

## HCPC approval process report

Education provider	Anglia Ruskin University
Name of programme(s)	MSc Occupational Therapy, Full time MSc Physiotherapy, Full time
Approval visit date	08 June 2021
Case reference	CAS-16875-K3J8L0

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### Executive Summary

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

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

## 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:

Rebecca Khanna	Occupational therapist
Kathryn Campbell	Physiotherapist
Rabie Sultan	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Esther Norton	Independent chair (supplied by the education provider)	Anglia Ruskin University
Joanne Wood	Secretary (supplied by the education provider)	Anglia Ruskin University
Donna Wynne	Professional body representative	The Chartered Society of Physiotherapy
Clare Gibson	External panel member	St. Mary's University Twickenham London

Beth Sidaway	External panel member	Sheffield Hallam University
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## Section 2: Programme details

Programme name	MSc Occupational Therapy
Mode of study	FT (Full time)
Profession	Occupational therapist
First intake	01 January 2022
Maximum learner cohort	Up to 24
Intakes per year	1
Assessment reference	APP02318

Programme name	MSc Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
First intake	01 January 2022
Maximum learner cohort	Up to 24
Intakes per year	1
Assessment reference	APP02319

We undertook this assessment of two new programmes proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	

Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	No	As these programmes have not yet commenced, this was not required

Due to the COVID-19 pandemic, the education provider and HCPC decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	No	We decided it was unnecessary to meet with this group, as visitors were satisfied with the information provided in the documentary submission regarding learners' involvement.
Service users and carers (and / or their representatives)	No	We decided it was unnecessary to meet with this group, as visitors were satisfied with the information provided in the documentary submission regarding service users and carer involvement
Facilities and resources	No	As the visit was virtual and the visitors were able to determine through the programme documentation that standards related to resources had been met, we decided it was unnecessary to have a virtual tour of the facilities and resources
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 30 July 2021.

## **2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.**

**Condition:** The education provider must ensure that appropriate, clear and consistent information is available to applicants to help them make an informed choice about whether to take up a place on the relevant programme

**Reason:** For the proposed MSc Occupational Therapy and MSc Physiotherapy programmes, visitors reviewed the weblinks provided in the mapping document. The weblinks made reference to the education provider's various existing programmes but not the two proposed programmes. The education provider submitted additional documents before the visit containing information relating to the proposed programmes and confirmed that this information will be available to applicants on the website, once the programmes have been granted approval by the HCPC. Visitors noted that both versions of the Course Specification Form made reference to additional costs for each of the respective programmes. For example, there was mention of additional costs relating to criminal conviction checks, travel to placement and uniforms. However, it was not made clear what monetary value was related to the additional costs and who will be responsible for paying these costs.

It was stated by the programme team that learners on the proposed programmes will be required to travel between the two campuses, based in Cambridge and Chelmsford on very rare occasions. It was also stated during the same meeting that there is a video that will be made available to applicants, that will provide detailed information regarding the admissions process for the proposed programmes. As the visitors did not see any information regarding travel between the two sites within the documentation, they could not determine how this information will be conveyed to potential applicants. Additionally, as visitors have not seen the video that has been created to provide admissions information to applicants, they could not consider how useful it will be and what important information will be conveyed to applicants. As such, the visitors were unable to determine how important information would be appropriately communicated to prospective applicants for the proposed programmes. In particular, visitors were not clear how the education provider intends to communicate the following information to prospective applicants:

- up to date information regarding the monetary value of the additional costs , including clarity about whose responsibility is it to pay for these costs;
- relevant information regarding travel between the two campuses; and
- clarity about the content of the video that will be made available to potential applicants and how will it be made accessible to applicants, as part of the admissions process.

Therefore, the education provider must demonstrate and provide information regarding the above mentioned points. From this, the visitors will be able to determine whether applicants for the proposed programmes, will have the relevant information they need to

make an informed choice about taking up the offer of a place on the relevant programmes.

### **3.5 There must be regular and effective collaboration between the education provider and practice education providers.**

**Condition:** The education provider must demonstrate how they will ensure ongoing regular and effective collaboration between the education provider and practice education providers.

**Reason:** The education provider stated within the mapping document “each clinical programme requires a minimum of one meeting each trimester between the course team and practice educators”. Additionally it was also stated “link tutor visits are conducted twice per trimester minimum, and practice educators attend regular meetings at the university”. From reviewing the various meeting agendas, minutes and summary notes provided as evidence for this standard, visitors noted that there is ongoing collaboration with the education provider and practice education providers for currently approved programmes such as the operating department practitioner profession. There was also notable information within the minutes that suggested discussions around placements, timetabling and forward planning for the proposed programmes. From this the visitors were clear there has been involvement from practice educators in the development of the proposed programmes, however visitors could not gather what the plans are to ensure future regular collaboration once the proposed programmes have commenced. For example, it was not clear whether the proposed trimester meeting will focus on the proposed programmes or whether it will continue as it is currently which involves an overall faculty based meeting, that will focus on any issues and action points. Whilst there are no issues with a faculty based approach to discuss all the programmes, the visitors were unclear if collaboration only took place at the time when a programme was being approved or when specific issues arose within practice-based learning, rather than at set, regular times during the year. As such, visitors could not determine how the collaboration arrangements for the proposed programmes will be regular and ongoing.

During the practice educators meeting, visitors were given verbal reassurances about intentions of regular collaboration with the education provider as per other professions, but the visitors did not clearly understand how regular this collaboration will be going forward. The visitors understood there has been collaboration between the education provider and practice educators until now. However based on the evidence submitted and discussions held at the visit, it was not clear what strategic agreements or arrangements will be in place to ensure there will be regular collaboration going forward for the proposed programmes. As such, the visitors could not be sure this represented an effective and continuous partnership between the practice education providers and education provider. As such, the education provider must demonstrate that there is a plan in place to address how they intend to maintain regular and effective collaboration with practice education providers.

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

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

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate there is an adequate number of appropriately qualified and experienced staff in place across both campuses for the proposed programmes, with relevant specialist knowledge and expertise to deliver effective programmes.

**Reason:** For these two standards, the education provider provided the curriculum vitae of existing staff for the proposed programmes, information regarding their intention to recruit further staff and confirmation on whether the particular vacant posts have been advertised. In their pre-visit responses to the visitors' questions, the education provider provided a breakdown of the workload planning model in place which accounted for the breadth of staff duties. From reviewing the information provided the visitors determined that there were plans in place to recruit further staff for the proposed number of learners on the programmes, but could not gather what the timelines for fulfilling the vacant posts were. The visitors also noted that the workload planning model provided generic information regarding a breakdown of the number of hours related to teaching, management and practice related activities within the faculty. However, the information provided did not make reference to either of the proposed programmes nor the breakdown of responsibilities for teaching at the Cambridge and Chelmsford campuses. As such, it was not clear to the visitors which staff members - including the ones yet to be recruited - will be responsible for teaching at which campus for the programmes. Based on this, it was not possible to determine whether there will be an adequate number of staff in place to deliver effective programmes at each of the education provider's campuses.

At the visit, the senior team undertook a presentation providing updates on some of the teaching posts that have been filled across the proposed programmes, while acknowledging it has been a slow process due to COVID-19. Additionally, the senior team and programme team confirmed that practitioner lecturers, who are based within their practice education partners, will contribute to the teaching activities on the proposed programmes. However, the visitors were unclear what experience and knowledge was required of individuals working as practitioner lecturers for them to be suitable, so they are well-equipped to take part in teaching and to support learning in the subject areas they are involved in. As such, the visitors could not make a judgement on whether the practitioner lecturers are appropriately qualified and experienced.

From further conversations at the visit, the visitors were not clear what contingency plans were in place if the recruitment of the outstanding staff posts was not complete for a January 2022 start. Considering the above mentioned aspects, the visitors were unclear how many staff will be involved in teaching at each campus, what the timelines, including contingency plans, are for ensuring staff will be in place and what qualifications and experience the practitioner lecturers will possess. The visitors therefore considered these standards were not met, as they could not determine whether there are an appropriate number of staff who are able and equipped to deliver both the programmes effectively at across both the sites at Cambridge and Chelmsford, and that staff have the necessary knowledge and expertise to deliver their parts of the programmes effectively. Therefore, the education provider must demonstrate:

- how they will ensure there is an adequate number of appropriately qualified staff in place to deliver the proposed programmes effectively for all learners at Cambridge and Chelmsford campuses, for a January 2022 start. This should include confirmation of the breakdown of occupational therapy and physiotherapy profession specific teaching staff posts that will be based at each campus;
- timelines, including any contingency plans, regarding the vacant teaching posts on the programmes to ensure there will be adequate support for learners; and the qualifications and experience which will be considered for utilising practitioner lecturers to teach on the relevant programmes, to ensure they have the relevant expertise and knowledge to deliver the programmes effectively

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

**Condition:** The education provider must evidence the effective process in place for obtaining appropriate consent from service users and learners.

**Reason:** From reviewing the mapping document and evidence submitted, visitors noted the details provided regarding the importance of interaction, gaining consent and the rights of service users. In addition, it was stated in the mapping document “where role play or student participation is required, students are asked for verbal consent prior to the activity and confidentiality”. Visitors noted there were policies and information regarding how learners are made aware of their responsibilities of giving consent, but it was not clear how verbal consent was recorded and managed as part of obtaining appropriate consent. During the programme team meeting, visitors learnt that a new policy has recently been put together that will involve obtaining written consent from learners and service users. Without any further information and not having access to the new policy or the consent form, visitors were unable to make a judgement on the appropriateness of the policy. Based on this, visitors could not determine:

- what formal protocols will be in place for obtaining consent from learners and service users, including how records will be maintained;
- how learners and service users are informed about the requirement for them to participate by giving consent; and
- how the education provider manages situations whereby learners decline from participating as service users and what alternative learning arrangements will be put in place where individuals do not consent to participating as a service user.

Considering the above, the visitors were unable to determine whether the process to obtain appropriate consent was effective. The visitors therefore require the education provider to submit evidence demonstrating their processes and policies across the proposed programmes, for obtaining appropriate consent from service users and learners.

#### **5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.**

**Condition:** The education provider must provide clarity regarding the rationale for the structure of practice-based learning and demonstrate how it supports the achievement of the learning outcomes and standards of proficiency.



**Reason:** From reviewing the relevant student and placement handbook documents submitted as evidence for this standard, visitors noted the structure, duration and range of practice-based learning for the proposed programmes. Visitors understood that the structure of the programmes is largely weighted towards learners attending practice-based learning during the second year, whilst all of the relevant basic preparation for all placement types would have been completed in year one. Visitors were not clear how this will be achievable because, as per the proposed structure of the programmes, learners will still be undertaking the relevant 30 credit academic modules in each year two semester in addition to attending placement blocks during year two for the programmes. From querying the rationale behind this before the visit, the education provider stated this will allow learners to engage with diverse settings regardless of the order of their rotation and provide flexibility in accessing placement blocks. From this, the visitors were unclear about the reasons for the decision to focus practice-based learning in year two of the respective programmes and how will this help learners achieve the learning outcomes.

At the visit, the programme team mentioned that learners are able to carry forward no more than 30 academic module credits to the next semester which meant that learners should be able to manage their academic load and still attend the block placements during year two of the programmes. The practice educators stated this can be managed based on their experience of managing other profession programmes currently. Based on these discussions, and considering the evidence submitted, visitors remained unclear about the reasoning for structuring placements during year two of the programmes. As such, it was not clear how this decision is appropriate to the design and content of the proposed programmes and how the balance of attending academic modules and placement blocks during year two will be managed, to support the achievement of the learning outcomes and standards of proficiency (SOPs). Therefore, the education provider must articulate the rationale for the structure of practice-based learning during year two of the respective programmes and demonstrate how will this ensure learners will be able meet the learning outcomes and SOPs.

### **6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.**

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

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate and clarify practice-based learning progression requirements and how these will ensure an objective, fair and reliable measure of learners' progression and achievement.

**Reason:** For this standard, the visitors were directed to the respective placement handbooks for the proposed programmes and a weblink for the education provider's academic regulations. From a review of the documentation the visitors understood that learners will not be given an opportunity to resit and will need to leave the programme, should they fail practice placements. However, visitors could not see detailed information regarding the academic regulations as the weblink provided was not accessible. In discussions with the programme team the visitors were informed that as

part of the education provider's generic academic regulations, learners are given an opportunity to retake placements within a period of two weeks time immediately after their placements. Information and details regarding progression with resit opportunity during placements was not contained in the documentation and as such the visitors were unsure how this pertinent information will be communicated to learners, so that they can progress and achieve within the respective programmes. It was also not clear whether this will apply to learners failing a particular placement block or each time they failed any particular placement block first time. This also meant that visitors could not make a judgement on the overall objectivity, fairness and reliability of assessments during practice-based learning on the proposed programmes. Considering the evidence submitted and discussions held with the programme team, the visitors considered that these standards have not been met. Therefore, the visitors require further evidence clearly articulating how the assessment regulations, particularly information regarding practice-based learning resit opportunity on the programmes, will be communicated to learners. Based on this they will then be able to make a judgement on the objectivity, fairness and reliability of assessments during practice-based learning. In this way the visitors can make determinations regarding these two standards for the proposed programmes.

## HCPC approval process report

Education provider	Brunel University London
Name of programme(s)	MA Art Psychotherapy, Full time
Approval visit date	17 June 2021
Case reference	CAS-16953-W0X2W0

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### Executive Summary

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

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

## 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:

Jennifer Caldwell	Occupational therapist
Janek Dubowski	Arts therapist - Art therapist
Niall Gooch	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Thomas Betteridge	Independent chair (supplied by the education provider)	Brunel University
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## Section 2: Programme details

Programme name	MA Art Psychotherapy
Mode of study	FT (Full time)
Profession	Arts therapist
Modality	Art therapist
First intake	01 October 2021
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP02339

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meetings held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Not Required	We determined that we could obtain sufficient answers from the programme team
Service users and carers (and / or their representatives)	Not Required	We determined that we could obtain sufficient answers from the programme team
Facilities and resources	Not Required	This was part of the programme team meeting
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 06 August 2021.

#### **2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.**

**Condition:** The education provider must demonstrate how they will ensure that all applicants are aware that completion of the programme requires that they participate in certain activities in experiential learning.

**Reason:** The visitors were aware from documentation and from discussions at the visit, that it was mandatory for learners to take part in certain forms of experiential learning. They were satisfied that it was reasonable for the education provider to have this requirement. However, they also noted that this was not explained in the information available to applicants, and that therefore applicants were not making an informed

choice about whether to take up an offer of a place on the programme. The visitors therefore require that the education provider submit evidence to show how they will communicate to learners the expectations around experiential learning.

## **5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.**

**Condition:** The education provider must demonstrate how they will ensure that the placement modules are organised such that all learners are enabled to meet all the standards of proficiency.

**Reason:** The visitors noted during their documentary review that the learning outcomes in the first practice-based learning module required the learners to meet a much larger number of standards of proficiency (SOPs) than the second practice-based learning module, even though they were the same length. Given the time available in the placement, they considered that this large number of SOPs might create a barrier to learners meeting them. This was discussed at the visit and the programme team gave verbal reassurances about their plans to support the learners in their achievement of the SOPs. The visitors, however, had not seen evidence to demonstrate how exactly this support would work and what specific steps would be taken to ensure that learners could achieve the necessary SOPs. They had also not seen evidence giving an appropriate rationale for the difference. They therefore require the education provider to demonstrate how specifically they will ensure that learners in the practice modules will have the best opportunity to meet the SOPs.

## **5.8 Learners and practice educators must have the information they need in a timely manner in order to be prepared for practice-based learning.**

**Condition:** The education provider must demonstrate how they will ensure that learners and practice educators have the information required to be prepared for practice-based learning.

**Reason:** From the documentary submission the visitors were aware that the education provider was planning to create a placement handbook for learners and practice educators, laying out the information they would require for practice-based learning. However, they were not supplied with this handbook, and were informed that it was not yet available. Although the HCPC does not mandate that such handbooks be produced, the education provider had decided to meet this standard through the production of such a handbook, and therefore the visitors considered that unless they were able to view it, or to be given a clear idea of what would it would contain, they could not determine whether the standard was met. They therefore require the education provider to submit further evidence demonstrating what information will be supplied to practice educators and learners before they go into placement.

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

**Condition:** The education provider must clarify for learners the regulations and expectations about progression from year one to year two.

**Reason:** The visitors were aware that the documentation stated that the attendance requirement was 100% throughout the programme. They were not clear, however,

either from the programme documentation or from discussions at the visit, what would happen if learners did need to repeat parts of the first year and had not completed this by the end of year one. It was not clearly stated for learners what would be expected of them in this scenario. At the visit, the programme team said that they would handle such situations on a case by case basis but were not able to clarify what would happen and where learners would access information about the process in that situation. The learners might therefore not understand how to progress and achieve within the programme, and this might impair their ability to complete the programme successfully. The visitors therefore require that the education provider submit further evidence showing how they will manage the transition between the learners who need to repeat parts of year one, and how this will be clearly communicated to learners.

### **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.

#### **3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.**

**Recommendation:** The education provider should keep under review the adequacy of teaching spaces to ensure that the standard continues to be met.

**Reason:** The visitors were satisfied that the standard was met, because there were sufficient teaching spaces available for the planned numbers of learners who would be coming on to the programme in the first cohorts, and because the education provider was aware of the need to develop more spaces as further learners came on to the programme. However, the visitors were aware that there were possibly challenges to expanding the amount of space available for teaching and learning activities, for example the sharing of space with other users, and so suggest that the education provider continue to bear these in mind to mitigate any risk of pressure on space.

#### **3.15 There must be a thorough and effective process in place for receiving and responding to learner complaints.**

**Recommendation:** The education provider should consider how best to make sure that learners are fully aware of how the complaints process works.

**Reason:** The visitors were satisfied that the standard was met, as there was a thorough and effective process in place for receiving and responding to learner complaints. They did consider, however, that it might not always be clear to learners in practice-based learning where the various responsibilities of the education provider and the NHS Trusts providing the placements would lie. They therefore suggest that the education provider continue to consider how best to demarcate these responsibilities for learners.



## Section 5: Visitors' recommendation

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

This report, including the recommendation of the visitors, will be considered at the 25 August 2021 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).

## HCPC approval process report

Education provider	University of Liverpool
Name of programme(s)	MSc Diagnostic Radiography (pre-registration), Full time accelerated
Approval visit date	07 July 2021
Case reference	CAS-16899-K2D5Q6

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## 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:

Jennifer Caldwell	Occupational therapist
Mark Widdowfield	Radiographer - Diagnostic radiographer
Temilolu Odunaike	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Louise Almond	Independent chair (supplied by the education provider)	University of Liverpool
Rebecca Rylance	Independent chair (supplied by the education provider)	University of Liverpool
Allan Saunders	Secretary (supplied by the education provider)	University of Liverpool

## Section 2: Programme details

Programme name	MSc Diagnostic Radiography (pre-registration)
Mode of study	FTA (Full time accelerated)
Profession	Radiographer
Modality	Diagnostic radiographer
Proposed First intake	01 January 2022
Maximum learner cohort	Up to 40
Intakes per year	1
Assessment reference	APP02326

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted
Completed education standards mapping document	Yes
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes
Descriptions of how the programme delivers and assesses learning	Yes
Proficiency standards mapping	Yes
Information provided to applicants and learners	Yes
Information for those involved with practice-based learning	Yes
Information that shows how staff resources are sufficient for the delivery of the programme	Yes
Internal quality monitoring documentation	Yes

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Not Required	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
Service users and carers (and / or their representatives)	Not Required	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
Facilities and resources	Yes	Facilities and resources were covered in a presentation by the programme team.
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

## Section 4: Outcome from first review

In considering the evidence provided by the education provider as part of the initial submission and at the virtual 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 26 August 2021.

#### 4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.

**Condition:** The education provider must demonstrate how the learning outcomes ensure that those who successfully complete the programme, meet the standards of proficiency (SOPs) for radiographers.

**Reason:** The visitors were directed to the SOPs mapping as evidence for this standard. They also reviewed the module descriptors where the education provider indicated how the learning outcomes will deliver the SOPs. The visitors noted that many of the learning outcomes were generic and it was not made explicitly clear within the module contents, how specific aspects of the SOPs would be delivered. For example, SOP 7: Understand the importance of and be able to maintain confidentiality

- 7.1 be aware of the limits of the concept of confidentiality
- 7.2 understand the principles of information governance and be aware of the safe and effective use of health and social care information
- 7.3 be able to recognise and respond appropriately to situations where it is necessary to share information to safeguard service users or the wider public

The visitors noted that the education provider indicated the following learning outcomes from the DRAD403 module – Clinical and Professional Practice and mapped them to the above mentioned SOPs:

- Critically evaluate and appraise experiences of clinical practice, including, communication and patient-centred care via reflective practice.
- Perform safely, accurately and efficiently a range of radiographic techniques, adaptive radiographic techniques and reflect on effective communication, team working, and effective administrative and organisational skills in professional practice.
- Competently perform and reflect critically on clinical practice in a manner that demonstrates professionalism, safe handling and working procedures and medico-legal awareness in accordance with HCPC guidance.

The visitors considered that whilst these learning outcomes could possibly fall under the general banner of professionalism, the knowledge that underpins safeguarding and confidentiality (for example General Data Protection Regulation (GDPR) and the processes of safeguarding), are not included explicitly within the module content. Without having these made explicit in the documentation, the visitors could not be certain that learners would cover these specific aspects of professionalism in this module or in the course of their study.

The visitors brought this to the attention of the programme team at the visit and made it clear that there needs to be more evidence of where the learning outcomes are met so the visitors can be satisfied that all aspects of the SOPs are covered. The visitors considered that, for example, the education provider could have the learning outcomes listed above, but the indicative content for the module would still need to cover areas such as confidentiality, consent and GDPR. Therefore, the education provider must review the module contents to ensure all the components of the SOPs for radiographers are covered in the modules.

**3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

**5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.**

**Condition:** The education provider must demonstrate how they will ensure availability and capacity of practice-based learning and that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning for the number of learners on the programme.

**Reason:** The visitors reviewed documentation submitted prior to the visit, including the University - Provider Placement Agreement, The College of Radiographers' Placement Pro Forma, clinical educators' curricula vitae, the practice placement profile and completed placement audit documents. From their review and through discussions at the visit, the visitors understood that there is currently practice - based learning capacity and staffing available for up to 20 learners. However, the visitors were unable to establish how the education provider would ensure capacity for 40 learners (effectively 80 learners in the second year of the programme). Similarly, the visitors were unable to determine how the education provider will ensure there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

In discussions with the practice educators, the visitors heard that staffing within placements is currently at full capacity and that there is need for more radiographers in order to be able to cope with the additional number of learners, alongside the number of learners on the existing BSc (Hons) provision. The practice educators also stated that the education provider organises teaching sessions to help staff cope in practice - based learning and to ensure staff feel valuable and supported in their role. However, they confirmed that they had in the past, struggled to cope with the limited time available and would appreciate if they had more hours to support learners in practice - based learning. The practice educators could also not assure the visitors that there is a process in place that would ensure practice - based learning capacity for the intended 40 learners on the programme.

The programme team, in their meeting, mentioned that they intend to start the programme with up to 20 learners and confirmed they have placement as well as staffing capacity in practice - based learning for up to 25 learners and will be looking to take more staff if needed. However, they were unable to demonstrate how they will ensure sufficient placement capacity and adequate number of staff in practice-based learning when the programme grows to up to 40 learners.

The visitors were therefore unsure that the education provider has a process in place that would ensure all learners on the programme have access to practice – based learning and that there is adequate number of practice educators for up to 40 learners, the programme is seeking approval for. The visitors therefore require further evidence of how placement availability and capacity will be maintained and that there is sufficient and suitable staff for all learners to take part in safe and effective practice - based learning.

## HCPC approval process report

Education provider	University of Liverpool
Name of programme(s)	MSc Physiotherapy (pre-registration), Full time MSc Occupational Therapy (pre-registration), Full time BSc (Hons) Physiotherapy, Full time
Approval visit date	07 July 2021
Case reference	CAS-16912-P0W1L0

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### Executive Summary

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

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet our standards of education and training (referred to through this report as ‘our standards’). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.



## 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:

Carol Rowe	Physiotherapist
Julie-Anne Lowe	Occupational therapist
Niall Gooch	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Louise Almond	Independent chair (supplied by the education provider)	University of Liverpool
Allan Saunders	Secretary (supplied by the education provider)	University of Liverpool

## Section 2: Programme details

Programme name	MSc Physiotherapy (pre-registration)
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 40
Intakes per year	1
Assessment reference	APP02328

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

Programme name	MSc Occupational Therapy (pre-registration)
Mode of study	FT (Full time)
Profession	Occupational therapist
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 40
Intakes per year	1
Assessment reference	APP02329

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

Programme name	BSc (Hons) Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
First intake	01 September 1999
Maximum learner cohort	Up to 57
Intakes per year	1
Assessment reference	APP02330

We undertook this assessment via the approval process, which involved consideration of documentary evidence and virtual approval visit, to consider whether the programme continues to meet our standards. We decided to assess the programme via the approval process due to the outcome of a previous assessment.

The education provider decided to review and update this programme as part of the same process for the initial approval of the new MSc programmes.

### Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Yes	We received quality monitoring documentation for the existing programme but not for the new programmes, as we only request this if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	No	The education provider did not arrange a meeting with learners
Service users and carers (and / or their representatives)	No	The education provider did not arrange a meeting with service users and carers
Facilities and resources	Yes	
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

### **Conditions**

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 03 September 2021.

#### **2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.**

**Condition:** With regard to the MSc Physiotherapy programme only, the education provider must demonstrate that all necessary information to make an informed choice is available to applicants.

**Reason:** In their MSc Physiotherapy mapping document, the education provider included a URL which showed the visitors a draft version of what would be available to applicants or potential applicants on their website. However, the visitors considered that this did not provide sufficient information that would enable applicants to make an informed choice. For example, it did not tell them about additional costs associated with practice-based learning, or give them an idea of the travel that was likely to be associated with practice-based learning. At the visit the programme team stated that an expanded version of this had been produced and would be supplied to applicants in time. However, without seeing the detail of this expanded version, the visitors were unable to determine whether the standard was met, and require the education provider to submit additional evidence demonstrating that all applicants will be given appropriate information to enable them to make an informed choice.

#### **3.5 There must be regular and effective collaboration between the education provider and practice education providers.**

#### **3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

The following condition applies to the above standards. For simplicity, as the issue spans two standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that there will be regular and effective collaboration between the education provider and the practice education providers, and that this will deliver an effective process for ensuring sufficient availability and capacity of practice-based learning.

**Reason:** This condition concerns the MSc Occupational Therapy programme. In their evidence for this standard, the education provider pointed the visitors to several pieces of evidence. This included minutes and agendas for meetings between the education provider and practice education providers, and a role description for a practice educator which included their mandated attendance at programme management commitment meetings.

The visitors considered that this evidence met the standard for the physiotherapy programmes – the existing BSc and the new MSc – because the documentation showed the education provider’s plans to meet the standards built on the existing mechanisms used for the undergraduate programme. However, for the occupational therapy programme, it was not clear to the visitors that the evidence provided showed that there would be ongoing collaboration with occupational therapy practice providers. They were also not sure that there was an effective process in place to ensure availability and capacity of practice-based learning for all learners. This was because the evidence supplied mostly concerned relationships with physiotherapy-focused settings and physiotherapy practitioners.

At the visit the senior team, the programme team and the practice educators all indicated that there was appropriate collaboration with occupational therapy practice providers, and that they were confident of being able to find sufficient good quality placements for the MSc Occupational Therapy. However, the visitors considered that they needed further detail that fleshed out these verbal assurances, along the lines of that supplied for the occupational therapy aspects of the visit – minutes of meetings, agendas, and similar documentation. They therefore require the education provider to submit additional evidence showing how they will ensure effective ongoing relationships with occupational therapy placement providers, and how they will ensure availability and capacity of practice-based learning for occupational therapy.

### **3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.**

**Condition:** For both the MSc Physiotherapy and the MSc Occupational Therapy programmes, the education provider must demonstrate how they will ensure that practice educators will have access to appropriate resources to support learning in practice placement settings.

**Reason:** In the mapping document for the M-level programmes, the education provider directed the visitors to a number of documents in which learners would be introduced to academic writing, library services and similar resources. Also included in the documentation were links to short IT courses and basic online training for practice educators on the M-level programmes. The visitors considered that this was helpful but it was not clear to them how the education provider would ensure that practice educators had access to all the resources they would need – for example, access to physical and digital books and textbooks, teaching materials and clinical materials. The visitors raised this at the visit, and were given assurances by the programme team that

practice educators would have regular meetings to encourage them to keep in touch with the programme and its requirements. However, the visitors remained unclear about how often these meetings would take place or how attendance by those who needed to attend would be ensured. They therefore require further evidence relating to how the education provider will maintain practice educators' ability to support learning appropriately.

### **3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.**

**Condition:** For the MSc Physiotherapy, the education provider must demonstrate how they will ensure that learners have access to appropriate information of the kind that would normally be included in a programme handbook.

**Reason:** The visitors were aware from the documentation that the education provider planned to produce a programme handbook for the MSc Physiotherapy, but that this was not yet available. At the visit the programme team told the visitors that this would be produced by the time the programme started. There is no HCPC requirement for a specific programme handbook to be produced. However, it is necessary under our standards for the type of information normally included in a handbook to be conveyed to learners. The visitors considered therefore that they would need to be assured of how this information would be conveyed before they considered the standard met. They require further evidence showing either that the programme handbook will be available for learners or that the information will be made available in some other way.

### **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.

### **3.17 There must be an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.**

**Recommendation:** The education provider should keep under review the accessibility of the information for learners about the concerns process.

**Reason:** The visitors considered that this standard was met because there was a process in place for learners to raise concerns about service user safety and wellbeing appropriately. However, they did note that the way the process was presented in materials available for learners was not very clear, and that if some learners were not entirely sure what they needed to do, this might create a risk that in future that the standard would not be met. They therefore suggest that the education provider keep in mind the need for processes to be clearly explained.

### **5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.**

**Recommendation:** The education provider should reflect on how best to support practice educators to explore and implement new models of supervision.

**Reason:** The visitors considered that this standard were met, as the education provider had demonstrated how they would ensure that sufficient appropriate staff were available for practice-based learning, through relationships with practice providers and audits. However, they did note that some of the practice educators met at the visit had expressed concern about the move to different models of supervision, away from the “traditional” models with which they were most familiar. This might in future create a risk that the standard was no longer met because staff would not be appropriately qualified and experienced. The visitors therefore suggest that the education provider reflect on how best to support practice educators who have such concerns.

## HCPC approval process report

Education provider	Manchester Metropolitan University
Name of programme(s)	MSc Dietetics, Full time
Approval visit date	10 June 2021
Case reference	CAS-16152-Z5G3Q1

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### Executive Summary

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

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet our standards of education and training (referred to through this report as ‘our standards’). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.



## 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:

Catherine Mackenzie	Speech and language therapist
Fiona McCullough	Dietitian
Temilolu Odunaike	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Carol Ainley	Independent chair (supplied by the education provider)	Manchester Metropolitan University
Vanessa Smithson	Secretary (supplied by the education provider)	Manchester Metropolitan University
Amanda Avery	Professional body representative	British Dietetic Association
Jane Wilson	Professional body representative	British Dietetic Association

Menna Wyn-Wright	Professional body executive	British Dietetic Association
Raquel Revuelta Iniesta	External assessor	University of Exeter
Anna Kime	University validation panel	Manchester Metropolitan University
Amber Gavin	Student representative	Manchester Metropolitan University

## Section 2: Programme details

Programme name	MSc Dietetics
Mode of study	FT (Full time)
Profession	Dietitian
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 24
Intakes per year	1
Assessment reference	APP02267

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	

Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Not Required	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
Service users and carers (and / or their representatives)	Not Required	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
Facilities and resources	Yes	
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 29 July 2021.

## **2.2 The selection and entry criteria must include appropriate academic and professional entry standards.**

**Condition:** The education provider must clarify the academic and professional entry criteria for the programme and how this is communicated to applicants.

**Reason:** The visitors reviewed documentation relating to admissions and discussed the subject with the programme team. Prior to the visit, the visitors were referred to the webpage for the postgraduate virtual open day, which listed the dates for forthcoming open day events. The visitors were also informed that applicants must hold an Honours degree in a relevant subject such as biological sciences, physiology, biochemistry, chemistry and psychology at 2:1 or above or equivalent to be eligible for admission to the programme. The information provided also stated that all candidates go through a two-stage admissions process:

- scoring of personal statement and academic check; and
- values-based interview with an academic member of staff.

However, there were no details provided about what the interview would entail or what applicants need to achieve in order to get on the programme. For example, what experience, in addition to their previous degree, would help them in getting a higher score.

At the visit, the programme team explained that they will organise campus or online tours, where applicants can find out more about the requirements to get onto the programme. The team also mentioned that a member of staff runs a series of open days for both undergraduate and post graduate programmes, where they would provide links to additional information about the entry requirements. However, they confirmed that the links are not yet visible. As the visitors did not see details of the selection and entry requirements that will be provided to applicants or how applicants will be signposted to this information, they could not determine that this standard was met. Therefore, the education provider must provide detailed information about the academic and professional entry criteria for the programme and that it is clearly set out and accessible to all applicants.

## **5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.**

**Condition:** The education provider must demonstrate how they will maintain a thorough and effective system for ensuring the quality of practice-based learning on the programme.

**Reason:** From reviewing the information provided prior to the visit, the visitors understood that a new quality assurance framework, the North West Practice Education Group has been set up amongst Higher Education institutions (HEIs) in the North West region of England to ensure the quality of practice-based learning. From reviewing the documentation and discussions at the visit, the visitors understood that this audit system will also be utilised by other Allied Health Professions. However, there was no detail provided about how the system will work specifically for the dietetic programme at Manchester Metropolitan University.

The practice educators informed the visitors that there are ongoing discussions on how Quality Assurance (QA) monitoring will be collected. They also mentioned that all three education providers within the region will use the same QA tool. However, they did not yet have details of how it will work for this particular programme. The visitors noted a lack of clarity around how, when and where the new QA system will be used for the proposed dietetic programme. As such, they request that the education provider provide further information detailing how they will ensure the quality of practice-based learning for the programme.

#### **5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.**

**Condition:** The education provider must demonstrate that there will be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

**Reason:** From the information provided prior to the visit, the visitors understood that the education provider is working with other higher education institutions who have dietetics as part of their suite of programmes. The information provided, also stated that a detailed mapping has been done to establish how many learners will be in practice at any given time and that placements have been located to ensure consistency in the number of learners, so as not to overwhelm staff in practice-based learning. The visitors noted however, that there was no broad outline of how this will be achieved.

In their meeting, the practice educators informed the visitors about the difficulties they had been experiencing in recruiting dietetic staff to practice-based learning. Although the staff stated that they are fairly confident that they will be ready to take learners in practice-based learning by July 2022 when learners undertake their first placement, the visitors noted that there was no evidence of how they will achieve this. The visitors considered that the education provider will need to provide a timeline showing how an adequate number of staff will be recruited to practice-based learning to support all learners, including those with specific learning needs. In this way, the visitors can determine that practice-based learning will be adequately resourced for the programme.

#### **5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.**

**Condition:** The education provider must demonstrate how they ensure that practice educators undertake mandatory regular training required to enable them assess the learning outcomes.

**Reason:** The visitors reviewed documentation relating to training for practice educators and were able to discuss the topic with practice educators and the programme team. Through their documentation review, the visitors were aware that other HEIs offer training opportunities for practice educators; that there are opportunities to engage in updates; and that the facility is offered through an online platform. In their meeting, the programme team informed the visitors that discussions about what the training would look like have started. However, the visitors were unsure how this education provider will be involved. The programme team confirmed that it will be a blended approach of both online and work based learning. However, the practice educators were not aware of any of these training arrangements or whether they are mandatory.

For training specific to assist practice educators to assess learners reliably and consistently, the programme team explained that there would be live sessions to support a failing learner and that aspects of the online training relate to assessment. The team also explained that they will use the same training document that other HEIs within the region will use and that details of in-training will be provided in the practice educator's handbook. The visitors noted that the practice educator's handbook was not yet available. As no documentation was provided demonstrating the training requirements for practice educators and how these requirements will be communicated to them, and due to the lack of awareness by the practice educators, the visitors could not determine that this standard is met. They therefore request that the education provider provide further evidence of how they will ensure practice educators undertake regular training, particularly that which would enable them to assess the learning outcomes. The education provider must also demonstrate how they will ensure practice educators are aware of the mandatory training.

## HCPC approval process report

Education provider	University of Portsmouth
Name of programme(s)	MSc Physiotherapy (Pre-Registration), Full time
Approval visit date	01 - 02 July 2021
Case reference	CAS-16847-N2B4N7

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### Executive Summary

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

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

## 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:

Anthony Power	Physiotherapist
Elsbeth McCartney	Speech and language therapist
Niall Gooch	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

The planned chair was not available due to unforeseen circumstances, so various panel members acted as chair	Independent chair (supplied by the education provider)	Portsmouth University
Allisson Cory	Secretary (supplied by the education provider)	Portsmouth University
Nina Paterson	Professional body reviewer	Chartered Society of Physiotherapy



Jo Jackson	Professional body reviewer	Chartered Society of Physiotherapy
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## Section 2: Programme details

Programme name	MSc Physiotherapy (Pre-Registration)
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 25
Intakes per year	1
Assessment reference	APP02315

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Yes	As the programme is not yet running we spoke to learners from the undergraduate sports science programme.
Service users and carers (and / or their representatives)	Yes	We met with a representative of Healthwatch Portsmouth who had been involved in staff interviews
Facilities and resources	Yes	
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 02 September 2021.

#### **2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.**

**Condition:** The education provider must demonstrate how they will ensure that all applicants have full information about the extra costs which may be incurred by learners on the programme.

**Reason:** From their review of the programme documentation, the visitors were aware that it was likely that many learners would incur certain extra costs associated with their practice-based learning. For example additional accommodation requirements if their practice-based learning location was a long distance from their normal home. This was

stated in the Course Details and Supporting Information document, which would be available to learners. However, the visitors could not see where these potential costs were laid out in the information available to applicants. They were therefore unable to determine whether the admissions process ensures that applicants have the information required to make an informed choice about whether to take up an offer.

Additionally the visitors were informed at the visit that some anatomy knowledge would be required of applicants. This was not made clear in the information that would be available to applicants, and the visitors' view was that this might impede their ability to make an informed choice.

The visitors therefore require further evidence showing that all applicants will have access to appropriate information about additional costs, and about the full admission requirements of the programme.

### **3.5 There must be regular and effective collaboration between the education provider and practice education providers.**

### **3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

The following condition applies to the above standards. For simplicity, as the issue spans both standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate how they will ensure that there is effective ongoing collaboration between themselves and their practice education providers and that within this collaboration there is an effective process for securing sufficient placement capacity.

**Reason:** To evidence these standards the education provider cited their Course Details and Supporting Information document. This briefly described the Professional Liaison Group (PLG), which is the committee that provides the point of contact between the education provider and practice education providers. This mentioned an intention for the PLG to meet twice a year but did not provide information about the composition, remit, agenda-setting and record-keeping of the PLG. The visitors were therefore unable to determine prior to the visit whether the work of the PLG would constitute regular and effective collaboration, or whether it would guarantee effective processes for ensuring availability and capacity of practice-based learning. At the visit they asked the senior team, programme team, and the practice educators about the PLG. From these groups they received verbal reassurances about how the PLG would work – that it would include representatives from key partner organisations, and that it would have standing agenda items about matters such as capacity and collaboration.

The education provider representatives noted that there were strong relationships between individuals at both the practice partners and the education provider. However, while the visitors noted that this would be helpful in the PLG's work, the purpose of these standards is to put education provider-practice partner relations on a formal, regularised footing so that co-operation continues even if key staff members leave.

In the light of the above, the visitors considered that without additional documentary evidence, they could not yet determine whether the standards were met. They therefore require the education provider to submit further evidence demonstrating how they will ensure:

- Regular, effective collaboration that continues on an ongoing basis; and
- Sufficient suitable placements for all learners on the programme.

With regard to this condition, the visitors wished to emphasise that the start date of the programme was only five months away and that in their view there remained a considerable amount for the education provider to do in securing sufficient availability and capacity for the planned learner numbers on the programme.

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

**Condition:** The education provider must demonstrate how they will ensure that service users and carers are appropriately involved with the programme.

**Reason:** As with SETs 3.5 and 3.6, in their evidence for this standard the education provider referred to the Course Details and Supporting Information document. This contained a brief description of the education provider's intentions around service user and carer involvement. It mentioned a service users and carers group that had been established, which had already had some input into staff recruitment and would in future have input into learner selection and programme design.

At the visit, the programme team elaborated on the documentary evidence, for example by explaining how service user involvement in curriculum development would be planned and evaluated. The visitors found this clarification useful but could not determine how the service user and carer group would work in the future. They therefore require the education provider to submit additional evidence clarifying the service user and carer strategy, in particular demonstrating that the involvement of service user and carers would be planned and evaluated appropriately.

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

**Condition:** The education provider must demonstrate how they will ensure that, by the start date, the programme will have in place sufficient educators with relevant specialist knowledge and expertise.

**Reason:** The visitors were aware from the Course Details and Supporting Information document that the education provider had committed to some additional recruitment before the programme start date. However, the visitors wanted some extra clarity about the number of lecturers who would be teaching on the physiotherapy programme, their registrant status, and the amount of time that would be available for this specific programme. The visitors understood that the plan was for two further 0.6 FTE registrant physiotherapists to be added, alongside the existing 0.8 FTE registrant physiotherapists.

At the visit the senior team told the visitors that the recruitment process was ongoing and would be complete in time for the programme to start, but they were not able to give a clear timeframe for its completion. The visitors noted that the start date for the

programme, January 2022, was relatively close, and that if the additional staff were not in place by then, the programme might have difficulty in running as planned.

They therefore considered that it was important to have a clear understanding of how the education provider would ensure that their recruitment would complete successfully before January 2022. They considered that this was particularly important as the Course Details and Supporting Information document indicated that the education provider intended to support the programme leader, who was not a physiotherapy registrant, with a strong physiotherapy team.

They require the education provider to submit further evidence to support the assurances given to the visitors at the visit, to clarify the time available to the programme, and to show what contingency plans were in place if they were not able to recruit.

### **3.17 There must be an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.**

**Condition:** The education provider must demonstrate that an effective process is in place for learners to raise concerns in practice-based learning.

**Reason:** The mapping document pointed the visitors to the practice handbook, which contained a hyperlink to the raising concerns procedure on the education provider's website. However, the visitors were not able to view the details of the procedure because it was not yet online. At the visit the programme team assured the visitors that the process was effective and that learners would be enabled to raise concerns as necessary. One of the learners to whom the visitors spoke was from another programme within the same School. She was able to give an example of a time when she had successfully raised a concern, and she had no adverse observations about the process. However, the visitors considered that to determine whether the standard was met, they needed to review the process that would be followed by learners on this Physiotherapy programme. They therefore require the education provider to submit evidence outlining the process and demonstrating that this process is effective in enabling learners to raise concerns about service user safety and wellbeing where necessary and appropriate.

#### **4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.**

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

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that the module learning outcomes ensure that learners meet the standards of proficiency (SOPs) and the standards of conduct, performance and ethics (SCPEs).

**Reason:** The education provider submitted module descriptors as evidence for these standards. Prior to the visit, the visitors considered that it was difficult to make a full determination about whether the learning outcomes could ensure that learners met the SOPs and the SCPEs. This was because there was relatively little detail in the descriptors. For example, they mostly did not have indicative content and reading lists. The HCPC does not explicitly require the inclusion of such material, but in its absence the visitors were unclear what exactly would be taught and how. This meant that they were not clear how the learning outcomes would be met. This in turn meant that they could not be sure that the SOPs and the SCPEs would be achieved.

At the visit, the visitors were able to discuss with the programme team the lack of detail in the modules. They were informed by the education provider that they did have a clear idea of module content. The lack of detail in the existing descriptors was the result of an institutional policy which prevented programmes from publishing full module descriptors until a programme had been approved. However, as noted above, without evidence demonstrating the module content, the visitors were unable to understand how learners would meet the learning outcomes. They considered that they would need to have a clear idea of how the learning outcomes would be met before they could consider that the standards noted above were met. Therefore they require the education provider to submit further evidence demonstrating that the module content would be appropriate, such that the learning outcomes would enable learners to meet both the SOPs and SCPEs.

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

**Condition:** The education provider must demonstrate that they will manage unsatisfactory attendance, including how learners will be enabled to make up missed learning.

**Reason:** In the mapping for this standard, the education provider referred the visitors to the Course Details and Supporting Information document, which informed the learners that all parts of the programme were compulsory. However, it did not give them any information about what would happen if their attendance, in either practice-based learning or academic sessions, was not satisfactory, and how they would be enabled / expected to catch up. The issue was discussed with the programme team at the visit. The visitors were told that there were procedures in place to manage such situations, but the visitors were not able to see a formal policy outlining what would happen, which meant that they could not be sure that all learners would be enabled to understand what they would need to do. The guidance for this standard notes that “Learners need to be aware of your requirements and any consequences of missing compulsory parts of the programme”, and the visitors were not clear how learners would be made aware of such consequences. They therefore require the education provider to submit further evidence showing how learners will be enabled to understand what will happen and what they will need to do, if they do miss parts of the programme that are compulsory.

#### **6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.**

**Condition:** The education provider must demonstrate that assessment on the programme will enable learners to meet the learning outcomes.

**Reason:** As outlined in the condition under SETs 4.1 and 4.2 above, the visitors noted that there was a lack of detail across the module descriptors, and they were aware from discussions at the visit that there was an institutional policy reason for this. The lack of detail meant that it was not clear to them which parts of the programme content would be assessed by which methods, and they were therefore unable to determine whether the assessment methods for the programme would enable learners to meet the learning outcomes. They therefore require further evidence showing that the content of the modules is such that the education provider's approach to assessment is suitable. This condition should be considered alongside the condition set under SETs 4.1 and 4.2.

## HCPC approval process report

Education provider	University College London
Name of programme(s)	MSc in Dietetics (Pre-registration), Full time
Approval visit date	01 June 2021
Case reference	CAS-16885-S6Y4X6

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### Executive Summary

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## 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:

Helen Catherine White	Dietitian
Susan Lennie	Dietitian
Temilolu Odunaike	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

David Spratt	Independent chair (supplied by the education provider)	University College London
Rebecca Woolston	Secretary (supplied by the education provider)	University College London
Amanda Avery	Professional body representative	British Dietetic Association (BDA)
Laura Stewart	Professional body representative	BDA

Najia Qureshi	Professional body executive	BDA
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## Section 2: Programme details

Programme name	MSc in Dietetics (Pre-registration)
Mode of study	FT (Full time)
Profession	Dietitian
Proposed First intake	01 October 2021
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02323

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Yes	
Service users and carers (and / or their representatives)	Not Required	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
Facilities and resources	Yes	
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 27 July 2021.

### 2.2 The selection and entry criteria must include appropriate academic and professional entry standards.

**Condition:** The education provider must make the selection and entry criteria for dietetic assistants onto the programme clear, and ensure that it includes appropriate academic and professional entry standards.

**Reason:** From reviewing documentation submitted prior to the visit, the visitors noted that dietetic assistants who meet 'the minimum entry requirements' could apply onto this programme. However, the visitors noted a lack of clarity around what these academic requirements were, for this group of applicants. For example, it was unclear how someone with a diploma would be deemed appropriate to enrol onto a Masters programme.

During discussions with the programme team, the visitors were informed that anyone applying to the programme would have to demonstrate they had the appropriate academic qualifications and experience. The visitors were clear about the entry requirements for other applicants as this was made clear in the documentation. However, for dietetic assistants, the programme team stated that these applicants would have to undertake an entrance test to demonstrate level 6 skills equivalent to BSc honours. They also mentioned that the test would use case-based scenarios to demonstrate competence and that they would consider adapting the test to match undergraduate final year assessment. The visitors noted that none of these was explicit in the programme documentation and was therefore not available for applicants with this background. The visitors were unable to determine what the entrance test was and how it demonstrates appropriate entry requirements for a Masters.

As the visitors could not see that the education provider has an appropriate process to determine the academic standards required for entry onto the programme for this group of potential applicants, they could not determine that this standard was met. They therefore require further evidence that clearly articulates what the academic and professional entry criteria are for dietetic assistants applying to the programme. The evidence must also show how the education provider would ensure the criteria are appropriate to the level and content of the programme.

#### **4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.**

**Condition:** The education provider must revise the module outlines to explicitly show how the learning outcomes ensure learners meet the SOPs for dietitians.

**Reason:** The visitors reviewed evidence relating to this standard including the SOPs mapping and the British Dietetic Association (BDA) mapping documents. The visitors saw in their review how the learning outcomes are mapped to the SOPs for dietitians. However, the visitors also noted that some of the learning outcomes mapped against specific SOPs did not explicitly demonstrate how they will be delivered. These include:

SOP 13. Understand the key concepts of the knowledge base relevant to their profession

- 13.8: understand, in the context of nutrition and dietetic practice:
  - pharmacology
- 13.9: understand, in the context of nutrition and dietetic practice:
  - the factors that influence food choice
- 13.13 understand, in the context of nutrition and dietetic practice:
  - sociology
  - social policy

The visitors noted that module MEDC0036 CP2: Therapeutic Aspects of Clinical Nutrition would cover pharmacological and surgical interventions. However, the module outline form made no mention of any subjects related to pharmacology. As none of the learning outcomes for this module explicitly links to pharmacology, the visitors could not determine how this particular component of the SOPs would be delivered. The visitors also noted that 'the factors that influence food choice' under SOP 13.9 was not explicitly covered in Clinical Practice 1: Lifestyle management, prevention and the food

environment or in any other module. Similarly, the visitors noted there was nothing relating to sociology or social policy in any of the learning outcomes of the modules mapped. For these areas, the education provider mapped LO 1-2 in module MEDC0038: Malnutrition in the community, Part 1: Knowledge and understanding LO1 in Professional Practice in Dietetics and the Placement 2A module. However, the visitors noted that the LOs did not explicitly link to sociology and social policy. The visitors noted the word 'social' was used but the learning outcomes are limited and have no link to the curriculum content in order to understand the context. Additionally, the visitors noted that the learning outcomes did not reflect the MSc level. For example, in Clinical Practice 3: Advanced Dietetic practice, there is no mention of 'analysis', 'critical evaluation' and 'synthesis' which are aligned with level 7. Instead, the learning outcomes 'measure', 'understand', 'develop' and 'appreciate'. As such, the visitors were unable to determine how these aspects of the SOPs would be delivered.

The visitors also could not see anywhere in the RPL process where any of these topics are covered or assessed, prior to joining the MSc in Dietetics programme meaning that learners did not need to meet these. When the visitors discussed this with the programme team at the visit, the team agreed that the module forms needed updating. Therefore, in order to consider whether this standard is met, the education provider must update their module outline forms to clearly demonstrate how the learning outcomes would ensure all aspects of the SOPs are delivered.

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

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

**Reason:** The visitors reviewed the module handbooks, the SOPs mapping and the BDA Accreditation mapping documents as evidence for this standard. As noted in the condition on SET 4.1, the visitors noted that there were aspects of the curriculum that were not specifically addressed in the module outline forms. For example, the visitors could not determine how knowledge and skills related to pharmacology would be covered on the programme as the learning outcomes mapped to this aspect of the programme did not in themselves, address this area. The visitors also noted that none of the learning outcomes in the module forms covered areas relating to sociology and social policy. The visitors noted that the presence of sociology and social policy lies within a single module and it is vague in relation to content. In addition, the visitors were unable to locate elsewhere in the documentation where these subject areas were covered.

During discussions, the programme team acknowledged that the module outline forms needed to be updated to address this issue. As such, the visitors were unable to establish how the programme would reflect the philosophy, core values, skills and knowledge base. Therefore, the education provider must revise the programme documentation to ensure it reflects the philosophy, core values, skills and knowledge base articulated in any relevant curriculum guidance.

#### **6.1 The assessment strategy and design must ensure that those who successfully complete the programme meet the standards of proficiency for the relevant part of the Register.**

**Condition:** The education provider must clarify the roles of formative and summative assessments so that they ensure those who successfully complete the programme meet the standards of proficiency for dietitians.

**Reason:** Through the documentary review and discussions at the visit, the visitors understood that assessments on the programme would include both formative and summative assessments. The SETs mapping also stated that all assessments are mandatory. The visitors noted however, that there were cases where formative assessments appeared to be used as summative assessments. For example in Clinical Practice 1: Lifestyle management, prevention and food environment, the module outline form states that the formative assessment would include problem-based learning assignments and practice multiple choice questions (MCQ) quizzes. The summative assessment on the other hand, comprised 50% MCQ and 50% Short answer questions (SAQ). During discussions with the programme team, the visitors learnt that there was no clear distinction between the MCQ quizzes which are formative and the MCQ which are summative. As such, the visitors were unclear how the education provider will ensure learners are clear on what they need to achieve on the programme in order for them to be able to meet the SOPs upon successful completion of the programme. The visitors therefore require the education provider reviews the assessment strategy and design to ensure a clear distinction between the roles of formative and summative assessments.

### **6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.**

### **6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.**

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that the assessments provide a reliable measure of learners' progression and achievement and the assessments methods used are appropriate to, and effective at, measuring the learning outcomes.

**Reason:** The visitors reviewed the UCL academic manual, UCL Assessment Guidance July 2020 and other documents as evidence for these standards. The visitors noted modules where MCQs were being used to assess a critical review of the literature. For example, in Clinical Practice 1: Lifestyle management, prevention and food environment, the visitors noted that MCQs are one of the summative assessments that would be used to assess the learning outcomes. The visitors could not determine how MCQ would be used to assess LO3, where learners are required to explain how the dietitian uses information gathered and critical thinking to formulate and justify dietetic management goals. In addition, LO4 which requires learners to be able to explain how the dietitian uses information gathered and critical thinking to develop and implement a dietetic action plan to achieve the management goals. The visitors could not determine that the assessments, for example, the use of MCQ to critically review and appraise literature or in areas where learners are required to explain or describe, would be thorough enough to allow learners to demonstrate their progression and achievement of the learning outcomes, particularly at Masters level.

The visitors also noted modules where learners would have to write four essays in 60 minutes. For example, in Clinical Practice 1: Lifestyle management, prevention and the food environment, the visitors noted that SAQ was being used alongside MCQ. The visitors could not determine how this is appropriate to ensure the learning outcomes are assessed effectively. During discussions with the programme team, the team considered that four to five SAQs would assess the LOs at adequate depth. However, the visitors could not determine how critical analysis and synthesis of information would occur given the type and length of assessment.

In addition, the visitors also noted inconsistencies in the programme documentation as to how modules are being assessed. For example, the visitors saw that case studies were mentioned in the module outline forms in module MEDC0036 CP2 Therapeutic Aspects of Clinical Nutrition but the mapping document stated a different assessment method. As such, the visitors were unclear about which was correct and request that the education provider clarifies this.

The visitors also noted some module LOs were not assessed summatively, for example, therapeutics aspects of nutrition where LO 5 (Appreciate the multidisciplinary team approach to successful nutrition support) was assessed only formatively.

As the visitors could not ascertain how the assessment methods used would appropriately and effectively to measure the learning outcomes, which will in turn ensure that the SOPs are met, they therefore require the education to provide further evidence to ensure:

- the assessments can reliably measure learners' progress and achievement; and
- the assessment methods are appropriate to and effective at measuring the learning outcomes.

## **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.

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

**Recommendation:** The education provider should clarify within the programme documentation the number of contact hours required on the programme.

**Reason:** The visitors reviewed the evidence submitted for this standard, including the placement handbooks where they noted the attendance requirements for both the taught sessions and the practice-based learning aspect of the programme. The visitors were therefore satisfied that this standard is met at threshold. The visitors noted however, from reviewing the module outline forms and through discussions at the visit, inconsistencies in the number of contact hours required on the programme. For example, the visitors noted that Placement 3 module form states learners will undertake a one-week university-based teaching prior to going on placement. However, the Professional Practice in Dietetics module form states that learners will undertake a two-

week university-based teaching before going on their third placement. The visitors also considered that the contact hours listed on the forms were potentially not a true representation of the total number of hours required on the programme as the programme team explained that the hours required in both taught sessions and on placement would be higher. As such, the visitors recommend that the module outline forms be updated so that accurate information relating to contact hours required is communicated to learners.

### **5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.**

**Recommendation:** The education provider should consider how they will ensure practice educators undertake the regular training they are required to undertake in order to be able to support learning and assess learners effectively.

**Reason:** From reviewing the evidence submitted for this standard, including the UCL MSc Dietetics ongoing support for practice educators and student supervisors document and discussions with the programme team, the visitors were satisfied that the standard is met at threshold. However, in discussions with the practice educators, the visitors noted that neither the traditional placement practice educators, nor those from private practice, had a clear understanding of the ongoing training they would be required to undertake during the course of the programme. In their meeting, the visitors noted that the practice educators were not aware of the 2-day regular training being organised by the education provider, which is in addition to the training they would have had at the start of the programme. The visitors considered that the education provider should provide clear expectations around ongoing training, to the practice educators. As such, they recommend that the education provider consider how they will communicate training requirements to all practice educators so they are appropriately prepared to support learning and assess learners effectively.



## HCPC approval process report

Education provider	University of East Anglia
Name of programme(s)	MSc Dietetics, Full time accelerated
Approval visit date	07 July 2021
Case reference	CAS-16890-V0N3D7

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### Executive Summary

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

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

## 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:

Tracy Clephan	Dietitian
Sara Smith	Dietitian
Rabie Sultan	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Susanne Lindqvist	Independent chair (supplied by the education provider)	University of East Anglia
Robbie Meehan	Secretary (supplied by the education provider)	University of East Anglia
Jane Wilson	Professional Body Representative	British Dietetic Association
Pauline Douglas	Professional Body Representative.	British Dietetic Association

Menna Wyn-Wright	Professional Body Representative	British Dietetic Association
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## Section 2: Programme details

Programme name	MSc Dietetics
Mode of study	FTA (Full time accelerated)
Profession	Dietitian
First intake	01 February 2022
Maximum learner cohort	Up to 15
Intakes per year	1
Assessment reference	APP02324

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for 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.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	As these programmes have not yet commenced, this was not required

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

<b>Group</b>	<b>Met</b>	<b>Comments</b>
Learners	Yes	We met a range of learners from the Occupational Therapy and Physiotherapy professions.
Service users and carers (and / or their representatives)	Not Required	We decided it was unnecessary to meet with this group, as visitors were satisfied with the information provided in the documentary submission regarding service users and carer involvement.
Facilities and resources	Not Required	As the visit was virtual and the visitors were able to determine through the programme documentation that standards related to resources had been met, we decided it was unnecessary to have a virtual tour of the facilities and resources.
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 18 August 2021.

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

**Condition:** The education provider must clarify their policy regarding resits and progression for practice-based learning in their documentation, to ensure learners are fully aware of the requirements for progression and achievement within the programme.

**Reason:** For this standard, visitors were directed to relevant pages of the Volume A - MSc Dietetic Course Framework – Course Overview document. From reviewing page 58 and 59 of this document, visitors noted that learners who fail a placement will need to undertake reassessment during the next planned block of clinical placement. It was also noted on page 59 that any practice-based learning hours accrued on any failed placement, will be voided and not be counted. Visitors also noted that learners who fail the reassessment of placements as part of their second attempt, will be withdrawn from the programme.

At the visit, the programme team stated that learners are able to progress onto a placement, with a failed academic module. The programme team also stated that learners who fail a reassessment placement during the resit period, cannot progress further onto the programme even with a failed academic module and will be asked to take an extended break on the programme. Additionally, it was stated that placement reassessment can only be undertaken for 50 percent of the placement hours.

Based on this, visitors considered the information conveyed from the programme team at the visit differed from what was presented in the documentation. As such, visitors could not determine how clear information and details regarding placement progression and resit requirements will be communicated to learners to ensure they are made aware of these requirements. The visitors considered that in order for them to be able to determine whether this standard is met, clear information showing specific requirements for progression and achievement must be communicated to learners. The education provider therefore, must provide additional evidence to demonstrate that this standard is met.