

# Appendix 2 – detailed findings

This appendix provided detailed findings from assessments undertaken in the 2023-24 academic year. It notes the key findings from the previous report, and explores any additional findings from 2023-24.

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# Approval assessments

In this section, we have reported findings linked to how education providers have met or aligned with our standards of education and training (SETs), at either the institution or programme level, depending on where the standard sits.

### SET 1 – Level of qualification for entry to the Register

Key findings (2021-23 report):

 All but one programmes proposed were at HEIs, which meant they were able to deliver programmes which meet the UK Quality Code. As programmes proposed by HEIs were at or above SET 1 level, we were able to take assurance that SET 1 was met due to HEI alignment with the Code.

### Findings (2023-24 academic year):

- About a quarter of programmes were proposed above the SET 1 level, which is in line with the percentage of all programmes delivered above SET 1
- The proportion of new programmes proposed above the SET 1 level has
  dropped from the previous report (where about a third of programmes were
  proposed above the SET 1 level). However, this finding continues to show that
  education providers are diversify professional provision, to enable individuals
  with undergraduate degrees to access professional training along shortened
  timeframes. This was most prevalent in occupational therapy training
- One programme was proposed by a non-HEI where the expected qualification level is at bachelors degree with honours. After a full and fair assessment, the Education and Training Committee (ETC) was minded to not approve this programme at its meeting of 30 August 2024. This was due to the proposed programme not being equivalent to the academic level required, and therefore the standards of proficiency would not be delivered as required. The final decision on this programme is pending at the time of writing, as the education provider is able to supply observations on the 'minded to not approve' decision, to the ETC meeting in November.

### **SET 2 – Programme admissions**

#### Institution level standards – programme advertising and admissions processes

Key findings (2021-23 report):

- Education providers had clear structures in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that all parties have the information required to make an informed choice about whether to take up or make an offer of a place on a programme (SET 2.1)
- These structures included:
  - o Clear advertising through central services (such as the University and College Admissions Service (UCAS) and Discover Uni)
  - Consideration of the model of learning, for example apprenticeship programmes being advertised differently and in different places
  - Consistency of information across information for applicants and members of staff applying admissions requirements
  - Selection methods and techniques being clearly defined and applied appropriately
  - Review of admissions requirements to ensure they remain current and fair

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

The use of hybrid activities to help applicants understand the requirements, for example, webinars and virtual tours.

#### Institution level standards – Language requirements

- Education providers had clear requirements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that applicants to programmes have a good command of English (SET 2.3).
- What we mean by 'good command' may differ depending on the programme we make sure that learners are able to use the English language at the level necessary to communicate effectively with service users and carers, educators and others, and to complete the programme successfully.
- These requirements included:
  - A threshold requirement for UK applicants to hold a GCSE in English.
  - o For international applicants, a requirement that learners hold an International English Language Testing System (IELTS) score of 7, with no element below 6.5, which is the requirement in the SOPs<sup>1</sup>.
  - Although not a requirement of our standards, education providers in Wales normally assessed Welsh language skills as part of entry, which links to a requirement of Health Education and Improvement Wales (HEIW) (who commission many HCPC-regulated professions in Wales) that Welsh proficiency is tested as part of entry requirements.

<sup>&</sup>lt;sup>1</sup> This is the case for all HCPC professions, except speech and language therapists, where the requirement is equivalent to level 8, with no element below 7.5

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- Variety of assessment methods for English language competence, such as interviews, online questionnaire / tests.
- Alternative entry requirements to IELTS or an English GCSE, such as the Common European Framework of References for Languages (CEFR).
- Requirements set are a combination of institution level policies with programme specific requirements.
- Post-registration programmes do not need to check English language competence at the point of application, as applicants are already registrants and therefore meet the relevant communication SOPs.

### Institution level standards – suitability of applicants

Key findings (2021-23 report):

- Education providers had clear requirements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that education providers assess the suitability of applicants, including criminal conviction checks (SET 2.4).
- By 'suitability' we mean that an applicant is of appropriate character to train to become a health and care professional and to interact safely with service users and carers.
- All education providers required a criminal conviction check to be carried out by the relevant national body (for UK applicants), or by an equivalent body for international applicants.
- Education providers were clear that admissions to programmes were subject to The Rehabilitation of Offenders Act (Exceptions) Order, which enables education providers to ask questions "about spent convictions and cautions in order to assess a person's suitability for admission to certain occupations".

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### <u>Institution level standards – compliance with health requirements</u>

Key findings (2021-23 report):

- Education providers had clear requirements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that the admissions process ensures applicants are aware of and comply with any health requirements (SET 2.5).
- This is to make sure learners will be able to take part in a programme safely and effectively, and meet our standards for registration once they complete the programme.
- Education providers set health requirements for entry to programmes, including:
  - Occupational health assessments, where judgements were made about whether individuals are able to practice a profession (ie meet all of our standards) considering any health conditions.
  - Mandatory immunisations, often linked to requirements for practice in specific professions.

# <u>Institution level standards – equality, diversity</u> and inclusion in recruitment

Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there are equality and diversity policies in relation to applicants (SET 2.7).
- This ensures that that the admissions process is open and impartial and does not discriminate unfairly against certain applicants. We also require that there is an appropriate and effective process for assessing applicants' prior learning and experience (SET 2.6).
- Education providers have active aims to recruit learners from a diverse range of backgrounds.
- They consider alternative arrangements for admissions, to widen access to a diverse range of potential learners.
- Education providers also capture diversity data in admissions, to consider where groups are under-represented in applications, and to consider differential outcomes. This data is then used to consider which groups should be focused on in future recruitment activities.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 A small number of programmes assessed were run by an education provider who is also the employer. For these education providers, the policies and processes relating to EDI will differ and include those appropriate to employment contracts.

#### <u>Programme level standards – academic and professional entry requirements</u>

Key findings (2021-23 report):

- Through our assessments we judged that all education providers set their academic entry requirements at a level appropriate to the delivery of the programme.
- Requirements were different for different programmes based on a range of factors, including the academic level of the programme, the model of learning, and expectations of other organisations.

### SET 3 - Programme governance, management and leadership

#### Institution level standards – sustainability of programmes

Key findings (2021-23 report):

- Education providers had clear arrangements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that programmes must be sustainable and fit for purpose (SET 3.1).
- This is to make sure that there is a future for the programmes, that they are currently secure and are supported by all stakeholders involved.
- Education providers integrated newly proposed programmes into existing business plans, which demonstrate the ongoing financial stability of the institution.
- Programmes aligned with existing sustainability arrangements, through the involvement of relevant stakeholders who provide resources and commitment to deliver programmes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### <u>Institution level standards – programme management</u>

Key findings (2021-23 report):

- Education providers had clear arrangements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that programmes must be effectively managed (SET 3.2).
- This is to ensure that there is effective management and clear responsibility for programmes.
- Policies and processes were in place to ensure programmes are effectively managed, such as management structures and clear articulation of the roles and responsibilities of all involved.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Institution level standards – overall professional responsibility for programmes

- Education providers had clear arrangements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there is a person in place holding overall professional responsibility for each programme, who is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register (SET 3.3).
- This is to ensure there is an appropriate person in place, and that the education provider has a mechanism for ensuring this role is filled on an ongoing basis.
- Education providers aligned new provision with existing policies and processes
  which ensure that the person with overall responsibility for the programmes is
  appropriately qualified and experienced, and that the role is filled on an ongoing
  basis.

- This recognised that this standard is not just about the person in place at the time of assessment, but also how they would ensure an appropriate person would be in place in the future, with any personnel changes.
- Normally, this was delivered through a clear job description, and management structures which ensure the role is essential and would be recruited to with changes in personnel.

Findings from 2023-24 cases support the conclusions from the 2021-23 report.

### <u>Institution level standards – quality and effectiveness of programmes</u>

### Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there are regular and effective monitoring and evaluation systems in place (SET 3.4).
- This is to ensure that programmes are of good quality and are effectively delivered on an ongoing basis.
- Education providers aligned proposed programmes with internal and external quality assurance assessments, including the quality assurance of practicebased learning.
- There was a split in education providers, with some running a 'continuous improvement' approach to quality, and some running a cyclical review model.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Institution level standards – service user and carer involvement

#### Key findings (2021-23 report):

- Education providers had clear strategies in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that service users and carers are involved in programmes (SET 3.7).
- This ensures that service users and carers contribute to the overall quality and effectiveness of programmes.
- Education providers aligned proposed programmes with existing policies and processes to ensure that services and carers are involved in their newly proposed programmes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Institution level standards – learner involvement

- Education providers had clear mechanisms in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that learners are involved in programmes (SET 3.8).
- This ensures that the experience of learners is central to the quality and effectiveness of programmes.
- Education providers aligned proposed programmes to existing policies and processes to ensure learners contribute to the programme in some way.

 Primarily, education providers sought structured feedback from learners, and many education providers also directly involved learners in review activities such as curriculum development and approving new programmes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 A small number of education providers explicitly noted that they involved learners in the development of new programmes. We were not clear how this compares to 2021-23 findings, because learner involvement in the development of new programmes was not explicitly reference by education providers in 2021-23, although this does not mean it did not happen.

# <u>Institution level standards – equality, diversity and inclusion (EDI)</u>

### Key findings (2021-23 report):

- Education providers had clear strategies, policies and procedures in place to
  ensure institution level standards were aligned to or met through the approval
  process, linked to our standards which require that there must be equality and
  diversity policies in place in relation to learners, and that those policies must be
  monitored (SET 3.14).
- This ensures that programmes provide an impartial, fair and supportive environment to allow people to learn.
- Equality and diversity policies are in place throughout programmes, including within practice-based learning.
- Education providers are aware of their legal responsibilities in this area, and have institution-level strategies / high level commitments in place related to EDI.
- Strategies are aimed to ensure education providers are inclusive and fair in their activities, focused on areas such as learner recruitment and admissions, experience, progression, attainment, and employability.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

• Several education providers sought external recognition of their EDI policies / processes. For example, the Athena Swan award and the Race Equality Charter.

### <u>Institution level standards – learner complaints</u>

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there is a thorough and effective process in place for receiving and responding to learner complaints (SET 3.15).
- This ensures education providers consider and settle complaints from learners, and that complaints contribute to the overall way in which the programme is governed.
- Education providers aligned proposed programmes to existing policies and processes which ensure a fair, transparent and supportive response to learner complaints.
- These apply throughout the duration of the programmes including practice-based learning.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### Institution level standards – ongoing learner suitability

Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there are thorough and effective processes in place for ensuring the ongoing suitability of learners' conduct, character and health (SET 3.16).
- This ensures that education providers protect service users and carers who interact with learners, and make sure that learners who complete the programme meet our standards for registration and expectations of professional behaviour.
- Education providers aligned proposed programmes to existing policies and processes to protect service users and carers interacting with learners.
- There were teaching and learning activities embedded which set out expectations of professional behaviour for learners in practice, and to develop learner ability to meet our standards of conduct, performance and ethics at the point of registration.
- Education providers had well documented learner fitness to practice procedures, to make decisions about learner continuation when things go wrong, and normally required declarations from learners when any situation might impact their ongoing suitability.
- There were some complexities for apprenticeship programmes, where learners are also employees. Education providers are clear which policies should be followed in these situations, and how engagement structures functioned to address any issues which might arise in the practice or academic setting.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### Institution level standards – concerns about the safety and wellbeing of service users

Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there is an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users (SET 3.17).
- This standard is to help learners to recognise situations where service users may be at risk, supporting them in raising any concerns, and making sure action is taken in response.
- Education providers aligned proposed programmes to existing mechanisms and support, through which learners can identify safety or well-being concerns about service users and make sure appropriate actions are undertaken.
- Normally policies were badged as 'whistleblowing', and applied to both the practice and academic settings.
- Importantly, education providers were committed to supporting learners to recognise situations where service users may be at risk, through structured teaching and learning.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

In addition to whistleblowing, policies were also referred to as 'escalating / raising concerns' and 'safeguarding'.

# <u>Institution level standards – eligibility for admission to the Register</u>

### Key findings (2021-23 report):

- Education providers had clear arrangements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that all parties are aware that only successful completion of an approved programme leads to eligibility for admission to the Register (SET 3.18).
- This ensures that there is no confusion about which programmes we approve. Learners, educators and the public must be clear on which programmes meet our standards for registration and which do not.
- There were clear regulations in place which clearly state which programmes are approved and hence lead to eligibility to apply to the HCPC Register. These were often contained in programme specifications.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### <u>Programme level standards – collaboration with practice education providers</u>

### Key findings (2021-23 report):

- Education providers recognised that collaboration with practice education providers was key to the sustainability and quality of programmes. This is due to the centrality of practice-based learning within education and training, and ensuring programmes are resourced and sustainable to deliver practice-based learning to all learners, to support delivery of the learning outcomes and standards of proficiency.
- Formal agreements were in place, with defined mechanisms to collaborate contained within these agreements. There were different considerations needed depending on the model of learning, and the type of relationship between the education provider and practice education provider. Many collaborative arrangements established when establishing programmes facilitated coproduction of programmes, particularly for apprenticeship routes.
- We often needed to explore this area further with education providers, to consider how information provided in documentation would work in practice. Through our explorations, we were satisfied that collaborative arrangements had been established that would be maintained once programmes were approved.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 Collaboration often worked differently for NHS providers and non-NHS providers, and education providers recognised the differences when working with NHS and non NHS providers, including whether central structures and resources were available to manage and ensure the quality of practice-based learning.

### Programme level standards - capacity of practice-based learning

Key findings (2021-23 report):

- Capacity of practice-based learning is an issue often discussed within the
  professions we regulate. From our assessments, all education providers were
  able to demonstrate that there was capacity for their proposed learner numbers,
  and that capacity issues would be managed effectively.
- They worked with sector stakeholders to achieve this, including groups that provide national / regional oversight, practice education providers, and other education providers (normally in collaborative regional groups).

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- Further references to central mechanisms to consider practice-based learning capacity, and allocate practice-based learning between education providers.
- Where it was relevant, we tested education provider and central intentions for increasing practice-based learning capacity, including how they ensure these intentions were sustainable.

### Programme level standards – staffing

Key findings (2021-23 report):

- Education providers had considered staffing requirements for proposed programmes and were aware of the challenges in this area, often driven by the availability of academic staff across professional areas.
- Through our assessments, we were confident that education providers either resourced or had robust plans in place to resource their programmes for the number of learners proposed. They considered how they would use existing staff, recruited new staff, and filled gaps in expertise with visiting or guest lecturers. There were clear mechanisms in place to develop new and existing staff to deliver effective programmes. Therefore, we were satisfied that programmes would be staffed appropriately for the number of learners proposed.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Programme level standards – resourcing

Key findings (2021-23 report):

- Education providers had considered resourcing requirements for proposed programmes. This included technical solutions, physical teaching space, and providing academic materials to support learning.
- Through our assessments, we were confident that education providers either resourced or had robust plans in place to resource their programmes for the number of learners proposed.
- They considered how they would use existing resources and develop new resources where required, depending on the design of the proposed programme.
   We found that education providers were resourced appropriately to deliver teaching and learning for the number of learners proposed.

### SET 4 - Programme design and delivery

Institution level standards – interprofessional education (IPE)

Key findings (2021-23 report):

- Education providers had clear strategies, policies and processes in place to
  ensure institution level standards were aligned to or met through the approval
  process, linked to our standards which require that learners are able to learn
  with, and from, professionals and learners in other relevant professions (SET
  4.9).
- This ensures that learners are prepared to work with other professionals and across professions for the benefit of service users and carers.
- Education providers normally had IPE leadership, policies, and procedures in place, which described the approach and methods used to enable learners of different programmes and from different professions to learn with and from each other.
- IPE was often well structured into programme delivery and assessment.
- Learning with and from other professional groups was often also included in practice-based learning agreements.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### Institution level standards - consent

Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there are effective processes for obtaining appropriate consent from service users and learners (SET 4.10).
- This ensures individuals' rights are respected, and the risk of harm is reduced, whilst also making sure that learners understand what will be expected of them as health and care professionals.
- There were established processes in place to enable leaners to obtain consent from service users, and for learners in practical or role play sessions.
- Education providers were clear that learners must identify themselves as learners to service users.
- In practical teaching, education providers gained consent from learners where required, and had good 'opt out' mechanisms which did not disadvantage individuals.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

Institution level standards – mandatory attendance and attendance monitoring

Key findings (2021-23 report):

 Education providers had clear policies and mechanisms in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that education providers identify and communicate to learners the parts of programmes where attendance is mandatory, and that associated monitoring processes are in place (SET 4.11).

- This ensures that all learners who complete programmes meet the SOPs, by being fully involved in the parts of the programme which are essential to achieving them.
- Education providers were clear about which parts of programmes were mandatory – these linked to teaching and learning required to meet our requirements for registration.
- Learners are normally informed of attendance requirements through programme handbooks.
- Education providers have processes in place to monitor learner attendance, and intervene when there are potential attendance issues.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 There was more focus on specific institution wide attendance monitoring policies which are used to identify and support at risk learners.

# <u>Programme level standards – overall programme design</u>

Key findings (2021-23 report):

- Programmes were structured to deliver our requirements for registration, including ensuring learners were able to develop their skills, knowledge and experience through practice-based learning. Primarily, two types of programmes were proposed:
  - Traditional taught programmes, where learners were situated at the academic institution with practice-based learning experience gained away from the academic institution.
  - Apprenticeship programmes, where learners were situated at their employer who delivered most practice-based learning, with academic learning gained at the academic institution.
- Programmes were designed embedding complimentary academic and practicebased learning to enable learners to develop the academic underpinning and practical skills to meet our requirements. This included ensuring practice is evidence based, through requirements to undertake research as relevant to the academic level of the programme.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

<u>Programme level standards – considering the expectations of professional bodies and other organisations</u>

- Education providers were aware of and usually aligned with the expectations of professional bodies and other relevant organisations. We welcomed consideration and alignment with these expectations, as it showed that education providers were considering professional norms in developing and delivering programmes.
- When there were bodies that had regulatory or commissioning requirements of education providers, those requirements were central to programme design. We frequently saw alignment for apprenticeship programmes, and programmes centrally commissioned in Wales.

• Sometimes, alignment with requirements was presented as meeting our standards in and of itself. We explored these areas with education providers to ensure our standards were met with these approaches.

Findings from 2023-24 cases support the conclusions from the 2021-23 report.

# <u>Programme level standards – currency of curricula</u>

Key findings (2021-23 report):

- Consideration of current practice informed programme design. This was enabled by education providers developing their curricula with stakeholder input, to meet regulatory requirements and normally professional body expectations.
- Mechanisms were inbuilt into quality assurance processes to ensure currency of programmes were continually considered, which normally included stakeholder input and active review of changing requirements and expectations of other bodies.

### **SET 5 – Practice-based learning**

#### Institution level standards – quality and safety of practice-based learning

Key findings (2021-23 report):

- Education providers had clear policies, systems, and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there is a thorough and effective system in place for approving and ensuring the quality of practice-based learning (SET 5.3), and that practice-based learning takes place in an environment that is safe and supportive for learners and service users (SET 5.4).
- This ensures practice-based learning is of the required quality to support learners to progress through programmes, and that practice-based learning is undertaken in a safe environment.
- Systems were in place to ensure that practice-based learning is initially approved and regularly monitored, to ensure it is of good quality and undertaken in a safe environment.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### Institution level standards – information for learners and practice educators

Key findings (2021-23 report):

- Education providers had clear mechanisms in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that learners and practice educators have the information they need in a timely manner to be prepared for practice-based learning (SET 5.8).
- This ensures clear expectations about practice-based learning are set and communicated to everyone involved.
- Education providers have mechanisms in place to set clear expectations for both learners and practice educators to ensure they are prepared for practice-based learning.
- These expectations were normally contained through learner and practice educator handbooks.
- Many education providers have individuals or teams to manage the placement experience. Their responsibilities include ensuring all involved in practice-based learning have the information they require to be prepared for practice-based learning.
- There was also normally documentation, such as practice assessment documents, which enabled practice educators and learners to understand specific requirements and competencies to be achieved.
- Education providers also provided training for practice educators to support this area.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Programme level standards – centralising practice-based learning in programmes

Key findings (2021-23 report):

 All proposed programmes planned to deliver practice-based learning, which was properly integrated with academic learning to support learners to meet our requirements for registration. There were two main approaches to this, linked to the two main types of programmes considered:

- Traditional taught programmes, where learners were situated at the academic institution with practice-based learning experience gained away from the academic institution.
- Apprenticeship programmes, where learners were situated at their employer who delivered most practice-based learning, with academic learning gained at the academic institution.
- We were satisfied with the arrangements to ensure practice-based learning was central to programmes in both models.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

### Programme level standards – structure, duration and range

Key findings (2021-23 report):

- Education providers had considered the number, duration, and range of practicebased learning required to support learners to achieve competencies required by the programme.
- This was different for different programmes, depending on the profession and the model of learning. All education providers were able to show how their intended number, duration and range of practice-based learning would effectively support learners.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Programme level standards – staffing

Key findings (2021-23 report):

- Education providers had mechanisms in place to set out requirements for practice educators to ensure practice educators were able to effectively support learners. These included the audit mechanisms applying to practice-based learning including areas to actively consider the staffing of practice-based learning.
- We were confident that these mechanisms were appropriate to ensure learners are supported by appropriately qualified and experienced practice educators in practice-based learning.
- Education providers recognised the challenges in this area, and that they had a role to play in driving up numbers of practice educators to support increases in learner numbers in the sector.

#### SET 6 - Assessment

### <u>Institution level standards – objective and fair assessments</u>

Key findings (2021-23 report):

- Education providers had clear strategies, policies and processes in place to
  ensure institution level standards were aligned to or met through the approval
  process, linked to our standards which require that assessments provide an
  objective, fair and reliable measure of learners' progression and achievement
  (SET 6.3).
- This enables us to ensure that learners are fit to practice by the end of programmes.
- Objectivity and fairness in assessment was central to assessment strategies. All
  education providers had systems and mechanisms to ensure assessments are
  conducted in an objective and fair way to measure and determine learner
  performance.
- Education providers demonstrated how their assessment procedures were set up with objectivity and fairness in mind, with mechanisms such as marking criteria for staff, the use of plagiarism software, second marking and grade reviews, and the appointment of external examiners.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 A focus on transparency and communication with policies and procedures clearly communicated to learners and staff. This ensures everyone is aware of standards and processes in place which ensures objectivity in assessment.

#### <u>Institution level standards – progression and achievement</u>

Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that requirements for progression and achievement through programmes are clearly specified (SET 6.4). This ensures that learners understand what is expected of them at each stage of programmes, and educators can apply assessment criteria consistently.
- Education providers had clear requirements for learner progression through programmes. These were set out in programme and module specification documents.
- Normally, there were 'no condonement' arrangements in place, due to the nature
  of programmes needing to deliver the full range of competencies as required by
  our standards. This means that it is not possible for learners to fail certain
  elements of the programme and still achieve the academic award that leads to
  registration.
- There were normally well defined 'gateway' points in programmes, such as a certain assessment being passed before learners could progress to practice-based learning. This is particularly important, when ensuring the safety of service users who will come into contact with learners.

#### Institution level standards – academic appeals

Key findings (2021-23 report):

- Education providers had clear policies and processes in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that that there is an effective process in place for leaners to make academic appeals (SET 6.6).
- This ensures that assessment processes are applied fairly, and that learners have a mechanism to appeal when they feel they have not been.
- Processes clearly explain how learners can make academic appeals at the institutional level. These can be found in academic regulations, and complaints policies and procedures.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Institution level standards – external examiners

Key findings (2021-23 report):

- Education providers had clear arrangements in place to ensure institution level standards were aligned to or met through the approval process, linked to our standards which require that there must be at least one external examiner for each programme, who is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register (SET 6.7).
- This is to ensure there is an appropriate person in place, and that the education provider has a mechanism for ensuring this role is filled on an ongoing basis.
- All programmes had at least one appropriately experienced external examiner in place, and mechanisms to replace external examiners when needed.
- Most external examiners appointed were HCPC registrants from the profession, and where this was not the case, the education provider was able to describe how their alternative arrangements were appropriate, for example more than one external examiner who between them cover the knowledge base required.
- External examiners' feedback is considered through quality mechanisms such as programmes boards, and they are provided with appropriate training and support.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### Programme level standards – assessment design and application

Key findings (2021-23 report):

- Assessments were designed to measure achievement of the learning outcomes, which education providers clearly linked to our requirements for registration.
- Assessments were undertaken through programmes, to ensure learners had the skills, knowledge and experience required to progress to the next stage of the programme.
- We saw a range of techniques used, appropriate to the areas being assessed, and are confident that education providers have the mechanisms in place to ensure only those who are fit to practice complete programmes.

#### Performance review assessments

In this section, we have reported findings linked to the portfolio areas we ask education providers to reflect on. This enables us to report alignment with our standards of education and training (SETs) across the education provider and programmes we approve.

#### Institution self-reflection

### Resourcing, including financial stability

Key findings (2021-23 report):

- We found that education providers who are cognisant of the current landscape, internal and external initiatives / challenges, and their own data, are best equipped to manage their resources and finances.
- Planning is key to this, and understanding the environment and specific situations help education providers plan, and deliver on those plans. For example, new provision can facilitate investment in physical resources, but comes with challenges of staff recruitment and availability of practice-based learning.
- Understanding and planning to mitigate these challenges is a key part of ensuring there is a return on investment, and that programmes remain fit for purpose.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- We reviewed five HEIs in Wales, and all of these education providers reflected
  on the commissioning arrangements with Health Education and Improvement
  Wales (HEIW) as being central to the continued financial sustainability of their
  commissioned programmes. For some education providers this led to additional
  programmes being approved (which we reviewed through our approval process
  in the 2021-22 academic year). Education providers also reflected on reporting to
  HEIW for these new programmes, and for continued commissioning for existing
  programmes, to show HEIW that quality was achieved and maintained.
- Many education providers reflected on continued financial pressures within the education sector and for their own institutions. Some education providers had put in place new financial strategies to proactively manage these challenges, and address where it was in their control to do so. In some instances education providers had reviewed, or were in the process of revieing their staff resourcing, which in some cases led to changes to support staffing arrangements and / or redundancies of support and / or academic staff. We have produced information support education providers in this area, including how they should consider our standards in making staff resourcing decisions.
- Some education providers had struggled to recruit academic staff, and had put mechanisms in place to try to address this, for example careers information for clinical staff who may wish to join the academic workforce.
- Some education providers reflected that they received funding from organisations such as the Office for Students and NHS England, to enable continued development in specific areas.
- Several education providers reflected on how international recruitment was an important part of their financial modelling, with the larger fees they are able to charge for international learners, and a small number of education providers

- reflected that there had been challenges in international recruitment due to a drop in applications from the European Union.
- Some education providers reflected on how they had been unable to recruit to intended learner numbers, and how this might impact the ongoing sustainability of specific programmes. In these cases, education providers applied mitigation plans, and were considering how they could drive up recruitment numbers, or consider resources for their programmes, in the longer term.

### Partnerships with other organisations

Key findings (2021-23 report):

 Across education providers, partnership working was understood as integral to the running of programmes. All education providers had identified and were maintaining partnerships, as required by our standards, and most were performing well in this area.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- Developing partnership arrangements with a broader range of organisations, to support with the delivery of practice-based learning.
- Education providers in Wales reflected on how they work in partnership with Health Education and Improvement Wales (HEIW) as the commissioning body for many HCPC-approved programmes in Wales, to support programme quality, including in practice-based learning.

### Academic quality

This section and the placement quality section were combined as one in the previous report. Education providers often split this section in two, as policies and processes, and education provider reflections were usually different for academic and placement settings. In portfolios for the 2023-24 academic year onwards, we have split this section in two to better facilitate reflections for the two distinct areas.

Key findings (2021-23 report):

- Quality is a central consideration for education providers, and they are
  maintaining the quality of their programmes well. This is important because
  quality of provision has a direct impact on learners meeting our regulatory
  requirements and becoming professionals who are fit to practice.
- There are different approaches to quality, but broadly speaking, education providers have a multifaceted approach which covers all areas of programmes and partnerships. There were very few education providers which were underdeveloped in this area, and all education providers were able to demonstrate continued alignment with our standards through this exercise. For the small number of education providers with gaps, they had always identified those gaps and had implemented appropriate solutions.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 Several education providers reflected on their Teaching Excellence Framework (TEF) submission, and the resulting TEF award, which were given in 2023.
 Education providers often used this process to drive improvements in teaching.

### Placement quality

This section and the academic quality section were combined as one in the previous report. Education providers often split this section in two, as policies and processes, and education provider reflections were usually different for academic and placement settings. In portfolios for the 2023-24 academic year onwards, we have split this section in two to better facilitate reflections for the two distinct areas.

Key findings (2021-23 report):

- See bullet points within the academic quality section.
- We found that education providers often considered external assessments of
  practice education providers when reviewing the quality of practice-based
  learning. We also found that some education providers could do more in this
  area, and will set clearer expectations that all information about the quality of
  practice-based learning should be considered when making decisions about
  continuation of, and support for, learners in practice settings.
- Strong strategic and operational relationships with practice partners were helpful in resolving any issues and maintaining or improving the learning experience to required standards.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- Some education provider reflected on challenges with the quality of practicebased learning, particularly stemming from needing to secure additional practicebased learning opportunities due to programme expansions. Education providers identified these challenges through existing quality mechanisms, which shows they are working well, and were able to put specific interventions in place where needed to ensure good practice-based learning experience for learners.
- Education providers in Wales referenced national placement allocation and quality model (the All-Wales Placement Reference Group), which is overseen by Health Education and Improvement Wales (HEIW). Education providers referenced the All-Wales Student Healthcare PACT (Partnership, Accountability, Credibility, Trust), which was a set of pledges co-produced by education providers through the All-Wales reference group, to help empower positive learning experiences.

### Interprofessional education (IPE)

Key findings (2021-23 report):

- Most education providers showed good IPE through their reflections, which
  positively impacted on learning linked to the SOPs. Where there were gaps in
  this area, education providers had often identified these gaps as areas for
  improvement, and were working on developing their IPE.
- Where gaps remained, we set expectations for education providers to improve in the short term or as part of their next portfolio submission, and this was considered in review periods we established through assessment outcomes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

• This is an area we often picked up to review further through quality activities, with six referrals to other processes. Normally we referred to ensure that plans noted

- by education providers to develop interprofessional education would be delivered.
- There remains a range of how developed IPE is for education providers
  assessed in 2023-24. There continued to be difficulties for some education
  providers with delivering IPE, but education providers recognised these issues
  and were working to address them. Understanding these difficulties, we were
  satisfied that all education providers continued to align with our IPE standard, but
  recognised the planned developments and will consider these moving forward in
  future assessments.
- Some education providers who deliver employment or portfolio-based routes, along with education providers which only deliver one professional programme, had a different approach to IPE. For example portfolio based routes ensure learning with and from others as part of portfolio requirements, rather than through direct learning. This is acceptable within our standards for this model of learning.
- Some education providers in Wales referenced Health Education and Improvement Wales (HEIW) requirements that IPE contributes to 20% of the curriculum, as part of their commissioning arrangements.

### Service users and carers

Key findings (2021-23 report):

- All education providers involved service users and carers in some way at the institution and / or programme level, and most were able to demonstrate how this involvement positively impacted on learning linked to the SOPs.
- Where there were gaps in this area, education providers had often identified these gaps as areas for improvement and were working on developing their service user and carer involvement.
- Where gaps remained, we set expectations for education providers to improve in the short term or as part of their next portfolio submission, and this was considered in review periods we established through assessment outcomes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- This is an area we often picked up to review further through quality activities, with eight referrals to other processes. Normally we referred to ensure that plans noted by education providers to develop service user and carer involvement would be delivered.
- This can be a difficult area for education providers to manage, with the COVID-19 pandemic and resourcing problems impacting continued development in this area. Our standard is not specific about how service users and carers must be involved in programmes, rather focusing on how service users and carers contribute to the overall effectiveness of programmes. This gives education providers the opportunity to meet this standard in a range of ways, but it can also enable more tokenistic involvement, and may encourage under thinking or under development when compared to norms within the education sector.
- Even considering referrals and problems identified, we were satisfied that all education providers continued to align with the relevant standard as part of this review exercise.

We will consider further engagement with education providers on this standard, to ensure our requirements are well understood. We should now see education providers

move beyond noting that COVID-19 restrictions impacted their service user and carer involvement, and there is much within the gift of education providers, with proper planning and investment, to develop this area further. We will also consider developing this standard as part of the review of our standards of education and training (SETs).

### Equality and diversity

Key findings (2021-23 report):

- Our analysis shows that EDI is a key area of focus for education providers, which should not be surprising considering current societal focus, and that education providers (particularly in higher education) have been leaders in this area for some time
- For example, the widening participation agenda has been in place for more than 20 years, and data and information shows the positive impact of this initiative<sup>2</sup> (although there is further work to do) and other corrective actions, such as responding to attainment gaps.
- Education providers are most successful in this area when they are proactive in their approach, clearly define their intentions, plan how to deliver these, and measure success.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 Some education providers reflected on drives to develop the local population into professional roles, which in turn impacted in the diversity of learner populations, where the local population was not diverse. Education providers recognised this point, and how it would impact their headline diversity data. We considered that it was important for education providers to reflect on data, and provide commentary to explain any data that might look, but may not actually be, concerning.

#### Horizon scanning

Key findings (2021-23 report):

- Good horizon scanning was undertaken at the regional, national, and occasionally global level, to enable education providers to plan effectively, mitigating risk and exploiting opportunities. Education providers who effectively horizon scan were better placed to win commissions, more quickly implement change, and less likely to experience problems due to external changes.
- Through portfolios, education providers were less clear how they undertook horizon scanning, instead focusing on the specific areas they had identified. For 2023-24 submissions, we have expanded our guidance for education providers so we can better understand and assess their horizon scanning mechanisms, to inform our overall view of education provider performance.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We will further consider how we ensure education providers understand the requirements of this section when working with education providers on our performance review requirements moving forward.

<sup>&</sup>lt;sup>2</sup> Widening participation in higher education, Academic year 2021/22 – Explore education statistics – GOV.UK (explore-education-statistics.service.gov.uk)

#### Thematic reflection

# Embedding the revised HCPC standards of proficiency (SOPs)

Our revised standards for proficiency (SOPs) became effective on 1 September 2023. Education providers needed to deliver the revised SOPs to new cohorts from this date, and we asked that they reported their approach to integrating the revised SOPs through their performance review submissions from 2022-23 onwards.

### Key findings (2021-23 report):

- It was clear from the reflections that education providers implemented effective processes to conduct the review and implementation the revised SOPs in a structured way.
- Through our reviews, we were satisfied that all education providers assessed would deliver and assess the revised SOPs from September 2023.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. This was the second year in which we considered this area through performance review assessments, and we will continue to assess and report on this area until we have reviewed all education providers.

#### Learning and developments from the COVID-19 pandemic

### Key findings (2021-23 report):

- Education providers responded well to an extremely challenging situation, and had gained valuable insight because of the pandemic.
- The successful and rapid adjustments to challenges show that most education providers have policies, processes, and structures in place to respond to challenging situations. Education providers used responses to the pandemic as a catalyst to deliver more permanent innovations to their programmes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. This was the last year where we included this portfolio area, as we have now reviewed learning and developments from the COVID-19 pandemic for all education providers.

#### Use of technology: changing learning, teaching and assessment methods

- Our analysis shows that that the pandemic was the major catalyst for the review and implementation of the use technology for delivering lessons and conducting assessments.
- A key outcome of this has been increased understanding of the opportunities that can harnessed using enhanced technology to deliver programmes. The urgent need to adapt to the using technology enabled education providers to identify the digital skills gaps amongst staff and learners.
- Overall, education providers have performed well in this area because they adapted effectively to the urgent needs to use technology to continue the delivery of their programmes.
- Many education providers have returned to at least some traditional face-to-face teaching post-pandemic, and many also retained a form of hybrid learning with the combination of online and face-to-face learning.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- There is more focus on actively monitoring the potential used and risks of artificial intelligence (AI) in education and healthcare. As a result, education providers have considered how they uphold academic integrity, and support staff and learners in this area.
- In response to the rise of generative AI, some education providers have trained their staff in educational technology. They also highlighted improvements in plagiarism detection tools like Turnitin, which now feature enhanced AI detection capabilities to maintain academic integrity.

### **Apprenticeships**

Key findings (2021-23 report):

- Education providers were managing this area well. Many education providers have directly engaged with the apprenticeship initiative, either delivering or planning to deliver apprenticeship programmes. Other education providers recognised the impact the apprentice provision would have within professions and / or regions.
- Particular challenges mainly linked to the availability of practice-based learning, and the shifting relationship with practice partners.

### Sector body assessment reflection

# Assessments against the UK Quality Code for Higher Education

Key findings (2021-23 report):

- Education providers were clear about how they utilised the Quality Code in their processes, instead of focusing on their reflections of how they had performed against this.
- We will expand our guidance for education providers and provide clarity about the status of the Quality Code so education providers can understand what to reflect upon. This will provide us with information to inform our overall view of education provider performance.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- From August 2024, the Commission for Tertiary Education and Research (Medr) replaced the Higher Education Funding Council for Wales (HEFCW), and is now responsible for regulating institutions, and funding for higher education (amongst other areas)<sup>3</sup>.
- Some Welsh education providers noted this point, and most education providers in Wales reflected on how they had maintained HEFCW requirements within the review period.

In relation to the point from the previous report, on expanding our guidance for education providers linked to the Quality Code, we have included further information in our guidance materials for education providers.

#### Office for Students

Key findings (2021-23 report):

- Education providers were clear about how they utilised the OfS Conditions of Registration in their processes to ensure continued compliance, instead of focusing on reflections about how they had performed against these requirements or the outcomes of their internal reviews.
- We appreciate there were temporary pauses to engagement with the OfS requirements due to the pandemic and while they finalised, and rolled out, their revised Conditions of Registration.
- We did not identify any risks as the education providers had appropriate mechanisms in place to ensure continued compliance internally. We therefore considered education providers were performing well in this area.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

 A large proportion of education providers had not reported to the OfS during the review period.

<sup>&</sup>lt;sup>3</sup> Home - Medr

#### Performance of newly commissioned provision in Wales

This was a one off portfolio area for performance review assessments undertaken in the 2023-24 academic year, and only applied to HEI education providers based in Wales. Education providers reflected on the successful integration of HEIW-commissioned provision, following these programmes starting or continuing from the start of the commissioned period (September 2022).

Following an exercise where we <u>worked with HEIW</u> on understanding their commissioning arrangements, we decided to review all Welsh HEI education providers in the 2023-24 academic year through performance review (year three of the programme of assessment for all education providers following introduction of our current model in September 2021). This was because we reviewed all new and existing programmes out of the commissioning exercise in the 2021-22 academic year, and so were confident with programmes at that point, and wanted to give sufficient time for developments and reflection before our next review.

Education providers reflected on the challenges they faced after securing bids for new programmes from HEIW. These included integrating interprofessional education (IPE) modules, achieving commissioning for new programmes, and enhancing existing HCPC programmes to ensure they were secure through the commissioning exercise.

We have woven findings linked to HEIW requirements and the commissioning exercise through other sections of this report, where they are most relevant.

### Other professional regulators / professional bodies

Key findings (2021-23 report):

- Where education providers engaged with other regulators and / or professional bodies, they usually reflected well on that engagement.
- Some education providers who were not subject to external reviews provided limited reflection, which missed some of the good work they may have done with engagement outside of formal review processes.
- We also found that professional bodies for smaller professions, or without a strong education accreditation function were overlooked by education providers in their reflection. This missed opportunities, either with education providers considering the work of the whole range of professional bodies, or in reporting to HCPC, about how they are keeping abreast of developments in professions. The former may limit the ability of education providers keeping their provision up to date, the latter may negatively impact on our view of risk for the education provider.

### **Profession specific reflection**

### Curriculum development

Key findings (2021-23 report):

- Our overall analysis shows that education providers have generally performed
  well in this area because they have demonstrated how they systematically review
  their curriculum and make changes when required. They have robust processes
  and policies in place to continuously monitor, review and make changes to their
  programmes through consultations with internal and external stakeholders.
- Changes are made to reflect standards from professional and regulatory bodies, but other catalysts include the need to meet learner need. Education providers have shown they are committed to continuously improving their curriculums to ensure learners meet the relevant standards.

Findings from 2023-24 cases support the conclusions from the 2021-23 report.

# Development to reflect changes in professional body guidance

Key findings (2021-23 report):

- Overall, we considered that education providers performed well in this area. Our analysis of the reflections shows most education providers have regular engagement with professional bodies relevant to their professions and update their curriculum to reflect changes made by their respective professional bodies.
- We noted the relationships between education providers and professional bodies was positive overall, and there was regular engagement between both parties.
- We are confident education providers have the processes in place to make adjustment in an effective way to meet professional body expectations.
- Some education providers gave explanations of the specific changes they made in response to changes to professional body guidance.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

- A small number of education providers reflected on how they had integrated changed made to professional body expectations in line with the revised HCPC SOPs. Education providers not reflecting on this point does not mean they did not also consider these changes; it may mean that they did not report those changes explicitly through their submission.
- A very limited number of professionals bodies made updates, and education providers considered these changes alongside HCPC updates.

# Capacity of practice-based learning (programme / profession level)

- Throughout their reflections in the portfolios, education provided recognised the challenges and importance of developing quality placement practices for learners.
- They explained how they addressed the short-term challenge of the COVID-19 pandemic and process implemented to address the ongoing challenges with regards to limited practice-based learning capacity. They adapted to serious challenges relating to placement capacity through long and short-term plans to

- continue to increase placement capacity through the development of planning models, technological innovations and effective partnerships.
- It is clear the ability to sustain practice-based learning capacity is a primary objective of the education providers and there are processes in place to ensure appropriate capacity of practice-based learning opportunities to support learners.
- There are also effective processes in place to manage and support learners on current placements.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

• Education providers in Wales referenced national placement allocation and quality model (the All-Wales Placement Reference Group), which is overseen by Health Education and Improvement Wales (HEIW). This enabled practice-based learning allocation based on a national strategy and arrangements.

#### Stakeholder feedback and actions

### <u>Learners</u>

Key findings (2021-23 report):

- We considered education providers clearly outlined effective processes for involving learners in the quality and effective delivery of the programmes. They appropriately reflected on the benefit of learner feedback and how this contributed to the ensuring the quality of the programme.
- Some education providers went on to discuss how they plan to enhance learner involvement going forward.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report. We also noted the following additional points from 2023-24:

• A small number of education providers introduced survey management processes to reduce survey volume to combat survey fatigue.

### Practice placement educators

Key findings (2021-23 report):

- Education providers clearly outlined effective and regular processes for gathering, and responding to feedback from practice educators.
- This enabled collaborative approaches to maintaining the quality and effective delivery of the programmes.

Findings from 2023-24 assessments support the conclusions from the 2021-23 report.

#### External examiners

Key findings (2021-23 report):

- Education providers had a good working relationship with their external examiners. They value the importance of the external examiner role, and these processes were robust and transparent to ensure the continued quality of programmes.
- The processes closed the feedback loop so individuals could see how their feedback had been considered and had been of benefit to the programme.

#### Data

#### Our use of data through performance review

We do not make regulatory decisions using solely data we produce or receive. We use data and intelligence to form part of a quality picture of education providers / programmes. For the performance review process this means that where risk assessment allows, we will lengthen the period between performance review engagements from two years (which is the historical norm for HCPC), up to a maximum of five years.

### Education provider reflection on supplied data points

Where data is available from external supplies, we provide this data to education providers through their portfolio and ask them to reflect on the data. This might include noting how they have used a disappointing data point as catalyst for change, or challenging us if they are unclear how data points were arrived at, and / or if data points are out of date.

Through our assessments, it was clear that education providers consider data in developing their programmes. Normally, they were aware of disappointing results, and had plans in place to address these results. These areas are referenced through our analysis for specific portfolio areas.

#### Education providers not included in external supplies

When we do not have access to data points for normal areas, the maximum length of time we will allow between performance review assessments is two years. This is so we can continue to understand risks in an ongoing way when data is not available.

If the education provider can show us how they will supply relevant data points, then the two-year cap is lifted – we consider what is reasonable on a case-by-case basis. This might include externally available or verifiable data but may also include data supplied directly by the education provider. Establishing the method of supply is important in this – we need to be assured that we will receive good data on a regular basis, and agreeing the method for this supply is a key part of the cap being lifted. We have developed information to help education providers understand our requirements, as referenced in the main body of the report.

In the period reviewed, no education providers established data returns that would satisfy our requirements, although some are making progress to be able to do this.