

HCPC approval process report

Education provider	University of Gloucestershire
Name of programme(s)	Independent Non-medical Prescriber, Part time
Approval visit date	16-17 July 2019
Case reference	CAS-14440-K4T1Z5

Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	3
Section 4: Outcome from first review.....	4
Section 5: Outcome from second review.....	8
Section 6: Visitors' recommendation.....	9

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 for prescribing (for education providers) (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:

Alaster Rutherford	Independent Prescribing
Nicola Carey	Independent Prescribing
Rabie Sultan	HCPC executive

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.

Andrea Chalk	Independent chair (supplied by the education provider)	University of Gloucestershire
Debbie Jones	Secretary (supplied by the education provider)	University of Gloucestershire
Shelly Peacock	External Panel member	Nursing and Midwifery Council
Sam Barry Wilson	Internal panel member	University of Gloucestershire

Bettie Heckford	Internal panel member	University of Gloucestershire
Janie Cowmeadow	Internal panel member	University of Gloucestershire

Section 2: Programme details

Programme name	Independent Non-medical Prescriber
Mode of study	PT (Part time)
Entitlement	Supplementary Prescribing, Independent Prescribing
First intake	01 March 2020
Maximum learner cohort	Up to 30
Intakes per year	2
Assessment reference	APP02088

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
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

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	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 09 September 2019.

A.1 The admissions procedures must give both the applicant and education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.

Condition: The education provide must provide information that will be made available to applicants regarding the admissions process, to enable them to make an informed decision about whether to take up an offer of a place on the programme.

Reason: For this evidence, the visitors were directed to the programme specification, course handbook and website link regarding admissions. From reviewing the evidence, the visitors noted there were generic university wide policies regarding admissions, but could not see any information regarding the admissions process and what content will be available to the potential applicants, regarding this programme. Additionally, the application form provided as evidence for this standard at the visit contained the entry requirements, but did not clearly specify what are the HCPC requirements, to be able to enrol onto this programme. As the content regarding the admissions procedure was not available for review, the visitors were unable to determine if this standard has been met. Therefore, the education provider must provide information that will be made available to applicants regarding the admissions process, sufficient for learners to make an informed decision about whether to take up an offer of a place on the programme

B.2 The programme must be effectively managed.

B.3 The programme must have regular monitoring and evaluation systems in place.

Condition: The education provider must provide further information to demonstrate there are effective monitoring mechanisms in place, to ensure the programme will be managed effectively

Reason: The education provider had referenced the course handbook, staff curriculum vitae and programme specification, as evidence for this standard. From reviewing the documentation, the visitors noted information regarding the education provider's generic policies such as academic and assessment regulations. However, the visitors could not find much information regarding what monitoring and evaluation systems were in place to ensure effective management of the programme. At the visit, it was mentioned by the programme team that there were university wide internal monitoring processes in place, which is fed back into all the programmes. This helps each programme to be evaluated by the respective programme teams. As the visitors did not see any evidence of such processes, as would have been provided for the existing NMC-approved prescribing course, within the documentation and how it was fed back into the programmes, they could not determine if the standards have been met. Therefore, the education provider must demonstrate how and what processes are in place to monitor and evaluate systems in place, how regular it is and how this helps to effectively manage the programme. Additionally, the education provider must submit external examiner reports that were referenced in the mapping document, but were not submitted as part of the initial submission.

B.14 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.

Condition: The education provider must demonstrate that there is an effective system in place to monitor attendance of learners on the programmes.

Reason: From reviewing the documentation provided, the visitors noted there is a 100 percent attendance requirement for this programme. At the visit, the programme team spoke about a new electronic system 'Learning Analytics Check in system', will be in place from September 2019 to monitor learners' attendance. The visitors noted the new application form that was provided at the visit, stating learning for this programme will be a blended approach that will involve 15 contact days teaching at the University and 10 days of learning to be completed online. While it was clear to the visitors how attendance gets monitored when learners will attend lectures at the University, there was a lack of information regarding how the attendance for 10 days online learning when the learner is not present physically on campus, will be monitored. The programme team did state that learners will have to log in online from their own chosen location, to complete the 10 days of online learning. However, the visitors could not determine what system or process will be in place to monitor the attendance for those 10 days of online learning. Additionally, it was not clear how the education provider will ensure that actual learning is taking place online, and what action or follow up actions will be taken should the learner fail to engage. Therefore, the education provider must demonstrate how the attendance will be monitored for the online learning, and how will this be communicated to all learners.

B.15 Service users and carers must be involved in the programme.

Condition: The education provider must ensure that service users and carers are involved in the programme.

Reason: From a review of the documentation provided for this standard, the visitors could not see any information regarding how the education provider involved service users and carers in the programme. The service users and carers mentioned at the visit they were shown a presentation regarding the proposed programme by the education provider, and informed that they will be asked to get involved in this programme at some point. The service users and carers did mention how they have contributed to other existing programmes by proofreading documents and having sessions with learners but not specifically to the prescribing module. During the programme team meeting, it was mentioned there is a strategy in place to involve service users and carers in this programme, but is yet to be finalised. As there was insufficient information as to how service users and carers will be involved in the programme, the visitors could not determine if this standard has been met. Involvement of service users and carers only in the delivery of teaching sessions is inadequate to meet this standard. The visitors therefore require the education provider to provide evidence demonstrating how service users and carers will be involved in the programme and their strategy for supporting the continued involvement of service users and carers in the programme.

C.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards for independent and / or supplementary prescribers.

Condition: The education provider must revise their documentations to clearly specify that registrants who complete the programme will be able to meet the standards for independent and supplementary prescribers

Reason: The documentation provided prior to the visit included a course handbook and programme specification, giving information about how registrants who successfully complete the programme meet the HCPC standards for supplementary and independent prescribers. However, the visitors noted inaccuracies regarding the standards for this profession. For example, programme specification page one point nine states 'Health and Care Professions Council registration as an Independent Non-Medical prescriber' is not fully correct. Registrants who successfully complete this programme should be able to meet the standards for Independent and Supplementary Prescribing. Current HCPC standards do not permit registration only as an Independent prescriber. Due to this, the visitors felt it is necessary to amend the documentations where necessary, to ensure information regarding supplementary prescribing is also included. Therefore, the education provider must revise their documentation to ensure the words 'and supplementary' are added, to ensure this standard is met.

D.4 The education provider must maintain a thorough and effective system for approving and monitoring all practice placements.

Condition: The education provider must demonstrate that there is an effective system in place for approving and ensuring the quality of practice-based learning.

Reason: The education provider had referenced the independent and supplementary learning environment profile document, for this standard. From reviewing this document, the visitors noted this was a form which included a checklist for supporting learners and

filling out any action plans for any identified issues in the practice-based learning. There was also an ISP Practice Supervision handbook referenced for this standard, but was missing as part of the submission, therefore the visitors were unable to view the content of this document. From the limited information provided, the visitors were unable to determine how the education provider approves and ensures the quality of practice-based learning. The visitors noted there is a partnership with the local secondary care and mental health NHS trusts who provide practice based learning to some learners, but due to lack of information regarding how approval and monitoring takes place, they were unable to determine if this standard has been met. Specifically the concern is for HCPC registrants employed by any organisation with which there is no formal liaison process, for example paramedics employed in General practice or Out-of-hours services. Therefore, the visitors require further evidence of the process demonstrating how approval and monitoring of quality of practice-based learning takes place.

D.5 There must be an adequate number of appropriately qualified, experienced and, where required, registered staff in the practice placements.

D.6 The designated medical practitioner must have relevant knowledge, skills and experience.

D.7 The designated medical practitioner must undertake appropriate training.

D.8 The designated medical practitioner must be appropriately registered.

Condition: The education provider must demonstrate how they ensure there are adequate practice educators, who are appropriately qualified and experienced; and what training will be provided to the designated medical practitioner

Reason: From reviewing the relevant pages of the course handbook as referenced in the mapping document, the visitors noted it contained a module descriptor and information regarding reassessment and module specific assessment regulations. Additionally, the ISP Practice Supervision Handbook was also referenced in the mapping document, but not provided as part of the submission. Due to lack of information, the visitors were unable to make a judgement regarding registered staff in the practice placements, in addition to what relevant knowledge, skills and experience a designated medical practitioner (DMP) must have. The visitors could also not see any information regarding whether the DMP must be appropriately registered and how and what appropriate training DMPs are required to undertake.

At the visit, the visitors were provided with an application form, which mentioned a practice supervisor and practice assessor's agreement on page seven, which had a few tick boxes to be filled out by the DMP. The visitors noted this page did not specify the criteria required to be a DMP for this programme; however, there was mention of criteria for the DMP as set out by the Royal Pharmaceutical Society's Practice Competency Framework (RPS CF). It was noted at the visit that the new RPS CF standards for assessor's and supervisors have not yet been published. The visitors recognised that this posed a problem for the education provider and accepted that the documentation could be clearly marked "draft" with explicit confirmation that it would be finalised when the standards are published by the RPS in November 2019. Therefore, the visitors could not determine if these standards have been met.

Therefore, the education provider must demonstrate how it will ensure that there will be adequate numbers of appropriately qualified and experienced registered practice placement staff for HCPC registrants enrolling for this programme. The evidence must show what relevant knowledge, skills and experience-registered staff in the practice

placements will possess. Additionally, the education provider must clarify the different registration, training and monitoring processes for DMPs, assessors and supervisors.

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 conditions were 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.

B.14 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.

Condition: The education provider must demonstrate that there is an effective system in place to monitor attendance of learners on the programmes.

Reason condition not met at this time: The visitors reviewed the documents provided as the conditions response for this standard. From reviewing the 'management and monitoring mechanism document', the visitors noted that the education provider expects learners to complete a learning log for their mandatory online 10 learning days, which can take place in any location. There was also mention of academic staff having the capacity to access Moodle (Virtual Learning Environment system) and observe the learner's last engagement, if observed on an ad-hoc basis. The visitors understood the learning log was a self-declaration form however it was not clear if and how these forms were validated. Hence, it was not clear to the visitors how the education provider ensures that actual learning is taking place online and what actions are taken if a learner isn't engaging with the online learning. Observing attendance on an ad hoc basis meant that not all learners' online attendance and learning was necessarily being monitored.

The visitors also noted the 'ISP course handbook', page 41, stating that learners will need to complete the mandatory 112.5 hours of clinical online study. The evidence further explains that these hours will be logged by the designated medical practitioner (DMP) and failure to attend 100% of the timetable programme may result in learners failing to be eligible to apply for HCPC registration. However, no information was provided demonstrating what process or mechanism was in place for the DMPs to monitor the attendance for online learning, how will it be ensured that learning is taking place, and what follow up actions will take place should the learner fail to engage. Therefore, the visitors were unable to determine adequate evidence of a systematic approach for monitoring online learning within practice-based learning.

Therefore education provider must demonstrate the effective mechanisms in place for monitoring the mandatory online learning across all areas of the programme, and what are the follow up steps should the learner fail to engage.

Suggested documentation: The processes or mechanisms in place to monitor the mandatory online learning to ensure actual learning is taking place across all areas of

the programme. In addition, demonstrate the follow up steps taken should a learner not engage in the online learning.

D.7 The designated medical practitioner must undertake appropriate training

Condition: The education provider must demonstrate how they ensure there are adequate practice educators, who are appropriately qualified and experienced; and what training will be provided to the designated medical practitioner.

Reason condition not met at this time: The visitors were directed to view the 'PLP Handbook for DPP's Competency Framework' document, provided as part of the conditions response by the education provider. The visitors noted there was clear information regarding the expectations of the DMPs' role including what relevant knowledge, skills and experience they must possess. However, the visitors could not see any information, or clear statements, in the evidence addressing what training or support is provided to DMPs, which the education provider expected the DMPs to undertake as part of their role with the proposed programme. The evidence did not provide information of a clear and systematic approach or process for training or communicating with DMPs. Additionally, the visitors could not determine how the training for DMPs will be monitored, especially when considering registrants and their relevant DMPs working for other organisations apart from Gloucestershire hospitals. Therefore the education provider must provide further information about the training and support provided to DMPs and how the education provider ensures DMPs undertake the training prior to supervising learners. In this way the visitors can ascertain whether this standard is met.

Suggested documentation: Information confirming the appropriate training DMPs must undertake appropriate for their role, the mechanisms used to ensure all DMPs undertake the required training, and the support provided to them.

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 26 November 2019 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).