

HCPC approval process report

Education provider	University of Plymouth
Name of programme(s)	BSc (Hons) Diagnostic Radiography with Foundation Ultrasonography, Full time
Approval visit date	20 April 2021
Case reference	CAS-16878-T8B8J5

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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:

Shaaron Pratt	Radiographer - Diagnostic radiographer
Julie Weir	Operating department practitioner
Temilolu Odunaike	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.

Tim O'Brien	Independent chair (supplied by the education provider)	University of Plymouth
Natalie Dixon	Secretary (supplied by the education provider)	University of Plymouth
Claire Ellis	Secretary (supplied by the education provider)	University of Plymouth

Section 2: Programme details

Programme name	BSc (Hons) Diagnostic Radiography with Foundation Ultrasonography
Mode of study	FT (Full time)
Profession	Radiographer
Modality	Diagnostic radiographer
Proposed First intake	01 September 2021
Maximum learner cohort	Up to 10
Intakes per year	1
Assessment reference	APP02320

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	No	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	Not Required	As the visit was carried out virtually, the facilities and resources were covered in discussions and the documentary submission.
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

Section 4: Outcome from first review

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 June 2021.

2.5 The admissions process must ensure that applicants are aware of and comply with any health requirements.

Condition: The education provider must update information regarding health requirements to ensure it is clear and appropriate to this programme so applicants are fully aware of and comply with the requirements.

Reason: The visitors noted from the programme documentation and discussions with the programme team that information about what was required of applicants was not clearly contained in the information provided to applicants. The visitors noted that some information provided was unclear. For example, full details of vaccination requirements specific to this programme were not clearly set out so applicants, particularly, those that

may have certain conditions or disabilities, would not be fully aware how these requirements could affect them. In addition, the visitors noted that a lot of the information provided related to medical students and may not be appropriate to learners on the BSc (Hons) Diagnostic Radiography with Foundation Ultrasonography programme. For example, the Selection Admission Technical Manual provided information on different health screening carried out on medical students but no health screening information was provided for learners on this programme. In their meeting, the programme team agreed some information on the website and programme documentation needed updating to reflect health requirements specific to this programme. Therefore, the visitors require the education provider to update information regarding health requirements to ensure it is up-to-date and appropriate to this programme so applicants are fully aware of and comply with the requirements.

3.5 There must be regular and effective collaboration between the education provider and practice education providers.

Condition: The education provider must demonstrate how there will be regular and effective collaboration between themselves and the practice education providers.

Reason: In their review of the documentation, the visitors learnt about the different roles and responsibilities of key individuals, both at the education provider and the practice education provider sites, who would be involved in practice-based learning. The visitors were satisfied that the education provider had clearly set out who would be involved to ensure the quality and effectiveness of practice-based learning. However, from discussions with the practice educators and the programme team, the visitors noted that there has not been regular and effective collaboration between the education provider and the practice education providers. In the programme team meeting, the visitors heard that the education provider met with the practice providers two years ago during the very early stages of the programme development. However, there has not been regular meetings with them since.

From discussions with the practice educators, the visitors noted that the majority knew very little about the programme and there were no plans to indicate how they would be involved in the programme going forward. The visitors considered that there was insufficient evidence of a partnership or ongoing relationship between the education provider and the practice education providers. As such, the visitors request information on how the education provider will engage with practice education providers going forward to ensure regular and effective collaboration with them.

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

Condition: The education provider must review and provide updated guidance on their process for obtaining appropriate consent from service users and learners.

Reason: From a review of the documentation submitted prior to the visit, the visitors noted that all learners sign a declaration at the start of the programme and then each year. The declaration states *"I will listen to patients and respect their views, treat them politely and considerately, respect patients' privacy and dignity, and respect their right to refuse to take part in teaching"*. The visitors noted that the declaration did not demonstrate evidence of any formal protocols to obtain consent from service users.

The education provider also provided a link which directed the visitors to a document for medical students, which contained no mention of Allied Health Professions learners. As such, the visitors were unclear about the education provider's process for obtaining appropriate consent from service users on this programme. Similarly, the visitors noted lack of clarity around how consent is obtained from learners when they take part as service users in practical and clinical teaching. For example, it was not clear within the documentation whether learners would have to give consent every year or only at the beginning of the programme or whether they have the option to change their mind or withdraw consent if they wish to. The visitors also noted that the process was aimed towards medical students, who may engage in different activities to Diagnostic Radiography learners. At the visit, the programme team agreed that the consent document was out-of-date and needed to be updated. Therefore, the visitors require further information about how the education provider obtains appropriate consent from both service users and learners and ensures the process is specific to this programme. This way, the visitors can determine whether the process is effective and subsequently whether the standard is met.

5.8 Learners and practice educators must have the information they need in a timely manner in order to be prepared for practice-based learning.

Condition: The education provider must demonstrate how they provide learners and practice educators with the necessary information for them to be prepared for practice-based learning in a timely manner.

Reason: As evidence for this standard, the education provider referred the visitors to sections of the placement handbook and some module handbooks amongst other documents. In these, the visitors saw information that would be provided to learners in order for them to be prepared for practice-based learning. However, from discussions with the learners, the learners spoke about their experience in their early placements – where they were sent to several hospital departments without a clear understanding of the purpose of those placements.

Similarly, from discussions with the practice educators at the visit, the visitors noted that the practice educators were unclear about the programme, particularly, as regards what is expected and required of them to ensure the effectiveness of practice-based learning for this programme. For example, the practice educators were unsure what was different about this new programme, or why it was being introduced in order for them to ensure practice-based learning is effective. As such, the visitors require further evidence to demonstrate how the education provider ensures that practice educators receive the information they need in a timely manner in order to be prepared for practice-based learning.

6.4 Assessment policies must clearly specify requirements for progression and achievement within the programme.

Condition: The education provider must ensure that all programme documentation clearly specifies requirements for progression and achievement within the programme.

Reason: The visitors reviewed the Assessment and grading strategy and the Diagnostic Radiography programme Operational Specification amongst other documents, as evidence for this standard. The visitors saw the requirements for progression and achievement within the programme in the Operational Specification,

but they noted the information was not provided in the programme handbook available to learners. In discussions with learners on the existing approved BSc (Hons) Diagnostic Radiography programme, the visitors noted that the learners were unclear about what is expected of them at certain stages of the programme. For example, the learners were unclear arrangements for second reassessments and progression opportunities in terms of the maximum number of credits they can carry over to another year if they fail, or what options are available to them. As this information was not provided in the programme handbook and due to the lack of clarity from the learners, the visitors could not determine that requirements for progression and achievement are clearly communicated to learners. They therefore require further evidence to ensure information on progression and achievement requirements is clearly specified.

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.

2.6 There must be an appropriate and effective process for assessing applicants' prior learning and experience.

Recommendation: The education provider should consider producing clearer and easily accessible guidance for applicants about how the education provider will assess their prior learning and experience.

Reason: The visitors were clear from their review of the programme documentation and discussions at the visit that the education provider had an appropriate and effective process in place for assessing applicant's prior learning and experience. Therefore, the visitors considered that the standard was met at threshold. However, the visitors considered that for a potential applicant seeking information about how the programme assesses applicants' alternative entry qualifications, the information may not be clear enough, easy to understand or easily accessible on the programme website. The visitors therefore recommend that the education provider review the Accreditation of Prior Learning section of their website to ensure the information provided on the process is clear and easily accessible for applicants.

2.7 The education provider must ensure that there are equality and diversity policies in relation to applicants and that they are implemented and monitored.

Recommendation: The education provider should consider updating the programme documentation and their website so their equality and diversity policies in relation to disability and additional learning needs are clear, accessible to applicants and specific to the programme.

Reason: The visitors saw the education provider's equality, diversity and inclusion (EDI) policies and how they are being implemented and monitored. Therefore, the visitors considered that the standard was met at threshold. Although the visitors saw information around disability they noted, for example, that the information provided was not specific to this programme. The visitors also noted a lack of information about policies around additional learning needs, within the admissions information for this programme. The visitors considered that different professions may have specific EDI

policies and that such policies need to be robust, clear and easily accessible to potential applicants so they are able to make fully informed decision about taking up an offer of a place on the programme. As there were no EDI policies provided for this programme, the visitors therefore recommend that the education provider review their EDI policies for admissions in both the programme documentation and their website to ensure the policies are:

- clear about disability and additional learning needs;
- easily accessible for potential applicants; and
- relevant to the BSc (Hons) Diagnostic Radiography with Foundation Ultrasonography programme.

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.

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

Condition: The education provider must review and provide updated guidance on their process for obtaining appropriate consent from service users and learners.

Reason condition not met at this time: In the education provider's response to this condition, the visitors noted that the education provider had updated the declaration that learners are required to make at the start of the programme. The declaration now states: *I will physically examine patients, peers and model patients as required during my training (irrespective of their gender, sexuality, culture, beliefs, disability, or disease). I will follow appropriate chaperone and consent guidance. I accept that in order to register with HCPC as a Diagnostic Radiographer in the UK, I will be willing to assess or complete any imaging techniques on any individual as fully and intimately as is required as part of my training.*

The education provider also stated that learners would need to complete an updated records/declaration form each year. In addition, the education provider submitted a 'Process for obtaining consent' document which showed how learners would obtain consent from service users when they interact with them. The visitors were therefore satisfied that there is an effective process for obtaining appropriate consent from service users.

However, the visitors noted that the education provider did not provide any information about how consent would be obtained from learners in situations where they take part as service users themselves in practical and clinical teaching. For example, when learners take part in role play as part of their learning or part of an assessment. As the visitors did not see the education provider's process for obtaining consent from learners when they participate as service users, they could not determine that this condition is met. They therefore require further evidence that demonstrates that this part of the standard is also met.

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

5.8 Learners and practice educators must have the information they need in a timely manner in order to be prepared for practice-based learning.

Condition: The education provider must demonstrate how they provide learners and practice educators with the necessary information for them to be prepared for practice-based learning in a timely manner.

Reason condition not met at this time: In their response to this condition, the education provider explained that the practice educators that attended the approval event did not have information about this programme because they were those involved in the existing diagnostic radiography programme and would not have known about the ultrasound element of the new programme. The education provider also stated that there will be information provided to all radiographers at the Continuing Medical Education days planned for July and November at the University Hospitals Plymouth NHS Trust

In addition, the education provider stated that since January 2021, more information is now being provided to practice-based learning staff so they are aware of the learning outcomes the learners need to achieve in practice-based learning. The education provider also explained that following discussions with the Deputy Chief Nurse at one of their practice providers, it has been suggested that a narrated recorded PowerPoint be made available for the first year placement. They also stated that, over the summer, a leaflet would be sent out to all departments hosting the learners. The visitors were unclear what the contents of the leaflets or the PowerPoint would be as this was not stated. The education provider stated further that they will be developing a separate practice placement handbook for year 1 and another for years 2 and 3 from September 2021 as opposed to the current practice placement handbook which covers all years of the programme. The visitors noted that the generic handbook did not contain sufficient information as the placement arrangements were different for the early placements, where learners were sent to other departments.

The visitors noted that the education provider has plans about how they will ensure learners and practice educators receive the information they require for them to be prepared for practice-based learning. However, as no evidence of any of these plans was made available to the visitors, and given that the programme is intended to start in September 2021, the visitors were unable to determine:

- what information will be provided to learners and practice educators;
- how it will be provided to them; and
- whether it would be provided in a timely manner to prepare them for practice-based learning.

The visitors therefore require further evidence to demonstrate that this standard is met.

Suggested documentation:

- An example of the information that will be provided to learners and practice educators and how it will be provided to them;

- A copy of the practice placement handbooks for years 1 and 2, with clear placement objectives;
- The education provider's mechanism for informing practice education providers of the learning / experience that needs to take place while learners are on placement – ahead of the placement; and
- An example of the leaflet or indication of content of the narrated PowerPoint.

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 25 August 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](#).