

HCPC approval process report

Education provider	University of Central Lancashire
Name of programme(s)	BSc (Hons) Occupational Therapy, FT (Full time) BSc (Hons) Occupational Therapy, PT (Part time)
Approval visit date	11 - 12 September 2018
Case reference	CAS-13063-Y9Y3X5

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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:

Rebecca Khanna	Occupational therapist
Jane Grant	Occupational therapist
Susanne Roff	Lay
John Archibald	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.

Darrell Brookes	Independent chair (supplied by the education provider)	University of Central Lancashire
Carl Nuttall	Secretary (supplied by the education provider)	University of Central Lancashire
Helen Roberts	External panel member	University of Derby
Caroline Livesey	External panel member	Blackpool, Fylde and Wyre Hospitals NHS Trust

Andy Ginty	Internal panel member	University of Central Lancashire
Kartina Choong	Internal panel member	University of Central Lancashire
Clair Parkin	Professional body representative	Royal College of Occupational Therapists – Education manager
Anne Longmore	Professional body representative	Royal College of Occupational Therapists – Representative
Julie-Anne Lowe	Professional body representative	Royal College of Occupational Therapists – Representative

Section 2: Programme details

Programme name	BSc (Hons) Occupational Therapy
Mode of study	FT (Full time)
Profession	Occupational therapist
First intake	01 September 2019
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP01891

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) Occupational Therapy
Mode of study	PT (Part time)
Profession	Occupational therapist
First intake	01 September 2019
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP01893

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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	Yes

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

Group	Met	Comments
Learners	Yes	This is a new programme, so the panel met with learners from the BSc (Hons) Physiotherapy programme.
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 16 November 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 their process for recognition of prior learning and experience.

Reason: From their review of the documentation and in discussions, the visitors were made aware there is a process for assessing applicant's prior learning and experience on a case-by-case basis. The visitors were made aware from a planning consent form that graduates with a Foundation Degree as an Assistant Practitioner who work within an Occupational therapy or a therapies service were able to have their prior learning assessed and recognised so they were able to start in the second year of the programme. However, the visitors could not see this communicated in other documentation for applicants. The visitors could not determine how or at what point in the programme learners from the foundation degree could apply for the BSc (Hons) Occupational Therapy at Level 5. The visitors could therefore not determine the information provided throughout the admissions process is clear and allows for informed decision-making. Therefore, the education provider needs to provide evidence of the programme's process for assessing applicants' prior learning and how this will be reflected in the information provided to both applicants and the education provider.

2.4 The admissions process must assess the suitability of applicants, including criminal conviction checks.

Condition: The education provider must provide assurance about their process for applicant criminal conviction checks for candidates from outside the UK enables them to assess the suitability of applicants in an appropriate way.

Reason: From the review of the documentation provided and in discussions at the visit, the visitors were made aware that applicants had to demonstrate a satisfactory enhanced disclosure and barring check. As this check is appropriate for UK applicants, the visitors were not clear as to the process for international applicants. The visitors therefore require the education provider to review information and provide clarification as to the process for carrying out criminal conviction checks when assessing the suitability of applicants from outside of the UK.

3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.

Condition: The education provider must demonstrate all learners on the programme will have sufficient resources to support their learning and the educators will have the appropriate resources to deliver the programme effectively.

Reason: In the resources presentation at the visit, the visitors were made aware the education provider is developing a purpose-built occupational therapy facility. This facility included two learning areas, a flat set-up including two supporting skills technicians and clinical skills lab facilities. On the tour of facilities, the visitors were able

to view teaching and learning areas and resources, and discuss resourcing of the programme. However, the new facilities, which are being proposed as a dedicated space for occupational therapy learners were still being developed. Also, the visitors were not provided with any supplementary information around the planning for this new facility. As such, the visitors were not clear what physical teaching space and facilities there will be for learners and educators on the programmes and what facilities will be dedicated to the programmes. In particular, it was not clear whether learners on the programmes would be using the resources alongside learners from other programmes, and if so, how they will be timetabled.

Based on these findings the visitors were not satisfied learners and educators will have access to sufficient learning resources to support learning in all settings. They could not be certain the education provider would have the resources and be able to use the rooms effectively for the projected number of learners on the BSc (Hons) Occupational Therapy programmes if they were going to be alongside learners from other programmes. As such, the education provider must provide further evidence to demonstrate all the learners on the programme will have sufficient resources to support learning and the educators will have the appropriate resources to deliver the programme effectively.

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 review the documentation to make sure it is clear which programmes provide eligibility to apply for admission to the Register and which do not.

Reason: For this standard, the visitors were directed to the course handbook, programme specification and module descriptors. The visitors noted that the exit awards for this programme are the Bachelor Degree Rehabilitation Studies, Diploma of Higher Education Rehabilitation Studies and the Certificate of Higher Education. Firstly, the visitors were unsure what the names of the latter exit award was as there was no programme title attached to the award. However, when reviewing the programme specification the visitors did not also see any evidence of how learners and educators will be made aware these exit awards will not lead to eligibility to apply for admission to the Register. The education provider must review its documentation to clearly specify what programme will lead to eligibility to apply for registration with HCPC, the exit awards for this programme, and that they do not lead to eligibility to apply for registration with the HCPC.

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 learners will be able to learn with and from professionals and learners in other relevant professions.

Reason: For this standard, the visitors were provided with evidence within the course handbook and the practice placement information document. The visitors were made aware there is an IPE group, staffed from all schools within the faculty. The learners said they were expected to have IPE experience in the practice-based learning setting. In the meeting with the senior team the visitors were informed the education provider's

overarching IPE strategy was not yet developed. The programme team informed the visitors they were hoping the design principles for the MSc Occupational Therapy would feed into IPE for the undergraduate programme. The visitors were informed there were links between the programme and social care provision in practice-based learning and colleagues from Pharmacy, and that they were to work on shared sessions with physiotherapists.

The visitors were unclear about the education provider's plans for developing an IPE strategy, and how this would lead to planned and meaningful IPE engagement for learners on this programme. They were unclear how the IPE will ensure learners are able to learn with and from professionals and learners from other relevant professions and how the education provider had decided which professions are most relevant to the programme and most useful for preparing learners for practice. Therefore, the education provider must provide further evidence on the design, delivery and long-term development of IPE on the programme, and how this ensures it is relevant for learners and is beneficial for their future practice.

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

Condition: The education provider must demonstrate they have a process in place for obtaining consent from learners where appropriate.

Reason: In discussions at the visit, the learners informed the visitors there is a consent process. During the visit, the visitors received a copy of the consent form, and accompanying information for learners, for the BSc (Hons) Physiotherapy programme. The visitors did not receive a consent form for the programmes under review but were informed the same format of form and information would be used. From their review of this document, the visitors were not clear the process for obtaining consent from learners was in place. The visitors therefore require the education provider to demonstrate they have an effective and up-to-date process in place for obtaining formal consent from learners on the programme where appropriate.

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

Condition: The education provider must review their documentation to ensure learners are able to give informed and appropriate consent.

Reason: In discussions at the visit, the learners informed the visitors there is a consent process. During the visit, the visitors received a copy of the consent form, and accompanying information for learners, for the BSc (Hons) Physiotherapy programme. The visitors did not receive a consent form for the programmes under review but were informed the same format of form and information would be used. The visitors noted the form contained language which could prove to be confusing to learners. The visitors are therefore concerned the learners would not be fully aware of any implications from signing the form, and so informed consent could not be obtained. As such, the visitors require the education provider to review the documentation to ensure it is clear for obtaining appropriate consent from learners.

5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Condition: The education provider must demonstrate the system used to approve and ensure the quality of practice-based learning in role emerging environments is thorough and effective.

Reason: In a review of the documentation and from discussions at the visit, the visitors understood there is a practice-based learning audit process in place. The visitors were made aware from the documentation practice-based learning providers are visited by a member of the programme team or Work Based Learning Team prior to the approval of the placement in order to complete a Learning Environment Audit. At the visit, the education provider provided the visitors with the North West Learning Environment Educational Audit, which is completed to approve new practice-based learning settings and to monitor the quality of existing ones.

The visitors were satisfied the current audit process is effective in approving traditional, practice-based learning environments. These environments are normally situated within larger organisations (e.g. NHS Trusts), where there are established governance arrangements around the provision of suitable placements, and they usually involve registered occupational therapists in direct supervision and oversight of learners.

However, the visitors were not satisfied this same audit system is effective to ensure role emerging practice-based learning environments provide suitable opportunities for learners. In particular, the visitors noted these environments could be placed within smaller settings with long-arm, and not direct, supervision from registered occupational therapists. Additionally, they noted such environments may not have the same experience in providing appropriate support and governance to the provision of practice-based learning. The visitors therefore require further evidence of the system used to approve and ensure the quality of practice-based learning in role emerging environments and how the education provider ensures it is thorough and effective.

5.4 Practice-based learning must take place in an environment that is safe and supportive for learners and service users.

Condition: The education provider must demonstrate the system used to approve practice-based learning in role emerging environments ensures the environment is safe and supportive for learners and service users.

Reason: In a review of the documentation and from discussions at the visit, the visitors understood there is a practice-based learning audit process in place. The visitors were made aware from the documentation practice-based learning providers are visited by a member of the programme team or Work Based Learning Team prior to the approval of the placement in order to complete a Learning Environment Audit. At the visit, the education provider provided the visitors with the North West Learning Environment Educational Audit, which is completed to approve new practice-based learning settings and to monitor the quality of existing ones.

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However, the visitors were not satisfied this same audit system is effective to ensure role emerging practice-based learning environments are suitable and support safe and effective learning. In particular, the visitors noted these environments could be placed within smaller settings with long-arm, and not direct, supervision from registered occupational therapists. Additionally, they noted such environments may not have the same experience in providing appropriate support and governance to the provision of practice-based learning. The visitors therefore require further evidence of the system used to approve practice-based learning in role emerging environments, and how the education provider ensures it is a safe and supportive environment for learners and service users.

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.

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

Recommendation: The education provider should consider further strengthening its system and strategy of moderation of practice-based learning assessments.

Reason: From the documentation provided and from the discussions during the visit, the visitors were informed about the system of moderation on the programme. The visitors were made aware the education provider has a moderation process for practice-based learning assessments and a policy for academic work. Results were examined at the education provider by an individual and also seen by external examiners. The visitors also heard the education provider is beginning to strengthen links for role-emerging placements, which could be in smaller settings with long-arm, and not direct, supervision from practice educators who may not be registered occupational therapists. Additionally, they noted practice educators in such environments may not have the same amount of experience in grading as those in traditional NHS-based practice-based learning settings. The visitors are satisfied the standard has been met. However, the visitors would recommend the education provider strengthen their systems of moderation, so the assessment strategy is more rigorous.

Section 5: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, 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 06 December 2018 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).