

## HCPC approval process report

Education provider	University of Exeter
Name of programme(s)	BSc (Hons) Diagnostic Radiography and Imaging, Work based learning
Approval visit date	19 – 20 November 2019
Case reference	CAS-14878-H9Y7Y2

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### Executive Summary

We are the Health and Care Professions Council (HCPC), a regulator set up to protect the public. We set standards for education and training, professional knowledge and skills, conduct, performance and ethics; keep a register of professionals who meet those standards; approve programmes which professionals must complete before they can register with us; and take action when professionals on our Register do not meet our standards.

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet our standards of education and training (referred to through this report as ‘our standards’). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.

## Section 1: Our regulatory approach

### Our standards

We approve programmes that meet our education standards, which ensure individuals that complete the programmes meet proficiency standards. The proficiency standards set out what a registrant should know, understand and be able to do when they complete their education and training. The education standards are outcome focused, enabling education providers to deliver programmes in different ways, as long as individuals who complete the programme meet the relevant proficiency standards.

Programmes are normally [approved on an open-ended basis](#), subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed [on our website](#).

### How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint [partner visitors](#) to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation of the visitors, inclusive of conditions and recommendations. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process reports, and any observations from education providers (if submitted). The Committee meets in public on a regular basis and their decisions are available to view [on our website](#).

### HCPC panel

We always appoint at least one partner visitor from the profession (inclusive of modality and / or entitlement, where applicable) with which the assessment is concerned. We also ensure that visitors are supported in their assessment by a member of the HCPC executive team. Details of the HCPC panel for this assessment are as follows:

Shaaron Pratt	Radiographer - Diagnostic radiographer
Ian Hughes	Lay
Helen Best	Radiographer - Diagnostic radiographer
Niall Gooch	HCPC executive
Naomi Oldenburg	CORU (observer)

### Other groups involved in the approval visit

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

Catherine Gallup	Independent chair (supplied by the education provider)	Exeter University
Charles Sloane	Reviewer	Society of Radiographers

## Section 2: Programme details

Programme name	BSc (Hons) Diagnostic Radiography and Imaging
Mode of study	WBL (Work based learning)
Profession	Radiographer
Modality	Diagnostic radiographer
Proposed first intake	01 March 2020
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP02126

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 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	No	The programme is new, and so internal monitoring data is not available.

We also usually ask to meet the following groups at approval visits, although there may be some circumstances where meeting certain groups is not needed. In the table below,

we have noted which groups we met, along with reasons for not meeting certain groups (where applicable):

<b>Group</b>	<b>Met</b>
Learners	Yes
Service users and carers (and / or their representatives)	Yes
Facilities and resources	Yes
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 approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

**Conditions**

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 10 January 2020.

- 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.**
- 2.4 The admissions process must assess the suitability of applicants, including criminal conviction checks.**
- 2.5 The admissions process must ensure that applicants are aware of and comply with any health requirements.**

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider should clarify who will be responsible for organising and funding DBS and occupational health checks, and how they will ensure that this information is communicated to applicants.

**Reason:** From their review of programme documentation, the visitors were aware that ownership of the admissions process rested largely with employers, who will be responsible for identifying likely suitable candidates. The education provider will enter into a contract with employers, which will clarify the different responsibilities of each

party. A draft copy of this contract was supplied in evidence. The visitors were not clear from their review of this contract who would have responsibility for carrying out Disclosure & Barring Service (DBS) checks, and occupational health checks, and they were not clear how, and at what stage of the admissions process, this information would be communicated to applicants. They therefore require further evidence clarifying who will have responsibility for ensuring that applicants have DBS and occupational health checks, and how this will be made clear to applicants.

**3.13 There must be effective and accessible arrangements in place to support the wellbeing and learning needs of learners in all settings.**

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

**3.16 There must be thorough and effective processes in place for ensuring the ongoing suitability of learners' conduct, character and health.**

**3.17 There must be an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.**

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate how they will ensure that the policies in place at employer partners, relating to the areas below, are appropriate.

- Wellbeing and learning support;
- Learner complaints;
- Assessment of learners' conduct, character and health; and
- Raising concerns

**Reason:** The visitors understood from their review of programme documentation that, for matters arising in practice-based learning, the education provider planned to rely on employers' processes. The visitors considered that this was reasonable, given the structure of the degree apprenticeship, in which learners spend the majority of their time in the employer setting. However, they were not clear from the evidence submitted how the education provider would ensure that the processes in place at the various partner employers were appropriate, and how they would be able to exercise appropriate oversight over them. This was discussed with the programme team at the visit, and verbal assurances were given that they had good relationships with their employer partners and were not concerned about how well such policies would work. However, the visitors were not able to see evidence to help them understand how the education provider determines whether each policy is appropriate, and so were unable to be certain that the standards were met. They therefore require further evidence demonstrating how the education provider will ensure appropriate processes are in place.

### **3.16 There must be thorough and effective processes in place for ensuring the ongoing suitability of learners' conduct, character and health.**

**Condition:** The education provider must demonstrate how they ensure that they are aware of the decisions made by employer partners in relation to the ongoing suitability of specific learners.

**Reason:** The visitors understood from their review of programme documentation that, for matters arising in practice-based learning that would affect ongoing suitability of a learner, the education provider planned to rely on employers' processes. The visitors considered that this was reasonable, given the structure of the degree apprenticeship, in which learners spend the majority of their time in the employer setting. However, they were not clear from the evidence submitted how the education provider would ensure that they were kept fully abreast of decisions made in specific cases. They noted that the education provider needed to be able to make a decision about whether learners would be fit to practise in future, and that any issues arising during the programme would be relevant to this. They were aware from the documentation that there were tripartite meetings between education provider, employer and learner, but these took place infrequently – only three or four per year – and so might not be suitable for informing the education provider of more urgent issues.

They were therefore not able to determine whether the standard was met. The programme team gave assurances that there would not be problems in keeping in touch with partners in this way but the visitors were not clear about the formal process for maintaining these lines of communication. They therefore require further evidence demonstrating how they will ensure that they are kept informed of any decisions made about individual learners.

### **3.13 There must be effective and accessible arrangements in place to support the wellbeing and learning needs of learners in all settings.**

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

The following condition applies to the above standards. For simplicity, as the issue spans several standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate how they will ensure that all learners understand what policies and processes apply to them in particular contexts, and what support is available from them.

**Reason:** The visitors understood from their review of programme documentation that, for matters arising in practice-based learning, the education provider planned to rely on employers' processes. The visitors considered that this was reasonable, given the structure of the degree apprenticeship, in which learners spend the majority of their time in the employer setting. The visitors were satisfied that learners would be able to understand what policies applied to them in the academic setting at the education provider. However, they could not see evidence explaining where learners would be able to access information about processes in the practice / employment environment. In discussions at the visit the education provider gave verbal assurances that learners would have access to this information and would be able to discuss any issues with

their link tutor, but the visitors were not able to see clear evidence of how this information, and the expectations around it relating to matters such as escalation, would be made readily available to learners. They were therefore unable to determine that the standards were met, and require further evidence demonstrating how learners will be given full information about what policies applied in what settings, and what support was available.

### **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.

**4.2 The learning outcomes must ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.**

**6.2 Assessment throughout the programme must ensure that learners demonstrate they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.**

**Recommendation:** The education provider should consider making more explicit reference to the standards of conduct, performance and ethics (SCPEs) in the parts of the curriculum where the content of the SCPEs is delivered.

**Reason:** The visitors were satisfied that these standards were met at threshold level, because the learning outcomes and the approach to assessment both incorporated the SCPEs and would ensure that learners both understood them and would have to demonstrate that they were able to meet them. However, they did note that although the content of the SCPEs was delivered, the SCPEs themselves were not always named and referred to. This might create a risk in future that the learners did not fully understand the place of the SCPEs in their practice. The visitors therefore suggest that wherever necessary SCPE-related content was explicitly linked to the SCPEs.

## 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 29 January 2020 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).