
Approval process report

University of Portsmouth, Supplementary and Independent Prescribing,
2023-24

Executive Summary

This is a report of the approval process to approve the Independent and Supplementary Prescribing for Allied Health Professionals programme at the University of Portsmouth. This report captures the process we have undertaken to assess the institution and programme against our standards, to ensure those who complete the proposed programme are fit to practice.

We have reviewed the institution against our institution level standards and found our standards are met in this area.

We have reviewed the programme against our programme level standards and found our standards are met, following exploration of key themes through quality activities.

- Quality activity 1 explored how the education provider will ensure that practice educators are appropriately qualified and experienced to supervise clinical learning
- Quality activity 2 explored how the education provider will ensure an appropriate number of suitably qualified staff, on the programme and in practice-based learning
- Quality activity 3 explored how the education provider will ensure appropriate academic resources for learners
- Quality activity 4 explored how the education provider will ensure adequate support for HCPC registrants on the programme

Through this assessment, we have recommended all standards are met, and that the programme should be approved.

We have decided that all standards are met, and that the programme is approved.

Previous consideration	N / A as this case did not emerge from a previous process
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Decision	The Education and Training Committee (Panel) is asked to decide whether the programme is approved.
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Next steps

If the Education and Training Committee (Panel) approves the visitors' recommendation, the programme will be approved and added to the Register.

The education provider will next go through performance review in 2026-27.

Included within this report

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Section 1: About this assessment

About us

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.

This is a report on the approval process undertaken by the HCPC to ensure that the programme detailed in this report meets our education standards. The report details the process itself, evidence considered, outcomes and recommendations made regarding the programme(s) approval.

Our standards

We approve education providers and programmes that meet our education standards. Individuals who complete approved programmes will meet proficiency standards, which 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.

Our regulatory approach

We are flexible, intelligent and data-led in our quality assurance of programme clusters and programmes. Through our processes, we:

- enable bespoke, proportionate and effective regulatory engagement with education providers;
- use data and intelligence to enable effective risk-based decision making; and
- engage at the organisation, profession and programme levels to enhance our ability to assess the impact of risks and issues on HCPC standards.

Providers and programmes are [approved on an open-ended basis](#), subject to ongoing monitoring. Programmes we have approved are listed [on our website](#).

The approval process

Institutions and programmes must be approved by us before they can run. The approval process is formed of two stages:

- Stage 1 – we take assurance that institution level standards are met by the institution delivering the proposed programme(s)
- Stage 2 – we assess to be assured that programme level standards are met by each proposed programme

Through the approval process, we take assurance in a bespoke and flexible way, meaning that we will assess whether providers and programmes meet standards based on what we see, rather than by a one size fits all approach. Our standards are split along institution and programme level lines, and we take assurance at the provider level wherever possible.

This report focuses on the assessment of the self-reflective portfolio and evidence.

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 design quality assurance assessments, and assess evidence and information relevant to the assessment. Visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make the 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 takes decisions through different levels depending on the routines and impact of the decision, and where appropriate meets in public. Their decisions are available to view [on our website](#).

The assessment panel for this review

We appointed the following panel members to support this review:

Nicholas Haddington	Lead visitor, Independent prescribing
Rosie Furner	Lead visitor, Independent prescribing
Niall Gooch	Education Quality Officer

Section 2: Institution-level assessment

The education provider context

The education provider currently delivers five HCPC-approved programmes across five professions. It is a Higher Education Institute (HEI) and has been running HCPC approved programmes since 2015.

The education provider is made up of five faculties and there are several schools that sit within each faculty. The HCPC approved programmes are based in the Faculty of Science and Health, which consists of eight schools and the programmes are spread across three of these schools. Most of the programmes are in the School of Health and Care Professions, except for the physiotherapy programme, which is based in the School of Sport, Health and Exercise Science. The proposed programme will be delivered as a short programme and will also be included as a

module on the Advanced Clinical Practice MSc programme, which currently sits in the School of Health and Care Professions.

The education provider is based in the South East region of England. There are no ongoing issues identified within the region that could impact on the provider's performance / quality.

Practice areas delivered by the education provider

The provider is approved to deliver training in the following professional areas. A detailed list of approved programme awards can be found in [Appendix 1](#) of this report.

	Practice area	Delivery level		Approved since
Pre-registration	Operating Department Practitioner	<input checked="" type="checkbox"/> Undergraduate	<input type="checkbox"/> Postgraduate	2016
	Paramedic	<input checked="" type="checkbox"/> Undergraduate	<input type="checkbox"/> Postgraduate	2015
	Physiotherapist	<input checked="" type="checkbox"/> Undergraduate	<input checked="" type="checkbox"/> Postgraduate	2022
	Practitioner psychologist	<input type="checkbox"/> Undergraduate	<input checked="" type="checkbox"/> Postgraduate	2016
	Radiographer	<input checked="" type="checkbox"/> Undergraduate	<input type="checkbox"/> Postgraduate	2017

Institution performance data

Data is embedded into how we understand performance and risk. We capture data points in relation to provider performance, from a range of sources. We compare provider data points to benchmarks, and use this information to inform our risk based decisions about the approval and ongoing approval of institutions and programmes.

This data is for existing provision at the institution, and does not include the proposed programme(s).

Data Point	Benchmark	Value	Date	Commentary
Total intended learner numbers compared to total enrolment numbers	286	296	2023	The benchmark figure is data we have captured from previous interactions with the education provider, such as through initial programme approval, and / or through previous performance review assessments. Resources available for the benchmark

				<p>number of learners was assessed and accepted through these processes. The value figure is the benchmark figure, plus the number of learners the provider is proposing through the new provision.</p>
Learners – Aggregation of percentage not continuing	3%	4%	2020-21	<p>This data was sourced from a data delivery. This means the data is a bespoke Higher Education Statistics Agency (HESA) data return, filtered bases on HCPC-related subjects.</p> <p>The data point is above the benchmark, which suggests the provider is performing below sector norms.</p> <p>When compared to the previous year’s data point, the education provider’s performance has dropped by 1%.</p> <p>We did not explore this data point through this assessment because we did not consider there was an impact on the standards.</p>
Graduates – Aggregation of percentage in employment / further study	93%	93%	2020-21	<p>This data was sourced from a data delivery. This means the data is a bespoke HESA data return, filtered based on HCPC-related subjects</p> <p>The data point is equal to the benchmark, which suggests the provider’s performance in this area is in line with sector norms.</p> <p>When compared to the previous year’s data point, the education provider’s</p>

				performance has been maintained.
Teaching Excellence Framework (TEF) award	N/A	Gold	2023	A Gold award would indicate that the education provider is consistently delivering outstanding teaching, learning and outcomes for its learners.
National Student Survey (NSS) overall satisfaction score (Q27)	75.4%	78.3%	2022	<p>This National Student Survey (NSS) data was sourced at the subject level. This means the data is for HCPC-related subjects.</p> <p>The data point is above the benchmark, which suggests the provider is performing above sector norms.</p> <p>When compared to the previous year's data point, the education provider's performance has improved by 3%.</p>
HCPC performance review cycle length	N/A	5 years	2021-22	The education provider engaged with the performance review process in 2021-22 and were given a five year monitoring period.

The route through stage 1

Institutions which run HCPC-approved provision have previously demonstrated that they meet institution-level standards. When an existing institution proposes a new programme, we undertake an internal review of whether we need to undertake a full partner-led review against our institution level standards, or whether we can take assurance that the proposed programme aligns with existing provision.

As part of the request to approve the proposed programme, the education provider supplied information to show alignment in the following areas.

Admissions

Findings on alignment with existing provision:

- **Information for applicants –**

- Information related to admissions is available on the education providers website. The Admissions policy and procedure outlines the institution wide policies covering information for applicants.
- Specific information relating to the proposed programme is also available on the website.
- There are programme specific policies which apply to individual disciplines and which can be found on the programme specific webpages. The information includes programme applicant guides, programme information and programme specifications.
- For the proposed programme, specific recruitment processes and requirements will apply, which applicants will be required to meet.
- These policies are set at institution level and will apply to the proposed programme.
- **Assessing English language, character, and health –**
 - Relevant entry requirements relating to this area are available on the education provider's website. The admissions policy outlines the English language, character and health requirements.
 - The new programme is a post registration qualification. Applicants will be required to already meet the required English language, character and health requirements as applicants will be on a professional register.
 - These policies are set at institution level and will apply to the proposed programme.
- **Prior learning and experience (AP(E)L) –**
 - The education provider uses the Accredited Prior (Experiential) Learning Policy to assess applicants' prior learning and experience.
 - This policy applies to most of the HCPC approved programmes, however some variations may apply to the proposed programme due to it being offered as a standalone module.
 - These policies are set at institution level and will apply to the proposed programme.
- **Equality, diversity and inclusion –**
 - The education provider demonstrates they are committed to equality, diversity and inclusion and has an Equality and Diversity policy that applies to all individuals. In addition to this, the University of Portsmouth Access and Participation Plan supports learners with accessing the appropriate services, which ensures any additional learning requirements are supported.
 - These policies are set at institution level and will apply to the proposed programme.

Non-alignment requiring further assessment: None.

Management and governance

Findings on alignment with existing provision:

- **Ability to deliver provision to expected threshold level of entry to the Register¹ –**
 - The policies outlined in the Academic awards of the University policy confirm the awards and provides details on any specific programme variations.
 - These policies are set at institution level and will apply to the proposed programme.
- **Sustainability of provision –**
 - The Risk Management Policy 2021-22 ensures the sustainability of programmes and applies to all programmes at all levels. The policy acts as a mechanism to mitigate risk and therefore identifies, analyses and manages risk.
 - In addition to the Risk Management Policy, there is also a University Strategy 2020-2025 and Vision 2030, which supports the development of partnerships locally and nationally.
 - These policies are set at institution level and will apply to the proposed programme.
- **Effective programme delivery –**
 - The education provider ensures they recruit appropriately qualified staff who are HCPC registered professionals.
 - All programmes are required to follow the Curriculum Framework Specification to ensure the quality and currency of the programmes.
 - These policies are set at institution level and will apply to the proposed programme.
- **Effective staff management and development –**
 - The Initial and Continuing Professional Development Policy requires all staff to engage with the personal development review process and identify their development needs to ensure knowledge and skills remain current. Through this process they are provided with further opportunities to develop their careers both internally and externally.
 - The Curriculum Framework Specification is used to ensure the curriculum for all programmes remains current. This involves experienced and qualified staff reviewing the curriculum and making necessary changes or amendments accordingly.
 - These policies are set at institution level and will apply to the proposed programme.
- **Partnerships, which are managed at the institution level –**
 - The Academic Partnerships Policy applies to all programmes, however there are some variations with the partnerships across the programmes based on the requirements of the individual programmes.
 - Learners on the proposed programme will be registered professionals practising in a clinical environment and will complete practice-based learning within these settings. Placements will therefore not be required and there will not be a requirement to develop partnerships for the proposed programme.

Non-alignment requiring further assessment: None.

¹ This is focused on ensuring providers are able to deliver qualifications at or equivalent to the level(s) in SET 1, as required for the profession(s) proposed

Quality, monitoring, and evaluation

Findings on alignment with existing provision:

- **Academic quality –**
 - The policies to monitor the quality of the programmes are outlined in the Annual Monitoring and Academic Review Policy and the Policy for Approval, Modification and Closure of Academic Provision. These policies ensure the continuous improvement of programmes.
 - For the proposed programme, learning outcomes have been mapped against the HCPC standards and cross referenced with the Nursing and Midwifery Council (NMC) and the General Pharmaceutical Council (GPhC).
 - These policies are set at institution level and will apply to the proposed programme.
- **Practice quality, including the establishment of safe and supporting practice learning environments –**
 - The Code of Practice for Work-Based and Placement Learning outlines a range of principles that must be applied to all work-based or placement learning. The code ensures standards and quality are consistently maintained with all experiences across all programmes. There are some variations on how it is applied, which is normally the duration of placements and the experience required.
 - The education provider is committed to ensuring sufficient support is in place for learners and that all learners have access to an academic tutor.
 - These policies are set at institution level and will apply to the proposed programme.
- **Learner involvement –**
 - Learners are involved and represented at the Student Voice Committees and Board of Studies. This provides learners with a platform where their views and experiences are heard and considered and informs future changes to the programmes. The Student Voice Policy supports this involvement strategically across all programmes and emphasises the importance of learner involvement.
 - There is a requirement for module evaluations to be completed by all learners for all programmes. The completion of these evaluation forms enables the education provider to capture both positive and negative aspects of the learner experience and make necessary improvements.
 - These policies are set at institution level and will apply to the proposed programme.
- **Service user and carer involvement –**
 - The School of Health and Care Professions Service User and Carer Strategy supports the involvement of service users and carers with all HCPC programmes.
 - There is a nominated Lead for the Service User Participation and Advisory (SUPA) Group, who is responsible for coordinating service user and carer involvement across the School.
 - This policy is a School level policy and will apply to the proposed programme.

Non-alignment requiring further assessment: None.

Learners

Findings on alignment with existing provision:

- **Support –**
 - There are a range of policies to support learners, such as the Student Wellbeing and Mental Health Policy, academic skills support and learning support tutors. The Student Complaints Procedure is also available to learners.
 - All learners are allocated a Personal Academic Tutor to provide them with pastoral and academic support, which includes referral to specific support services. This tutor supports learners through the duration of the programme.
 - These policies are set at institution level and will apply to the proposed programme.
- **Ongoing suitability –**
 - The suitability of learners is considered through the Admissions Policy and through the Fitness to Study Policy and Procedure. Learners are also expected to adhere to the Code of Student Behaviour and are required to complete annual declarations to confirm there have been no changes with their circumstances.
 - These policies are set at institution level and will apply to the proposed programme.
- **Learning with and from other learners and professionals (IPL/E) –**
 - Interprofessional learning policies are profession specific and there is an established working group within the school to support this area. This group is made up of academics from across the school who are involved with health care education. The purpose of this group is to create interprofessional learning opportunities for learners across the health care programmes.
 - They recognise the importance of teaching across programmes and have therefore mapped the module against the GPhC standards for prescribing and the Royal Pharmaceutical Society (RPS) competency framework. This approach will enable learners to gain a better understanding of other disciplines and prepare them to work in multidisciplinary teams.
 - The interprofessional learning approach used for the current health care programmes will apply to the proposed programme.
- **Equality, diversity and inclusion –**
 - The education provider's Equality and Diversity Policy statement demonstrates their commitment to equality, diversity and inclusion. This policy is embedded across all the programmes.
 - There are a range of other policies to promote this area and support learners, such as the Access and Participation plan, Dignity and Respect policy, Religion and Belief policy and Gender identity and expression policy.
 - These policies are set at institution level and will apply to the proposed programme.

Non-alignment requiring further assessment: We have noted the interprofessional learning policies are profession specific. As such, we will review the relevant policies for the proposed programme through Stage 2 of this approval case.

At the moment, there is no indication if the education provider has any plans to develop interprofessional learning policies at the institution level. If the education provider chooses to develop such policies regarding at an institution level, this should be considered further and referred to their next performance review in 2026-27.

Assessment

Findings on alignment with existing provision:

- **Objectivity –**
 - Programmes are aligned to the Curriculum Framework Specification, which is outlined in the Assessment for Learning policy. To ensure further consistency and transparency, the Examination and Assessment Regulations are applied across all programmes.
 - External Examiners are involved with all elements of assessments and provide independent input into the assessments to ensure quality and academic standards are maintained.
 - These policies are set at institution level and will apply to the proposed programme.
- **Progression and achievement –**
 - The Student Engagement and Attendance Monitoring policy identifies and monitors learners at risk and aims to support learners with this.
 - The Examination and Assessment regulations apply to all programmes with regards to progression and achievement, with the exception of some specific variations for some of the professional courses.
 - These policies are set at institution level and will apply to the proposed programme.
- **Appeals –**
 - The appeals procedure is available in the Examination and Assessment Regulations and applies to all programmes. It is also included in the School of Health and Care Professions handbook.
 - These policies are set at institution level and will apply to the proposed programme.

Non-alignment requiring further assessment: None.

Outcomes from stage 1

We decided to progress to stage 2 of the process without further review through stage 1, due to the clear alignment of the new provision within existing institutional structures, as noted through the previous section. As part of the stage 2 process, we must explore further with the education provider their intentions and timeframes on developing a interprofessional learning policy, which will apply to the proposed programme.

Section 3: Programme-level assessment

Programmes considered through this assessment

Programme name	Mode of study	Profession (including modality) / entitlement	Proposed learner number, and frequency	Proposed start date
Independent and Supplementary Prescribing	PT (Part time)	Independent prescribing & Supplementary prescribing	1 cohort per year of 10 learners, which will increase every year by 5 learners.	02/09/2024

Stage 2 assessment – provider submission

The education provider was asked to demonstrate how they meet programme level standards for each programme. They supplied information about how each standard was met, including a rationale and links to supporting information via a mapping document.

Quality themes identified for further exploration

We reviewed the information provided, and worked with the education provider on our understanding of their submission. Based on our understanding, we defined and undertook the following quality assurance activities linked to the quality themes referenced below. This allowed us to consider whether the education provider met our standards.

Quality theme 1 – insufficient information about ensuring appropriate supervision of learners in practice-based learning

Area for further exploration: In their stage 2 submission, for the SETs concerning the skills, experience and qualifications of practice educators, the education provider stated that they had agreements in place with their practice partners to ensure the suitability of practice educators. Learners coming on to the programme are intended to be existing employees of NHS Trusts, who will already have supervision arrangements in place when they begin the programme. This is why the education provider has delegated the response for determining the suitability of practice educators.

The visitors had two concerns: the education provider hadn't defined what they considered a qualified practice educator, and couldn't ensure their practice partners met the SETs requirements. Second, the education provider had not made it clear

how they would ensure appropriate clinical supervision for applicants who were coming on to the programme without an employer who had an existing arrangement with the education provider.

Without this information the visitors could not determine the standard was met, because they did not know how the education provider would ensure that practice educators were suitable persons. There was a risk that clinical supervision would not be appropriately carried out so we explored this issue further.

Quality activities agreed to explore theme further: We decided to schedule a virtual meeting with the provider to enable the visitors to have a useful discussion about the relevant standards. Subsequently, we asked the education provider to submit written evidence to support the statements they had made in the virtual meeting.

Outcomes of exploration: During the virtual meeting, the education provider assured the HCPC that they had agreements in place and had a clear idea of what constituted a suitable practice educator. They mentioned, for example, the need for such persons to be HCPC registrants in good standing.

The visitors sought documentary clarification on this issue, for the reason that the education provider still seemed to be unclear about what constituted an appropriate practice educator. The visitors did not consider that HCPC registration on its own was a suitable level of qualification and experience. They also had an additional conversation with the education provider to explain the issue in more depth, and encourage the education provider to define their requirements more closely. The education provider understood the need to establish their own definition for what constituted a suitably experienced, skilled and qualified practice educator, and produced documentary evidence to support this. The evidence was an updated application form which set out requirements for practice educators clearly.

The visitors considered that the relevant standards were now met at threshold, because the education provider could ensure they had their own way of establishing the suitability of practice educators.

Quality theme 2 –insufficient information about the number and suitability of programme staff who would be delivering the programme.

Area for further exploration: In their stage 2 submission, for the SETs around programme staff (3.9 and 3.10), the education provider referred to the programme handbook, part of which set out the roles of specific staff members. The visitors noted there was useful information here about how the education provider intends to ensure that learners have access to an appropriate number of qualified staff. However, the visitors considered that there was insufficient detail to enable them to determine whether the standards were met. For example, there was limited information about how much time each staff member would commit to the programme. There was no information about how the education provider would use their staffing arrangements ensure profession-specific support for learners from different HCPC professions.

This meant that the visitors could not ascertain whether there would be a sufficient number of appropriately qualified and experienced staff in place to deliver an effective programme. They also could not see how the education provider would ensure that educators have relevant specialist knowledge and expertise. We therefore used quality activity to explore the area further.

Quality activities agreed to explore theme further: We decided to schedule a virtual meeting with the provider to enable the visitors to have a useful discussion about the relevant standards. Subsequently, we asked the education provider to submit written evidence to support the statements they had made in the virtual meeting.

Outcomes of exploration: During the virtual meeting, the education provider explained the staff arrangements in more detail. They elaborated on the time that individual members of staff would have available for the programme. They also stated that they were confident that they had sufficient appropriate staff available for the programme, and gave some examples of individual staff and their backgrounds and qualifications. They agreed to follow up these verbal assurances with documentary evidence.

Regarding the concern about support for HCPC learners, the education provider stated that there was a member of staff who was the lead for HCPC registrant learners. This staff member would not necessarily be an HCPC registrant themselves, but their supervisory role would be a formally defined part of their work description.

The documentary evidence consisted of a narrative setting out the staff time available for the programme, and the expertise and qualifications of those staff. This was detailed and showed that the education provider had engaged in detailed planning around staffing, and the visitors therefore considered the relevant standards to be met.

Quality theme 3 – demonstration of the processes for ensuring appropriate academic support for learners.

Area for further exploration: The education provider submitted a link to their virtual learning environment (VLE), which was intended to be a key source of academic support for learners. The visitors were not able to access this link and the education provider did not submit other evidence regarding how learners would be supported. For this reason the visitors were not able to determine whether SET 3.12 was met.

Without being able to review the VLE, the visitors were unable to determine whether the standard was met, because the VLE was the key resource for learner support. There was a risk that learners would not be appropriately supported. We therefore decided to explore this area through quality activity.

Quality activities agreed to explore theme further: We decided to schedule a virtual meeting with the provider to enable the visitors to have a useful discussion about the relevant standards. Subsequently, we asked the education provider to

submit written evidence to support the statements they had made in the virtual meeting.

Outcomes of exploration: In the virtual meeting the education provider gave us verbal assurances that there were a wide range of academic resources available for their learners, including libraries, revision sessions, academic skills workshops and individualised support from programme staff.

The visitors considered that this was useful context. They were reassured about the education provider's ability to support learners academically. However, they did ask that the education provider supply some documentary evidence, and the education provider agreed to do this. When the education provider supplied the documentary support, the visitors considered the standard was now met. The documentary evidence consisted of materials for learners signposting them to academic support, information about the library and the capabilities of the Moodle VLE, and schedules for academic tutor sessions. This satisfied the visitors because it demonstrated a wide range of facilities and resources for academic support.

Quality theme 4 – Ensuring the programme appropriately contextualises prescribing for HCPC learners

Area for further exploration: The visitors reviewed the stage 2 submission. From the evidence, the visitors considered that in several areas it was not clear how the education provider planned to ensure that HCPC learners were appropriately prepared to prescribe in their particular professions. For example, in the evidence for SETs 4.2 and 6.2, it was not clear how the HCPC standards of conduct, performance and ethics would be covered through the programme learning outcomes.

Without this evidence and information, the visitors could not determine how the education provider would ensure that learners were appropriately prepared to prescribe within the context of their profession. They therefore decided to explore in more detail how the education provider would support HCPC registrants on the programme.

Quality activities agreed to explore theme further: We decided to schedule a virtual meeting with the provider to enable the visitors to have a useful discussion about the relevant standards. Subsequently, we asked the education provider to submit written evidence to support the statements they had made in the virtual meeting.

Outcomes of exploration: In the virtual meeting the education provider stated that they considered their support for HCPC registrants was appropriate. They noted that they had individuals on staff with a background in the HCPC professions, and that all staff would be trained to deliver appropriate support to all professions.

The visitors considered that this was useful context. They were reassured about the education provider's support for HCPC learners. However, they did require supporting evidence.

The additional documentary evidence consisted of mapping documents and guides to individual modules showing where the learners would have the opportunity to understand prescribing within their own professions. The visitors considered the relevant standards met once they had seen this evidence, because it clearly showed how the education provider would prepare learners for prescribing practice within their own professional contexts.

Section 4: Findings

This section details the visitors' findings from their review through stage 2, including any requirements set, and a summary of their overall findings.

Conditions

Conditions are requirements that must be met before providers or programmes can be approved. We set conditions when there is an issue with the education provider's approach to meeting a standard. This may mean that we have evidence that standards are not met at this time, or the education provider's planned approach is not suitable.

The visitors were satisfied that no conditions were required to satisfy them that all standards are met. The visitors' findings, including why no conditions were required, are presented below.

Overall findings on how standards are met

This section provides information summarising the visitors' findings against the programme-level standards. The section also includes a summary of risks, further areas to be followed up, and areas of good practice.

Findings of the assessment panel:

- **SET 1: Level of qualification for entry to the Register** – this standard is covered through institution-level assessment
- **SET 2: Programme admissions** –
 - The education provider set out their admissions requirements in detail in the mapping exercise, referring to the more detailed information available in the documentation.
 - They noted the academic and personal requirements. This includes evidence of HCPC registration, as well as a signed Statement Of Commitment. This statement required learners to demonstrate employer support for their application. The education provider is also linked to the relevant webpages that would enable learners to understand the programme and its requirements.
 - The visitors considered that the relevant standard was met. They agreed the education provider was applying appropriate academic and professional entry standards. This should enable those admitted to the programme to have a strong likelihood of completing the programme.
 - The visitors therefore considered the relevant standards within this SET area met at threshold level.

- **SET 3: Programme governance, management and leadership –**
 - The education provider set out their approach to this area in their mapping document and supporting evidence.
 - With regards to collaboration with practice partners and the maintenance of placement capacity, they demonstrated how learners' employers would have to be committed to their learners undertaking the programme, and to supporting those learners' clinical learning. Additionally, they noted that learners will be assigned a practice supervisor who will support the learner throughout the programme.
 - With regard to staff, the education provider submitted the programme handbook, which set out how staff would be used on the programme. The visitors explored this area further [through quality activity 2](#), because insufficient evidence was provided about the numbers of staff and the range of expertise available.
 - Concerning resources, the education provider submitted a link to their virtual learning environment, but no further evidence. The visitors used [quality activity 3](#) to explore this area further in order to determine whether the standard was met. Following the quality activity, they determined the standard was now met.
- **SET 4: Programme design and delivery –**
 - The education provider submitted a module specification, as well as a standards of prescribing mapping exercise which will be integrated and assessed on the programme. They also provided a Royal Pharmaceutical Society (RPharm) competency framework.
 - They also submitted a programme handbook and other guidance documents for learners which set out the structure and requirements of the programme.
 - The visitors considered that this was appropriate evidence. However, during a virtual meeting they asked for clarification around a number of areas, including how the programme would support learners' autonomous practice and evidence-based decision-making. They also wished to clarify how the education provider would ensure the curriculum was appropriately tailored towards HCPC learners, and how the education provider had ensured compliance with the Online Curriculum Framework for Allied Health Professionals.
 - The education provider gave verbal assurances that they would be able to support these areas. The visitors found this discussion useful, but requested additional documentary evidence to support what they had been told in the virtual meeting. They considered that the written evidence submitted for [quality activity 4](#) was suitable to clarify this area, and after reviewing the quality activity considered that the relevant standards were now met.
- **SET 5: Practice-based learning –**
 - The education provider submitted in evidence the Statement Of Commitment form, the programme handbook, and the HCPC-NMC Practice Supervisor and Assessor Booklet (PSAB). The first two pieces of evidence were to demonstrate that the practice-based learning requirements were integrated with the programme's delivery. The PSAB was to demonstrate how the education provider planned to

ensure that clinical supervision on the programme was carried out by appropriately qualified and experienced staff.

- The visitors considered that this was useful evidence, but they asked the education provider to clarify what information was provided to learners, employers and assessors in relation to programme requirements. Without this information they could not determine whether the relevant standards were met. In the virtual meeting the education provider stated that the training and preparation for practice educators was thorough, but the visitors requested additional information about this. Following the clarification, the visitors considered SET 5.2 was met, because it was clear how the structure, duration and range of practice-based learning was appropriate to the programme.
- In [quality activity 1](#), we explored with the education provider how they determined what constituted an appropriate practice educator, and how they would ensure that all learners coming on to the programme had access to appropriate clinical supervision. The education provider undertook to define this more closely, in line with the requirements of the SETs. Following the clarification, we considered that the relevant standards were now met.
- **SET 6: Assessment –**
 - The education provider submitted a Prescribing Assessment Brief as their main piece of evidence in this area. This set out the various approaches and methods of assessments they will use on the programme.
 - The visitors considered that this was useful evidence, and helped their understanding of the assessment approach. However, it was not clear from the evidence provided how the education provider integrated the standards of conduct, performance and ethics into their assessment. They explored this through [quality activity 4](#), in the form of a virtual meeting. The education provider explained in more depth how they would ensure that learners had a clear understanding of the professional expectations of their prescribing role.
 - Following the submission of additional evidence, the visitors considered the standards in this area to be met.

Risks identified which may impact on performance: None.

Areas of good and best practice identified through this review: None.

Section 5: Referrals

This section summarises any areas which require further follow-up through a separate quality assurance process (the approval, focused review, or performance review process).

There were no outstanding issues to be referred to another process.

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. They do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

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

Recommendation: The education provider should review the sections of the application form which set out requirements for practice educators to ensure they give a comprehensive and complete description of the requirements for the role.

Reason: In their stage 2 submission, for the SETs concerning the skills, experience and qualifications of practice educators, the education provider stated that they had agreements in place with their practice partners to ensure the suitability of practice educators. Learners coming on to the programme are intended to be existing employees of NHS Trusts, who will already have supervision arrangements in place when they begin the programme.

The visitors explored through quality activity two concerns around this standard:

- They were not clear how the education provider defined a qualified practice educator, and how they would ensure that practice partners' standards for practice educators aligned with the HCPC SETs;
- They were not clear how the education provider would ensure appropriate clinical supervision for applicants who were coming on to the programme without an employer who had an existing arrangement with the education provider.

In their [response to quality activity](#), the education provider submitted an updated application form which strengthened the requirements for practice educator qualifications, and laid them out clearly. The visitors considered that the standard was met after seeing this update document.

However, they did note that there were a couple of ambiguities in this form. It wasn't clear whether the education provider would consider an individual who was a General Pharmaceutical Council registrant to be a suitable practice educator for HCPC registrants on the programme. It also wasn't clear in the "Competencies for Practice Supervisors" section whether "nurse and midwife non-medical prescribers" should be replaced by "HCPC prescribers".

The visitors therefore suggest that the education provider review the new section of this form to make sure that the information is accurate and to avoid any risk of misunderstanding, leading to inappropriate supervision in clinical placements.

Section 5: Referrals

This section summarises any areas which require further follow-up through a separate quality assurance process (the approval, focused review, or performance review process).

There were no outstanding issues to be referred to another process.

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. They do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

The visitors did not set any recommendations.

Section 6: Decision on approval process outcomes

Assessment panel recommendation

Based on the findings detailed in section 4, the visitors recommend to the Education and Training Committee that all standards are met, and therefore the programme should be approved.

Education and Training Committee decision

Education and Training Committee considered the assessment panel's recommendations and the findings which support these. The education provider was also provided with the opportunity to submit any observation they had on the conclusions reached.

Based on all information presented to them, the Committee decided that the programme is approved

Reason for this decision: The Panel accepted the visitor's recommendation that the programme should receive approval.

Appendix 1 – list of open programmes at this institution

Name	Mode of study	Profession	Modality	Annotation	First intake date
BSc (Hons) Degree Apprenticeship in Operating Department Practice	FT (Full time)	Operating department practitioner			24/09/2024
BSc (Hons) Diagnostic Radiography & Medical Imaging	FT (Full time)	Radiographer	Diagnostic radiographer		01/09/2017
BSc (Hons) Diagnostic Radiography and Medical Imaging	FT (Full time)	Radiographer	Diagnostic radiographer		01/09/2017
BSc (Hons) Operating Department Practice	FT (Full time)	Operating department practitioner			01/08/2016
BSc (Hons) Paramedic Science	FT (Full time)	Paramedic			01/09/2015
MSc Physiotherapy (Pre-Registration)	FT (Full time)	Physiotherapist			01/01/2022
Professional Doctorate in Sport and Exercise Psychology	PT (Part time)	Practitioner psychologist	Sports and exercise psychologist		01/09/2016