hpc health professions council

Visitors' report

Name of education provider	The Smae Institute
Programme name	Diploma in Local Anaesthesia for Podiatry Practice
Mode of delivery	Distance learning
Relevant part of HPC Register	Chiropodist / Podiatrist
Relevant entitlement	Local anaesthetic
Date of visit	14 March 2012

Contents

Executive summary

The Health Professions Council (HPC) approve educational programmes in the UK which health professionals must complete before they can apply to be registered with us. The HPC is a health regulator and our main aim is to protect the public. The HPC currently regulates 15 professions. All of these professions have at least one professional title which is protected by law. This means that anyone using the title 'Chiropodist' or 'Podiatrist' must be registered with us. The HPC keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

As well as approving educational programmes for people who want to join the Register, the HPC also approve a small number of programmes for those already on the Register. The post-registration programmes we currently approve are supplementary prescribing programmes (for chiropodists / podiatrists, radiographers and physiotherapists) and programmes in local anaesthetics and prescription-only medicine (for chiropodists / podiatrists).

The visitors' report which follows outlines the recommended outcome made by the visitors on the approval of the programme. This recommended outcome was accepted by the Education and Training Committee (Committee) on 5 July 2012. At the Committee meeting on 5 July 2012, the programme was approved. This means that the education provider has met the condition(s) outlined in this report and that the programme meets our standards of education and training (SETs) and ensures that those who complete it meet our standards of proficiency (SOPs) for their part of the Register. The programme is now granted open ended approval, subject to satisfactory monitoring.

Introduction

The HPC visited the programme at the education provider as it was a new programme which was seeking HPC approval for the first time. This visit assessed the programme against the standards of education and training (SETs) and considered whether those who complete the programme meet the standards of proficiency (SOPs) for their part of the Register.

This visit was an HPC only visit. The education provider did not validate or review the programme at the visit and the professional body did not consider their accreditation of the programme. The education provider supplied an independent chair and secretary for the visit.

Visit details

Name of HPC visitors and profession	Paul Blakeman (Podiatrist) Gordon Burrow (Podiatrist)
HPC executive officer (in attendance)	Lewis Roberts
Proposed student numbers	15
Proposed start date of programme approval	September 2012
Chair	Maria Young (University of Brighton)
Secretary	Alison Barnard (University of the West of England, Bristol)

Sources of evidence

Prior to the visit the HPC reviewed the documentation detailed below, sent by the education provider:

	Yes	No	N/A
Programme specification	☒	☐	☐
Descriptions of the modules	☒	☐	☐
Mapping document providing evidence of how the education provider has met the SETs	☒	☐	☐
Mapping document providing evidence of how the education provider has met the SOPs	☒	☐	☐
Practice placement handbook	☒	☐	☐
Student handbook	☒	☐	☐
Curriculum vitae for relevant staff	☒	☐	☐
External examiners' reports from the last two years	☐	☐	☒

The HPC did not review external examiners' reports prior to the visit as the programme is new.

During the visit the HPC saw the following groups or facilities:

	Yes	No	N/A
Senior managers of the education provider with responsibility for resources for the programme	☒	☐	☐
Programme team	☒	☐	☐
Placements providers and educators/mentors	☒	☐	☐
Students	☒	☐	☐
Learning resources	☒	☐	☐
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	☒	☐	☐

The HPC met with students from the Diploma in Foot Health, as the programme seeking approval currently does not have any students enrolled on it.

Recommended outcome

To recommend a programme for approval, the visitors must be assured that the programme meets all of the standards of education and training (SETs) and that those who complete the programme meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that a number of conditions are set on the programme, all of which must be met before the programme can be approved.

The visitors agreed that 43 of the SETs have been met and that conditions should be set on the remaining 14 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for approval. Conditions are set when certain standards of education and training have not been met or there is insufficient evidence of the standard being met.

The visitors have also made a number of recommendations for the programme.

Recommendations are observations on the programme or education provider which do not need to be met before the programme is recommended for approval. Recommendations are normally set to encourage further enhancements to the programme and are normally set when it is felt that the particular standard of education and training has been met at, or just above the threshold level.

Conditions

2.1 The admissions procedures 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 revisit all programme documentation, including advertising materials, to ensure that potential applicants are made aware of any likely additional costs associated with the programme.

Reason: In discussions with students from the Diploma in Foot Health, the visitors noted that students may be expected to self-fund a number of additional costs associated with taking up a place on the programme. The visitors also noted that the documentation for the Diploma in Local Anaesthesia for Podiatry Practice did not reference potential additional costs such as those associated with Criminal Records Bureau (CRB) checks, resources such as books and the internet. The visitors also articulated that costs associated with travel and accommodation and costs associated with undertaking a cardiopulmonary resuscitation (CPR) course were not clearly stated. The visitors therefore require the education provider to ensure that the potential additional costs associated with the programme are clearly stated to demonstrate that this standard has been met.

2.1 The admissions procedures 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 revisit the programme documentation to clearly state all of the requirements an applicant would need to meet in order to gain a place on the programme.

Reason: Through discussions with the programme team the visitors noted that students must either provide evidence of current CPR certification or undertake a course in CPR whilst on the programme. The visitors also noted that the programme is framed around distance learning, and utilises e-learning throughout. However the visitors could not determine, from the documentation provided, how information regarding the requirement for internet access and the requirement for a CPR qualification is provided to applicants. The visitors therefore require the education provider to revisit the programme documentation to clearly outline all of the requirements and procedures associated with an applicant being offered and taking up an offer of a place on the programme.

2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.

Condition: The education provider must revisit the programme documentation to clearly highlight the mechanisms in place that demonstrates all students have undertaken criminal conviction checks at admissions and articulate the procedures that deal with an applicant who declares a criminal conviction.

Reason: In discussions with the programme team the visitors were made aware of the education provider's admissions procedures relating to criminal conviction checks. The visitors noted that applicants are asked to declare any criminal convictions to the programme team and sign a self-declaration form. It was also noted that students must provide evidence of an enhanced CRB check before they undertake the placement component of the programme. The programme team also made the requirement for applicants to the programme to be HPC Registrants clear and articulated that as such they must abide by the HPC's standards of conduct, performance and ethics. However, the visitors articulated that the information provided about the education provider's procedures relating to criminal conviction checks did not provide sufficient evidence to demonstrate that criminal conviction checks are applied at admission. As such the visitors noted that a student could enrol on the programme, complete all theoretical aspects of the programme and have to terminate study because an offence has been disclosed on the CRB check prior to undertaking placement. From a review of the programme documentation the visitors were also unable to determine the formal procedures in place to ensure that any applicant who declares a criminal conviction is treated fairly and in a manner consistent with other decisions of this nature. The visitors therefore require the education provider to provide further evidence to demonstrate how criminal conviction checks are completed during the admissions process and to articulate the procedures in place to deal with any applicant who declares a criminal conviction.

2.5 The admissions procedures must apply selection and entry criteria, including appropriate academic and/or professional entry standards.

Condition: The education provider must revisit the admissions procedures to clarify the selection and entry criteria.

Reason: From a review of the programme documentation the visitors noted that as part of the admissions procedures the programme team intend to undertake a phone interview with applicants prior to accepting them on the programme. However, from discussions with the programme team it was stated that all students must attend an open day and it is at the open day where the programme team make an informal judgement on an individual's suitability to undertake the programme. The visitors require clarification of the selection and entry criteria for the programme. The visitors also require further information that highlights how the education provider clearly communicates the admissions processes to applicants before this standard can be met.

2.7 The admissions procedures must ensure that the education provider has equality and diversity policies in relation to applicants and students, together with an indication of how these will be implemented and monitored.

Condition: The education provider must provide further evidence of the equality and diversity policies utilised by the programme and further evidence how these policies are implemented and monitored.

Reason: The visitors noted that in the SETs mapping document the education provider signposted the visitors to the 'Student Handbook' as the source of evidence for this standard. However, after reviewing the 'inclusion and diversity

statement' visitors were unable to determine what the equality and diversity policy being implemented and used by the education provider was. The visitors could also not determine, from the evidence provided, what process are in place for collecting information on the application and monitoring of the policy. The visitors noted that in the SETs mapping document it stated that "…these polices are implemented and monitored by the equal opportunities steering committee which feeds back to the Principal". However, the visitors were not provided with evidence of an equality and diversity steering committee, what its role is in relation the equality and diversity policy and how it goes about fulfilling this role. The visitors therefore require further evidence to determine what the equality and diversity policy is employed by the education provider, and how the implication of this policy is monitored to ensure this standard is being met.

3.2 The programme must be effectively managed.

Condition: The education provider must provide further evidence of the programme management structure, clarifying the roles and responsibilities of everyone involved, including evidence of lines of responsibility and links with programme committees.

Reason: From discussions with the programme team the visitors noted discussions that highlighted the roles and responsibilities of some members of the programme team and management. However, from a review of the programme documentation the visitors were unable to determine the exact management structures. The visitors therefore require formal clarification of the programme management structure, including roles and responsibilities of everyone involved and the lines of responsibility. The visitors also require further details of how the committee structures support the management of the programme.

3.3 The programme must have regular monitoring and evaluation systems in place.

Condition: The education provider must provide further evidence of the programme committee structures and details of how the committee structures support the management of the programme.

Reason: From a review of the programme documentation the visitors noted a number of references to several committees. In discussions with the programme team it was clarified that the education provider utilises a number of committees to support the management of the programme. However, from a review of the programme documentation the visitors were unable to find evidence of committee activity. As a consequence the visitors were unable to determine how these committees operate and what role they play in monitoring and evaluating the programme. Therefor the visitors require further evidence to determine what the regular monitoring and evaluation systems the programme is subjected to and what role the programme committees have in this process.

3.7 A programme for staff development must be in place to ensure continuing professional and research development.

Condition: The education provider must submit further evidence of a programme for staff development to ensure continuing professional and research development.

Reason: The visitors noted discussions with the programme team where it was stated that the education provider has a formal programme in place for staff development. The visitors also noted that the programme team gave a number of examples of where the education provider has supported staff development. However, the visitors noted that they were not provided with documentary evidence of a formal programme for staff development. The visitors therefore require further information to ensure this standard is being met.

3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.

Condition: The education provider must demonstrate how they ensure resources are available to effectively support the required learning and teaching activities of the programme.

Reason: From a review of the programme documentation the visitors noted that the programme is largely delivered via distance learning and that the education provider has developed a range of e-learning resources to support this. It was also clear that much of the indicative content of the curriculum is available through the e-learning resources. The visitors were also made aware that students on the programme are also required to access books and journal articles to support the learning activity on the programme. However, from a tour of the education provider's resources, and in discussions with students, the visitors noted that the education provider does not provide students with access to these books.

When discussing resources with the programme team the visitors noted that the education provider subscribes to 'Science Direct' and students can access five journals through this resource. The visitors articulated that some of the current provision of journals lacked currency and a specialist focus on local anaesthesia and could therefore impact on a student's ability to achieve the required learning outcomes of this programme. The visitors require the education provider to review the current provision of journal and book resources and provide further evidence as to how they will ensure that they are appropriate for this programme. In this way the visitors can determine how the resources provided by the education provider effectively support the required learning and teaching activities of the programme.

3.11 There must be adequate and accessible facilities to support the welfare and wellbeing of students in all settings.

Condition: The education provider must provide further evidence that demonstrates adequate and accessible facilities that support the welfare and wellbeing of students in all settings.

Reason: In discussions with students the visitors noted a number of positive comments about the support offered by the programme team. The visitors also noted in discussions with the programme team where examples were given

describing how they have supported the welfare and wellbeing of students by offering flexibility within the programme, including where appropriate, assignment extensions. However, from a review of the programme documentation the visitors were unable to determine what documented systems were in place to support the welfare and wellbeing of students and where students would find out about the support systems in place. The visitors require further evidence outlining the facilities available for student support, how the education provider tells students about these facilities and how students access the facilities..

3.13 There must be a student complaints process in place.

Condition: The education provider must provide evidence of a formal student complaints process.

Reason: From discussions with the programme team and the students the visitors noted that an informal process for student complaints was used by the education provider. The visitors were made aware that if a complaint is made that complaint can be cascaded up the education provider's management structure and dealt with formally, if required. However, the visitors could find no evidence of a formalised student complaints process and in reviewing the programme documentation were unable to find documented evidence of the process described to them in the meetings at the visit. As a consequence the visitors could not determine how a student could complain formally or how students are provided information about the complaints process. The visitors therefore require the education provider to provide evidence of a student complaints process, and how this process is highlighted to students to demonstrate that this standard is met.

3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.

Condition: The education provider must ensure that a system is in place for gaining students informed consent before they participate as service users in practical teaching.

Reason: From the documentation provided the visitors noted that students may be involved in practical teaching within biomechanics and anatomy. However the visitors were unable to determine where the evidence of a consent procedure in place to mitigate any risk involved in students participating as service users was provided. The visitors require further evidence to show the consent protocols in place, how the education provider will gain students' consent, and also how they will inform students about this policy and their right to confidentiality.

3.16 There must be a process in place throughout the programme for dealing with concerns about students' profession-related conduct.

Condition: The education provider must ensure that a system is in place for dealing with concerns about students' profession-related conduct.

Reason: From a review of the programme documentation and discussions with the programme team the visitors noted that the education provider's admissions protocols require students to be HPC Registered. The visitors noted in further

discussions that all students must abide by the HPC standards of conduct, performance and ethics and any profession-related conduct issues would be referred to the HPC. However, the visitors were not provided with evidence of a process in place for dealing with concerns about students' profession-related conduct. As a consequence the visitors were unable to determine how the education provider makes a judgement about what constitutes a profession-related conduct concern and how academic misconduct would be dealt with. The visitors therefore require the education provider to provide evidence of a formalised process for dealing with concerns about students' profession-related conduct in all settings to ensure the process is thorough, fair and open.

6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.

Condition: The education provider must revisit the practical assessment methods to ensure that it is clear for students how they can progress and achieve within the programme.

Reason: From a review of the programme documentation the visitors were unable to determine when the assessment of practical competencies moves from formative to summative assessment. Through discussions with the programme team the visitors were also unable to clarify the number of procedures a student will undertake, how many attempts a student is allowed to demonstrate competence and exactly what constitutes an attempt. The visitors therefore require the education provider to revisit the programme documentation to provide clarity on the assessment methods that are employed to measure the practical learning outcomes.

6.11 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.

Condition: The education provider must provide further evidence of the regulations in place to ensure that at least one external examiner is on the HPC Register and has appropriate experience of local anaesthesia.

Reason: In reviewing the documentation the visitors noted that the current external examiner is not on the HPC Register. Through discussions with the programme team it was clarified that the external examiner will shortly be on the register and this is a requirement of the position. However, through their review of the programme documentation the visitors could not determine what appropriate experience a professional would need to have in order to take up the role of external examiner. In particular the visitors could not determine what experience an external examiner would need to have of practicing local anaesthesia and how current this experience would have to be. The visitors therefore require further evidence of the criteria the education provider recruits external examiners against and what they consider appropriate experience of local anaesthesia. In this way the visitors can determine how the regulations specify the requirements for the appointment of an external examiner who has appropriate experience and is on the relevant part of the Register.

Recommendations

2.4 The admissions procedures must apply selection and entry criteria, including compliance with any health requirements.

Recommendation: The education provider should consider revisiting the programme documentation to further enhance the information that is made available to applicants and students about reasonable adjustments and the support services available to individuals with certain health requirements.

Reason: From a review of the programme documentation and from discussions with the programme team the visitors are satisfied that this standard has been met. The visitors noted that in the discussions with the programme team that they gave a number of examples where reasonable adjustments had been made to support students on the programme. The visitors did, however, note an apparent discrepancy between the discussions with the programme team and the information made available within the programme documentation. The visitors felt that information on reasonable adjustments and support mechanisms that the programme team were operating could be made more explicit in the programme documentation to ensure that the options and services available to individuals with health requirements are more clearly and consistently highlighted. The education provider may therefore want to consider formalising the processes in place associated with reasonable adjustments and making them more explicit in the programme documentation.

2.6 The admissions procedures must apply selection and entry criteria, including accreditation of prior (experiential) learning and other inclusion mechanisms.

Recommendation: The education provider may want to consider introducing an accreditation of prior (experiential) learning (APEL) scheme to review CPR certification.

Reason: From a review of the programme documentation and discussions with the programme team the visitors noted that the education provider does not have an APEL scheme. Through discussions with the programme team the visitors also noted that all students who undertake the programme are required to complete a CPR course and the education provider makes a judgement on whether the course is appropriate. The visitors recommend that the education provider may want to consider formalising this process and consider introducing an APEL scheme to review CPR certification.

3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.

Recommendation: The education provider should consider reviewing the access to books within the programme and consider holding core texts for students to access.

Reason: From a review of the documentation the visitors noted that students on the programme are required to access books to support the learning activity on

the programme. The visitors noted that the education provider recommends that students access a range of indicative learning resources outlined within the module descriptors. From a tour of the education provider's resources and discussions with students the visitors noted that the education provider does not provide students with access to books. The visitors recommend that the education provider should consider reviewing the access to books within the programme and consider holding core texts for students to access. In this way they may be able to better support student learning in all settings.

3.12 There must be a system of academic and pastoral student support in place.

Recommendation: The education provider should consider revisiting the programme documentation to further enhance the information that is made available to students relating to the availability of tutor support.

Reason: The visitors noted a demonstration of the education provider's online virtual learning environment that allowed students to access academic and pastoral support. Through discussions with students the visitors noted that the education provider offers generous access to the programme team through the online system. The visitors did, however, note an apparent discrepancy between the discussions with the students and the information made available within the programme documentation. The visitors felt that information on access to online tutor support could be made more explicit in the programme documentation to ensure that access times are more clearly and consistently highlighted.

5.3 The practice placement settings must provide a safe and supportive environment.

Recommendation: The education provider may want to consider reviewing the audit processes used to quality assure the practice placement environment.

Reason: From discussions with the programme team the visitors noted that the education provider is subject to the ISO9001:2008 quality management system. From a review of the education providers practice placement setting the visitors were satisfied that a safe and supportive environment is in place. However, the visitors noted that the ISO9001:2008 quality management system is a generic business audit and does not specialise in auditing clinical settings. The visitors therefore recommend that the education provider may want to consider reviewing the audit processes used to quality assure the practice placement environment to further enhance the quality audit systems. The visitors suggest that the education provider may want to consider bringing in an external advisor with expertise in auditing clinical settings.

6.5 The measurement of student performance must be objective and ensure fitness to practise.

Recommendation: The education provider should consider utilising the external examiner in practical assessments to ensure the measurement of student performance is objective and offers parity.

Reason: The visitors noted discussions with the programme team where it was stated that they are considering having the external examiner sit in on some

practical assessments to ensure the measurement of student performance is objective and offers parity. The visitors noted that this suggestion had not yet been formalised and agreed with the external examiner. The visitors recommend that the education provider should ensure that this arrangement is formalised and the external examiner should observe some practical assessment within each student cohort.

Gordon Burrow
Paul Blakeman