Education and Training Committee, 22 May 2019

Approval process visitors' recommendation – University of Bedfordshire – BSc (Hons) Occupational Therapy and BSc (Hons) Physiotherapy

Executive summary and recommendations

**Introduction**

These programmes were visited on 18-19 September 2019. They were visited because they were new programmes, due to start in September 2019. Conditions were placed on the approval of the programmes, which are documented in section 4 of the visitors' report in appendix 1. The visitors' report was agreed by the Committee at its meeting of 5 December 2018. At that meeting, the Committee agree that all conditions must be met in order for the programme to be approved. The decision notice from this meeting can be found in appendix 2.

The education provider was provided with two attempts to meet the conditions placed on the approval of the programme. The first conditions deadline was negotiated for 7 January 2019. The second conditions response was provided on 1 March 2019.

After reviewing the additional evidence provided by the education provider through both conditions responses, the visitors consider that:

- 4 conditions are not met for the occupational therapy programme; and
- 3 conditions are not met for the physiotherapy programme.

At this stage of the process, the visitors were only able to recommend that the programmes were approved or not approved. As they are not satisfied that a number of conditions are met, they have chosen the second of these two options.

The conditions that the visitors consider are not met are noted through section 6 of the report provided as appendix 1, along with reasoning as to why these conditions are not met.

The education provider has provided observations on this report, which are included as Appendix 3. In their mapping document, the education provider has referenced several 'annexes', which the education provider offered to provide to the Committee. However, the executive has opted to not provide these, as they constitute further evidence in relation to how conditions are met, rather than observations on the visitors' recommendation.

If the Committee is minded to not approve the programme, the education provider will have a 28 day period to provide observations on this decision, which will then be taken to a future Committee meeting alongside the visitors' report. At that future meeting, the Committee will be asked to make a decision about whether to not approve the programme.

**Decision**
The Committee is asked to determine whether proceedings for the consideration of non-approval of the programme should be commenced in accordance with Article 18(4) of the Health and Care Professions Order 2001.

The Committee may decide to:
- approve the programmes;
- commence non-approval proceedings; or
- direct the executive to undertake any other course of action it deems necessary to inform its decision regarding the approval of the programmes.

In reaching this decision, the Executive asks that the Committee:
- provides reasons for their decision; and
- provides the Executive with any necessary instructions to give effect to the decision.

**Resource implications**
None

**Financial implications**
None

**Appendices**

Appendix 1 – approval process report, containing the final visitors' recommendation
Appendix 2 – Decision notice from 5 December 2018 ETP meeting
Appendix 3 – Observations on the visitors' final recommendation by the education provider

**Date of paper**
14 May 2019

# HCPC approval process report

| | |
|---|---|
| Education provider | University of Bedfordshire |
| Name of programme(s) | BSc (Hons) Occupational Therapy, Full time |
| | BSc (Hons) Physiotherapy, Full time |
| Approval visit date | 18 September 2018 |
| Case reference | CAS-12987-Y3G8S0 |

## Contents

## 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:

| | |
|---|---|
| Joanna Goodwin | Occupational therapist |
| Valerie Maehle | Physiotherapist |
| Roseann Connolly | Lay |
| Niall Gooch | HCPC executive |
| Ismini Tsikaderi | HCPC executive (observer) |

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

| | | |
|---|---|---|
| Paul Sant | Independent chair (supplied by the education provider) | University of Bedfordshire |
| Nathan Spencer | Secretary (supplied by the education provider) | University of Bedfordshire |
| Guangming Cao | Internal panel member | University of Bedfordshire |

| Liz Grant | Internal panel member | University of Bedfordshire |
|---|---|---|
| Toby Smith | Internal panel member | University of Oxford |
| Nina Paterson | Head of Education | Chartered Society of Physiotherapists |
| Liz Hancock | Education representative | Chartered Society of Physiotherapists |

## Section 2: Programme details

| Programme name | BSc (Hons) Occupational Therapy |
|---|---|
| Mode of study | FT (Full time) |
| Profession | Occupational therapist |
| Proposed first intake | 01 September 2019 |
| Maximum learner cohort | Up to 24 |
| Intakes per year | 1 |
| Assessment reference | APP01859 |

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

| Programme name | BSc (Hons) Physiotherapy |
|---|---|
| Mode of study | FT (Full time) |
| Profession | Physiotherapist |
| Proposed first intake | 01 September 2019 |
| Maximum learner cohort | Up to 24 |
| Intakes per year | 1 |
| Assessment reference | APP01860 |

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

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we require 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.

| Required documentation | Submitted |
|---|---|
| Programme specification | Yes |

| Module descriptor(s) | Yes |
|---|---|
| Handbook for learners | Yes |
| Handbook for practice based learning | Yes |
| Completed education standards mapping document | Yes |
| Completed proficiency standards mapping document | Yes |
| Curriculum vitae for relevant staff | Yes |
| External examiners' reports for the last two years, if applicable | Not Required |

We also expect to meet the following groups at approval visits:

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

## Section 4: Outcome from first review

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

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 10 December 2018.

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

**Condition:** The education provider must clarify for applicants their arrangements for assessing applicants' prior learning and experience.

**Reason:** The visitors reviewed evidence submitted for this standard, including information that would be available to applicants. They could not see in this evidence where the education provider's approach to recognition of prior learning (RPL) was clearly set out. The senior team and programme team told the visitors that they would consider applicants' prior learning and experience on a case-by-case basis, in accordance with a set of guidelines, which the visitors saw and considered appropriate. However, as these guidelines, and the principles underlying them, had not been set out for applicants, the visitors considered that at present applicants would not have access to all the information required to make an informed choice about whether to take up a place on the programme. This was especially important in light of the senior team's declared intention to attract more mature applicants and applicants from non-traditional backgrounds. There was a strong possibility that applicants from these groups were more likely to ask that prior learning and experience be taken into account in their application. The visitors therefore require the education provider to demonstrate how they will communicate their RPL policy to applicants.

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

**Condition:** The education provider must clarify their plans for the programmes if their planned degree apprenticeship routes go ahead.

**Reason:** The visitors reviewed the evidence provided for this standard, and discussed the future and management of the programmes with the senior team. Based on the documentation and the discussions there appeared to be appropriate arrangements in place overall. However, the visitors were aware from discussions at the visit that the education provider intends to introduce a degree apprenticeship route for both physiotherapy and occupational therapy. They considered that this might affect the sustainability of the BSc programmes. Additional routes would create additional pressure on staff time, resources, practice-based learning. They might also affect recruitment to the BSc programmes, as some applicants who wished to register as physiotherapists or occupational therapists would have another route available. The senior team stated that they were confident that there would be local demand for the BSc programmes. However, it was not clear to the visitors that the education provider had considered the impact of the degree apprenticeships on the BSc programmes, and they were not able to clarify the detail of their plans for the visitors. They therefore require the education provider to submit further evidence demonstrating that these BSc programmes will still be sustainable and fit for purpose if the degree apprenticeships are brought in as planned.

### 3.2 The programme must be effectively managed.

**Condition:** The education provider must clarify the roles and responsibilities of staff on the programme.

**Reason:** The visitors reviewed the evidence submitted for this standard, which included a Quality Handbook. From this evidence, they were able to seen that there was a management structure for the programmes. However, it was not clear which staff members held positions within these structures. For example, the visitors were not able to see which staff were responsible for liaison and co-ordination with providers of practice-based learning. The programme team and senior team were not able to clarify the responsibilities within the programme, meaning that the visitors could not be satisfied that there was effective management and clear lines of responsibility on the

programme. They therefore require the education provider to submit further evidence showing which staff have which responsibilities within the programme.

**3.3  The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.**

**Condition:** The education provider must demonstrate that they have an effective process in place for identifying suitable persons for the role of programme leader.

**Reason:** The visitors were not able to review evidence related to this standard as part of the programme documentation, as none was provided. In discussions with the senior team, the visitors were told that programme leaders were not yet in place for the programmes, but would be appointed before the programme admitted its first cohort in September 2019. However, the visitors were not able to see evidence that there was an appropriate process for identifying and appointing programme leaders. There was a university-wide procedure for doing so, but from the description given it was not clear to the visitors how it would ensure that these programmes were led by someone with appropriate qualifications and experience who could effectively organise programme delivery. They therefore require the education provider to submit further evidence demonstrating how they will ensure that those who hold overall professional responsibility for the programmes are appropriately qualified and experienced.

**3.6  There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

**Condition:** The education provider must demonstrate that they have an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

**Reason:** The visitors reviewed the evidence provided for this standard, including a document outlining placement policies and processes. They could not see from this document what process the education provider would use to ensure availability and capacity of practice-based learning. In discussions with the senior team and programme team they were told that there had been substantial planning for practice-based learning provision, and that further such planning was intended, but the visitors were not able to see evidence of this planning and so were unable to be satisfied that the standard was met. In the meeting with providers of practice-based learning the visitors were told that there had been some discussion with the education provider, and that discussions were ongoing. The visitors were satisfied that there was appropriate collaboration between the education provider and providers of practice-based learning. However, they considered that these discussions had not yet resulted in clear and finalised plans to ensure availability and capacity for all learners. The visitors therefore require the education provider to submit further evidence demonstrating how they will ensure the availability and capacity of practice-based learning for all learners.

**3.7  Service users and carers must be involved in the programme.**

**Condition:** The education provider must demonstrate how service users and carers will be involved in the programme.

**Reason:** The visitors reviewed evidence submitted for this standard, including information about how service users and carers had given input into the development of the programmes. They also met with members of the university service user group, and discussed with the programme team how service users and carers would be involved. From the evidence, and from the discussions, the visitors were not clear how service users would be involved in the programmes. They had been told that some service users and carers had helped develop the programme, but could not see details of the nature and extent of this involvement. In terms of the programme itself, it was not clear which service users would be involved, what they would be doing, and how they would be supported. The visitors could not see where the education provider had considered which service users and carers were most appropriate and relevant to these programmes. They therefore require the education provider to submit further evidence demonstrating how service users and carers will be involved in the programme, and how this involvement will be planned and evaluated.

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

**Condition:** The education provider must demonstrate that there will be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

**Reason:** The visitors reviewed the staff curriculum vitaes submitted as evidence for this standard. They were not clear how the programmes could be effectively delivered with the current level of staffing, given the proposed learner numbers. The senior team stated that they had plans for further recruitment, including of programme leaders, and would be using visiting lecturers as necessary. However, the visitors were not able to see evidence relating to the recruitment planning or to the plans to use visiting lecturers, and so they were not able to make a judgment about whether there would be an adequate number of appropriately qualified and experienced staff in place by the programmes' planned start date of September 2019. In discussions with the senior team the visitors were told that recruitment would be taking place in spring 2019, but no more detailed timescale was given. The visitors therefore require further evidence demonstrating how the education provider will recruit sufficient qualified and experienced staff to deliver the programmes effectively.

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

**Condition:** The education provider must demonstrate how they will ensure that subject areas are delivered by educators with relevant specialist knowledge and expertise.

**Reason:** The visitors reviewed the staff curriculum vitaes submitted as evidence for this standard. They were not clear from this evidence how the education provider would ensure that subject areas are delivered by appropriate specialists. The visitors considered that the present staff currently in place did not have the relevant specialist knowledge and expertise to deliver the programmes. The senior team stated that they had plans for further recruitment, and would be using visiting lecturers as necessary, to ensure appropriate coverage of all subject areas. However, the visitors were not able to see clear evidence of which staff would have responsibility for which curriculum areas. They were not clear that the education provider had prepared appropriate job specifications to ensure that newly recruited permanent or visiting staff would, between

them, be able to cover all subject areas. They were therefore not able to make a judgment about whether subject areas on the programmes would be delivered by educators with relevant specialist knowledge and expertise. In discussions with the senior team the visitors were told that recruitment would be taking place in spring 2019, but no more detailed timescale was given, and no indication was given by the senior team of what areas would be covered by visiting lecturers and which by permanent staff. The visitors therefore require further evidence demonstrating how the education provider will ensure that subject areas are delivered by educators with relevant specialist knowledge and expertise.

**3.18 The education provider must ensure learners, educators and others are aware that only successful completion of an approved programme leads to eligibility for admission to the Register.**

**Condition:** The education provider must ensure the following:
- that it is clear to learners that completion of an HCPC-approved programme gives eligibility to apply for registration, rather than entitlement to register; and
- that learners not eligible to apply for registration are not given an award that refers to a title protected by the HCPC.

**Reason:** The visitors reviewed the Course Information Form provided as evidence for this standard, and the information given about the step-off awards from the programme. They noted that in the information provided for learners it said that completion of the programme would mean that learners could register with the HCPC. In fact, completion of an approved programme confers eligibility to apply for admission to the Register rather than automatic eligibility for admission. The visitors additionally noted that the name of the step-off awards for the programme included the words "physiotherapy" and "occupational therapy". The visitors considered that this created a lack of clarity around which awards actually led to eligibility for registration. The visitors therefore require the education provider to demonstrate how they will ensure that there is no confusion about which programme we approve and which we do not.

**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 demonstrate how they will ensure that the programmes' learning outcomes are worded in such a way that it is clear how they are related to the standards of proficiency.

**Reason:** The visitors reviewed the module learning outcomes provided as evidence for this standard. They noted that the wording of the learning outcomes was quite different from the standards of proficiency (SOPs) for physiotherapists and occupational therapists, and therefore that it was not clear how the learning outcomes related to the SOPs. The visitors considered that this lack of clarity might present a barrier to learners meeting the SOPs, as it might be possible to meet the learning outcomes without having met the SOPs. They therefore require the education provider to submit further evidence demonstrating that the learning outcomes on the programmes will ensure that learners meet the SOPs for physiotherapists and occupational therapists.

**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 how the programmes will reflect the philosophy, core values, skills and knowledge base of the relevant professions.

**Reason:** The visitors reviewed evidence submitted for this standard including module information. From this module information, and from discussions with the programme team and senior teams, the visitors were not clear how the education provider would ensure that the programmes consistently reflected the key values and professional expectations of the two professions, as articulated in guidance from the professional bodies. They were not able to see materials showing how the education provider would meet this standard, for example mechanisms for reviewing and updating the curriculums in light of changes in the profession, or a mapping document showing how the curriculum could reflect relevant curriculum guidance. They considered that there was a link to the condition set under SET 3.10, regarding the lack of evidence that there were sufficient specialist staff on the programmes. Without staff who are either from a profession or well-grounded in it, it is harder for an education provider to ensure that a programme reflects the philosophy, core values, skills and knowledge base of that profession. The visitors therefore require that the education provider submit evidence showing how they will ensure that the programmes will continue to reflect the philosophy, core values, skills and knowledge of the professions.

### 4.4  The curriculum must remain relevant to current practice.

**Condition:** The education provider must demonstrate how they will ensure that the curriculum is updated in line with changes and developments in practice.

**Reason:** The visitors reviewed evidence submitted for this standard, including staff curriculum vitaes. From the documentation it was not clear how the education provider would ensure that the curriculum reflected current professional practice on an ongoing basis. In discussions with the programme team and senior team the visitors were given verbal assurances about this, but it was not clear to the visitors how it would be done. There did not appear to be mechanisms in place for ensuring regular review to maintain professional currency in the curriculum. The visitors considered that there was a link to the condition set under SET 3.10, regarding the lack of evidence that there were sufficient specialist staff on the programmes. Without staff who are either from a profession or well-grounded in it, it is harder for an education provider to ensure that a programme remains relevant to current practice. The visitors therefore require the education provider to submit further evidence demonstrating how they will ensure that the curriculum remains relevant to current practice.

### 4.9  The programme must ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

**Condition:** The education provider must demonstrate how they will ensure that the curriculum is updated in line with changes and developments in practice.

**Reason:** The visitors were not able to view documentary evidence relating to how the education provider would ensure that all learners were able to learn with, and from, professionals and learners in other relevant professions. In discussions with the senior team and the programme team, the visitors were informed that there was planning underway for inter-professional education (IPE), and that there had been some consideration at the education provider of the best way to go about this. Staff stated that they had given some consideration to which other professions were most appropriate

and relevant for IPE. They also mentioned that IPE might be available to learners via the professional practice modules. However, there was no evidence available for the visitors to consider. For example, they were not able to see IPE-related content in the professional practice modules, or detailed plans for IPE scheduling or records of communication with possible IPE partners. They were therefore not able to determine whether the standard was met. They require the education provider to submit further evidence relating to how they will ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

### 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.

**Condition:** The education provider must demonstrate how learners will be informed of how they can catch up if they miss scheduled teaching and learning activities on the programmes.

**Reason:** The visitors reviewed the evidence submitted for this standard. They also discussed attendance and monitoring policies with the programme team and senior team. There were appropriate procedures in place for monitoring attendance, and explaining to learners which parts were mandatory. However, from their review and from these discussions it was not clear how it was communicated to learners what opportunities were available to catch up with programme content if they missed scheduled activities on the programmes. The visitors were therefore not clear that learners were fully aware of the consequences of missing compulsory parts of the programme. They require the education provider to demonstrate how learners will be enabled to understand how to catch up with missed learning.

### 5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

**Condition:** The education provider must demonstrate how they will ensure that learners have access to an appropriate range of practice-based learning.

**Reason:** The visitors reviewed the Course Information Form submitted as evidence for this standard. From this document it was not clear that learners would have access to the range of placements that would fully prepare them for safe and effective practice as physiotherapists or occupational therapists. For example, there did not appear to be any opportunities for learners to spend time in mental health settings. The HCPC does not mandate that education providers must offer specific types of practice-based learning. However, the visitors considered that the type of practice-based learning settings presently available were not appropriate to the design of the programme as they did not match the breadth of topics covered in the curriculum. The senior team and the programme team stated that they wanted to offer a wide range of practice-based learning and that they had had discussions with placement providers, but there did not appear to be evidence available to show that all learners would have access to an appropriate range. The visitors therefore require the education provider to submit further evidence demonstrating that the range of practice-based learning will support the achievement of the learning outcomes and the standards of proficiency for physiotherapists and occupational therapists.

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

**Condition:** The education provider must demonstrate how they will ensure that practice educators are appropriately trained.

**Reason:** The visitors reviewed the evidence submitted for this standard, which stated that the education provider would have access to supervisor registers at partner Trusts after the programme was approved. It was not clear to the visitors from this evidence how the education provider would ensure that practice educators had received appropriate training, or how they would ensure that ongoing training took place. They asked the senior team, programme team and practice educators about this, but it was not clear from these discussions who would be ultimately responsible for monitoring the training status of practice educators, or ensuring that such training was appropriate. It was also not clear who had final ownership of the training process. The visitors therefore require further evidence showing how the education provider can ensure that practice educators receive appropriate initial and ongoing training.

**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 demonstrate how the assessment strategy and design in the modules ensures that learners can meet the standards of proficiency.

**Reason:** The visitors reviewed the evidence submitted for this standard, including course information and module information forms. They also reviewed the standards of proficiency mapping (SOPs) document. It was not clear to them from this evidence how the assessment strategy and design would ensure that learners met the SOPs. This was because it was not clear how assessments were appropriately matched to the SOPs, that is to say, the visitors could not be sure that passing assessments, especially at the higher levels of the programme, would result in learners possessing all the skills and knowledge they will require to practise safely and effectively. It might be possible for learners to pass all the assessments on the programmes without actually having met the SOPs. The visitors therefore require the education provider to submit further evidence demonstrating that assessment will be clearly linked to the SOPS. They considered that this condition is linked to the condition set under SET 4.1.

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

**Condition:** The education provider must demonstrate how assessment will escalate appropriately at different levels of the programmes.

**Reason:** The visitors reviewed the evidence submitted for this standard, including course information forms. From this evidence, and from discussions with the programme team and senior team, it was not clear how the education provider would ensure that the assessment strategy on the programme provided a reliable measure of learners' achievement. This was because it was not apparent how the assessment of learners' abilities and knowledge would take into account their position on the programme. For example, there did not seem to be any evidence of how the education

provider would guide practice educators to adjust their expectations across Levels 4, 5 and 6. Learners can reasonably be expected to achieve higher standards in the second and third years of a programme than in the first, but the visitors could not see where in the assessment strategy or other programme documentation the education provider had a way of ensuring that learners would develop higher levels of skill and knowledge to enable them to practise safely and effectively as independent professionals. The visitors therefore require that the education provider submit additional evidence showing how they will ensure that learners are assessed at the appropriate level for the level of the programme they have reached, especially in their practice-based learning.

**6.7 The education provider must ensure that at least one external examiner for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.**

**Condition:** The education provider must clarify their process for appointing an external examiner, and the timelines for the appointment.

**Reason:** The visitors were not able to access the evidence submitted for this standard, as it was a hyperlink which did not appear to be functioning. They were therefore unable to be clear about the process and requirements for appointing an external examiner for the programmes. They asked the programme team and senior team about this issue, and were told that plans were in place to make an appointment before the programmes started. The visitors understood that the programmes were not due to start for another year and so it was reasonable for an appointment not to have been made. However, in this situation, the HCPC does require evidence of a clear procedure for an appointment. The visitors were not able to see evidence relating to this process, for example a person specification or job description, and so were not able to be certain that the standard was met. They therefore require further evidence demonstrating how the education provider can ensure that an appropriate external examiner will be appointed.


## 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 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.

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

**Condition:** The education provider must clarify the roles and responsibilities of staff on the programme.

**Reason condition not met at this time:** The visitors reviewed the evidence submitted for this condition, including a Practice Placement Handbook and the Recruitment and Selection Policy. The visitors were aware that a recruitment plan was in place to fill the roles of programme leaders, and they considered that this was appropriate and useful. However, it was not clear to them from the evidence how these individuals would be integrated into the management structure, and what the roles and responsibilities would be once the appointees were in post.

**Suggested documentation:** Evidence that demonstrates what the management structure on the programmes will look like once all posts are filled, including clear descriptions of the roles and responsibilities of individuals in the management team.

**3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

**Condition:** The education provider must demonstrate that they have an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

**Reason condition not met at this time:** In the response to this condition the education provider outlined the steps they had taken to ensure that they had effective processes in place for ensuring the availability and capacity of practice-based learning for all learners. This included detailing the outcomes of discussions with two local hospital Trusts, with whom the education provider has agreed in detail how they will work together to manage practice-based learning opportunities. The visitors understood from this information that the Trusts in question - Milton Keynes University Hospital and Bedford Hospital – would take the lead in allocating placements and ensuring that an appropriate range of practice-based learning was available. This arrangement is not in itself problematic from the HCPC's perspective, as long as the education provider retains appropriate oversight. However, the visitors were not clear that the education provider did have oversight over the processes for ensuring availability and capacity of practice-based learning for all learners. The visitors also did not see evidence that the Trusts in question had confirmed the arrangements set out in the conditions response. They therefore considered that the standard was not yet met.

**Suggested documentation:** Evidence demonstrating the following:
- how the education provider will retain oversight over the process for ensuring availability and capacity of practice-based learning for all learners.
- That the partner Trusts have agreed to the arrangements set out in the conditions response.

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

**Condition:** The education provider must demonstrate how they will ensure that subject areas are delivered by educators with relevant specialist knowledge and expertise.

**Reason condition not met at this time:** The visitors were aware from the education provider's response that the education provider had developed a plan for further appropriate recruitment, including timescales, which had agreement from senior staff. However, it was not clear to the visitors which staff would have responsibility for which curriculum areas following the planned recruitment. The visitors could also not see in the submission information about what teaching responsibilities would be assumed by outside clinical staff or visiting lecturers. They were therefore unable to determine whether all subject areas would be delivered by educators with relevant specialist knowledge and expertise.

**Suggested documentation:** Evidence demonstrating how the education provider will ensure that their recruitment of new staff, and their use of visiting lecturers, will enable

them to deliver all required subject areas with appropriate levels of knowledge and expertise.

**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 demonstrate how they will ensure that the programmes' learning outcomes are worded in such a way that it is clear how they are related to the standards of proficiency.

**Reason condition not met at this time:** As part of their evidence for this standard the education provider submitted updated versions of their mapping exercises. However, the visitors considered that it was still not clear from this mapping exercise how the specific unit-level learning outcomes on the programme related to the HCPC standards of proficiency (SOPs) for physiotherapy and occupational therapy. The mapping documents included in the evidence listed all the SOPs, and next to each section of the SOPs listed some high-level learning outcomes, but in this format the visitors could not see how the module-level specific learning outcomes related to particular SOPs and so they could not determine whether the standard was met.

**Suggested documentation:** Evidence to show that how the individual standards of proficiency for physiotherapists and occupational therapists are addressed by module-level learning outcome.

**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.**

**Condition:** The education provider must demonstrate how learners will be informed of how they can catch up if they miss scheduled teaching and learning activities on the programmes.

**Reason condition not met at this time:** The conditions response from the education provider sough to clarify the information that would be given to learners about what they needed to do if they missed practice-based learning sessions, or learning and teaching activities on the programme. However, the visitors noted that much of the terminology used in this evidence appeared to relate to the nursing programmes, for example talking about attendance in terms of shifts and making reference to the limits placed on working by the Working Time Regulations. They considered that this was unlikely to be relevant to physiotherapy and occupational therapy learners, and so may not provide them with appropriate levels of clarity. They were therefore unable to determine whether the standard was met.

**Suggested documentation:** Evidence to show how learners on both programmes will receive profession- and programme-specific information relating to what they must do if they miss scheduled learning and teaching activities.

**5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.**

**Condition:** The education provider must demonstrate how they will ensure that learners have access to an appropriate range of practice-based learning.

**Reason condition not met at this time:** The visitors reviewed the evidence submitted by the education provider, which included amendments made to the student handbook in light of the progress made towards securing appropriate and sufficient practice-based learning. There was overlap between the issues highlighted in this condition and those highlighted in the condition under SET 3.6, and the education provider referred to some of the same evidence in their responses. The visitors noted that there are now firmer arrangements in place for the provision and development of practice-based learning as the education provider had been working with local NHS Trusts. However, it was not clear to the visitors how the education provider will ensure an appropriate structure and range of practice-based learning for learners in occupational therapy. This is for two main reasons. First, because the education provider appear to have delegated responsibility for organising and allocation of practice-based learning to the Trusts, without a clear way of having oversight of the process. Second, because the range of available occupational therapy placements appears to be relatively restricted. For instance, there do not appear to be any opportunities for occupational therapy learners to access mental health placements, or placements with a more community or "non-traditional" focus. It is therefore not clear how learners will be enabled to meet all the standards of proficiency. Many of the occupational therapy SOPs in sections 13 and 14 require experience and knowledge of many different areas in which occupational therapies may need to practise. The visitors were therefore not able to determine whether this standard was met.

**Suggested documentation:** Evidence to show how learners on the occupational therapy programme will have access to a sufficient structure and range of practice-based to ensure that they meet all the SOPs, including mental health settings and community-based settings.

## 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 not satisfied that the conditions are met for the reason(s) noted below, and recommend that the programme(s) are not approved.

This report, including the recommendation of the visitors and any observations provided by the education provider, will be considered at a future meeting of the ETC. At this meeting, the ETC will determine whether proceedings for the consideration of non-approval of the programme should be commenced in accordance with Article 18(4) of the Health and Care Professions Order 2001. At the meeting, the ETC may decide to:
- approve the programme;
- commence non-approval proceedings; or
- direct the executive to undertake any other course of action it deems necessary to inform its decision regarding the approval of the programmes.

In reaching this decision, the ETC will
- provide reasons for their decision; and
- provide the Executive with any necessary instructions to give effect to the decision.

If the Committee is minded to not approve the programme, the education provider will have a 28 day period to provide observations on this decision, which will then be taken

to a future Committee meeting alongside the visitors' report. At that future meeting, the Committee will make a decision about whether to not approve the programme.

### 3.2 The programme must be effectively managed.

**Condition:** The education provider must clarify the roles and responsibilities of staff on the programme.

**Reason condition not met:** From the conditions responses, the visitors were aware that the programmes would now be situated in the School of Healthcare Practice. They considered that this could potentially be helpful for the programmes, by giving them access to more institutional support. However, from the organisational map provided, they were unable to determine how the programmes' management would be integrated into the new School. It was not clear, for example, how the individual Course Co-ordinators would collaborate with the senior management or committee structures of the School.

Additionally, the visitors could not determine whether the programmes would be effectively managed on an operational level. The person appointed to the role of Course Co-ordinator for the occupational therapy programme has no previous experience in such roles and has relatively limited experience in higher education. While this is not necessarily a problem in itself from an HCPC perspective, the education provider did not identify specific support mechanisms for this individual that would support them in managing a programme effectively.

For both programmes, it was not clear who would hold responsibility for a number of the modules. It appeared to the visitors that this was because appropriate staff were not available, and they did not see evidence of a plan for recruitment to make up any deficit or deficiencies in staffing. The education provider suggested that the delivery of these modules would be supported by Course Co-ordinators, but it was not clear how this would be achieved.

Therefore, the visitors were not satisfied that this condition is met.

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

**Condition:** The education provider must demonstrate how they will ensure that subject areas are delivered by educators with relevant specialist knowledge and expertise.

**Reason condition not met:** In the initial condition, the visitors requested more detail about the education provider's plans for recruitment so that the programme could be effectively delivered. A recruitment plan was provided as part of the first conditions response but this plan did not contain an appropriate level of detail about the roles and responsibilities of the new staff members. The first conditions response also did not contain information about what use would be made of external staff, such as visiting lecturers, in delivering the programme. During the visit the programme team and senior team had stated that visiting lecturers would be used to deliver parts of the programme where there were gaps in expertise or knowledge of the permanent staff. However, the visitors have not been able to view plans for this.

The second conditions response included evidence relating to programme management, and job descriptions for module leads. From this evidence, it appears that the education provider has not recruited staff to these roles. The visitors were not able to make a judgment about the suitability of any of these staff as they did not have their details. The education provider did not submit evidence relating to planned recruitment to the roles, or to alternative methods of covering the subject areas, for example visiting lecturers or part-time staff.

Therefore, the visitors were not satisfied that this condition is met. They considered that there was a link between this condition and the outstanding condition under SET 3.2.

### 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 demonstrate how they will ensure that the programmes' learning outcomes are worded in such a way that it is clear how they are related to the standards of proficiency.

**Reason condition not met:** In their second conditions response the education provider provided an updated mapping exercise that was intended to show a closer alignment between each programmes' learning outcomes and the standards of proficiency (SOPs) for the professions. The visitors had requested this so that they could determine whether the learning outcomes and the SOPs were appropriately aligned, in order to be satisfied that the programme would enable learners to meet the SOPs. However, the visitors were not clear from this exercise how specific learning outcomes were linked to particular SOPs. In the mapping table, multiple SOPs were mapped to each of the two learning outcomes for each module, but it was not clear to the visitors how learners' meeting the learning outcome would be linked to particular SOPs. The visitors noted the learning outcomes were not sufficiently detailed enough to determine alignment to the SOPs. As a result, the visitors were unable to make a decision about whether the learning outcomes were appropriately related to the SOPs.

They also considered that the way in which learning outcomes were presented in the practice-based learning modules might not ensure that learners were able to meet the SOPs. This was because all the practice modules had learning outcomes aligned to the same SOPs, and so it was not clear that learners would be enabled to progress and develop their understanding appropriately as they moved through the programme.

For the occupational therapy programme, from the second conditions response, the visitors considered that there was an additional area of concern related to the SOPs. As well as noting the lack of clarity around the alignment of learning outcomes and SOPs noted above, the visitors were not clear that the learning outcomes in certain modules were fit for purpose. This was because the SOPs state that practitioners must understand "key concepts of the knowledge base relevant to their profession" (section 13) and "be able to draw on appropriate knowledge and skills to inform practice" (section 14). The visitors considered that for learners on a programme to demonstrate that they can meet these SOPs, the learning outcomes for the programme need to refer to up-to-date and relevant knowledge and expertise. At the moment, the visitors cannot see how the learning outcomes deliver the knowledge base of occupational therapy as required by the SOPs. Some of the particular areas that the visitors considered were not appropriately covered in the learning outcomes for the occupational therapy programme include:

- Patient management over the life cycle
- Occupational therapy practice and treatment interventions
- First interventions in occupational therapy.

In light of the above, the visitors were not satisfied that this condition is met.

## 5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

**Condition:** The education provider must demonstrate how they will ensure that learners have access to an appropriate range of practice-based learning.

**Reason condition not met:** In their response the education provider provided more detail clarifying how they will ensure that the content of the programmes is matched by the practice-based learning available. For the physiotherapy programme, the visitors were satisfied from the education provider's first conditions response that the range of practice-based learning would support the delivery of the learning outcomes and the standards of proficiency (SOPs). However, the visitors were unclear what practice-based learning had been secured to support the mental health and community-based working components of the occupational therapy programme. This is an issue because these settings are likely to be a key part of modern occupational therapy practice, and the SOPs for occupational therapists require practitioners to be able to practice safely and effectively across this range of settings. For example, the SOPs say that they must "be able to draw on appropriate knowledge and skills to inform practice" and "be able to practise as an autonomous professional". The visitors considered that if learners do not have access to clinical experience in key areas of practice, then the range of practice-based learning would not support the achievement of the SOPs.

The second conditions response included information relating to audit of practice-based learning and plans for working with the University of Bedfordshire's Quality Education Partnership Liaison, as well as a high-level flowchart for developing new placements. However, it was still not clear to the visitors that an appropriate range of practice-based learning would be in place for occupational therapists. They did not see evidence, for example, of a timeframe for developing new practice-based learning in the necessary areas, or agreements with practice partners.

Therefore, the visitors were not satisfied that this condition is met.

**Education and Training Committee Panel**

**Programmes in respect of which approval is recommended subject to conditions**

| | |
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| **Programme name** | BSc (Hons) Occupational Therapy |
| **Education provider** | University of Bedfordshire |
| **Mode of delivery** | FT (Full time) |
| **Assessment ref** | APP01859 |
| **Date of decision** | 5 December 2018 |

**Panel:**   Stephen Wordsworth (Chair)   Sonya Lam
Maureen Drake   Joanna Mussen
Luke Jenkinson

| **Decision** |
|---|
| That the Visitors' report (including the conditions and recommendations in the report) should be accepted. |
| **Reasons** |
| The Panel is satisfied that the conditions in the Visitors' report must be met before the programme can be approved or before the ongoing approval of the programme can be confirmed. |

**Signed: Stephen Wordsworth, Panel Chair**

**Education and Training Committee Panel**

**Programmes in respect of which approval is recommended subject to conditions**

| Programme name | BSc (Hons) Physiotherapy |
|---|---|
| Education provider | University of Bedfordshire |
| Mode of delivery | FT (Full time) |
| Assessment ref | APP01860 |
| Date of decision | 5 December 2018 |

**Panel:**    Stephen Wordsworth (Chair)    Sonya Lam
Maureen Drake    Joanna Mussen
Luke Jenkinson

| Decision |
|---|
| That the Visitors' report (including the conditions and recommendations in the report) should be accepted. |
| **Reasons** |
| The Panel is satisfied that the conditions in the Visitors' report must be met before the programme can be approved or before the ongoing approval of the programme can be confirmed. |

**Signed: Stephen Wordsworth, Panel Chair**

**University of Bedfordshire**

**Observations on HCPC Visitors' Recommendations**

**BSc (Hons) Occupational Therapy & BSc (Hons) Physiotherapy**

Since the approval event the Occupational Therapy and Physiotherapy courses have moved from the School of Sports Therapy and Rehabilitation (which has now been closed) to the School of Healthcare Practice.

Under my guidance and leadership as Head of School, the School of Healthcare Practice has an established long-standing record of offering healthcare courses, including those approved by the Health and Care Professions Council (HCPC) and the Nursing and Midwifery Council (NMC). We have successful HCPC approved courses in Operating Department Practice and Paramedic Science and take pride in the fact that we have contemporary and innovative courses which produce high calibre healthcare professionals fit for future services and which regularly score highly in the National Student Survey.

The rationale for moving the Occupational Therapy and Physiotherapy courses to the School was to create opportunities for multi-professional learning and teaching due to synergies in curricula content. It also provides a support network for course teams who share common values and ideals in the delivery of healthcare practice within their specific fields.

I acknowledge that there have been difficulties with the original submission documentation, particularly relating to the approval of the Occupational Therapy course, but under my direction and with the support of an experienced Portfolio Lead for Allied Health Professions and Midwifery, we can provide you with the necessary reassurance on the quality and provision of these two courses. However, if it would reassure you further we would propose working with an external consultant, on your recommendation, who could work with the course teams to support the curriculum developments.

The Physiotherapy and Occupational Therapy courses have been planned for some time as an extension to our current allied health professions programs and as part of a longer-term strategy to develop HCPC courses and apprenticeships across the Faculty. Our VC is committed to supporting and resourcing of these courses as part of a five-year resource plan, which includes provision for staffing. We have a sustainable plan for the future, building on our experience as we proceed and resourcing ahead of students rather than in their wake. We have invested in infrastructure to support these courses plus the technical support and simulation facilities (both facilities and software) to enhance the student experience.

In response to the visitor's observations I have attached to this document a table of issues relating to the visitor's conditions and our narrative of how we have since reviewed the documentation to meet the SETs following the transfer of the courses into my School. We now consider that we can meet the conditions relating to the SETs and request your support in:

- Re-visiting us at the earliest opportunity to discuss the changes that we have already implemented;
- Providing us with another opportunity to supply you with the necessary documentation and reassurance, in a robust and comprehensive manner, to show how we have met the requirements of the HCPC SETs.

We thank you in advance for considering our request.

Dr Barbara Burden
Associate Dean and Head of School Healthcare Practice
RN, RM, ADM, PGCEA, MSc Social Research, MBA (HEM), SFHEA, PhD

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hcpc health & care professions council

| Standards of education and training (SET) | How did you meet the original SET/Conditions? | How do you now meet the SET? | In which document / page of the document provided can this information be found? |
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| **3. Programme management and resources** | | | |
| **3.2** The programme must be effectively managed. | From the conditions responses, the visitors were aware that the programmes would now be situated in the School of Healthcare Practice. They considered that this could potentially be helpful for the programmes, by giving them access to more institutional support. However, from the organisational map provided, they were unable to determine how the programmes' management would be integrated into the new School. It was not clear, for example, how the individual Course Coordinators would collaborate with the senior management or committee structures of the School. | The organization and management of courses within the School of Healthcare Practice are assigned to specific Portfolios. The School currently has three established Portfolios:<br>• Pre-registration Nursing;<br>• Allied health professions and midwifery and<br>• Postqualifying healthcare education.<br><br>The Occupational Health and Physiotherapy courses are now located within the Portfolio of Allied Health Professions and Midwifery, which includes other HCPC approved courses, such as paramedic science and operating department practice. This is an established Portfolio with an experienced Portfolio Lead who has overall responsibility for the quality of the provision, supporting and leading staff to ensure a high standard of the student experience.<br><br>The management structure is linear with Unit Leads reporting to the Course Coordinator, Course Coordinator reporting to the Portfolio | **Annexe 1:** School Organogram<br>**Annexe 2:** University's Quality Handbook Chapter 1: Introduction and Framework |

| | | Lead, who in turn reports to the Head of School (Annexe 1: School Organogram).

The Head of School holds regular meetings with Course Coordinators and Portfolio Leads to provide strategic direction and monitors adherence to university policies and standards. The Portfolio Leads hold regular meetings with Course Coordinators to plan and support the implementation of University and professional body standards and procedures. Course Coordinators then operationalise the course with the unit leads and other staff.

The Portfolio Leads chair their own Portfolio Committee Meetings, which act as the main channel of communication between the Faculty Academic Board and University Academic Board, course teams and students. Membership includes, Unit Leads, Course Coordinators, student representatives and practice partner representatives. The University's Quality Handbook Chapter 1: Introduction and Framework, describes the terms of reference for Portfolio Executive Committees (Annexe 2). Some of the key purposes of the Portfolio Executive Committee include: maintaining the academic standard of courses and units, ensuring that decisions affecting the quality of the students' learning experience are directly informed by students' views; ensuring curriculum currency and | |
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| | | consider issues raised in course team meetings.<br><br>Portfolio specific interim Examination Boards are held and chaired by the Head of School. Course Coordinators and Unit Leads are required to attend to present their assessment outcomes and to answer queries relating to these. Examination Boards report to Scheme Boards at University level. | |
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| | Additionally, the visitors could not determine whether the programmes would be effectively managed on an operational level. The person appointed to the role of Course Co-ordinator for the occupational therapy programme has no previous experience in such roles and has relatively limited experience in higher education. While this is not necessarily a problem in itself from an HCPC perspective, the education provider did not identify specific support mechanisms for this individual that would support them in managing a programme effectively. | We acknowledge that this condition related to the Occupational Therapy course only as the Course Lead for the Physiotherapy course is an experienced academic at the University.<br><br>Course Coordinators roles are fulfilled by academics with significant experience within the relevant field of practice. The newly appointed Course Coordinator for the Occupational Therapy course was appointed because she had significant experience as a senior occupational therapist with teaching experience.<br><br>The University adopts a number of strategies to support newly appointed Course Coordinators to develop confidence in their role. These include:<br>• An induction programme to prepare them for their new role. The new OT Course | **Annexe 3:** Staff induction programme for OT Course Coordinator<br>**Annexe 4:** Probationary year booklet<br>**Annexe 5:** Staff development calendar<br>**Annexe 6:** Centre for Learning Excellence Professional Teaching Scheme (workshops and short courses) |

| | | Coordinator has already completed this induction. Including meeting with senior staff within the School, such as the Director of Practice Learning and the PL in Healthcare and Quality Enhancement, to explore their roles and the support they could provide.<br>• Commencing a probationary period of one year during which regular meetings are held with the Head of School. The HoS has already met with the OT Course Coordinators and course and developmental objectives have been agreed.<br>• Mentorship offered by an experience academic leader who is knowledgeable about the University's values, policies and procedures. In this instance this being provided by the Portfolio Lead who many years previous experience as a Course Coordinator.<br>• Allocation of a 'buddy' who is an experienced Course Coordinator within the Portfolio and who supports the new OT Course Coordinators with day-to-day aspects of the course coordinators role.<br>• Training and development pertinent to the role of Course Coordinator offered by the Centre for Learning Excellence. These include sessions and guidance on: annual course and unit monitoring, curriculum development, preparation for Examination Boards, marking and | |
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| | | moderation processes, use of the virtual learning environment, and working in teams. The OT Course Coordinator has already accessed many of these as part of her developmental objectives. | |
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| | For both programmes, it was not clear who would hold responsibility for a number of the modules. It appeared to the visitors that this was because appropriate staff were not available, and they did not see evidence of a plan for recruitment to make up any deficit or deficiencies in staffing. The education provider suggested that the delivery of these modules would be supported by Course Co-ordinators, but it was not clear how this would be achieved. | Since the transfer of the courses to the School of Healthcare Practice, we have advertised and appointed additional staff for both courses. All units within years one and two of both courses have named Unit Leads. We plan to advertise additional substantive posts in the Autumn 2019 once the course has been approved. This is an approach that we have used successfully in the past, for example with our operating department practice programme.<br><br>Unit Leads are supported in unit delivery by other academics from within the School who have been assigned to teach the non-field specific content for which they have expertise, for example, mental health teachers provide expertise on mental health conditions such as Dementia. | **Annexe 7:** Hourly paid staff advertisement<br>**Annexe 8:** List of unit leads and allocated units<br>**Annexe 9:** CVs |
| **3.10** Subject areas must be delivered by educators with relevant specialist knowledge and expertise | In the initial condition, the visitors requested more detail about the education provider's plans for recruitment so that the programme could be effectively delivered. A recruitment plan was provided as part of the first conditions response but this plan did not contain an appropriate level of detail about the | We acknowledge that at the time of the approval visit date in September 2018 substantive appointments had not been made to either Course Coordinator role. Since the approval event we have:<br>• Recruited a Course Coordinator for Physiotherapy (Annexe 9)<br>• Recruited a Couse Coordinator for Occupational Therapy (Annexe 9) | **Annexe 2:** University's Quality Handbook Chapter 1: Introduction and Framework (role and responsibilities of the course coordinator)<br>**Annexe 8:** List of unit leads and allocated units<br>**Annexe 9:** CVs |

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| | roles and responsibilities of the new staff members. The first conditions response also did not contain information about what use would be made of external staff, such as visiting lecturers, in delivering the programme. During the visit the programme team and senior team had stated that visiting lecturers would be used to deliver parts of the programme where there were gaps in expertise or knowledge of the permanent staff. However, the visitors have not been able to view plans for this. | Both staff are:<br>• Registered with the HCPC in their respective fields of practice (Annexe 9)<br>• Responsible for coordinating course activities whilst leading field specialist units in year one of the course (Annexe 2).<br>The School recruitment plan for OT and PT provides evidence of the strategy in place for subsequent recruitment to support both courses (Annexe 10).<br><br>In support of the Course Coordinators the following teaching support has also been agreed:<br>• A range of additional teaching staff from within the School with knowledge and expertise appropriate to the units being taught have been identified to teach to the courses. These include: midwifery staff teaching midwifery related anatomy and physiology; mental health lecturers providing teaching on mental health conditions and the impact of these on daily living and recovery; and ODP team members teaching HCPC professional values (Annexe 9).<br>• Hourly paid staff have been identified, following successful advertising, to assist in teaching to the units of study (Annexe 8 and 9).<br>• Practice partner staff with specialist expertise and knowledge have agreed to | **Annexe 10:** School Recruitment plan for OT and PT staff |

| | | provide support as Guest Lecturers (Annexe 9). | |
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| | The second conditions response included evidence relating to programme management, and job descriptions for module leads. From this evidence, it appears that the education provider has not recruited staff to these roles. The visitors were not able to make a judgment about the suitability of any of these staff as they did not have their details. The education provider did not submit evidence relating to planned recruitment to the roles, or to alternative methods of covering the subject areas, for example visiting lecturers or part-time staff. | Suitably qualified staff, with specialist expertise, have now been appointed to supplement the current Course Coordinators.<br>All Hourly Paid Lecturers (visiting lecturers) have been:<br>• recruited to the teaching team because of their specialist areas of expertise or teaching (Annexe 9).<br>• Employed to work closely with the Course Coordinators to ensure a good student experience;<br>• Recruited as their specialist skills can be mapped against the curriculum content and can influence the units that they are assigned to lead (Annexe 9).<br><br>In the current round of recruitment for Hourly Paid Staff (visiting lecturers) we have appointed two additional Occupational Therapist and two Physiotherapists to complement the teams. | **Annexe 9:** CVs<br>**Annexe 10:** School Recruitment plan for OT and PT staff |
| **4. Curriculum** | | | |
| **4.1** The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register. | In their second conditions response the education provider provided an updated mapping exercise that was intended to show a closer alignment between each programmes' learning outcomes and the standards of proficiency (SOPs) for | We agree that in response to the conditions there is a lack of clarity concerning the mapping of unit learning outcomes to SOPs. Within the School of Healthcare Practice, we have substantial experience of undertaking mapping exercises to academic and professional benchmarks for our HCPC and | **Annexe 11:** Mapping of SOPs to unit learning outcomes |

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| | the professions. The visitors had requested this so that they could determine whether the learning outcomes and the SOPs were appropriately aligned, in order to be satisfied that the programme would enable learners to meet the SOPs. However, the visitors were not clear from this exercise how specific learning outcomes were linked to particular SOPs. In the mapping table, multiple SOPs were mapped to each of the two learning outcomes for each module, but it was not clear to the visitors how learners' meeting the learning outcome would be linked to particular SOPs. The visitors noted the learning outcomes were not sufficiently detailed enough to determine alignment to the SOPs. As a result, the visitors were unable to make a decision about whether the learning outcomes were appropriately related to the SOPs. | NMC courses. We typically take the SOPs as a starting point and map course and unit learning to each of these in turn to ensure that all SOPs are achieved within the course and not the other way around. The rationale for this is that any particular SOP maybe addressed within one or more units. This mapping exercise has been amended using the School's approach to mapping for PSRBs. | |
| | They also considered that the way in which learning outcomes were presented in the practice-based learning modules might not ensure that learners were able to meet the SOPs. This was because all the practice modules had learning | Based on experience of working with PRSBs within the School, we have reviewed the mapping of SOPs to learning outcomes and acknowledge that the mapping lacked detail and specificity. The Schools approach to learning in practice is to convey a staged developmental approach to practice learning | **Annexe 11:** Mapping of SOPs to unit learning outcomes |

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| | outcomes aligned to the same SOPs, and so it was not clear that learners would be enabled to progress and develop their understanding appropriately as they moved through the programme. | with students being required to meet specific proficiencies at different points within their course and across units. We have therefore:<br><br>• Revisited and remapped each unit with a practice focus to SOPs relevant to that unit.<br>• Reflected the mapping within the practice assessment documents, to provide a mechanism for linking unit learning outcomes to practice learning.<br>• Reviewed the current Practice Placement documentation for both Occupational Therapy and Physiotherapy courses to ensure a developmental approach to the achievement of SOPs throughout the courses<br>• Considered adopting the regional practice assessment documents for both courses used by universities across HEE Midlands and East, which have already been approved by the HCPC. | |
| | For the occupational therapy programme, from the second conditions response, the visitors considered that there was an additional area of concern related to the SOPs. As well as noting the lack of clarity around the alignment of learning outcomes and SOPs noted above, the visitors were not clear that the learning outcomes in | We acknowledge that some of the learning outcomes may not provide sufficient assurance that all of the SOPs will be achieved. To some extent this is symptomatic of the University convention of having only two learning outcomes. However, we have extensive experience within the School of achieving HCPC approval using this approach. | **Annexe 12:** Unit Information Forms |

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| | certain modules were fit for purpose. This was because the SOPs state that practitioners must understand "key concepts of the knowledge base relevant to their profession" (section 13) and "be able to draw on appropriate knowledge and skills to inform practice" (section 14). The visitors considered that for learners on a programme to demonstrate that they can meet these SOPs, the learning outcomes for the programme need to refer to up-to-date and relevant knowledge and expertise. At the moment, the visitors cannot see how the learning outcomes deliver the knowledge base of occupational therapy as required by the SOPs. Some of the particular areas that the visitors considered were not appropriately covered in the learning outcomes for the occupational therapy programme include:<br><br>• Patient management over the life cycle<br>• Occupational therapy practice and treatment interventions<br>• First interventions in | We have therefore reviewed the course documentation to:<br><br>• strengthen the learning outcomes to ensure they are fit for purpose;<br>• provide more detailed syllabus content to ensure it is contemporary and reflects current and future practices<br>• contain a comprehensive mapping of course and unit learning outcomes against the SOPs to provide reassurance that units draw upon contemporary evidence-based knowledge and skills.<br>• Ensure that OT learning outcomes and unit content include patient management, treatment interventions; contemporary OT practice and first interventions in care. | |

| | | occupational therapy. | | |
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**5. Practice Placement**

| **5.2** The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency. | In their response the education provider provided more detail clarifying how they will ensure that the content of the programmes is matched by the practice-based learning available. For the physiotherapy programme, the visitors were satisfied from the education provider's first conditions response that the range of practice-based learning would support the delivery of the learning outcomes and the standards of proficiency (SOPs). However, the visitors were unclear what practice- based learning had been secured to support the mental health and community-based working components of the occupational therapy programme. This is an issue because these settings are likely to be a key part of modern occupational therapy practice, and the SOPs for occupational therapists require practitioners to be able to practice safely and effectively across this range of settings. For example, the SOPs say that they must "be able to draw on appropriate knowledge and skills | We acknowledge that the visitors were satisfied with the range of placements available for physiotherapy students. Following the move of the Occupational Therapy course to the School of Healthcare Practice, the Director of Practice Learning has been working closely with practice partners to identify and secure a range of placements which reflect current OT practice.

Since the approval event we have secured placements for Occupational Therapy students with the:
- Local Mental Health Trusts
- Local Council, which provides community-based OT services.
- Local Acute Healthcare Trusts
It is anticipated that our local CCGs and acute and community Trusts will also provide placements.

The Portfolio Lead for Allied Health Professions and Midwifery accompanied by the Course Coordinator for Occupational Therapy have been meeting with the practice partners to explore the range of placements available within their organisations and discuss the support that the University can offer students and staff in | **Annexe 13:** Practice Partner Placement Profiles |
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| | to inform practice" and "be able to practise as an autonomous professional". The visitors considered that if learners do not have access to clinical experience in key areas of practice, then the range of practice- based learning would not support the achievement of the SOPs. | both preparation for students attending placements and support provided during placements. | |
| | In their response the education provider provided more detail clarifying how they will ensure that the content of the programmes is matched by the practice-based learning available. For the physiotherapy programme, the visitors were satisfied from the education provider's first conditions response that the range of practice-based learning would support the delivery of the learning outcomes and the standards of proficiency (SOPs). However, the visitors were unclear what practice- based learning had been secured to support the mental health and community-based working components of the occupational therapy programme. This is an issue because these settings are likely to be a key part of modern occupational therapy practice, and | We acknowledge that the visitors were satisfied with the range of placements available for physiotherapy students. Following the move of the Occupational Therapy course to the School of Healthcare Practice, the Director of Practice Learning has been working closely with practice partners to identify and secure a range of placements which reflect current OT practice.<br><br>We have secured Occupational Therapy placements with:<br>• Local Mental Health Trusts – dementia and mental health services; day care facilities<br>• Local Council, which provides community-based OT services – nursing homes; care homes; schools and day care facilities<br>• Local Acute Healthcare Trusts – inpatient assessment services across the lifespan | **Annexe 13:** Practice Partner Placement Profiles |

| | the SOPs for occupational therapists require practitioners to be able to practice safely and effectively across this range of settings. For example, the SOPs say that they must "be able to draw on appropriate knowledge and skills to inform practice" and "be able to practise as an autonomous professional". The visitors considered that if learners do not have access to clinical experience in key areas of practice, then the range of practice- based learning would not support the achievement of the SOPs. | Within the School we have an established network of schools that we access for student placements. These include early years, specialist schools, learning disability and special needs schools. We are currently in discussion with them regarding placements for OTs and are confident that they will extend placements to this group of students. | |
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