the Register but did not feel that the wording of the proposed amendment made this clear. They suggested in the short-term two external examiners should be used, one from the relevant part of the register with necessary subject expertise and one from another part of the register with relevant education experience. The Chartered Society of Physiotherapy expressed concern that some education providers “would take this opportunity to combine external examiner duties between two or more AHP programmes.”

One of the Standards of Education and Training is being diluted to address what is, essentially, a short-term problem - The Society & College of Radiographers

A number of respondents agreed in principal with the proposed amendment but felt that more detail was required in the standard. The College of Occupational Therapists felt the additional statement should read:

“Alternative arrangements must be agreed by the HPC at the time of programme approval and be subject to a time limit that takes account of the time required for the training for professional educators and practitioners from the relevant part of the Register for the role of external examiner.”

The external examiner should be allied to and have appropriate experience in the subject being examined, we can appreciate that this does not necessarily mean the examiner must come from the same discipline - PSNI

Others, such as the General Medical Council and Play Therapy UK felt that any clarification of the criteria required to meet the amended standards should be contained in the guidance notes.

A number of respondents asked “who has to agree the selection of the external examiner?”, whilst the British Dietetic

Association said that the guidance should strongly emphasise that professionals should be sought from the relevant part of the Register and then other arrangements should be agreed in exceptional circumstances.

Our response

We had previously received feedback about the standard which suggested it was causing difficulties to approved programmes, and was not be suitably flexible to meet the needs of the education sector.

In particular, when approving programmes for supplementary prescribing, education providers may wish to appoint an external examiner from a profession that has had

prescribing rights for a longer period of time, in order to ensure the integration of good professional prescribing knowledge into the programme. We also received queries from programmes in operating department practice who had successfully appointed external examiners who are registered nurses, and various pieces of feedback concerning external examiners in clinical science and biomedical science. We recognise the role that health professionals from other professions can play in education (for example, we already recognise that programme leaders, and practice placement educators may be from other professions, if appropriate) and do not wish to restrict this un-necessarily.

We agree that for many professions and education providers that any need to make use of the suggested amendment may be short-term. Our visitors would want to be sure that whatever the background of the external examiner that they were appropriately experienced and qualified.

We disagree that the suggested amendment dilutes the standard and lessens public protection. The statement 'unless other arrangements are agreed' is designed to allow greater flexibility for those who find the current standard difficult to meet without compromising public protection or the quality of programmes. The external examiner would be agreed between our visitors and the education provider. The visitors will want to be sure that there is an appropriate reason for appointing an examiner who is not from the relevant part of the Register.

We believe the proposed new wording to the standard allows for the flexibility that some education providers require. We will stress in the guidance notes that any other arrangements must be agreed with the HPC in advance.

Respondents

Below is a list of the organisations that responded to our consultation. We received responses from 28 organisations and 19 individuals (or where it was not possible to tell if the response was from an individual or on behalf of their organisation). Where we have quoted from these organisations in the text, we have attributed the quotation. Where the quotation used is from the response of an individual, it has not been attributed.

Organisations

All Wales Speech and Language Therapy Managers Committee
British Association for Counselling and Psychotherapy
British Dental Association
College of Occupational Therapists
Chartered Society of Physiotherapists
Department of Health
Electrophysiology Technologists Association
Faculty of Health at the University of Central Lancashire
General Medical Council
General Optical Council
Heads of University Centres of Biomedical Science
Institute of Biomedical Scientists
Music Therapy at the University of the West of England
NHS Education for Scotland
NHS Tayside
Play Therapy UK
Pharmaceutical Society of Northern Ireland
The Registration Council for Clinical Physiologists
School of Health, Community and Education Studies, Northumbria University
School of Health and Social Care, University of Teesside
Southern Health and Services Board
Suffolk College
The British Society of Echocardiography
The Board of Community Health Councils in Wales
The Institute of Chiropodists and Podiatrists
The Society & College of Radiographers
UK Voluntary Register for Public Health Specialists
Welsh Scientific Advisory Committee

We would like to thank all those who responded to this consultation for their time and comments.