

HCPC major change process report

Education provider	University of Essex
Name of programme(s)	Practice Certificate in Supplementary and Independent Prescribing for Physiotherapists, Podiatrists and Radiographers, Part time
Date submission received	27 September 2017
Case reference	CAS-12938-J4K6C3

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.....	3
Section 5: Visitors' recommendation	5

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 major change process undertaken by the HCPC to ensure that programmes 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).

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process report. 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:

Nicholas Haddington	Independent prescriber
Alaster Rutherford	Independent prescriber
Mandy Hargood	HCPC executive

Section 2: Programme details

Programme name	Practice Certificate in Supplementary and Independent Prescribing for Physiotherapists, Podiatrists and Radiographers
Mode of study	PT (Part time)
Entitlement	Independent prescribing Supplementary prescribing
First intake	01 March 2018
Maximum student cohort	Up to 25
Intakes per year	2
Assessment reference	MC03608

We undertook this assessment to consider whether the programme meets our standards, following changes to the education provider’s prescribing provision reported to us via the major change process. The following is an overview of the changes from the information received via this process.

Due to changes in legislation, the education provider has highlighted that they want to include therapeutic radiographers as independent prescribers on their non-medical prescribing programme. This has resulted in a new programme record, replacing the previous programme Practice Certificate in Supplementary & Independent Prescribing for Physiotherapists and Podiatrists, Part time (programme reference ESS00429).

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
Major change notification form	Yes
Completed major change standards mapping	Yes

Section 4: Outcome from first review

In considering the evidence provided by the education provider as part of the initial submission, the visitors were not satisfied that there was sufficient evidence that our standards continued to be met at this time, and therefore require further evidence as noted below.

Further evidence required

In order to determine whether the standards continue to be met, the visitors require further evidence for the following standards for the reasons noted below.

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programme(s), and then provide any further evidence to demonstrate how they meet the standards.

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.

Reason: The visitors reviewed the documentation provided for this major change. From their reading, the visitors were unclear if the education provider is applying for the inclusion of therapeutic radiographers or diagnostic radiographers, or both therapeutic and diagnostic radiographers in the programme. The visitors could not see from the mapping and the documentation where it clearly stated which type of radiographers the evidence referred to. From the documentation provided, the education provider has

mentioned that they do not expect ‘many diagnostic radiographers to apply’ to the programme. The flier the visitors received as evidence stated that the module would prepare the individual practitioner to practice as both an independent prescriber and a supplementary prescriber working in partnership with independent practitioners. The visitors note that this could be misleading to those applying to the programme as there is no information about what a diagnostic and therapeutic radiographer’s prescribing entitlements would be upon successful completion of the programme. The programme is currently approved only for HCPC registrants eligible to train as independent prescribers, and there is therefore no defined route within the programme for HCPC registrants to train only as supplementary prescribers (as would be the case for diagnostic radiographers). Therefore, the visitors require clarification that explicitly sets out whether the provider is applying for approval for inclusion of therapeutic radiographers only, or therapeutic and diagnostic radiographers, and in relation to this, evidence that explicitly describes the relevant criteria for application to this programme, as an independent prescriber where it applies to the therapeutic radiographer, and/or as a supplementary prescriber where it is applicable to the diagnostic radiographer. This will allow the visitors to determine if there is sufficient documentation to allow an applicant to the programme to make an informed choice to take up a place on the programme.

Suggested evidence: Revised documentation that clearly states the HCPC registrants are seeking approval for inclusion on the programme, and demonstrates clearly the relevant prescribing route for therapeutic radiographers and diagnostic radiographers.

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

Reason: From their reading of the documentation provided, the visitors were unclear how the education providers statement in the mapping document that the “OSCE will be specific to each students’ area of practice” would be implemented. The visitors were unclear from this statement and the evidence provided as to how the education provider would validate that the OSCE for a therapeutic or diagnostic radiographer was appropriate as there appears to be no professional input from therapeutic or diagnostic radiographers.

Suggested evidence: Evidence that clearly identifies how the OSCEs for the additional professional group will be validated and assessed to ensure that the profession-specific skills are addressed.

D.9 There must be regular and effective collaboration between the education provider and the practice placement providers.

Reason: On reading the evidence provided by the education provider regarding the letter sent to the designated medical practitioner (DMP), the visitors were unclear how the DMPs would be made aware of the addition of therapeutic or diagnostic radiographers. The DMP “Fact sheet” makes no reference to radiographers

Suggested evidence: Evidence that demonstrates that the education provider ensures that the DMPs receive the correct information on their role with the additional professional group[s][eligible to undertake this programme and the qualification received [if this includes diagnostic radiographers]

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 HCPC Register

Reason: Following the reading of the mapping document, the visitors were unclear if there had been a change in the external examiner for the programme. The mapping document seemed to indicate a change had been made to the appointment of the external examiner. However, they could not be sure, if this change had been made in line with the appointment of external examiners document provided, or if this policy had changed too. Therefore, the visitors are seeking clarification over the appointment of the external examiner, if a change has been made to ensure this standard is met.

Suggested evidence: Evidence that clarifies if there has been a change to how an external examiner is appointed or if there has been a change to the external examiner that might not meet the appointment policy.

Section 5: Visitors' recommendation

Considering the education provider's response to the request for further evidence set out in section 4, the visitors are satisfied that there is sufficient evidence that the standards continue to be met and recommend that the programme(s) are approved.

This report, including the recommendation of the visitors, will be considered at the 07 December 2017 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).