

## HCPC approval process report

Education provider	University College London
Name of programme(s)	MSc in Dietetics (Pre-registration), Full time
Approval visit date	01 June 2021
Case reference	CAS-16885-S6Y4X6

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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:

Helen Catherine White	Dietitian
Susan Lennie	Dietitian
Temilolu Odunaike	HCPC executive

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

David Spratt	Independent chair (supplied by the education provider)	University College London
Rebecca Woolston	Secretary (supplied by the education provider)	University College London
Amanda Avery	Professional body representative	British Dietetic Association (BDA)
Laura Stewart	Professional body representative	BDA

Najia Qureshi	Professional body executive	BDA
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## Section 2: Programme details

Programme name	MSc in Dietetics (Pre-registration)
Mode of study	FT (Full time)
Profession	Dietitian
Proposed First intake	01 October 2021
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02323

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual 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	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Yes	
Service users and carers (and / or their representatives)	Not Required	As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them.
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 virtual 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 27 July 2021.

### 2.2 The selection and entry criteria must include appropriate academic and professional entry standards.

**Condition:** The education provider must make the selection and entry criteria for dietetic assistants onto the programme clear, and ensure that it includes appropriate academic and professional entry standards.

**Reason:** From reviewing documentation submitted prior to the visit, the visitors noted that dietetic assistants who meet 'the minimum entry requirements' could apply onto this programme. However, the visitors noted a lack of clarity around what these academic requirements were, for this group of applicants. For example, it was unclear how someone with a diploma would be deemed appropriate to enrol onto a Masters programme.

During discussions with the programme team, the visitors were informed that anyone applying to the programme would have to demonstrate they had the appropriate academic qualifications and experience. The visitors were clear about the entry requirements for other applicants as this was made clear in the documentation. However, for dietetic assistants, the programme team stated that these applicants would have to undertake an entrance test to demonstrate level 6 skills equivalent to BSc honours. They also mentioned that the test would use case-based scenarios to demonstrate competence and that they would consider adapting the test to match undergraduate final year assessment. The visitors noted that none of these was explicit in the programme documentation and was therefore not available for applicants with this background. The visitors were unable to determine what the entrance test was and how it demonstrates appropriate entry requirements for a Masters.

As the visitors could not see that the education provider has an appropriate process to determine the academic standards required for entry onto the programme for this group of potential applicants, they could not determine that this standard was met. They therefore require further evidence that clearly articulates what the academic and professional entry criteria are for dietetic assistants applying to the programme. The evidence must also show how the education provider would ensure the criteria are appropriate to the level and content of the programme.

#### **4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.**

**Condition:** The education provider must revise the module outlines to explicitly show how the learning outcomes ensure learners meet the SOPs for dietitians.

**Reason:** The visitors reviewed evidence relating to this standard including the SOPs mapping and the British Dietetic Association (BDA) mapping documents. The visitors saw in their review how the learning outcomes are mapped to the SOPs for dietitians. However, the visitors also noted that some of the learning outcomes mapped against specific SOPs did not explicitly demonstrate how they will be delivered. These include:

- SOP 13. Understand the key concepts of the knowledge base relevant to their profession
- 13.8: understand, in the context of nutrition and dietetic practice:
  - pharmacology
- 13.9: understand, in the context of nutrition and dietetic practice:
  - the factors that influence food choice
- 13.13 understand, in the context of nutrition and dietetic practice:
  - sociology
  - social policy

The visitors noted that module MEDC0036 CP2: Therapeutic Aspects of Clinical Nutrition would cover pharmacological and surgical interventions. However, the module outline form made no mention of any subjects related to pharmacology. As none of the learning outcomes for this module explicitly links to pharmacology, the visitors could not determine how this particular component of the SOPs would be delivered. The visitors also noted that 'the factors that influence food choice' under SOP 13.9 was not explicitly covered in Clinical Practice 1: Lifestyle management, prevention and the food

environment or in any other module. Similarly, the visitors noted there was nothing relating to sociology or social policy in any of the learning outcomes of the modules mapped. For these areas, the education provider mapped LO 1-2 in module MEDC0038: Malnutrition in the community, Part 1: Knowledge and understanding LO1 in Professional Practice in Dietetics and the Placement 2A module. However, the visitors noted that the LOs did not explicitly link to sociology and social policy. The visitors noted the word 'social' was used but the learning outcomes are limited and have no link to the curriculum content in order to understand the context. Additionally, the visitors noted that the learning outcomes did not reflect the MSc level. For example, in Clinical Practice 3: Advanced Dietetic practice, there is no mention of 'analysis', 'critical evaluation' and 'synthesis' which are aligned with level 7. Instead, the learning outcomes 'measure', 'understand', 'develop' and 'appreciate'. As such, the visitors were unable to determine how these aspects of the SOPs would be delivered.

The visitors also could not see anywhere in the RPL process where any of these topics are covered or assessed, prior to joining the MSc in Dietetics programme meaning that learners did not need to meet these. When the visitors discussed this with the programme team at the visit, the team agreed that the module forms needed updating. Therefore, in order to consider whether this standard is met, the education provider must update their module outline forms to clearly demonstrate how the learning outcomes would ensure all aspects of the SOPs are delivered.

#### **4.3 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.**

**Condition:** The education provider must demonstrate that the programme reflects the philosophy, core values, skills and knowledge base articulated in any relevant curriculum guidance.

**Reason:** The visitors reviewed the module handbooks, the SOPs mapping and the BDA Accreditation mapping documents as evidence for this standard. As noted in the condition on SET 4.1, the visitors noted that there were aspects of the curriculum that were not specifically addressed in the module outline forms. For example, the visitors could not determine how knowledge and skills related to pharmacology would be covered on the programme as the learning outcomes mapped to this aspect of the programme did not in themselves, address this area. The visitors also noted that none of the learning outcomes in the module forms covered areas relating to sociology and social policy. The visitors noted that the presence of sociology and social policy lies within a single module and it is vague in relation to content. In addition, the visitors were unable to locate elsewhere in the documentation where these subject areas were covered.

During discussions, the programme team acknowledged that the module outline forms needed to be updated to address this issue. As such, the visitors were unable to establish how the programme would reflect the philosophy, core values, skills and knowledge base. Therefore, the education provider must revise the programme documentation to ensure it reflects the philosophy, core values, skills and knowledge base articulated in any relevant curriculum guidance.

#### **6.1 The assessment strategy and design must ensure that those who successfully complete the programme meet the standards of proficiency for the relevant part of the Register.**

**Condition:** The education provider must clarify the roles of formative and summative assessments so that they ensure those who successfully complete the programme meet the standards of proficiency for dietitians.

**Reason:** Through the documentary review and discussions at the visit, the visitors understood that assessments on the programme would include both formative and summative assessments. The SETs mapping also stated that all assessments are mandatory. The visitors noted however, that there were cases where formative assessments appeared to be used as summative assessments. For example in Clinical Practice 1: Lifestyle management, prevention and food environment, the module outline form states that the formative assessment would include problem-based learning assignments and practice multiple choice questions (MCQ) quizzes. The summative assessment on the other hand, comprised 50% MCQ and 50% Short answer questions (SAQ). During discussions with the programme team, the visitors learnt that there was no clear distinction between the MCQ quizzes which are formative and the MCQ which are summative. As such, the visitors were unclear how the education provider will ensure learners are clear on what they need to achieve on the programme in order for them to be able to meet the SOPs upon successful completion of the programme. The visitors therefore require the education provider reviews the assessment strategy and design to ensure a clear distinction between the roles of formative and summative assessments.

### **6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.**

### **6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.**

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that the assessments provide a reliable measure of learners' progression and achievement and the assessments methods used are appropriate to, and effective at, measuring the learning outcomes.

**Reason:** The visitors reviewed the UCL academic manual, UCL Assessment Guidance July 2020 and other documents as evidence for these standards. The visitors noted modules where MCQs were being used to assess a critical review of the literature. For example, in Clinical Practice 1: Lifestyle management, prevention and food environment, the visitors noted that MCQs are one of the summative assessments that would be used to assess the learning outcomes. The visitors could not determine how MCQ would be used to assess LO3, where learners are required to explain how the dietitian uses information gathered and critical thinking to formulate and justify dietetic management goals. In addition, LO4 which requires learners to be able to explain how the dietitian uses information gathered and critical thinking to develop and implement a dietetic action plan to achieve the management goals. The visitors could not determine that the assessments, for example, the use of MCQ to critically review and appraise literature or in areas where learners are required to explain or describe, would be thorough enough to allow learners to demonstrate their progression and achievement of the learning outcomes, particularly at Masters level.

The visitors also noted modules where learners would have to write four essays in 60 minutes. For example, in Clinical Practice 1: Lifestyle management, prevention and the food environment, the visitors noted that SAQ was being used alongside MCQ. The visitors could not determine how this is appropriate to ensure the learning outcomes are assessed effectively. During discussions with the programme team, the team considered that four to five SAQs would assess the LOs at adequate depth. However, the visitors could not determine how critical analysis and synthesis of information would occur given the type and length of assessment.

In addition, the visitors also noted inconsistencies in the programme documentation as to how modules are being assessed. For example, the visitors saw that case studies were mentioned in the module outline forms in module MEDC0036 CP2 Therapeutic Aspects of Clinical Nutrition but the mapping document stated a different assessment method. As such, the visitors were unclear about which was correct and request that the education provider clarifies this.

The visitors also noted some module LOs were not assessed summatively, for example, therapeutics aspects of nutrition where LO 5 (Appreciate the multidisciplinary team approach to successful nutrition support) was assessed only formatively.

As the visitors could not ascertain how the assessment methods used would appropriately and effectively to measure the learning outcomes, which will in turn ensure that the SOPs are met, they therefore require the education to provide further evidence to ensure:

- the assessments can reliably measure learners' progress and achievement; and
- the assessment methods are appropriate to and effective at measuring the learning outcomes.

## **Recommendations**

We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

### **4.11 The education provider must identify and communicate to learners the parts of the programme where attendance is mandatory, and must have associated monitoring processes in place.**

**Recommendation:** The education provider should clarify within the programme documentation the number of contact hours required on the programme.

**Reason:** The visitors reviewed the evidence submitted for this standard, including the placement handbooks where they noted the attendance requirements for both the taught sessions and the practice-based learning aspect of the programme. The visitors were therefore satisfied that this standard is met at threshold. The visitors noted however, from reviewing the module outline forms and through discussions at the visit, inconsistencies in the number of contact hours required on the programme. For example, the visitors noted that Placement 3 module form states learners will undertake a one-week university-based teaching prior to going on placement. However, the Professional Practice in Dietetics module form states that learners will undertake a two-



week university-based teaching before going on their third placement. The visitors also considered that the contact hours listed on the forms were potentially not a true representation of the total number of hours required on the programme as the programme team explained that the hours required in both taught sessions and on placement would be higher. As such, the visitors recommend that the module outline forms be updated so that accurate information relating to contact hours required is communicated to learners.

### **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.**

**Recommendation:** The education provider should consider how they will ensure practice educators undertake the regular training they are required to undertake in order to be able to support learning and assess learners effectively.

**Reason:** From reviewing the evidence submitted for this standard, including the UCL MSc Dietetics ongoing support for practice educators and student supervisors document and discussions with the programme team, the visitors were satisfied that the standard is met at threshold. However, in discussions with the practice educators, the visitors noted that neither the traditional placement practice educators, nor those from private practice, had a clear understanding of the ongoing training they would be required to undertake during the course of the programme. In their meeting, the visitors noted that the practice educators were not aware of the 2-day regular training being organised by the education provider, which is in addition to the training they would have had at the start of the programme. The visitors considered that the education provider should provide clear expectations around ongoing training, to the practice educators. As such, they recommend that the education provider consider how they will communicate training requirements to all practice educators so they are appropriately prepared to support learning and assess learners effectively.

## 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.

### **6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.**

### **6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.**

**Condition:** The education provider must demonstrate that the assessments provide a reliable measure of learners' progression and achievement and the assessments methods used are appropriate to, and effective at, measuring the learning outcomes.

**Reason condition not met at this time:** In response to the condition, the visitors reviewed the revised module descriptors and covering letter from the education provider. The visitors recognised the additional section included within the module descriptors showing how each learning outcome will be assessed and considered this helped illustrate how learning outcomes will be demonstrated by learners.

As outlined in the original report, the visitors noted inconsistencies within the documentation as to how some of the modules are to be assessed. From their review of the revised module descriptors, they were still aware of inconsistencies within module descriptors regarding the:

- type / design of assessment methods;
- learning outcomes were to be assessed by a particular method; and
- percentage module mark of particular assessments.

Please see Appendix 1 for more information about which modules and assessment methods these queries relate to. Based on this, the visitors remain unclear about which assessment method is to be used for these modules. As they are unable to identify, with certainty, the associated assessment method, the visitors remain unable to determine how and whether the assessments appropriately and effectively measure the relevant learning outcomes.

The visitors noted the changes made to the assessment method for the Clinical Practice 1: Lifestyle management, prevention and food environment module. This module now incorporates coursework for 40 percent of the module mark with the aim of assessing understanding of the information provided, demonstrating specialised knowledge and synthesising and evaluating clinical information.

The visitors noted other modules which use MCQs / SAQs within their assessment strategy to demonstrate a large percentage of the module mark. Where this occurred, the visitors remained unclear about how the use of these assessment methods allowed learners to, for example, meet learning outcomes (LOs) which required a critical review and interpretation or to demonstrate a systematic understanding.

Please see the examples below, using information taken from the relevant module descriptors:

- Fundamentals of nutrition and metabolism– the Assessment strategy outlines that 90 percent of the module mark is an unseen exam comprising MCQ and SAQ sections. The visitors were unclear how these assessment methods could adequately and appropriately assess LOs which require an individual to “Demonstrate a systematic understanding...” (LO 1), “...evaluate critically current research” (LO 2) and “...critically interpret...” (LO 4).
- Clinical practice 1: Lifestyle Management, Prevention and the Food Environment – the Assessment strategy outlines that 60 percent of the module mark is made up of MCQs and SAQs. The visitors were unclear how these assessment methods could adequately and appropriately assess LOs which require an individual to “Understand and critically evaluate...” (LO 6) and “Identify and critically review...” (LO 1).
- Professional practice in Dietetics 1 – the Assessment strategy outlines that the MCQ exam counts as 50 percent of the module mark. The visitors were unclear

about how MCQ single answer questions can adequately and appropriately assess LO 1 which requires an individual to “Critical understand and demonstrate a systematic knowledge...” and “Critically interpret...” (LO 2).

- Clinical practice 2: Therapeutics Aspects of Nutrition – the Assessment strategy outlines that the MCQ final exam counts as 50 percent of the module mark. The visitors were unclear how MCQs could adequately and appropriately assess LOs which require an individual to “Have a sound foundation and systematic understanding...” (LO 1), “Develop a systematic understanding...” (LO 2), “...evaluate critically current research...” (LO 3) and “Appreciate and critically evaluate...” (LO 4).

While the visitors have identified the four modules above, they recognise that MCQs / SAQs are used within other modules to assess similar LOs, though with less reliance in terms of the percentage of the module mark. In addition, the visitors recognise there are no modules which are solely assessed by MCQ and / or SAQ and that many of these LOs will also be assessed by other methods. However, they remain unclear about how the MCQs / SAQs across the programme have been designed, or the reasoning behind the use of MCQs / SAQs, to assess the Level 7 LOs of this Masters programme. They therefore are unable to determine whether the assessments are objective, fair and reliable and allow an accurate picture of a learner’s progression and achievement to be judged within the programme. The visitors therefore require further documentation to demonstrate how these two standards are met.

**Suggested documentation:** The education must clarify the assessment methods outlined within Appendix 1.

In addition, they must provide further reasoning which:

- Explains how the chosen assessments of MCQs / SAQs are in line with the Level 7 learning outcomes to ensure that learners who complete the programme can practise safely and effectively.

## 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 28 September 2021 meeting of the ETC. Following this meeting, this report should be read alongside the ETC’s decision notice, which are available [on our website](#).