### HCPC approval process report

Education provider	Sheffield Hallam University
Name of programme(s)	MSc Radiotherapy and Oncology in Practice – Full time
	Pg Dip Radiotherapy and Oncology in Practice – Full time
Approval visit date	12 – 13 September 2017
Case reference	CAS-11935-W1R0B0

health & care professions council

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#### **Executive Summary**

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

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

## Section 1: Our regulatory approach

#### Our standards

We approve programmes that meet our education standards, which ensure individuals that complete the programmes meet proficiency standards. The proficiency standards set out what a registrant should know, understand and be able to do when they complete their education and training. The education standards are outcome focused, enabling education providers to deliver programmes in different ways, as long as individuals who complete the programme meet the relevant proficiency standards.

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

#### How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint <u>partner visitors</u> to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation of the visitors, inclusive of conditions and recommendations. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process reports, and any observations from education providers (if submitted). The Committee meets in public on a regular basis and their decisions are available to view <u>on our website</u>.

#### **HCPC** panel

We always appoint at least one partner visitor from the profession (inclusive of modality and / or entitlement, where applicable) with which the assessment is concerned. We also ensure that visitors are supported in their assessment by a member of the HCPC executive team. Details of the HCPC panel for this assessment are as follows:

Clare Bates	Lay
Simon Walker	Radiographer - Therapeutic
	radiographer
Beverley Ball	Radiographer - Therapeutic
	radiographer
Niall Gooch	HCPC executive
Jamie Hunt	HCPC executive (observer)

#### Other groups involved in the approval visit

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

Lisa Reidy	Chair	Sheffield Hallam University
Sandra Clark	Secretary	Sheffield Hallam University

## Section 2: Programme details

Programme name	MSc Radiotherapy and Oncology in Practice
Mode of study	FT (Full time)
Profession	Radiographer
Modality	Therapeutic radiographer
Proposed first intake	01 January 2018
Maximum student cohort	Up to 15
Intakes per year	1
Assessment reference	APP01735

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

Programme name	Pg Dip Radiotherapy and Oncology in Practice
Mode of study	FT (Full time)
Profession	Radiographer
Modality	Therapeutic radiographer
First intake	01 September 2003
Maximum student	Up to 18
cohort	
Intakes per year	1
Assessment reference	APP01843

We undertook this assessment via the approval process, which involves consideration of documentary evidence and an onsite approval visit, to consider whether the programme continues to meet our standards. We decided to assess the programme via the approval process as we were visiting the education provider to give initial approval to the MSc which will replace it, and re-approving the programme in this way would remove the need for the programme to submit annual monitoring during its final two years. The programme has now admitted its final cohort and will be closed when these learners have completed.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we require certain evidence and information from education providers. The following is a list of evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence, we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

Required documentation	Submitted
Programme specification	Yes
Module descriptor(s)	Yes
Handbook for learners	Yes
Handbook for practice based	Yes
learning	
Completed education standards	Yes
mapping document	
Completed proficiency standards	Yes
mapping document	
Curriculum vitae for relevant staff	Yes
External examiners' reports for the	Yes
last two years, if applicable	

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

Group	Met
Learners	Yes – from the existing PG Dip
	programme
Senior staff	Yes
Practice education providers and	Yes
educators	
Service users and carers (and / or	Yes
their representatives)	
Programme team	Yes
Facilities and resources	Yes

### Section 4: Outcome from first review

#### **Recommendation of the visitors**

In considering the evidence provided by the education provider as part of the initial submission and at the approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

#### Conditions

Conditions are requirements that must be met before programmes can be approved. We set conditions when there is insufficient evidence that standards are met. The visitors were satisfied that 47 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 October 2017.

# 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 information about all costs associated with the programme is fully available to applicants.

**Reason:** The visitors were able to view information made available to applicants regarding programme costs. They noted that there was clear information about programme fees. However, they were not able to see where applicants could find information about other costs associated with the programme. In particular, it was not clear to the visitors where applicants could find out that the education provider pays for the Disclosure and Barring Service checks, or where they could get an indication of the costs associated with practice-based learning. Based on their review of documentation and discussions with learners, the visitors considered that these costs could be significant for some learners, depending on placement location, and so it was important for applicants to have as full information as possible in order to make an informed choice about taking up a place on the programme. They therefore require the education provider to demonstrate how they will ensure the availability of the relevant information.

# 2.3 The admissions process must ensure that applicants have a good command of English.

**Condition:** The education provider must ensure that information about IELTS requirements is clear, accurate and consistent across all materials.

**Reason:** The visitors were able to view information about the IELTS entry requirements of the programme. They noted, however, that different parts of the programme documentation gave different figures for the IELTS requirements for the programme. In the submission document (page 26), the education provider states that "should [international] students wish to register with the HCPC, they will need to take an IELTS test prior to registration". The visitors were unclear what the education provider meant by this statement. The HCPC does not administer such tests, and does not impose additional requirements for eligibility for registration for international applicants besides having completed an approved programme. The HCPC ensures that registrant radiographers have an appropriate proficiency in English via the requirement that learners on approved programmes meet the standards of proficiency (SOPs) for the profession. In their SOPs mapping document, under SOP 8.3 (be able to communicate in English to the standard equivalent to level 7 of the International English Language Testing System, with no element below 6.5), the education provider noted that this SOP was met by the entry requirements. Given these considerations, the visitors were not clear how the admissions process ensured that applicants had a good command of spoken English, or that applicants would understand HCPC requirements. They therefore require the education provider to demonstrate how they will ensure consistency and accuracy across all documentation for applicants concerning English language requirements. In this way the visitors can be satisfied that the standard is met.

# 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 they have an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.

Reason: From review of programme documentation and discussions with current learners, the visitors were not able to see an effective process which enables learners to highlight concerns about the safety and wellbeing of service users. They were aware that there was a formal policy in place, "Guidance for Students Responding to Concerns and Complaints on Placement", but learners did not seem to be familiar with it. The learners suggested that they had tended to rely on informal pathways by which concerns could be raised, but the visitors considered that this was insufficient for the standard to be met, as it appeared to be dependent on good relationships between particular learners and educators. The visitors considered that the lack of awareness of a formal policy would make it harder for all learners to understand what constituted acceptable behaviour across different contexts and in different practice-based learning settings. They also considered that it would be difficult for learners to know what to do if a concern involved the person to whom they would normally report concerns on an informal basis, and that the lack of awareness of a formal process might mean a lack of equity or consistency in how concerns were dealt with. They therefore require the education provider to demonstrate how they will ensure that learners and educators are aware of the formal process for raising concerns. In this way they can be satisfied that it is an effective process.

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

**Condition:** The education provider must demonstrate that they have a process in place for obtaining consent from learners where appropriate.

**Reason:** From their review of programme documentation, and discussions with current learners and the programme team, the visitors were not clear that processes for obtaining consent from learners were in place. There was a policy on confidentiality and consent relating to service users included in the documentation, which was referenced in the education provider's mapping for this standard. The learners did not appear to be aware of the policy, and could not recall having given formal consent at any point during their time on the programme. The visitors therefore require the education provider to demonstrate that they have an effective process in place for obtaining formal consent from learners where appropriate, and for ensuring that learners understand what it is that they are consenting to. This includes ensuring that learners understand the nature of ongoing consent, and that factors such as cultural differences and disability are taken into account.

# 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 ensure that their attendance policy is clear and consistent in programme documentation, and ensure that learners are aware of which parts of the programme are mandatory.

**Reason:** From reviewing programme documentation relating to attendance, and discussions with the programme team and learners, the visitors were not clear about the programme policy on attendance. Some documents gave the minimum attendance figure as 80 per cent and others said that 100 per cent attendance was "normally expected". In discussion with the programme team, educators stated that the policy was that 100 per cent attendance was expected, but that 80 per cent was the threshold below which "sanctions" would be taken. However, the visitors could not see how this was clearly communicated to learners. They were also unable to determine how the 80 per cent attendance expectation would be spread across theory and practical parts of the programme, and could not see where the education provider has specified which parts of the programme were mandatory. In addition, they noted that the programme documentation mentions that 80 per cent attendance has been set by the "regulating bodies", when this is not in fact the case. The visitors therefore require the education provider to clarify their attendance policy, to demonstrate how they will identify to learners which programme components are mandatory, and to remove any references to specific HCPC attendance requirements.

#### 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.

# 4.2 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.

**Recommendation:** The education provider should review the reading lists of modules to ensure that HCPC documents regarding professional behaviour are included wherever appropriate.

**Reason:** From their review of descriptors of modules that included learning outcomes about professional behaviour, the visitors noted that HCPC documents regarding expectations of professional behaviour were not referenced in the reading lists. They were satisfied that the standard is met as they saw other evidence in the documentation that learners will be able to understand and meet expectations of professional behaviour. However, the visitors noted that learners would benefit from relevant HCPC documents, such as the standards of conduct, performance and ethics, and the Guidance on conduct and ethics for students being more thoroughly embedded in the modules. They therefore suggest that the education provider revisits module reading lists to ensure that learners are appropriately signposted to these documents.

## 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 23 November 2017 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available <u>on our website</u>.