

HCPC approval process report

Education provider	Canterbury Christ Church University
Validating body	Canterbury Christ Church University and University of Greenwich
Name of programme(s)	BSc (Hons) Speech and Language Therapy, Full time
Approval visit date	15-16 March 2018
Case reference	CAS-12155-Q5R3B2

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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:

Calum Delaney	Speech and language therapist
Caroline Sykes	Speech and language therapist
Ian Hughes	Lay
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.

Liz Hryniewicz	Independent chair (supplied by the education provider)	Faculty Director of Childhood Education Sciences Scheme, Canterbury Christ Church University
Alison Coates	Quality and Standards panel member	Assistant Director of Quality and Standards, CCCU

Diane Coutinho	Quality and Standards panel member	Quality Manager, University of Greenwich
Jennifer Shearman	Internal panel member	Faculty of Education, CCCU
Sarah James	External assessor	Leeds Beckett University
Lauren Smyth	Quality Office	Quality Officer, CCCU

Section 2: Programme details

Programme name	BSc (Hons) Speech and Language Therapy
Mode of study	FT (Full time)
Profession	Speech and language therapist
First intake	01 September 2018
Maximum learner cohort	Up to 36
Intakes per year	1
Assessment reference	APP01784

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.

The education provider previously ran an approved PG Dip Speech and Language Therapy programme, which will be closed and replaced by the BSc (Hons) Speech and Language Therapy programme.

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	Yes

We also expect to meet the following groups at approval visits:

Group	Met	Comments
Learners	Yes	We met with three graduates and a current first year learner on the approved PG Dip Speech and Language Therapy programme.
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.

We expect education providers to review the issues identified in this report, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 18 May 2018.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that the programme is sustainable and fit for purpose by ensuring that the programme meets the needs of learners who will be entering the profession.

Reason: Following a review of the documentation prior to the visit, the visitors were not clear how various communication disorders and their assessment and management are addressed across the programme, and how this provision is managed in relation to staffing provision. The 'Clinical areas and the curriculum' document states "academic modules are linked both within and across the stages of the programme through use of the principles of spiral curricula, whereby topics and themes are revisited several times across the three years of the programme". The document lists the clinical areas, and how these are integrated through the modules in the curriculum. From this, the visitors were not clear what range of communication disorder specific information and foundation subject information learners will receive at different points during the programme, as the visitors could not track this through the curriculum from the information provided. As such, the visitors were not clear if the learners would develop an adequate understanding of the communication disorders for practice. This is related to standards 3.9, which requires the programme to have an adequate number of staff in

place, and 4.3, which requires the programme to reflect the knowledge base as articulated in any relevant curriculum guidance, which are detailed later in this report. As the visitors could not determine how the programme would ensure learners develop an adequate understanding of communication disorders for practice, the visitors could not determine how the programme meets the needs of learners who will be entering the profession. As such, from the information provided, the visitors could not make a judgement as to whether this standard has been met.

3.5 There must be regular and effective collaboration between the education provider and practice education providers.

Condition: The education provider must demonstrate how there will be regular and effective collaboration between the education provider and practice education providers

Reason: In their review of the documentation, the visitors read about the 'Practice Learning Unit' comprising of support staff and an academic placement lead whose role is to arrange placements for learners. The programme specification document notes that practice education providers "have direct liaison with identified practice placement coordinators within each organisation using a range of communication methods". At the visit, the visitors heard from practice education providers that communication between themselves and the education provider is ongoing through email, and there has not been much face-to-face interaction. The visitors heard from the programme team about the collaboration with the practice education providers, and the different meetings that are in place between practice education providers and the education provider, in addition to the ongoing email communication. However, from the documentation provided, the visitors could not see any information regarding the meetings between the practice education providers and the education providers, or plans to have meetings in place in future. As such, while the visitors have heard about the collaboration between the education provider and practice education providers, they were unable to see how the education provider ensures that collaboration between both parties happens at regular intervals and how they ensure that it is effective. Therefore, in order for the visitors to make a judgement as to whether this standard is met, the education provider must demonstrate how there will be regular and effective collaboration between the education provider and practice education providers.

3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Condition: The education provider must demonstrate that there is an effective process in place that ensures the availability and capacity of practice-based learning for all learners.

Reason: In their review of the documentation, the visitors read about the 'Faculty Practice Learning Sub Committee', which has responsibility for overseeing, monitoring and enhancement of the practice based learning environment. The programme specification also outlines that finding capacity for practice-based learning, which ensures an appropriate range of experiences for all learners, is "challenging in the current Health and Social Care context". The documentation mentions that efforts to increase capacity include building capacity in the private, voluntary and independent sectors. At the visit, the visitors heard from the learners and practice educators that it is often a difficult time sourcing learners onto placements. The visitors heard from the practice education providers that over the last few years the education provider has had

difficulty placing learners, in particular for adult-specific practice based learning, which is placement two on the current PG dip programme. The visitors heard from both the practice education providers and the programme team that as the proposed BSc programme has a different placement structure, pressure will be taken off providing adult placements, which will solve some of the issues they have had with practice-based learning capacity.

In addition, the visitors noted that the proposed new programme will have a higher number of learners and an additional year on the programme in comparison to the PG Dip programme. The visitors heard from the programme team that they have been preparing for the change to the programme and increase in capacity needs. Through their good relationship with the practice education providers they are confident there will continue to be adequate provision. The programme team talked about how the structure and design of practice-based learning is different for the proposed new programme, and there will not be as much pressure on providing targeted practice-based learning, which will allow for more capacity. The programme team talked about their efforts to involve private and independent sectors to increase capacity. The visitors heard reassurances and plans around practice-based learning capacity, however the visitors have not seen where or how this has been documented to demonstrate that there is an effective process in place that will ensure the availability and capacity of practice-based learning for all learners. As such, the education provider must demonstrate that there is an effective process in place to ensure the availability and capacity of practice-based learning for all learners on the new programme.

3.9 There must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

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

Reason: From reading the documentation, the visitors were not clear what the staffing provision would be for the programme, considering there will be a significant increase in learner numbers on the proposed three-year programme in comparison to the existing programme which will be superseded by the new programme. In the documentation, the education provider noted the full time equivalence (FTEs) for staff on the programme. However the visitors were not clear how this would be an adequate number of staff in place for the number of learners anticipated for the programme. The education provider also noted that other staff based at the education provider will carry out teaching on some of the modules that are not speech and language therapy specific. In addition, some teaching on the speech and language therapy specific modules will be carried out by 'visiting lecturers' who are speech and language therapy practitioners with relevant specialist knowledge and expertise. The visitors were not clear on what the visiting lecturers are responsible for delivering across the modules in the programme to ensure the delivery of an effective programme. As such, they could not determine whether they have the appropriate qualifications and experience to teach certain aspects of the programme, which are yet to be disclosed, and whether there are sufficient numbers of visiting lecturers teaching alongside staff to deliver to the number of learners on the programme.

In addition to the increase in learner numbers, the visitors noted that the needs of learners for this programme may differ to those on the current programme, considering

the proposed new programme is at undergraduate level. For example, undergraduate learners may need more support in study or research skills when compared to those who have already completed an undergraduate degree. The visitors heard from the programme team that the plan is to draw on resources from other programmes at the education provider, in addition to continued use of 'visiting lecturers' who have also taught on the current PG Dip programme. However, the visitors have not seen information regarding all staff that will be brought in to teach on the programme, or how their teaching time is distributed across modules. Therefore, in consideration of the increase in learner numbers and the needs of the learners, the visitors could not determine whether there will be an adequate number of appropriately qualified and experience staff in place to deliver an effective programme. As such, they require further evidence to demonstrate this to determine whether the standard is met.

3.10 Subject areas must be delivered by educators with relevant specialist knowledge and expertise.

Condition: The education provider must demonstrate that subject areas are delivered by educators with relevant specialist knowledge and expertise.

Reason: From review of the documentation, the visitors understood that some teaching on the speech and language therapy specific modules will be carried out by 'visiting lecturers' who are practising speech and language therapists, and will teach their areas of speciality. The programme specification states, "clinical areas not within the specialisms of the permanent teaching staff will be taught by expert clinicians". However, the visitors have not seen information about the educators that will be brought in to teach on the programme, or what they are responsible for delivering within the modules of this programme. As such, in order for the visitors to make a judgement on whether this standard is met, the education provider must demonstrate that the additional teaching staff used on the programme will have the relevant specialist knowledge and expertise to deliver the subject areas.

3.11 An effective programme must be in place to ensure the continuing professional and academic development of educators, appropriate to their role in the programme.

Condition: The education provider must demonstrate that an effective programme is in place to ensure the continuing and academic development of all educators, appropriate to their role in the programme.

Reason: On review of the documentation, the visitors noted that the programme specification states "clinical areas not within the specialisms of the permanent teaching staff will be taught by expert clinicians". At the visit, the visitors heard that the education provider has long-standing relationships with the visiting educators who have taught on the PG Dip programme for many years. However, the visitors were not clear on what the arrangements for preparation and arrangements for visiting staff development and support are for visiting staff on the programme. The programme specification states that "permanent teaching staff have access to a broad range of staff development opportunities, and robust appraisal systems ensure that lifelong learning is prioritised". However, the visitors were not clear what, if any, arrangements are in place for continuing professional and academic development for visiting educators that is appropriate to their role in the programme. The visitors recognise that visiting educators may not take part in all professional-development arrangements that the education

provider has in place. However, the visitors could not determine how the education provider ensures that these educators are keeping their professional and academic skills (relevant to their role on the programme) up to date. Therefore, in order for the visitors to make a judgement as to whether this standard has been met, the education provider must demonstrate that there is an effective programme in place to ensure the continuing professional and academic development of all educators, appropriate to their role in the programme.

4.3 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Condition: The education provider must demonstrate that the programme does reflect the knowledge base as articulated in relevant curriculum guidance.

Reason: From the information provided, the visitors were not clear how various communication disorders and their assessment and management are addressed across the programme. The 'Clinical areas and the curriculum' document states "academic modules are linked both within and across the stages of the programme through use of the principles of spiral curricula, whereby topics and themes are revisited several times across the three years of the programme". The document listed the clinical areas, and how these are integrated through the modules in the curriculum. From this, the visitors were not clear what range of communication disorder specific information and foundation specific information learners will receive, as the visitors could not track this through the curriculum from the information provided. As such, the visitors were not clear if the learners will develop an adequate understanding of the range and depth of communication disorders for practice. The visitors were also unclear how many hours will be taught by visiting educators, and when, and where different disorders appear across modules due to the nature of the spiral curriculum. Therefore, the visitors require further evidence which demonstrates how the programme reflects the knowledge base as articulated in relevant curriculum guidance, and the relationship of this to the overall programme structure, to ensure learners will have an adequate breadth and depth of understanding of communication disorders for practice.

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.

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

Recommendation: The education provider should consider how learners are made aware of the differences between the appeals, raising concerns, and complaints processes, how the processes are initiated, and where the information can be found.

Reason: On review of the documentation, the visitors noted that the SETs mapping document references the student handbook in relation to this standard, however the visitors could not find information related to the complaints procedure. From discussion at the visit, the visitors heard from the learners that they were not sure of the complaints procedure or where to find it, though they did know where they would go to look for it if needed. At the visit, the visitors heard from the programme team that in the placement

handbook learners are referred to a 'my essential information' link which will direct the learners to information on the complaints procedures. However, the visitors were not clear how learners would clearly understand to use this if they wanted to find information on the complaints procedure. The visitors understand that there are processes in place, however they note that the education provider could strengthen how learners are made aware of this and the importance of it, in order for the process to remain thorough and effective.

Section 5: Outcome from second review

Second response to conditions required

The education provider responded to the conditions set out in section 4. 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.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that the programme is sustainable and fit for purpose by ensuring that the programme meets the needs of learners who will be entering the profession.

Reason condition not met at this time: This condition relates to standard 3.9, which requires the programme to have an adequate number of staff in place. From their review of the education provider's response to this condition, the visitors were satisfied with the response in relation to the curriculum; however, the visitors require more information about staffing provision for the programme to ensure that the programme is sustainable. When providing evidence for standard 3.9, the education provider stated that there are currently 3.5 FTE permanent speech and language therapist (SLT) teaching staff, and that by September 2020, an additional 1.0 FTE will bring the core FTE staffing to 4.5. In addition, the education provider has noted that visiting SLT lecturers, lecturers from the education provider's psychology and biology departments, and service users will contribute to teaching on the programme. From the information provided, the visitors were not clear what the education provider's rationale was for starting an additional SLT teaching staff member in September 2020, rather than September 2018, as the new programme will be running alongside the existing PG Dip programme until the final cohort has completed the programme. As such, the visitors were not clear how the education provider plans to manage the overlapping of cohorts to ensure there is adequate SLT staffing provision on the programme between September 2018 and December 2019. Therefore, the visitors require further information as to how the education provider plans to manage SLT staffing provision between September 2018 and December 2019 while the new programme is running alongside the existing PG Dip, to determine whether the programme is sustainable and fit for purpose.

Suggested documentation: A rationale for the introduction of an additional speech and language therapy staff member in 2020 (rather than 2018), and the plan for managing SLT staff provision with the overlapping of cohorts from September 2018 to December 2019.

3.9 There must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

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

Reason condition not met at this time: In response to this condition, the education provider stated that there are currently 3.5 FTE permanent speech and language therapist (SLT) teaching staff, and that by September 2020 an additional 1.0 FTE will bring the core FTE staffing to 4.5. In addition, the education provider has noted that visiting SLT lecturers, lecturers from the education provider's psychology and biology departments, and service users will contribute to teaching on the programme. From the information provided, the visitors were not clear what the education provider's rationale was for starting an additional teaching staff member in September 2020, rather than September 2018, as the new programme will be running alongside the existing PG Dip programme until the final cohort has completed the programme. As such, the visitors were not clear how the education provider plans to manage the overlapping of cohorts to ensure there is adequate SLT staffing provision on the programme between September 2018 and December 2019. Therefore, the visitors require further information as to how the education provider plans to manage SLT staffing provision between September 2018 and December 2019 to ensure there is an adequate number of staff to deliver an effective programme.

Suggested documentation: A rationale for the introduction of an additional speech and language therapy staff member in 2020 (rather than 2018), and the plan for managing SLT staff provision with the overlapping of cohorts from September 2018 to December 2019.

Section 6: 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 5, 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 23 August 2018 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).