

## HCPC approval process report

Education provider	University of Huddersfield
Name of programme(s)	HCPC Annotation of existing Podiatrists practising Podiatric Surgery, Part time
Approval visit date	30-31 October 2018
Case reference	CAS-12995-V5D9Z5

### Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	4
Section 4: Outcome from first review.....	5
Section 5: Details of the visit to consider the first conditions response.....	13
Section 6: Outcome from second review .....	13
Section 7: Visitors' recommendation.....	17
Appendix 1 – decision notice from the Education and Training Committee (ETC) meeting 11 September 2019 .....	22

### 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 for podiatric surgery (for education providers) (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. For this particular visit, there is no Podiatric Surgeon on the panel, as this is within the rules around visitor section set out by the committee in June 2015.

Details of the HCPC panel for this assessment are as follows:

Gordon Burrow	Chiropodist / podiatrist (Prescription only medicines – administration)
Andrew Robinson	Orthopaedic surgeon
Susanne Roff	Lay
Tamara Wasylec	HCPC executive
Shaista Ahmad	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.

Sara Eastburn	Independent chair (supplied by the education provider)	University of Huddersfield
---------------	--	----------------------------

Julie Hogan	Secretary (supplied by the education provider)	University of Huddersfield
Kim Bryan	External panel member	College of Podiatry representative
Alison Hart	External panel member	College of Podiatry representative
Alan Borthwick	External panel member	College of Podiatry representative
John Malik	External panel member	College of Podiatry representative

## Section 2: Programme details

Programme name	HCPC Annotation of existing Podiatrists practicing Podiatric Surgery
Mode of study	PT (Part time)
Entitlement	Podiatrists practising podiatric surgery
Proposed first intake	01 August 2019 <sup>1</sup>
Maximum learner cohort	Up to 116
Intakes per year	1
Assessment reference	APP01864

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 meets our standards for the first time.

The education provider has developed and proposed a new route to train as a podiatrist practising podiatric surgery, which is based on prior learning and training. This programme is designed to assess trainees' prior experience through their formal education and career to date. Candidates will provide a portfolio of evidence which details how their previous education and work experience meets the learning outcomes for the programme, which are intended to ensure those assessed through the programme meet the HCPC standards for podiatrists practising podiatric surgery.

Using a panel of nine trainees who form a pilot group and academic staff, who will both assess the portfolio of evidence, the education provider will determine if the learning outcomes are met or not. The pilot group are elected to the College of Podiatry, Faculty of Podiatric Surgery committee and an academic who will be the independent moderator and chair of the group. The peer group will assess the reflective portfolio to determine if the HCPC standards for podiatrists practising podiatric surgery are met or not. The pilot group will then be able to assess claims of the remaining applicants who apply for annotation. There is no opportunity for trainees to make up experience after being assessed and there is no formal learning or teaching on the programme. There is also no opportunity for trainees to undertake practice placement experience. The programme itself consists entirely of the assessment of a trainees' experience, skills and knowledge.

---

<sup>1</sup> The programme was approved by the Education and Training Committee (ETC) in September 2019. This meant that the programme start date was moved to January 2020 by the education provider.

As part of the visit, the visitors assessed whether the programme can be exempted from SET D (practice placements), as proposed by the education provider. After scrutiny of the programme via documentation and at the visit, the visitors concluded that the programme could be exempted from SET 5 as:

- the education provider demonstrated through the approval process that this not a taught programme;
- no additional training can be undertaken once the student has been admitted onto the programme, and no advice or guidance will be provided by the education provider which could constitute a learning plan
- the assessment of the candidate is completely retrospective; and
- applicants to the programme must have worked in an appropriate surgical training environment, which will be demonstrated through the admissions process.

However, in order for the programme to be exempted from SET 5 and approved, all of the conditions in this report must also be met.

### 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	Reason(s) for non-submission
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	As this is a new programme, this document is 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. The visitors determined that a further visit is required to make an appropriate assessment of the response to the conditions. Any further visit would need to focus on the standards on which conditions have been set. This would include meetings with the programme team, senior team, and service users and carers. The education provider has suggested that the visit takes place on 18 and 19 March 2019 to allow the education provider sufficient time to prepare their response to the conditions and considering the start date of August 2019.

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 23 January 2019.

#### **A.1 The admissions procedures must give both the applicant and 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 provide further evidence of how it intends to communicate the programme costs trainees will incur whilst studying on the programme, which enables them to make an informed choice about taking up a place on the programme.

**Reason:** For this standard, the visitors were referred to the programme specification, which contained details about the admission criteria for the programme. However, there were no details provided about the costs trainees would incur for studying on the programme such as programme fees and potential travel or accommodation costs. Whilst at the visit, the visitors were provided with information about the fee structure and were made aware that other costs would be covered by the trainees. However, applicants were not aware of this information, therefore the visitors were concerned that without this information applicants would be unable to make an informed choice about the programme. Therefore, the education provider must provide further information demonstrating how applicants are provided with all the information they require to make an informed choice about whether to take up an offer of a place on the programme.

## **B.2 The programme must be effectively managed.**

**Condition:** The education provider must provide further evidence that there is a management structure in place to manage the programme effectively.

**Reason:** From a review of the memorandum of understanding tabled at the visit and from discussions at the visit, the visitors understood that the College of Podiatry (COP) would be willing to provide support for this programme and collaborate with the University of Huddersfield in areas of mutual interest. The visitors also read in the document tabled at the visit entitled, "Annotation of podiatric surgeons' agreement", the visitors noted that the education provider would receive funding from the COP for delivering this programme. The visitors also understood that the College of Podiatry will not play a formal role in the delivery of this programme and that any decisions regarding the programme delivery will be taken by the education provider, the University of Huddersfield. From a review of the documentation, the visitors understood that (COP) would advertise this programme to COP Fellows and would provide the education provider with a list of eligible applicants who they deem to meet the education provider's entry requirements. The visitors also noted that the education provider would conduct an interview process together with the members of the COP and service users and carers. The visitors were not clear whether the COP or the education provider would make the final decision about who would be accepted on to the programme. As such the visitors require some clarity around the nature of the relationship between the COP and the education provider. The visitors also require information detailing what the management structure of the programme is and what the role and responsibilities of the COP is, if any, in the delivery of the programme. Consequently, the visitors require further evidence, which outlines the roles and responsibilities of all parties involved in the management and delivery of the programme in order to demonstrate how the programme will be effectively managed.

## **B.5 There must be an adequate number of appropriately qualified, experienced and, where required, registered staff in place to deliver an effective programme.**

**Condition:** The education provider must demonstrate that there is an adequate number of appropriately qualified and, where required, registered staff in place to deliver and effective programme.

**Reason:** For this standard the visitors reviewed the curriculum vitae provided by the education provider in relation to this standard. Through their reading of the documentation and in discussions at the visit, the visitors understood that the individuals who would be responsible for assessing the portfolios of the trainee pilot group would be the trainees themselves. This pilot group would include one of the programme staff Matthew Rothwell. The visitors could not see how the education provider will ensure that the trainees would have the relevant qualifications or experience to enable them to assess portfolios on this programme. Additionally, the visitors could not determine how the trainees on this programme are prepared for their role in assessing trainee portfolios. As such, the visitors could not determine whether there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme. The visitors heard that the programme lead would moderate the portfolio assessments however they were unclear how the programme

lead had the appropriate qualifications and experience to assess trainees on this programme. Therefore, the visitors require evidence which demonstrates how they ensure that individuals with the appropriate skills and experience to assess and make a judgement, that the standards for podiatrists practicing podiatric surgery are met, will assess the portfolios for the pilot group on the programme. The visitors understood that individuals from the pilot group who successfully completed the programme would be employed on an affiliate lecturer basis to assess subsequent cohorts on the programme and felt this arrangement was appropriate.

#### **B.7 A programme for staff development must be in place to ensure continuing professional and research development.**

**Condition:** The education provider must demonstrate how they ensure that staff responsible for the delivery of this programme are supported in undertaking relevant continuing professional and research development.

**Reason:** To evidence this standard the visitors were directed to the staff curriculum vitae and programme specification. From the documentation, the visitors were unable to determine how the teaching staff maintained their research, teaching and professional development to enable them to deliver an effective programme. In the meeting with the programme team, the visitors were told that the programme team engages in some development. For instance, a member of the programme delivery team is currently undertaking professional training in podiatric surgery and were supported by the education provider to undertake professional development. However, from discussions with the programme team, the visitors could not determine what development opportunities are in place for affiliate lecturers or for others in the core staff team. The visitors were therefore, unable to gain a full understanding of the current participation from staff in research and continued professional development. The visitors were in particular unclear about how the trainees on the programme, who will assess each other's portfolio, will be supported to develop the required skills to assess the portfolios. Additionally, the visitors could not see how the same trainees who will become affiliate lecturers once they have successfully completed the programme, will be supported through their staff development to assess the subsequent cohorts of trainees. The visitors therefore require further information to evidence how the education provider ensures that staff, including affiliate lecturers, are supported to undertake relevant continuing professional and research development to ensure the delivery of an effective programme.

#### **B.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to trainees and staff.**

**Condition:** The education provider must ensure that the virtual learning environment resource used by staff and trainees is appropriate for the programme and developed before the planned start date for the programme.

**Reason:** The education provider delivered a presentation of the virtual learning environment (VLE). The visitors saw the information contained on the VLE was incomplete and not fully developed and that this would be the main learning resource trainees would use to complete their portfolio and gain access to pertinent information. The visitors saw some of the areas of the online portfolio trainees would have to complete as part of their portfolio of evidence, however they could not see how trainees are informed about how to complete the portfolio. The programme team explained that

they would provide guidance in the introductory day of the programme delivered at the education provider. The visitors were also told that trainees who could not physically attend the first day of the programme would be able to access resources via the VLE instead. However, the visitors did not have sight of what information would be provided to the trainees on that day or the resources that would be available on the VLE for those who could not attend physically which would help them to complete the portfolio. Therefore they could not make a judgement as to whether the information provided to support trainees to access and use the resource was sufficient and would effectively support the trainees to complete their portfolio via the VLE. The visitors therefore require further evidence of how the VLE is appropriate to the delivery of the programme and is readily available to trainees and staff.

### **B.13 There must be a trainee complaints process in place.**

**Condition:** The education provider must demonstrate the process for dealing with trainee complaints raised against other trainees who are tasked with assessing their peers on the programme.

**Reason:** From the programme documentation, the visitors noted that there is a trainee complaints process in place. From their review of the process and in discussions with the education provider, it was unclear to the visitors what the process is should a trainee make a complaint against a fellow trainee who is acting in the capacity of a peer assessor. As the trainees in the pilot group will be expected to assess and make a judgement on the work of their fellow trainees the visitors were unclear how the complaints process would work should a trainee raise a complaint about their assessors on the programme. The visitors therefore require further information about the process for trainees to make a complaint about a fellow trainee/assessor or appeal a decision made about the assessment of their portfolio. Additionally, the visitors require information about how the process for dealing with these complaints feeds in to the complaints process at the education provider and how trainees are informed of this process.

### **B.15 Throughout the course of the programme, the education provider must have identified any mandatory components and must have associated monitoring mechanisms in place.**

**Condition:** The education provider must identify mandatory components of the programme and the associated monitoring mechanisms, the consequences for not meeting these requirements, and demonstrate how this information is effectively communicated to trainees.

**Reason:** The education provider delivered a presentation of the virtual learning environment (VLE). The visitors saw the information contained on the VLE was incomplete and not fully developed. The visitors also heard trainees would be expected to attend a day in the academic setting to learn about expectations and requirements on the programme. For instance, trainees would be given information about support available to them and how to complete their portfolio by accessing the VLE. The visitors also heard trainees who could not attend the academic session could access the information using the VLE. The visitors heard that trainees must attend or engage via the VLE in the preparatory session at the start of the programme. Due to the physical attendance or virtual access requirements not being clearly defined at this stage, and the documentation not clearly stating the attendance requirement for trainees, the



visitors could not determine that trainees are aware of the mandatory attendance requirements for this programme. Additionally the visitors heard what could be done to monitor participation but could not determine that the education provider had a clear process in place for monitoring of required participation. It follows that the visitors could not determine how trainees would be made aware of these requirements or the consequences for not meeting requirements set out by the education provider. As such, the visitors require the following information to determine whether this standard is met:

- the elements of the programme where trainee attendance or access via the VLE is mandatory;
- how attendance or access of mandatory elements is monitored
- the consequences for trainees who do not meet the mandatory attendance or access requirements for the programme; and
- how trainees, clinical supervisors and staff are made aware of this information.

#### **B.16 Service users and carers must be involved in the programme.**

**Condition:** The education provider must demonstrate that there is a clear policy for service user and carer involvement on this programme, that the service users and carers are supported in their role and that this involvement is appropriate to the programme.

**Reason:** At the visit, the visitors met a service user who was involved in a podiatry programme delivered by the education provider. From discussions with the service user, the visitors noted that they were not involved in this programme. In discussion with the programme team, the visitors heard that service users and carers will form part of the programme board and will be involved in interviewing trainees. The visitors were not provided with minutes from programme board meetings to demonstrate service user and carer involvement. They also did not meet service users and carers with relevant experience to this programme who would be on the programme board and would interview trainees. They were also unable to establish how those service users and carers would be prepared for their role in the programme and the plan for continued service user and carer involvement in the programme. As such, they were unable to determine how service users and carers have been or will be involved in the programme. Therefore, the visitors require information, which demonstrates how service users and carers are involved in this programme, the plans to support them in their role and how their involvement is appropriate to the programme.

#### **C.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards for podiatrists practising podiatric surgery**

**Condition:** The education provider must clearly articulate how the learning outcomes for the programme ensure that those who successfully complete the programme meet the standards for podiatrists practicing podiatric surgery.

**Reason:** From their review of the programme specification, the visitors understood that there are four programme learning outcomes and the standards for podiatrists practising podiatric surgery were grouped together under learning outcome 3. From the documentation and discussions at the visit, the visitors understood that trainees are expected to be able to demonstrate they meet all of the learning outcomes by the time they complete the programme. The visitors noted that there is one assessment task for

the programme, which is to complete the portfolio; they also noted that the assessment criteria refers to the programme learning outcomes. However, the visitors were not provided with a completed portfolio which details how the standards for podiatrists practicing podiatric surgery, contained within learning outcome 3, would be contained within the portfolio. The visitors noted whilst an example of the portfolio was discussed during the visit when reviewing the VLE, along with evidence of a portfolio set sheet, they remained unclear how the portfolio is used to ensure trainees and assessors can clearly see where the standards and the wider learning outcomes would need to be demonstrated throughout the portfolio. As such, the visitors require documentation, such as detailed portfolio assessment content, which clearly articulates how trainees who successfully complete the programme cover the learning outcomes, which deliver the standards for podiatrists practicing podiatric surgery.

**C.5 The curriculum must make sure that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's code: standards of conduct, performance and ethics on their podiatric surgery practice.**

**Condition:** The education provider must clearly articulate how they ensure that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's code: standards of conduct performance and ethics on their podiatric surgery practice.

**Reason:** The visitors were directed to page 38 of the Student Handbook Partnership Statement Page 38 for this standard. The visitors noted that trainees are "advised" to ensure their practice is in line with the HCPC standards. In a presentation demonstrating the portfolio that trainees must complete the visitors could not determine how the education provider ensures that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's code: standards of conduct, performance and ethics on their podiatric surgery practice. For this standards to be met the visitors require additional information which demonstrates how the education provider ensures trainees understand the implications of above standards on their podiatric surgery.

**E.4 Assessment methods must be employed that measure the learning outcomes.**

**Condition:** The education provider must submit further evidence which demonstrates how the assessment method ensures an objective and consistent measure of the learning outcomes is carried out.

**Reason:** The visitors noted that the education provider was still developing the VLE and portfolio during discussions held at the visit. As articulated in the reasoning for the condition against standard C.1, this meant the visitors remained unclear how the learning outcomes ensure individuals will meet the required standards upon completion of the programme. In addition, the visitors were also unable to determine how the portfolio is structured to ensure it provided an objective and consistent assessment method to measure the learning outcomes. In particular, the visitors note the assessment criteria currently used are the learning outcomes. Although the learning outcomes, which are also the Standards for podiatrists practising podiatric surgery, describe what learners are expected to know, understand and be able to demonstrate, the visitors were unclear what indicators or criteria is used to assess that the learning

outcomes are achieved. As such, the visitors were unable to determine how this approach ensures objective and reliable assessments of portfolios are carried out by assessors. The visitors therefore require further evidence which demonstrates how the assessment of the portfolio will be structured which ensures learning outcomes are measured in an objective and reliable way.

#### **E.5 The measurement of trainee performance must be objective and ensure safe and effective podiatric surgery practice.**

**Condition:** The education provider must provide further evidence to demonstrate how the measurement of student performance is objective and ensures fitness to practise at placement.

**Reason:** Through their reading of the documentation and in discussions at the visit, the visitors understood that the individuals who would be responsible for assessing the portfolios of the pilot group of trainees would be the trainees themselves. The trainees would mark their peer's assessment on the programme. The visitors noted that the standards for podiatrists practicing podiatric surgery is the criteria which the portfolios are assessed against. However, the visitors could not see how trainees' performance on the programme could be objectively measured by a fellow trainee to ensure that they meet the standards, due to the conflict of interest. The visitors were told by the programme team that the peer reviews would be the first stage of assessment and would be followed up by an academic marking process completed by the programme lead. However, as the programme lead does not have any qualifications or experience in podiatric surgery the visitors could not determine how the two levels of assessment are appropriate and objective. Therefore, the visitors require evidence which demonstrates the assessment strategy which ensures trainee portfolios are assessed objectively and ensure safe and effective podiatric surgery practice.

#### **E.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.**

**Condition:** The education provider must provide further evidence to demonstrate what effective monitoring and evaluation systems are in place to ensure appropriate standards in the assessment.

**Reason:** Through their reading of the documentation and in discussions at the visit, the visitors understood that the individuals who would be responsible for assessing the portfolios of the pilot group of trainees would be the trainees themselves. The trainees would mark their peer's assessment on the programme. The visitors noted that the standards for podiatrists practicing podiatric surgery is the criteria which the portfolios are assessed against. The visitors were told by the programme team that the peer reviews would be the first stage of assessment and would be followed up by an academic marking process completed by the programme lead. However, as the programme lead does not have any qualifications or experience in podiatric surgery the visitors could not determine how the two levels of assessment ensure that the marks are moderated and the appropriate standards in assessment are achieved. Therefore, the visitors require evidence which demonstrates what moderation systems are in place and the monitoring and evaluation mechanisms which ensure appropriate standards in the assessment.

### **E.9 Assessment regulations must clearly specify requirements for a procedure for the right of appeal for trainees.**

**Condition:** The education provider must provide further evidence of the appeal procedure that is in place for this programme, how this process takes account of any procedure at the education provider and how this is communicated to students

**Reason:** In their review of the documentation the visitors noted that this programme is non-credit bearing. In discussions with the programme team, the visitors noted that there is an appeal process for credit-bearing, taught programmes at the education provider, and contained within the assessment regulations. The visitors also heard that this appeal procedure would also apply to this programme. However, they were unclear how the trainees and all involved in the delivery of the programme would be aware that the appeal procedure would apply to this programme, as it is non-credit bearing and does not have a taught element. As such the visitors require further evidence which describes the appeal procedure for trainees on this programme and how all involved in the programme would be made aware of this information.

### **E.10 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the Register.**

**Condition:** The education provider must provide further evidence to demonstrate that the assessment regulations clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the HCPC Register.

**Reason:** From reviewing the documentation, the visitors noted that the external examiner will be a professionally qualified podiatrist and an individual who is approved by both the education provider and the College of Podiatry. The visitors noted that the role of the external examiner is to ensure academic and professional standards are maintained on the programme. They did note that although the external examiner must be qualified in the podiatrist profession, there was no requirement in the assessment regulations for the external examiner to be registered with the HCPC or whether other arrangements would be agreed the HCPC. In discussion with the programme team the visitors were unable to determine how a podiatrist would have the necessary experience and qualifications in the practice area that would enable them to ensure that academic and professional standards for podiatrists practicing podiatric surgery are maintained on the programme. As such, the visitors require the education provider to review the assessment regulations to ensure that they specify the requirement for at least one external examiner to be appointed who is appropriately experienced and qualified in a relevant area of practice to ensure they can provide a level of appropriate and relevant, external quality assurance for the programme. Additionally, the assessment regulations should stipulate that the external examiner is from the relevant part of the Register unless other arrangements are agreed with the HCPC.

## Section 5: Details of the visit to consider the first conditions response

In order for us to progress with the visit to consider the first conditions response, we required a documentary response to the conditions 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.

Required documentation	Submitted
First response to the conditions contained in Section 4 of this report	Yes

The visit took place on 18 - 19 March 2019. We met the following groups as required in the recommendation by visitors' in section 4.

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

### HCPC panel for considering the conditions response

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. For this particular visit, there is no Podiatric Surgeon on the panel, and this is within the rules around visitor selection set out by the committee in June 2015.

Details of the HCPC panel for this assessment are as follows:

Gordon Burrow	Chiropodist / podiatrist (Prescription only medicines – administration)
Andrew Robinson	Orthopaedic surgeon
Roseanne Connolly	Lay
Tamara Wasylec	HCPC executive

## Section 6: Outcome from second review

### Second response to conditions required

The education provider responded to the conditions set out in section 4 and the visitors considered the response prior to and during a second visit to the education provider, as detailed in section 5 of this report. Following their consideration of this response, the visitors were satisfied that the conditions for several of the standards were met. However, they were not satisfied that the following conditions were met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following conditions are met, they require further evidence.

**C.5 The curriculum must make sure that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's code: standards of conduct, performance and ethics on their podiatric surgery practice.**

**Condition:** The education provider must clearly articulate how they ensure that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's code: standards of conduct performance and ethics on their podiatric surgery practice.

**Reason condition not met at this time:** From the documentation provided, the visitors understood that trainees would have a discussion regarding the HCPC's standards of conduct, performance and ethics (SCPEs) on their podiatric surgery, during the day at the university. The programme team told the visitors, that the trainees are expected to demonstrate their understanding of the implications of the SCPEs on their podiatric practice throughout the portfolio. The visitors considered the information provided in the portfolio of evidence, which is the reflective record used by trainees to demonstrate their skills, knowledge and competence. The visitors were unable to determine how the portfolio, as the main method of recording and ascertaining the trainees' understanding, and the discussion at the university provides the education provider with the means to assess learner's understanding. The visitors were also unable to see how trainees would be able to demonstrate clearly that they have understood the implications of the HCPC standards of conduct performance and ethics on their podiatric surgery practice within the portfolio. As such, the visitors require further evidence of the way in which the education provider ensures that trainees can demonstrate their understanding and the education provider can ensure the learner has understood, in order for this condition to be met.

**Suggested documentation:** Information within the portfolio and/or day at the university which clearly demonstrates how trainees are expected to demonstrate their understanding of the implications of the SCPEs on their podiatric practice and how the education provider checks their understanding.

**E.4 Assessment methods must be employed that measure the learning outcomes.**

**Condition:** The education provider must submit further evidence which demonstrates how the assessment method ensures an objective and consistent measure of the learning outcomes is carried out.

**Reason condition not met at this time:** The visitors were provided with information about the online, reflective portfolio trainees would complete and were satisfied that the majority of the learning outcomes, which ensure the standards for podiatrists practicing podiatric surgery are met, can be assessed through the portfolio. However, for the proficiency standard 1.11, the visitors cannot determine whether there was a robust assessment in place which ensures assessors can determine that trainees are able to competently undertake a range of surgical techniques within the foot and associated structures.

In reaching this position, the visitors note that the annotation route is based fundamentally on a holistic assessment of an individual's training, qualifications and

experience to date. In this regard, they acknowledge this approach assumes applicants to the programme have achieved and maintained competency to practice podiatric surgery to date (in absence of any specific regulatory requirements linked to annotation), and have done so as an HCPC-registered chiropodist / podiatrist working within an extended scope of practice. They also acknowledge such practice takes place in highly regulated environments, which contain established medical oversight and governance arrangements, comparable to other surgical regulated professions.

With this in mind, the visitors note the portfolio assessment is designed to establish continued competence, as it relates specifically to the HCPC standards, rather than as a measure to use to determine an individual's ability to practice for the first time. The visitors would of course always expect the latter would need to contain direct supervision and observation in practice. However, for the purposes of this route, the visitors are unclear how, in absence of any direct observation, the current portfolio assessment method provides enough assurance to be satisfied those currently practicing podiatric surgery meet the specific HCPC standard in question.

At the revisit, the visitors understood that trainees would be expected to provide evidence of the surgical techniques performed. For instance, a log and their reflections on that log of surgical techniques, and information which measures the surgical clinical outcomes and the surgery performed. The example provided was the College of Podiatry's (COP) database PASCOP (Podiatric and Surgical Clinical Outcome Measurement) which is a method of measuring clinical outcomes of the procedures performed by trainees, which is a tool accessible only to trainees who are members of the COP. The visitors noted that this is an example of the information trainees could provide, but they were unable to see from this example how trainees' competence in completing the surgical techniques was effectively assessed. In particular, the visitors noted there was no clear criteria set around what information a surgical log entry must contain, what elements of the surgical intervention should be reflected upon, the range of surgical interventions required (as a minimum) and how such a log and reflection is verified and supported by an appropriately qualified and experienced individual (ie a foot and ankle surgeon). Furthermore, in absence of this detail, the visitors could not determine how an effective assessment of such information could be undertaken to determine competence.

Additionally, the visitors were unclear from the information provided, how trainees and assessors would know the timeframe from which a learner could draw on their past experience (ie within a certain number of years). As such, the visitors were unable to make a judgement as to whether the currency of the practice the trainees are expected to reflect upon is appropriate and relevant.

Based on the visitors' position and their findings so far through this process, the visitors require evidence which demonstrates that the method used to assess whether trainees have achieved proficiency standard 1.11 is appropriate, in absence of direct observation of practice.

**Suggested documentation:** In providing this evidence, the education provider should seek to include:

- a rationale as to why the education provider's chosen assessment method is appropriate to assess this proficiency standard;

- further detail about the information trainees are required to submit within this section of the portfolio to achieve proficiency standard 1.11. This should include detailed criteria which specifies:
  - what a surgical log entry must contain,
  - what elements of reflections are required in relation to that log,
  - the range of surgical interventions required (as a minimum),
  - and the verification needed to be by an appropriately qualified and experienced individual (i.e. a foot and ankle surgeon)
- evidence which details the appropriate timeframe in which the learner's practical experience must have taken place so the learner and assessors are aware of the expectations and requirements of assessment and can ensure currency of experience; and
- evidence of assessment criteria used to determine how such how the information provided by the trainees can be objectively assessed to determine how an individual meets proficiency standard 1.11.

#### **E.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.**

**Condition:** The education provider must provide further evidence to demonstrate what effective monitoring and evaluation systems are in place to ensure appropriate standards in the assessment.

**Reason condition not met at this time:** The visitors are satisfied that the monitoring and evaluation mechanisms in place ensure appropriate standards in the assessment. The only exception to this is the required experience, ability and knowledge of the individual responsible for assessing the first cohort of trainees and who would take up the role of moderating the programme as external examiner thereafter. The visitors noted through the conditions response and in discussions at the revisit that the education provider would require someone who is able to perform foot and ankle surgery for instance, a vascular surgeon. However, the visitors were unable to see how a vascular surgeon could assess musculoskeletal surgery of the foot and therefore they are not clear on how the descriptor of the individual ensures that they are appropriately experienced and knowledgeable to ensure appropriate standards in the assessment for this programme. As such, the visitors require evidence of how the education provider will ensure that there is an appropriately qualified and relevantly experienced individual, to act as external assessor and external examiner for this programme. For instance, an orthopaedic foot and ankle surgeon (who is a member of a foot and ankle subspecialty association) or someone who is an HCPC annotated podiatrist practicing podiatric surgery. The visitors require this information to determine whether this standard is met.

**Suggested documentation:** Evidence of a person specification, or equivalent, which describes the criteria an individual must meet in order to be able to assess the trainees' portfolios and/or be the external examiner for this programme.

#### **E.10 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the Register.**

**Condition:** The education provider must provide further evidence to demonstrate that the assessment regulations clearly specify requirements for the appointment of at least



one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the HCPC Register.

**Reason condition not met at this time:** The visitors noted through the conditions response and in discussions at the revisit that the education provider's requirements for the external examiner is that the individual can perform foot and ankle surgery for instance, a vascular surgeon. However, the visitors were unable to see how a vascular surgeon is appropriately experienced and qualified to assess musculoskeletal surgery of the foot, for example. Therefore the visitors were unable to determine how the requirements for the appointment of an external examiner are appropriate for this programme. As such, the visitors require evidence of how the education provider will ensure that there is an appropriately qualified and relevantly experienced individual, to undertake the role of external examiner for this programme. For instance, an orthopaedic foot and ankle surgeon (who is a member of a foot and ankle subspecialty association) or someone who is an HCPC annotated podiatrist practicing podiatric surgery. The visitors require this information to determine whether this standard is met.

**Suggested documentation:** Evidence of the specific requirements for the appointment of an external examiner with the appropriate qualifications, experience and membership of a subspecialty association or that the person is an HCPC annotated podiatrists practicing podiatric surgery.

## Section 7: 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 6, 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 programme(s).

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

### **C.5 The curriculum must make sure that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's**

**code: standards of conduct, performance and ethics on their podiatric surgery practice.**

**Condition:** The education provider must clearly articulate how they ensure that trainees understand the implications of the HCPC's standards of conduct, performance and ethics and/or the NMC's code: standards of conduct performance and ethics on their podiatric surgery practice.

**Reason condition not met:** From the information provided through the conditions response, the visitors note that:

- the education provider expects applicants to “discuss the implications of the HCPC standards of conduct, performance and ethics on [their] podiatric surgical practice” through their written, reflective portfolio submission;
- one of the “Marking criteria / possible evidence to be provided” is “Demonstrates an understanding of the implications HCPC standards of conduct, performance and ethics on their podiatric surgical practice”; and
- there is some training provided in this area, specifically a slide in training materials that “outlines what the SCPE's are and that the implication of them on their podiatric surgical practice must be included in their portfolio.”

In their evidence submission, the education provider also notes that:

- the programme “uses learning outcomes that are based upon the FHEQ level 7 framework”;
- that applicants through this programme “will be podiatrists practising podiatric surgery” who “will have the qualities outlined in the SCPE's and the transferable skills necessary for employment requiring the exercise of initiative and personal responsibility and the independent learning ability required for continuing professional development”; and
- That the above means that applicants “should be able to demonstrate the implication of the SCPE's in their portfolio.”

From this information, the visitors consider that applicants will not be equipped with sufficient knowledge about how to address this area in their portfolio, and that assessors will not know how to mark this area in a consistent and reliable way. The visitors consider this for the following reason:

Broad learning outcomes and marking criteria for granular standards

The learning outcome and marking criteria within the Assignment Instruction Sheet are very broad when considering the granularity of the SCPEs. From the marking criteria section, the visitors noted that the following information was provided to candidates and assessors, which is intended to enable these individuals to understand the education provider's requirements:

1. Learning outcome: Create and interpret relevant professional knowledge which extends the forefront of their podiatric discipline.
2. Achieved by: In their portfolio the learner must demonstrate their knowledge of podiatric surgery and how this is applied in their practice to formulate individual treatments that promote and protect the interests of service users and supported by evidence.
3. Relevant part of the marking criteria / possible evidence to be provided: Demonstrates an understanding of the implications HCPC standards of conduct, performance and ethics on their podiatric surgical practice.

Considering this, the visitors noted that with the broad definitions of how this competency is expected to be demonstrated and marked, neither applicants nor assessors will have the tools they need to understand what is required to demonstrate competence in this area. They noted that there is no detail about what constitutes appropriate reflection for specific SCPEs for an assessor to mark this competency as met. The visitors note it is particularly important that those assessing know what is acceptable to demonstrate competence, to be sure that competence has been achieved, and those being annotated to the Register are fit to practice in this area.

The visitors also note that the statement within the Assignment Instruction Sheet that applicants should demonstrate “compliance with” (rather than consider the implications on their practice) of the SCPEs would undermine the expectations set up by the provider.

#### **E.4 Assessment methods must be employed that measure the learning outcomes.**

**Condition:** The education provider must submit further evidence which demonstrates how the assessment method ensures an objective and consistent measure of the learning outcomes is carried out.

**Reason condition not met:** The visitors have considered the education provider’s response in this area, and note that they have further clarified their intention to assess candidates’ clinical proficiency for standard 1.11 through the written portfolio. Within this portfolio, there is an expectation that applicants provide reflections from practice, records of qualifications, a log book (including a summary of audit data from a wide range of podiatric surgical procedures detailing patient and surgical outcome measures). Other evidence “could be” included in the portfolio, such as “PASCOM or equivalent outcome reports, publications, course certificates, videos, presentations, business cases, dissertations, reflections, case discussions, passed courses elsewhere similar to the HCPC CPD audit.” The log will be verified by “a podiatry service manager/surgery manager/private hospital confirming that activity reported in the log... are a true reflection”.

The visitors are cognisant that the portfolio assessment is designed to establish continued competence, as it relates specifically to the HCPC standards, rather than as a measure to use to determine an individual’s ability to practice for the first time. However, through the process, the visitors have questioned the rationale for the provider’s approach for assessing clinical competence, rather than assessing this competence through observation of practice.

With the above in mind, the visitors deem that the portfolio is not an appropriate assessment method for the reasons below.

#### Ability to assess continued competence in clinical skills via a written portfolio

As previously noted, the visitors are clear that the annotation route is based on a holistic assessment of an individual’s training, qualifications and experience to date. They acknowledge that this approach assumes applicants to the programme have achieved and maintained competency to practice podiatric surgery to date (in absence of any specific regulatory requirements linked to annotation), and have done so as an HCPC-registered chiropodist / podiatrist working within an extended scope of practice. They also acknowledge such practice takes place in highly regulated environments, which

contain established medical oversight and governance arrangements, comparable to other regulated surgical professions.

However, the visitors consider that, in absence of any direct observation, the portfolio assessment method does not provide assurance to be satisfied those currently practicing podiatric surgery meet HCPC proficiency standard 1.11. Specifically, the visitors note that a written portfolio and a log book (accepting other evidence 'could' also be provided alongside these required parts) cannot adequately address clinical skills such as hand to eye coordination, tissue handling, and manual dexterity.

The visitors note that providing evidence of having successfully completing a range of procedures on its own does not allow the education provider to ensure those who complete the programme are clinically competent.

#### Inaccurate guidance for the completion of the portfolio

The visitors noted that under the 'specific guidance for meeting standard 1.11, the provider has noted that applicants "must submit a surgical log that contains a list of procedures undertaken by you in the last three years." There is then a table that sets out minimum numbers of procedures required to be undertaken by the applicant.

However, the following paragraph notes that applicants must specify "the role one played in the encounter (primary surgeon, assistant, observer)". This could be interpreted (by applicants or assessors) that observation of practice could count in the required numbers. The visitors consider that if a portfolio is to work, then the requirements and expectations must be robust and clearly communicated, to ensure only those who meet the required proficiency level pass the programme.

#### **E.10 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the Register.**

**Condition:** The education provider must provide further evidence to demonstrate that the assessment regulations clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from a relevant part of the HCPC Register.

**Reason condition not met:** In their response to this condition, the education provider noted that the external examiner must "Provide evidence of suitability in surgical practice to evaluate appropriately the candidates against the HCPC standards for podiatrists practising podiatric surgery" (criteria 2).

From the criteria, including the above, the visitors noted that the education provider will not ensure that the person appointed to this role has experience of working on the foot and ankle, and of musculoskeletal surgery. The visitors consider this experience necessary as the foot and the vagaries of bone surgery to the foot is different to all other types of surgery. As such they would expect that the position is filled by an individual with that specialism, to enable them to be able to properly assess and then oversee the assessment processes to ensure they are fit for purpose. In reaching this conclusion, the visitors note that they have previously stated that the individual appointed to this role should be an "orthopaedic foot and ankle surgeon (who is a member of a foot and ankle subspecialty association) or someone who is an HCPC

annotated podiatrist practicing podiatric surgery” (section 6). They note, however, that the education provider has not been explicit in its requirements in this area in relation to the professional grouping of the individual to be appointed.

Therefore, the visitors consider that this standard is not met.

Appendix 1 – decision notice from the Education and Training Committee (ETC) meeting 11 September 2019

## Education and Training Committee

**Programmes previously recommended for approval subject to conditions where the visitors have recommended non-approval:**

<b>Programme name</b>	HCPC Annotation of existing Podiatrists practising Podiatric Surgery
<b>Education provider</b>	University of Huddersfield
<b>Mode of delivery</b>	PT (Part time)
<b>Assessment ref</b>	APP01864
<b>Date of decision</b>	11 September 2019

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

<b>Decision</b>
That the programme, which was previously recommended for approval subject to conditions, should be approved, as the conditions have been met.
<b>Reasons</b>
<p>Visitors recommended that the programme was not approved, as they were not satisfied that several conditions were met. The Committee considered this recommendation, alongside observations from the education provider, and from the professional body (the College of Podiatry).</p> <ol style="list-style-type: none"> <li>Condition C5 – The Committee noted the visitors' position in relation to this condition not being met was that the learning outcome and marking criteria was too broad to allow effective demonstration and assessment of a granular set of standards (the standards of conduct, performance and ethics (SCPEs)). In considering this position the Committee noted: <ul style="list-style-type: none"> <li>That the provider had mapped the HCPC standards to the programme's learning outcomes</li> <li>Entrants to the programme were required to be current HCPC registrants subject to the HCPC's standards of conduct and performance and ethics</li> <li>It is reasonable for the education provider to set out expectations of candidates in completing their portfolio (related</li> </ul> </li> </ol>

to this area), and for candidates to use the portfolio to provide an account of how they understand the implications of the SCPEs on their podiatric surgery practice.

The Committee agreed that the information provided by UoH had been proportionate and sufficient to show that the standard was met by the programme, and therefore decided that there was no outstanding issue against this standard.

2. Condition E4 – The Committee noted the visitors' position in relation to this condition not being met, as follows:

- There is no direct observation of practice for this programme
- The portfolio assessment method does not provide assurance to be satisfied that those currently practicing podiatric surgery meet the HCPC proficiency standard 1.11
- A written portfolio and log book cannot adequately address clinical skills, such as hand to eye co-ordination, tissue handling, and manual dexterity
- There is inaccurate guidance for those completing the portfolio, relating to the role played in surgery

In reaching their position, the Committee noted:

- that the intention of this assessment was to provide a mechanism to assess podiatrists currently practising podiatric surgery to access an annotation on their HCPC registration record, rather than to establish clinical competence for the first time
- Therefore, requiring observed practice as part of the programme was not required to meet the standard
- Entrance to the programme requires fellowship of the professional body, which in itself involved observed practise
- Candidates are currently practising in highly regulated environments, and evidence of this needs to be provided through the portfolio

The Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

3. Condition E.10 – The Committee noted the visitors' position in relation to this condition not being met was that the role criteria does not ensure that the person appointed would have experience of working on the foot and ankle, and of musculoskeletal surgery. In considering this position, the Committee noted:

- The role brief required that external examiners would be appointed to ensure specific experience and knowledge of all of the HCPC standards for podiatrists practising podiatric surgery.
- That from the role brief, the knowledge of the individual appointed would, by nature, cover all areas of the programme to undertake the role of an external examiner
- That it appeared that the visitors were setting more detailed requirements this area than is reasonable for assessing whether the standard is met at a threshold level.



The Committee decided that there was no outstanding issue against this standard, and that therefore the standard is met by the programme.

The Committee decided that as there were no outstanding issues against the standards (for the reasons noted above), the UoH HCPC Annotation of existing Podiatrists practising Podiatric Surgery (Part time) was approved.



**Signed:**

**Panel Chair**