

HCPC approval process report

Education provider	Queen Margaret University
Name of programme(s)	Non Medical Prescribing, Part time
Approval visit date	30 April 2019
Case reference	CAS-13746-J5Y7P2

Contents

Section 1: Our regulatory approach	2
Section 2: Programme details.....	2
Section 3: Requirements to commence assessment.....	3
Section 4: Outcome from first review.....	4
Section 5: Visitors’ recommendation.....	7

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

Roseann Connolly	Lay
Janet Lawrence	Physiotherapist (Independent prescriber)
David Packwood	Practitioner psychologist - Counselling psychologist
Eloise O'Connell	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.

John Docherty-Hughes	Independent chair (supplied by the education provider)	Queen Margaret University
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Section 2: Programme details

Programme name	Non Medical Prescribing
Mode of study	PT (Part time)

Entitlement	Independent prescribing Supplementary prescribing
First intake	01 September 2019
Maximum learner cohort	Up to 25
Intakes per year	2
Assessment reference	APP02033

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	Comments
Learners	Yes	This a new programme, so we met with learners on the education provider's prescribing module which is approved by the Nursing and Midwifery Council.
Senior staff	Yes	
Practice education providers	No	The education provider said that practice educators / designated medical practitioners are identified by the learners themselves prior to applying for the programme. As the programme has not yet been approved for allied health professionals (AHPs) they have not been able to identify any AHP practice educators who could contribute to this approval event.

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 25 June 2019.

B.6 Subject areas must be taught by staff with relevant specialist expertise and knowledge.

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

Reason: From their review of the documentation, the visitors understood that the programme will be delivered by a range of staff including physiotherapists, podiatrists, independent nurse prescribers, pharmacists and pharmacologists. The education provider said they would make use of visiting lecturers to provide specialist allied health professions (AHP) expertise in prescribing. The education provider provided the details of five AHP staff members who will be contributing to the programme. Of those five staff, three of them have non-medical prescribing qualifications. The documentation stated that these three AHP staff with prescribing qualifications will have 'visiting lecturer hours as required'. The visitors were not clear how much contribution the AHP staff with prescribing qualifications will have on the programme. For example, in the Indicative Content NMP Contact Days document, the three AHP prescribers appeared to be included as a 'facilitator' on only a few of the sessions. The visitors noted that the legal / ethical / professional issues on prescribing was led by AHP staff members, however those staff did not have prescribing qualifications. The visitors considered this session may require specialist expertise and knowledge from a staff member with a prescribing qualification.

At the visit, the programme team discussed ways in which they aim to involve a range of practitioner colleagues in the programme to ensure specialist expertise and knowledge. The programme team said that the documentation provided was indicative,

and there is room for some changes. The programme team said that their AHP staff have close links to the visiting lecturers with prescribing qualifications, and so have the ability to call on their relevant knowledge and skills where required. The programme team also mentioned the nursing colleagues with prescribing rights, as well as the Designated Medical Professionals (DMPs) in practice, who they will be liaising with to draw on their expertise. The visitors agreed that there were sufficient AHP staff with prescribing qualifications who have involvement with the programme. However, it was not clear to the visitors how much these staff members will be contributing to the programme, which would ensure that subject areas are taught by staff with relevant specialist expertise and knowledge. Therefore, the visitors require more evidence about the involvement of AHP prescribers on the delivery on the programme to determine whether this standard is met.

B.8 The resources to support student learning in all settings must be effectively used.

Condition: The education provider must revise programme documentation to ensure it contains relevant information and references for allied health professionals.

Reason: On reviewing the documentation, the visitors noted that the documentation did not include many references to allied health professionals (AHPs) or the HCPC. The education provider currently offers a prescribing programme for nurses and midwives, which is approved by the Nursing and Midwifery Council. Some of the documentation provided for the proposed new programme, such as the Programme Specification and the 'NMP DMP Handbook' contained little reference to HCPC and AHPs throughout. Within the DMP Handbook, the visitor's noted that the reading list is predominantly nursing focused. In order to determine that AHPs on the new programme will effectively use resources to support learning in all settings, the visitors require evidence of updated programme documentation which contains up to date and relevant references to AHPs and HCPC where appropriate.

C.9 When there is interprofessional learning the profession-specific skills and knowledge of each professional group must be adequately identified and addressed.

Condition: The education provider must demonstrate how they will ensure the profession-specific skills and knowledge of each professional group are adequately identified and addressed.

Reason: The visitors understood that the proposed programme will allow admission of physiotherapists, podiatrists, dietitians, therapeutic radiographers and paramedics. The teaching staff for the programme includes physiotherapists and podiatrists, as well as staff from other professions such as nurses and pharmacologists. The visitors noted that there was no provision within the teaching team for dietitians, therapeutic radiographers or paramedics. The education provider currently does not have any paramedic programmes, and therefore learners from this profession will be new to the education provider. At the visit, the programme team discussed ways in which they intend to support paramedic learners. The programme team said there is potential to draw in other staff depending on the needs of the programme as it develops. The programme team also said that nursing colleagues have close relationships with paramedic teams, and if paramedic learners come onto the programme then they will be able to draw on that expertise.

From discussions at the visit, the visitors understood the programme team has had some discussions about how to support paramedic learners, however it was not clear to the visitors that there was a plan in place for when the programme is due to commence. At the visit, the visitors heard about how the AHP staff members from the professions of physiotherapy and podiatry will support the AHP professions on the programme. However, the visitors were not clear how the education provider plans to support learners on the programme who will not have input from teaching staff specific to their profession. As such, the visitors require further information about how the education provider will ensure the profession-specific skills and knowledge of each professional group are adequately identified and addressed.

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.

B.15 Service users and carers must be involved in the programme.

Recommendation: The visitors recommend that the education provider strengthens and develops the involvement of service users and carers in the programme, to ensure ongoing and meaningful involvement.

Reason: The visitors heard of the plans the education provider has in place to involve service users and carers once the programme is running. The visitors met with service users and carers who are currently involved with other allied health professions (AHP) programmes at the education provider, including physiotherapy and podiatry programmes. The programme team said they plan to involve these service users and carers in the delivery of the programme, through inviting them to speak to learners about their experiences. The service users and carers also told the visitors about these plans, and expressed some interest in being involved in other areas of the programme, such as the development stages.

The programme team spoke about ways in which they plan to develop service user and carer involvement on the programme, such as opportunities of involvement at the programme development stage. From the information provided and through discussions at the visit, the visitors considered this standard is met. However, the visitors noted that this is still in the planning stage, and at this stage the education provider has plans to involve service users and carers only in the delivery of this programme. The visitors recommend that the education provider continues to develop and strengthen the involvement of service users and carers in other areas of the programme, such as within the ongoing development of the programme. In this way, the education provider can ensure ongoing and meaningful involvement in the programme to ensure this standard continues to be met.

D.7 The designated medical practitioner must undertake appropriate training.

Recommendation: The visitors recommend that the education provider revises the DMP handbook to include clear requirements about the training for new designated medical practitioners.

Reason: For this standard, the education provider said that designated medical practitioners (DMPs) are provided with a specific handbook for their role. Individual discussion will take place between the programme team and DMP to ensure that their role is clear and they understand their responsibilities. From considering the information and through discussions at the visit, the visitors consider this standard is met. At this visit, the programme team clarified that any new DMP would have individual, face-to-face discussion with the programme team before starting their role. The visitors considered that this was not clearly reflected in the DMP handbook. As such, the visitors considered that as the initial discussion between DMP and programme team is only implied, there is a risk in future that this will no longer happen and DMPs may no longer receive appropriate training. Therefore, the visitors recommend that the education provider ensures the requirements of training for the new DMPs are more clearly reflected in the DMP handbook, to ensure there continues to be appropriate training for all new DMPs.

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 programmes are approved.

This report, including the recommendation of the visitors, will be considered at the 22 August 2019 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).