

## HCPC approval process report

Education provider	University of Hertfordshire
Name of programme(s)	BSc (Hons) Occupational Therapy (Degree Apprenticeship), Work based learning
Approval visit date	25 - 26 February 2020
Case reference	CAS-15022-J9P1M7

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### Executive Summary

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

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

## Section 1: Our regulatory approach

### Our standards

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

Programmes are normally [approved on an open-ended basis](#), subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed [on our website](#).

### How we make our decisions

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

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

### HCPC panel

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

Laura Akers	Occupational therapist
Rebecca Khanna	Occupational therapist
Mohammed Jeewa	Lay
Temilolu Odunaike	HCPC executive
Tracey Samuel-Smith	HCPC executive (observer)

### Other groups involved in the approval visit

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

Joel Carlton	Independent chair (supplied by the education provider)	University of Hertfordshire
Liz Mellor	Secretary (supplied by the education provider)	University of Hertfordshire
Liz Gormley-Fleming	Internal validation panel	University of Hertfordshire
Sarah Flynn	Internal validation panel	University of Hertfordshire

Alison Hampson	External subject specialist	University of Cumbria
Anna Clampin	Professional body representative	Royal College of Occupational therapy (RCOT)
Lyn Westcott	Professional body representative	Royal College of Occupational therapy (RCOT)
Clair Parkin	Professional body representative	RCOT Officer

## Section 2: Programme details

Programme name	BSc (Hons) Occupational Therapy (Degree Apprenticeship)
Mode of study	WBL (Work based learning)
Profession	Occupational therapist
Proposed First intake	01 September 2020
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP02160

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

## Section 3: Requirements to commence assessment

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

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

Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	The programme has never run.

We also usually ask to meet the following groups at approval visits, although there may be some circumstances where meeting certain groups is not needed. In the table below, we have noted which groups we met, along with reasons for not meeting certain groups (where applicable):

Group	Met
Learners	Yes
Service users and carers (and / or their representatives)	Yes
Facilities and resources	Yes
Senior staff	Yes
Practice educators	Yes
Programme team	Yes

## Section 4: Outcome from first review

### Recommendation of the visitors

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

### Conditions

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 12 May 2020.

### 3.1 The programme must be sustainable and fit for purpose.

**Condition:** The education provider must provide further clarity around learner numbers to demonstrate that the programme is sustainable.

**Reason:** Prior to the visit, the visitors reviewed the resource statement as evidence for this standard. The visitors noted that the document sets out the education provider's intentions for developing the programme. However, they could not see any evidence of the programme's place in the school's business plan, which could include possible risks to its delivery and how these are to be effectively managed

At the visit, the employers (partner organisations) stated that they are looking to recruit 22 learners from their existing workforce and would look to undertake this level of recruitment over the next three years but they also stated that the numbers might change. The programme team informed the visitors that there would be a minimum of 16 learners on the programme. However, when asked, the practice educators were uncertain about the number of learners to expect on the programme. Given the different information from the different groups, the visitors were unclear about the actual number of learners expected on the programme. As such, they could not be sure that the programme would continue to recruit sufficient numbers of learners in the future to ensure ongoing sustainability. In addition, the visitors were unclear about the contingency plans in place should learner numbers fall below expectations. The visitors therefore considered that they require further clarity around the learner numbers at each year of the programme before they can determine the programme's sustainability.

### **3.1 The programme must be sustainable and fit for purpose.**

**Condition:** The education provider must provide further evidence of their recruitment plans, including timelines and contingency plans to demonstrate the programme's sustainability.

**Reason:** The visitors reviewed the resource document as evidence for this standard. The document stated that the programme is predicted to recruit 1.6-1.8 WTE staff for a maximum cohort of 22 learners. The visitors noted that from the 1.6-1.8 WTE, a programme lead has been appointed to a 0.8 WTE post and the education provider would be advertising for senior lecturers equivalent to 1.0 WTE to start in May/June 2020. The senior team reiterated this at the visit and added that the new staff members would likely be practitioners (practice educators) who will be recruited to the academic team through secondments. When asked about any contingency plans in place to manage any possible risks and threats to the programme should be unsuccessful in recruiting sufficient staff with the required level of qualification and experience, the education provider could not provide clarity around how they would manage such risks. The visitors considered that the education provider had not provided the level of detail required to demonstrate how they will effectively manage any possible risks around staffing challenges, in terms of numbers and experience, should they be unsuccessful in their recruitment plans. As such, the visitors considered that the education provider would need to provide timelines for their recruitment plans and information around their contingency plans should their staff recruitment plans be unsuccessful. This way they can determine whether the programme is sustainable.

### **3.2 The programme must be effectively managed.**

**Condition:** The education provider must provide further evidence of the programme management structure, which describes the lines of responsibility of everyone involved in the day-to-day management of the programme and how they are made aware of their responsibilities.

**Reason:** The visitors were directed to pages 82-83 of the submission document as evidence for this standard. In their review, the visitors could see an overview of how the programme will be managed overall. However, it was unclear to them the partnership arrangements that were in place to deliver those parts of the programme within practice placement sites. This included the roles and responsibilities and conjoint decision-

making arrangements at the programme level. In their pre-visit response to the visitors' feedback on the documentary review, the education provider referred the visitors to Appendix DA17 B. However, the visitors were unable to locate this document.

In the senior team presentation on resourcing the programme, the visitors were made aware that the programme had been co-designed and co-produced between the education provider, employers, clinicians and practice educators. However, the senior team was unable to provide the visitors with clarity about how the different organisations and individuals will be involved at a programme level going forward.

The visitors considered that the education provider had not provided clear evidence of the roles and responsibilities of all parties who will be involved in the management of the programme, including governance. Therefore, the visitors require further evidence that clearly articulates the roles and responsibilities of individuals involved in the programme's management including, how all those involved in the programme management have a clear understanding of their responsibilities

### **3.8 Learners must be involved in the programme.**

**Condition:** The education provider must demonstrate how apprentices will be involved in the programme.

**Reason:** From the documentation provided prior to the visit, the visitors identified the university and school's arrangements for the involvement of learners in the ongoing delivery of a typical non-degree apprenticeship programme. At the visit, the visitors met with learners on 'traditional' routes for paramedic, radiography and physiotherapy programmes who spoke widely about their involvement in their programmes. They explained to the visitors how feedback works between learners and educators and outlined their existing student liaison committee. They also explained to the visitors how, through their feedback, they have been able to contribute to improvements in their own programmes.

The visitors recognised the extent of the involvement of learners within programmes with more traditional models of education. However, the visitors also recognised that there are differences between degree apprenticeship programmes and traditional route programmes, particularly as the apprentices would only be in the university one day a week and would not have the same level of access to the programme resources or time to possibly attend meetings. The visitors were therefore unable to determine how this model of learner involvement would translate to a degree apprenticeship programme and therefore how apprentices will be involved in the programme. The visitors therefore require further evidence that clearly articulates how apprentices will be involved in and continuously contribute to the programme.

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

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

**Condition:** The education provider must demonstrate that there is an adequate number of appropriately qualified staff with relevant specialist knowledge and expertise to deliver the programme effectively.

**Reason:** In a review of the documentation and in discussions with the programme and senior teams, the visitors were informed about the education provider's proposal to recruit clinical practitioners in the delivery of the curriculum. The senior team also informed the visitors that they have advertised for 1.6 – 1.8 WTE academic staff to start in May/June 2020. From this information, the visitors were clear about the education provider's plans to recruit a number of staff onto the programme. However, they could not be sure of the appropriateness of the staff that will be recruited, as they have not seen the role specification. In addition, the visitors were unclear about the contingency plans in place should the recruitment be unsuccessful.

The visitors noted the CVs of the clinical practitioners, who may be involved in the programme delivery through secondment, demonstrated a broad range of experience. However, they considered that the amount of commitment expected from these individuals in terms of time, and details of how the modules will be apportioned, remained unclear. In addition, the programme team informed the visitors that a member of staff will be allocated the role of practice lead to manage the relationship with practice-based learning, including preparing practice educator training. The visitors noted however that the staffing plan did not highlight who will be responsible for undertaking this role and how this would be incorporated into their other academic activities.

As such, the visitors require further evidence that demonstrates the education provider's plan to ensure the programme is adequately staffed with appropriately qualified and experienced staff and that subject areas will be delivered by educators with relevant specialist knowledge and expertise. As part of this, the visitors require:

- evidence of the roles being recruited to, to ensure the individuals can support the delivery of, and breadth of, knowledge taught on the programme – for example role specifications;
- further information that shows the timeframes for staff recruitment as well as contingency plans if recruitment is unsuccessful; and
- evidence of the role responsible for managing the relationship with practice-based learning – for example role specification.

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

**Condition:** The education provider must ensure that occupational therapy profession-specific resources are available and accessible to all learners and educators.

**Reason:** Through a virtual facilities tour, the visitors were able to view teaching and learning areas and resources, and discuss resourcing for the programme with the senior and the programme teams. The visitors were made aware, both through the documentation and during discussions at the visit, that learners on the programme would share resources with other programmes. During the virtual facilities tour, the visitors were informed that occupational therapy learners would be able to use the physiotherapy laboratories. The programme team said dietetic laboratories can also be used for teaching skills in home settings. The visitors were not made aware of any occupational therapy profession-specific resources or equipment, for instance, commonly used standardised assessments and orthotic equipment, which will be used to support the delivery of the programme. Both the practice educators and the programme team informed the visitors that learners will be able to utilise resources

within practice placement sites in situations where there is not the required resources within the university. However, they stated that these arrangements are not yet finalised and are therefore not certain. Therefore, the visitors were unable to determine what occupational therapy specific resources were available, and the arrangements within the university and / or within partner organisations to ensure the availability and accessibility of these, to support the required learning and teaching activities of the programme.

The visitors therefore require further evidence which demonstrates the occupational therapy specific resources available to learners and educators on this programme, including, any resources available at practice placement sites when these resources are not available in the university. In this way, the visitors can determine whether this standard is met.

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

**Condition:** The programme team must provide evidence of the effective processes in place to obtain consent from service users when they participate as service users in practical and clinical teaching.

**Reason:** From a review of the documentation, the visitors noted that the SETs mapping document submitted by the education provider stated that the process for obtaining appropriate consent from service users and learners was contained in the practice placement assessment forms. From reviewing this documentation, the visitors saw information relating to how consent was sought from learners but they were unable to locate information relating to how consent was sought from service users. The visitors did not see any form of written consent or evidence of the effective processes in place to obtain consent from service users. The programme team informed the visitors that service users are expected to have a pre-session discussion before participating in role-plays, however, they confirmed that there were no formal processes for obtaining their consent. The service users also informed the visitors that consent is taken formally and informally. They explained that their understanding was that when they sign up as service user, it was implied that they had given their consent to participate in activities such as role plays. From this information, the visitors were unclear about how the programme respected individual's rights and reduced the risk of harm. To ensure this standard is met, the visitors require evidence of the effective processes in place for obtaining consent from service users and carers before they participate as a service user in practical and clinical teaching.

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

#### **5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.**

**Condition:** The education provider must demonstrate how they ensure adequacy in the number and appropriateness of the qualifications, skills and experience of practice educators.



**Reason:** The education provider referred in their mapping to the CVs of practice educators. The visitors were also referred to other documents (Appendix 17-A, 17-B) which they were unable to locate. From their review of the CVs, the visitors could see the qualifications and experience of the practice educators who will be involved in the delivery of the programme. However, the visitors did not receive information about the minimum number of practice educators required or the knowledge, skills and experience they will need in order to ensure safe and effective learning. Therefore, it was not clear to the visitors from looking at this information how the education provider will ensure adequate numbers of practice educators across all practice-based learning settings. The visitors were also unclear about the education provider's requirements for practice educators in terms of their qualifications, skills and experience. The programme team informed the visitors that local practice education providers currently provide practice-based learning to learners from other education providers. However, they stated that they are now looking to grow their own practice educators. The visitors received verbal assurance that there will be an adequate number of appropriately qualified and experienced practice educators for this programme. However, the visitors were not clear how the education provider will determine whether the practice educators have the relevant knowledge, skills and experience to support safe and effective practice-based learning in relation to the learning outcomes to this programme. They therefore require further evidence demonstrating how the education provider ensures there will continuously be an adequate number of practice educators with the knowledge, skills and experience to ensure safe and effective practice.

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

**Condition:** The programme team must demonstrate how they ensure that practice educators have undertaken the appropriate practice educator training.

**Reason:** The education provider referred the visitors to page 55 of the submission document as their evidence for this standard. From their review, the visitors noted that the programme team will provide training sessions for both new and experienced practice educators. At the visit, the programme team informed the visitors that a member of staff will be allocated the role of practice lead to prepare and assist in practice educator training. The programme team also stated that some training will be occupational therapy specific, while some will be delivered with the physiotherapy team. They added that the training had not yet been developed but would be delivered over the summer. The senior team told the visitors that the majority of the practice educators were experienced working with learners from other education providers. They also confirmed that the practice educators will have access to library facilities within the university.

The visitors noted that apprenticeship programmes are a different model of education and may attract more mature learners who have different needs than someone on a traditional programme. Given this, the visitors considered it was important that practice educators undertake specific training appropriate to this type of learner needs and the delivery of the learning outcomes of the programme. The visitors therefore considered that the education provider had not evidenced how they will ensure that practice educators have undertaken the appropriate practice educator-training specific to this programme or how often this training will occur. To ensure practice educators are appropriately prepared so they support learning and assess apprentices effectively, the

visitors require the education provider to clearly articulate how often specific training for practice educators will happen and the processes in place for ensuring these requirements are met and monitored.

## Section 5: Outcome from second review

### **Second response to conditions required**

The education provider responded to the conditions set out in section 4. Following their consideration of this response, the visitors were satisfied that the conditions for several of the standards were met. However, they were not satisfied that the following condition was met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following conditions are met, they require further evidence.

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

**Condition:** The programme team must provide evidence of the effective processes in place to obtain consent from service users when they participate as service users in practical and clinical teaching.

**Reason condition not met at this time:** In the education provider's response to this condition, the visitors noted an 'offer letter' which contained the appointment letter for Experts by Experience working in the school. However, they could not find evidence within the terms specified, a reference to service users giving their consent to participate in practical and clinical teaching sessions. The visitors also noted that the 'Service User and Public Involvement – How to guide for staff' states "the Public Involvement Coordinator liaises with the service user and ensures that all paperwork and consent are in place." However, they could not find evidence of the process as to how consent is gained from the service users by the Public Involvement Coordinator. Within the 'How to guide for staff', the visitors noted that staff are advised to "assess whether the service user is appropriate (the right fit) for the session as it must be mutually beneficial – trust your instincts." The visitors noted however, that there was no explicit information about how learners will obtain appropriate consent from the selected service users when they take part in practical and clinical teaching. The visitors also found within the evidence provided, a form, 'Consent to be videotaped – students or staff.' However, they noted that the form covered the physiotherapy and not the occupational therapy programme. As such, the visitors were unclear whether this form would also be provided to service users taking part in occupational therapy practical and clinical teaching, to provide their written consent to be videoed. Given the evidence submitted, the visitors are still unclear about how the programme team demonstrates the process in place to obtain appropriate consent from service users to participate in practical and clinical teaching.

Therefore, the visitors require that the education provider provide further evidence to demonstrate that the programme has effective processes in place for obtaining consent from service users when they participate in practical and clinical teaching on the programme.

**Suggested documentation:** Documentation which demonstrates the education provider's process for obtaining consent from service users when they participate as service users in practical and clinical teaching on this occupational therapy programme.

## Section 6: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 5, the visitors are satisfied that the conditions are met and recommend that the programme(s) are approved.

This report, including the recommendation of the visitors, will be considered at the 01 July 2020 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).