

HCPC approval process report

Education provider	Brunel University London
Name of programme(s)	MA Art Psychotherapy, Full time
Approval visit date	17 June 2021
Case reference	CAS-16953-W0X2W0

Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details	3
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 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:

Jennifer Caldwell	Occupational therapist
Janek Dubowski	Arts therapist - Art therapist
Niall Gooch	HCPC executive

Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Thomas Betteridge	Independent chair (supplied by the education provider)	Brunel University
-------------------	--	-------------------

Section 2: Programme details

Programme name	MA Art Psychotherapy
Mode of study	FT (Full time)
Profession	Arts therapist
Modality	Art therapist
First intake	01 October 2021
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP02339

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

Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for certain evidence and information from education providers. The following is a list of evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence, we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meetings held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Not Required	We determined that we could obtain sufficient answers from the programme team
Service users and carers (and / or their representatives)	Not Required	We determined that we could obtain sufficient answers from the programme team
Facilities and resources	Not Required	This was part of the programme team meeting
Senior staff	Yes	
Practice educators	Yes	
Programme team	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 virtual 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 06 August 2021.

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 demonstrate how they will ensure that all applicants are aware that completion of the programme requires that they participate in certain activities in experiential learning.

Reason: The visitors were aware from documentation and from discussions at the visit, that it was mandatory for learners to take part in certain forms of experiential learning. They were satisfied that it was reasonable for the education provider to have this requirement. However, they also noted that this was not explained in the information available to applicants, and that therefore applicants were not making an informed

choice about whether to take up an offer of a place on the programme. The visitors therefore require that the education provider submit evidence to show how they will communicate to learners the expectations around experiential learning.

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

Condition: The education provider must demonstrate how they will ensure that the placement modules are organised such that all learners are enabled to meet all the standards of proficiency.

Reason: The visitors noted during their documentary review that the learning outcomes in the first practice-based learning module required the learners to meet a much larger number of standards of proficiency (SOPs) than the second practice-based learning module, even though they were the same length. Given the time available in the placement, they considered that this large number of SOPs might create a barrier to learners meeting them. This was discussed at the visit and the programme team gave verbal reassurances about their plans to support the learners in their achievement of the SOPs. The visitors, however, had not seen evidence to demonstrate how exactly this support would work and what specific steps would be taken to ensure that learners could achieve the necessary SOPs. They had also not seen evidence giving an appropriate rationale for the difference. They therefore require the education provider to demonstrate how specifically they will ensure that learners in the practice modules will have the best opportunity to meet the SOPs.

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

Condition: The education provider must demonstrate how they will ensure that learners and practice educators have the information required to be prepared for practice-based learning.

Reason: From the documentary submission the visitors were aware that the education provider was planning to create a placement handbook for learners and practice educators, laying out the information they would require for practice-based learning. However, they were not supplied with this handbook, and were informed that it was not yet available. Although the HCPC does not mandate that such handbooks be produced, the education provider had decided to meet this standard through the production of such a handbook, and therefore the visitors considered that unless they were able to view it, or to be given a clear idea of what would it would contain, they could not determine whether the standard was met. They therefore require the education provider to submit further evidence demonstrating what information will be supplied to practice educators and learners before they go into placement.

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

Condition: The education provider must clarify for learners the regulations and expectations about progression from year one to year two.

Reason: The visitors were aware that the documentation stated that the attendance requirement was 100% throughout the programme. They were not clear, however,

either from the programme documentation or from discussions at the visit, what would happen if learners did need to repeat parts of the first year and had not completed this by the end of year one. It was not clearly stated for learners what would be expected of them in this scenario. At the visit, the programme team said that they would handle such situations on a case by case basis but were not able to clarify what would happen and where learners would access information about the process in that situation. The learners might therefore not understand how to progress and achieve within the programme, and this might impair their ability to complete the programme successfully. The visitors therefore require that the education provider submit further evidence showing how they will manage the transition between the learners who need to repeat parts of year one, and how this will be clearly communicated to learners.

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.

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.

Recommendation: The education provider should keep under review the adequacy of teaching spaces to ensure that the standard continues to be met.

Reason: The visitors were satisfied that the standard was met, because there were sufficient teaching spaces available for the planned numbers of learners who would be coming on to the programme in the first cohorts, and because the education provider was aware of the need to develop more spaces as further learners came on to the programme. However, the visitors were aware that there were possibly challenges to expanding the amount of space available for teaching and learning activities, for example the sharing of space with other users, and so suggest that the education provider continue to bear these in mind to mitigate any risk of pressure on space.

3.15 There must be a thorough and effective process in place for receiving and responding to learner complaints.

Recommendation: The education provider should consider how best to make sure that learners are fully aware of how the complaints process works.

Reason: The visitors were satisfied that the standard was met, as there was a thorough and effective process in place for receiving and responding to learner complaints. They did consider, however, that it might not always be clear to learners in practice-based learning where the various responsibilities of the education provider and the NHS Trusts providing the placements would lie. They therefore suggest that the education provider continue to consider how best to demarcate these responsibilities for learners.

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 25 August 2021 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).