

Council - 26 March 2009

Consultation on the standards of education and training and guidance

Executive summary and recommendations

### **Introduction**

The Council agreed a workplan to review the standards of education and training (SETs) and SETs guidance on 31 May 2007.

A Professional Liaison Group (PLG) was set up by the Council to review the SETs and the SETs guidance. The last meeting of the PLG took place on the 18 February 2008.

The Council approved the consultation document on 3 July 2008 and agreed to consult on the revised SETs and SETs guidance.

The consultation of the revised SETs and SETs guidance took place between 1 August 2008 and 14 November 2008.

The attached papers are the outcome of the review and consultation.

The Council will be provided with a verbal summary of the discussion and recommendations from the Education and Training Committee's meeting on 25 March 2009.

### **Decision**

The Council is invited to:

- approve the text of the standards of education and training consultation response document;
- approve the text of the standards of education and training (subject to legal scrutiny);
- approve the text of the standards of education and training guidance (subject to Plain English editing and legal scrutiny);
- add practitioner psychologists to SET 1 and appropriate reference documents into the 'Further information' section (subject to practitioner psychologists becoming regulated by the HPC); and
- agree the revised SETs will be effective from September 2009.

### **Background information**

The consultation document is available to download from <http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=70>.

### **Resource implications**

- Legal scrutiny of the SETs and SETs guidance documents

- Publication of the consultation responses on the HPC website

These form part of the Policy and Standards Department workplan and budget for 2009/10

- Editing and laying out of the SETs and SETs guidance documents
- Organising mail out of the SETs and SETs guidance documents to all education providers

These form part of the Education Department workplan and budget for 2009/10

### **Financial implications**

- Plain English editing of the SETs guidance
- Laying out and publication of the SETs and SETs guidance documents

These form part of the Education Department workplan and budget for 2009/10

### **Appendices**

1. A draft copy of the standards of education and training consultation response document;
2. A draft copy of the standards of education and training; and
3. A draft copy of the standards of education and training guidance.

### **Date of paper**

16 March 2009

# Standards of education and training guidance

## Responses to our consultation

### Contents

<b>Introduction</b> .....	<b>4</b>
About the SETs .....	4
The approval and monitoring processes .....	4
This document.....	5
Changes to the SETs and guidance.....	5
<b>Your responses</b> .....	<b>6</b>
Overall comments .....	6
Our comments.....	6
Suggested changes.....	7
Our comments.....	7
Detailed guidance.....	8
<b>Consultation questions</b> .....	<b>9</b>
1) Are the alterations to the SETs and SETs guidance appropriate? .....	9
2) Are additional SETs required? .....	10
3) Is more guidance required?.....	11
4) Is the guidance clear? .....	12
5) Do any standards or parts of the guidance need to be amended to ensure they are applicable to future professions? .....	12
6) How might the standards and guidance better support service user involvement and input into the development and delivery of approved programmes? .....	13
<b>SET 1. Level of qualification for entry to the Register</b> .....	<b>15</b>
<b>SET 2. Programme admissions</b> .....	<b>18</b>
<b>SET 2.1</b> .....	<b>18</b>
<b>SET 2.2.1</b> .....	<b>19</b>
<b>SET 2.2.2</b> .....	<b>22</b>
<b>SET 2.2.3</b> .....	<b>24</b>
<b>SET 2.2.4</b> .....	<b>26</b>
<b>SET 2.2.5</b> .....	<b>26</b>
<b>SET 2.3</b> .....	<b>27</b>
<b>SET 3. Programme management and resource standards</b> .....	<b>28</b>
<b>SET 3.1</b> .....	<b>28</b>
<b>SET 3.2</b> .....	<b>28</b>
<b>SET 3.3</b> .....	<b>29</b>
<b>SET 3.4</b> .....	<b>30</b>

SET 3.5.....	31
SET 3.6.....	32
SET 3.7.....	32
SET 3.8.1.....	33
SET 3.8.2.....	33
SET 3.9.....	34
SET 3.10.1.....	35
SET 3.10.2.....	35
SET 3.10.3.....	35
SET 3.11.....	36
SET 3.12.....	37
SET 3.13.....	38
<b>SET 4. Curriculum standards.....</b>	<b>40</b>
SET 4.1.....	40
SET 4.2.....	40
SET 4.3.....	42
SET 4.4.....	42
SET 4.5.....	43
SET 4.6.1.....	45
SET 4.6.2.....	45
SET 4.7.....	46
SET 4.8.....	46
<b>SET 5. Practice placement standards .....</b>	<b>48</b>
SET 5.1.....	48
SET 5.2.....	49
SET 5.3.....	50
SET 5.4.....	51
SET 5.5.....	51
SET 5.6.....	52
SET 5.7.1.....	53
SET 5.7.2.....	53
SET 5.7.3.....	54
SET 5.8.....	54
SET 5.9.1.....	55
SET 5.9.2.....	55
SET 5.9.3.....	56
SET 5.9.4.....	56
SET 5.9.5.....	57
SET 5.10.....	57
SET 5.11.....	58
<b>SET 6. Assessment standards.....</b>	<b>60</b>
SET 6.1.....	60
SET 6.2.....	61

<b>SET 6.3.....</b>	<b>62</b>
<b>SET 6.4.....</b>	<b>63</b>
<b>SET 6.5.....</b>	<b>63</b>
<b>SET 6.6.....</b>	<b>64</b>
<b>SET 6.7.1.....</b>	<b>64</b>
<b>SET 6.7.2.....</b>	<b>65</b>
<b>SET 6.7.3.....</b>	<b>65</b>
<b>SET 6.7.4.....</b>	<b>66</b>
<b>SET 6.7.5.....</b>	<b>67</b>
<b>Respondents .....</b>	<b>68</b>

## **Introduction**

The standards of education and training (SETs) are the standards against which we (the Health Professions Council) assess education and training programmes.

An education and training programme that meets the SETs allows a student who successfully completes that programme to meet the standards of proficiency. They are then eligible to apply to the Health Professions Council (HPC) for registration.

We first published the SETs in 2004, and began operating our new programme approval process. We also use the SETs in our monitoring processes. We launched our monitoring processes and published guidance for the SETs in 2006. We committed then to review the SETs and guidance after a suitable period of time.

We consulted on our draft document 'Standards of education and training guidance' from 1 August 2008 to 14 November 2008.

You can download the original consultation document from our website:  
<http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=70>

## **About the SETs**

We assess education programmes against the SETs to ensure that they allow those who successfully complete the programme to meet the standards of proficiency (SoPs). The SETs are the threshold level we consider necessary for safe and effective practice. If we approve an education programme it means that those who successfully complete the programme are eligible to apply for registration.

## **The approval and monitoring processes**

The Education Department is responsible for conducting approval visits to education providers to ensure their programmes meet the SETs. If a programme meets the SETs we grant open-ended approval, subject to satisfactory monitoring. There are two monitoring processes – annual monitoring and major change.

Annual monitoring is a retrospective, documentary process to determine whether a programme continues to meet the SETs.

If any changes are made which significantly impact on the provision of the programme we consider these via our major change process to make sure that the SETs continue to be met.

We have also produced supplementary information documents for education providers preparing for an approval visit, completing annual monitoring

submissions, or making significant changes to programmes. These documents give more information about the methods we use to assess programmes against the SETs.

### **This document**

This document is presented in a similar structure to the consultation document with each section addressed individually. The initial section of this document covers the feedback we had to the overall consultation document; we then go on to address the responses to the questions posed in the consultation document.

The substantive element of this document outlines the responses we received about individual SETs and guidance. These have been collated with each individual SET. We have separated these into responses to the SET and responses to the guidance. Where possible, responses have been attributed to the appropriate respondent. We then provide our response to all of the comments and any changes we are making as a result of the comments.

### **Changes to the SETs and guidance**

The review of the SETs and guidance resulted in the SETs and guidance being clarified and reworded where the Professional Liaison Group (PLG) thought appropriate. Some of the SETs were reordered to group them together in a more user-friendly way. Some parts of the SETs and guidance were removed because they were considered unnecessary or duplicated information elsewhere.

This document explains the comments we received, our response and the changes we want to make. This has identified some overall points such as ensuring that the language used is appropriate and is applicable to all types of education providers. We will also make sure that the wording of the example questions is consistent with the SETs.

We have received a number of requests to include additional sources and documentation published by other organisations. We do not endorse or recommend these documents, but we feel they may be helpful when education providers are collecting evidence to show how they meet our SETs. These sources and documents will be added to the SETs and guidance document in the sections titled 'Other sources of guidance' and the 'Further information' section at the end of the document. We have not included the list of sources and documents in this consultation response document.

We will now publish the SETs and guidance having taken account of the feedback.

## **Your responses**

The document was sent to a variety of different stakeholders including professional bodies, education providers and practice placement providers. A list of those who responded can be found at the end of the document.

We held a series of education seminars for education providers and stakeholders in October and November 2008 in London, Glasgow, Liverpool, Cardiff and Belfast. We also held refresher training sessions in September and October 2008 for the registrants in each of the professions who provide the expertise we need for decision making when we approve and monitor programmes' (visitors). We asked all those who attended to go through the consultation document and provide feedback. The feedback from all of these events was collated by the Education Department and submitted as responses to the consultation.

We would like to thank all those who responded to this consultation for their comments.

The responses highlighted in this section address the responses to the overall SETs and guidance. Any responses to the specific questions asked in the consultation document or specific SETs or guidance are highlighted under those SETs later in the document.

## **Overall comments**

The majority of responses we received were positive and many respondents, such as the Department of Health and other health regulators made no comments about specific SETs or guidance.

De Montfort University said they were '...disappointed that the revisions had not led to a reduction in the administrative burden associated with HPC approval'. Two respondents questioned the role of the SETs. A head of centre said the SETs '...did not appear to be directly related to the HPC's role in setting standards for safe and effective practice to protect the public'. While the British Academy of Audiology said '...there are already a number of approval and monitoring schemes in place for academic health care programmes'. They said the approach of the SETs '...creates a huge overlap with other such schemes, with potential for conflict of purpose'.

## **Our comments**

We were pleased to receive so many positive endorsements of the SETs and guidance. The PLG and all those who fed in to the review of the SETs and guidance should be proud of their contribution.

The main issues raised were that we were exceeding our remit to protect the public with our approval and monitoring processes, and also providing education

providers with an additional bureaucratic burden when they were 'already extensively monitored and regulated'.

Article 15(1) of the Health Professions Order 2001 states: 'The Council shall from time to time establish - (a) the standards of education and training necessary to achieve the standards of proficiency it has established under article 5(2); and (b) the requirements to be satisfied for admission to, and continued participation in, such education and training which may include requirements as to good health and good character.'

The legislation is clear that the SETs should apply not only to the outcome of education and training but also to the 'admission to, and continued participation in' education and training. It is important for the safety of the public that those who successfully complete an approved education and training programme can meet the standards of proficiency, but it is equally as important that those on education and training programmes are gathering the appropriate skills and knowledge to meet them. Therefore, we approve and monitor the programmes that would allow someone to apply to join our Register.

We accept that there are a number of monitoring and approval mechanisms that education providers must meet. This is why we have designed our system to work as closely as possible with the other systems, such as the Quality Assurance Agency (QAA). We try to use much of the same information for our approval and monitoring to reduce the administrative burden.

### **Suggested changes**

Northumbria University and the British Association of Counselling and Psychotherapy said the document was sometimes unclear about what was required and what was recommended.

The British Psychological Society requested a change to the terminology to 'trainee' rather than 'student' because they said it would more fairly represent the broader spectrum of those undertaking education and training.

The British and Irish Orthoptic Society said the lists titled 'Example questions' was misleading because these questions are not always asked on approval visits. They also said the questions may limit what education providers may provide. They said the heading should be changed from 'Example questions' to 'Things you may consider'.

### **Our comments**

The wording of the SETs and guidance was looked at very closely during the review. We made sure the SETs and guidance applied to all of the professions regulated by the HPC without being too prescriptive. We found there was often more than one way for the requirements to be met and we did not want to limit

the ability of education providers to demonstrate how they met the SETs in the manner which was most appropriate to them.

We used the term 'student' throughout the document to mean anyone studying on a programme which leads to eligibility to apply to join our Register. The term includes 'trainees' or 'practitioners in training'. To help define and explain terms we provided a glossary of terms at the end of the SETs guidance document.

### **Our changes**

We will clarify at the start of the document that the 'example questions' are not intended to be an exhaustive list of the questions that may be asked. Our intention is to provide examples of the type of questions that may be asked and the areas that may be considered.

We appreciate that the term 'student' may be contentious for some, however, this also applies to the term 'trainee'. Rather than changing this in the document we will add a paragraph in the 'About this document' section. The paragraph will say: 'We have used the term 'student' throughout this document. We use this to mean anyone studying on a programme which leads to eligibility to apply to join our Register. The term includes trainees or practitioners in training.'

### **Detailed guidance**

In the remainder of the document we summarise the responses to the consultation questions and then show the detailed responses made about specific SETs or guidance for the SETs.

## **Consultation questions**

To help people formulate a response we asked five specific consultation questions, we also sought views on service user involvement, in the consultation document. The following responses are general comments, not addressing a specific SET.

### **1) Are the alterations to the SETs and SETs guidance appropriate?**

The Royal Bolton Hospital, the University of Cumbria and some participants at the visitor training days said the alterations were: ‘...appropriate, clear and explicit’, The Chartered Society of Physiotherapy and the University of Ulster also said the alterations were appropriate and that the SETs guidance was easy to read.

The Society of Sports Therapists said: ‘...the alterations to the SETs and the SET guidance notes are appropriate and well thought out...the way the notes have been written in this consultation document are exemplary. If the notes were expanded there would be an increased risk of confusion taking place.’

The response of Canterbury Christ Church University related the amendments to the programmes they run. They said a number of their programmes were interprofessional programmes and that ‘...the alignment through the generic SETs eases interprofessional programme development’.

A number of responses including the feedback from the visitor training days referred to the overarching SETs and the need for them to be ‘stand alone’ SETs. These are the SETs such as SET 6.7, where a number of SETs cover various aspects of the programme. The feedback suggested that these SETs were confusing and it was not always appropriate for them to be kept together.

The Open University said other health regulators specified the amount of time that should be spent on practice and theory which HPC did not. They said this raised questions of equity and patient safety in relation to professions not regulated by the HPC.

### **Our comments**

We are pleased that so many responses were positive about the alterations made to the SETs and guidance. Many of the suggested amendments have been applied under specific SETs along with our responses.

We agree that separating the SETs and guidance will make the document clearer and remove the possibility of confusion about which aspect of the SET is required. The numbering of the SETs will change, but no more additional SETs will be added as a result.

We do not specify the amount of time spent on practice and theory because this may vary between the professions we regulate and would place an unnecessary limitation on individual programmes. There must be a placement element of the programme and this is covered by SET 5.

### **Our changes**

All sub-divided SETs will be separated into 'stand alone' SETs. We highlight which SETs these are under the specific SET. Appropriate guidance will be separated and added where necessary.

### **2) Are additional SETs required?**

Some respondents said there were areas that were not addressed by the SETs and said further SETs were required.

A principal lecturer said there should be a SET or guidance for advanced practice.

Play Therapy UK suggested there should be an additional SET in SET 4. They suggested: 'The delivery of the programme must require practice based evidence'.

The Higher Education Academy said teaching quality should be strengthened to make it a core SET.

The University of Greenwich said there should be '...a SET covering the registration process for students graduating from higher education programmes'.

The Heads of Radiography Education Group said they '...would like to see something about students having access to appropriate IT when on placement'.

### **Our comments**

The SETs must apply to all of the professions we regulate and must also cover all the aspects of the education and training so that those who complete a programme can meet all of the standards of proficiency and are safe and effective to practise. The SETs do not serve 'advanced practice'; guidance in this area is sometimes produced by appropriate professional bodies.

We do not feel that adding an additional SET requiring: '...practice based evidence' adds to the SETs. The type of practice based evidence varies between the professions we regulate and can be found in the proposals for more than one of the SETs.

Teaching quality is implied and covered indirectly by many of the SETs and guidance and we did not feel that a specific SET relating to teaching quality would be appropriate because there are other monitoring mechanisms in place

that education providers must meet that relate specifically to the quality of teaching.

The SETs are used to approve and monitor education and training programmes. By completing an approved programme a student will show they are able to meet the standards of proficiency and are eligible to apply to join the Register. Joining the Register is an individual decision, it would not be appropriate to link it to the approval and monitoring of a programme. We would recommend to education providers that they should provide information to students about registration and where they can find further information.

The requirements made around appropriate resources, such as IT, on placements are made under the programme management and resource SETs. We do not approve practice placement providers and could not make any requirements under the practice placement SETs (SET 5), therefore appropriate resources at the practice placement setting are covered by SET 3.9 which requires there to be 'the resources to support learning in all settings'.

### **Our changes**

No changes will be made.

### **3) Is more guidance required?**

Some responses suggested there was already too much guidance. For example the Board of Community Health Councils Wales responded by stating the '...guidance notes are thought to be over prescriptive and may unintentionally be interpreted as restrictive in an individual profession'.

A hospital manager said there should be more guidance on support mechanisms for practice placement educators and specifically in regard to training.

### **Our comments**

Many of the responses to this question were attributed directly to specific SETs and inform the responses later in this document.

We are conscious of providing too much, or too little guidance. We have to strike a balance where there is sufficient information available to allow the education provider to know how they can meet the SETs whilst still allowing them to interpret them to their local situation. We try to make sure that the guidance we provide is appropriate and is not prescriptive. We use language that shows when something is a requirement and when it is one of the ways the SET could be met.

The guidance on support mechanisms and training differ between education providers, and practice placement providers. We would not specify one type of training over another; however, we want to see evidence of how an education provider provides support to practice placement educators.

## **Our changes**

Any changes to the guidance are highlighted after the specific SET.

### **4) Is the guidance clear?**

The majority of responses to this question were attributed directly to specific SETs and inform the responses later in this document.

The Association for Perioperative Practice said some of the cross-referencing throughout the document appeared to be potentially tenuous. However, the Head of Radiography Education Group said the ‘...variation in interpretation by different HEIs is valuable for creativity and minimises potential for stagnation and reduces the likelihood of a formulaic approach’.

## **Our comments**

We must make sure the guidance can be understood by all those who need to meet the SETs. We also try to reduce the administrative burden on education providers by providing cross-referencing in the guidance to show where the evidence required for one SET may also be used for another SET. This may vary between programmes.

## **Our changes**

We will review the cross-referencing throughout the document. Any changes to the guidance will be highlighted after the specific SET.

### **5) Do any standards or parts of the guidance need to be amended to ensure they are applicable to future professions?**

Both UNISON and the Council of Deans said the SETs and guidance were sufficiently comprehensive and that their generic nature means they will be applicable to the development of programmes for future HPC approved professions.

The Heads of Radiography Education Group said the document should have some guidance about how somebody starts to prepare a programme of study for a professional group who is not yet on the Register. While the British Society of Hearing Aid Audiologists said we needed to make sure the SETs gave ‘...the right balance of academic and workplace learning’.

The British Association of Counselling and Psychotherapy said they appreciated the flexibility that the SETs had to offer but were concerned that some of the SETs may not be achievable by education providers in the private sector.

## **Our comments**

The government White Paper ‘Trust Assurance and Safety - The regulation of health professionals in the 21<sup>st</sup> Century’ suggested that the HPC would be the most likely regulator of any future health professions to be statutorily regulated. With this in mind, we wanted to make sure that the SETs would be applicable to

these professions and be aware of potential issues. We are pleased to see that most respondents suggested the SETs are effective and would not pose too many difficulties for professions who are regulated in the future to meet.

We are currently hosting a professional liaison group with counsellors and psychotherapists to look at how they may be regulated in the future. One discussion being undertaken is about all aspects of education relating to the profession.

There are a number of independent training providers who currently meet the SETs and have programmes approved. We make sure that we work with all education providers to allow them to meet the SETs.

### **Our changes**

Where possible we have addressed the concerns of 'future professions' after the specific SETs they relate to. We will retain all concerns that 'future professions' have and use them in our work with them to make sure they are able to meet all of the SETs when they become statutorily regulated by us.

### **6) How might the standards and guidance better support service user involvement and input into the development and delivery of approved programmes?**

A note of caution was provided by a number of respondents. The University of Manchester said it was a valid aim for the SETs to encourage service user input into programmes but it cannot be prescriptive about degree or nature of involvement given the huge range of topics and service users covered. Whilst a visitor wanted to stress that any possible new SET '...must result in meaningful involvement'.

The University of Greenwich said it was a good idea to enable students to have some insight of intense personal experiences. They suggested it would be appropriate for those involved in paramedic education and training to use resources from large events that have been broadcast on national television, such as the London bombings on July 7 and the Marchioness disaster.

A number of respondents suggested amending existing SETs or the guidance for a SET. The Chartered Society of Physiotherapy suggested something could be included in either the SET or guidance for SET 3.3. They said programmes could include service users in the design and delivery of programmes and as a result have appropriate monitoring and evaluation systems in place.

The Chartered Society of Physiotherapy also said service user involvement and input could be included as part of SET 3.8. They suggested that we should include human resources within our consideration of resources. This would then allow us to highlight patient/service user input in the programme.

Northumbria University suggested a SET 3.14: 'The programme should demonstrate a process to enable the involvement of service users and carers in the development, delivery, assessment and evaluation of the curriculum'. The North East Strategic Health Authority said they would support this response.

An occupational therapist suggested adding the following to the start of the guidance for SET 4.2: 'It is best practice to involve service users in developing and reviewing a programme, particularly with regard to safe practice, and you may wish to refer us to any process that you either have in place or are developing'.

The University of Teesside suggested amending SET 4.4. They said SET 4.4 could stress the significant role of user/carers in curriculum development, implementation and evaluation. Whilst The Chartered Society of Physiotherapy said we could strengthen our commitment to service user involvement by requiring a meeting with them in SET 4.4, along with the groups we currently meet such as placement educators, students and representatives from strategic health authorities.

The University of Teesside also said it could be made clear in SET 4.8 about the centrality and purpose of the service user / patient journey for successful interprofessional learning'.

NHS Education for Scotland suggested including it in the guidance in SET 5.7 where the service user can access some education/training

Skills for Health said SET 5.11 could be amended to reflect service user's active engagement in the curriculum planning and development.

### **Our comments**

We feel it is important that any requirements for service user involvement would lead to meaningful involvement. For this reason, we do not want to rush in a new SET. We will add to the existing guidance where appropriate.

### **Our changes**

Guidance will be added where appropriate. This is highlighted under the specific SET.

## **SET 1. Level of qualification for entry to the Register**

1. 1 The Council normally expects that the threshold entry routes to the Register will be the following:
1. 1. 1 Bachelor degree with honours for:
- biomedical scientists (with the Certificate of Competence awarded by the Institute of Biomedical Science, or equivalent);
  - chiropodists / podiatrists;
  - dietitians;
  - occupational therapists;
  - orthoptists;
  - physiotherapists;
  - prosthetists / orthotists;
  - radiographers; and
  - speech and language therapists.
- 1.1.2 Masters degree for arts therapists.
- 1.1.3 Masters degree for clinical scientists (with the Certificate of Attainment awarded by the Association of Clinical Scientists, or equivalent).
- 1.1.4 Diploma of Higher Education for operating department practitioners.
- 1.1.5 Equivalent to Certificate of Higher Education for paramedics.

### **Comments on the standard**

We found that many stakeholders were confused by this SET and they said there was a lack of clarity provided by the guidance. At the visitor training days, some participants said the inclusion of the word 'normally' made the SET difficult to assess and questioned whether the SET had any value while it contained the word 'normally'. At the education provider seminars, some participants said they were confused about when, or how, 'normally' applied.

At the visitor training days, some participants said academic levels were not appropriate to particular professional roles and that competency did not equate to an academic award level. The British Psychological Society suggested the use of degree titles was ambiguous and inflexible. They said the SET would be better served by using 'nationally agreed qualification frameworks in higher education'.

At the education provider seminars, some participants asked why the academic levels for entry to the Register differed. At the visitor training days, some participants said mixed messages were being given to professions because of the different levels of qualifications being set for various professions.

The College of Paramedics and a number of individual responses said it would be appropriate to make the threshold entry level for paramedics higher. They said '...it should be at foundation degree or diploma of higher education level' because they did not feel that the threshold of a certificate of higher education was appropriate to achieving the practical elements of the programme.

Other respondents, including the British Dietetic Association, said they understood that the SET related to the minimum educational requirements they would welcome reference to the post-graduate routes available.

### **Comments on the guidance**

At the education provider seminars, some participants said the guidance should mention prescribing entitlements, but if this was not possible, the guidance should explain where this information could be found.

### **Our comments**

The purpose of the SETs is to identify the means by which the standards of proficiency can be delivered by a programme of education and training.

SET 1 provides the threshold levels of qualification 'normally' expected to meet the remainder of the SETs (and thus the standards of proficiency). The term 'normally' is included in SET 1 as a safeguard against the unlawful fettering of the Council's discretion. Given the terms of the Health Professions Order 2001, it would be an improper exercise of its powers for the HPC to refuse to approve a programme which delivered the standards of proficiency and the remainder of the SETs solely on the basis that it did not lead to the award of a qualification specified in SET 1.

In setting the threshold level of qualification for entry, the Council is setting the threshold academic level of qualification which it would normally accept for the purposes of an approved programme which leads to registration. As the threshold is the 'minimum', programmes above the threshold academic level may be approved.

Our primary consideration in approving a programme, at, or substantially above the threshold, is that the programme meets the SETs and will allow students to meet the standards of proficiency on completion.

The threshold level might change over time to reflect changes in the delivery of education and training. This has happened in a number of the existing professions we regulate – as professions have developed the threshold academic level has increased. Any change in the threshold academic level is one that is normally led by the profession and/or by education providers and employers and which occurs over time. At an appropriate time, consideration might be given to changing SET 1, having regard to the level at which the majority of education and training is delivered.

In the case of paramedics, the current threshold level is set at equivalent to a Certificate of Higher Education. In the past, all pre-registration training was via the IHCD Paramedic award delivered by ambulance trusts. The IHCD Paramedic award is not a formal Certificate of Higher Education, but an IHCD (Part of Edexcel) award. There has been a move by education providers to develop

paramedic pre-registration education and training and we now approve a number of programmes at foundation or honours degree level, however, a substantial number of new entrants to the Register still qualify by the IHCD route.

Reference to prescribing rights goes beyond the remit of this SET. Information relating to prescribing rights can be found on our website.

### **Our changes**

The subsections of the SET (i.e. 1.1.1, 1.1.2, 1.1.3, etc) are unnecessary. The professions will be listed without being grouped using numbers.

We will revise the guidance to provide examples of when normally and equivalent may apply. We will also revise the guidance to help explain the purpose of the SET and the flexibility within it.

## **SET 2. Programme admissions**

### **Overall comments**

At the education provider seminars, some participants said a specific requirement for identity checks should be included within SET 2.

### **Our comments**

We feel that having a specific SET requiring identity checks is unnecessary. All of the current SETs require the identity of the applicant to be known.

### **Our changes**

No changes will be made.

## **SET 2.1**

The admissions procedures must:

2.1 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.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

The feedback from the visitors training days said the guidance needed to be clarified so that the costs related to placement travel and accommodation were made clear to applicants.

### **Our comments**

The second paragraph of the guidance refers to travel and accommodation costs. The guidance states: 'You may want to provide information to show how you tell applicants about accommodation costs, funding arrangements such as bursaries and loans and any other costs (such as personal therapy for arts therapists). You will also need to provide information about:

- any costs that applicants will need to meet (for example to cover criminal record checks, health checks and immunisations);
- the length and possible location of practice placements;
- whether they will need to stay away from the main site of programme delivery; and
- their travel, and how this is funded.'

We agree that the guidance could be clearer on the information that should be provided.

### **Our changes**

The second paragraph of the guidance will be amended. It will now read:

'You will need to provide information to show how you tell applicants about the costs and how they are funded. You will need to provide information on:

- funding arrangements (such as bursaries and loans);
- accommodation costs; and
- other costs (such as criminal record checks, health checks, immunisations, or personal therapy for arts therapists).

You will also need to provide information to show how you tell applicants about placements. You will need to provide information on:

- the length and possible location of practice placements;
- whether they will need to stay away from the main site of programme delivery; and
- their travel, and how this is funded.'

### **SET 2.2.1**

The admissions procedures must:

2.2 apply selection and entry criteria, including:

2.2.1 evidence of a good command of reading, writing and spoken English;

#### **Comments on the SET**

The responses we received for this SET were positive about the proposed change. The University of Greenwich said '...the change is welcomed', whilst the Council of Deans and Manchester Metropolitan University suggested alterations to the wording of the SET whilst retaining the intention of the amendment.

The Council of Deans suggested that the SET should read: 'The admissions procedures must apply selection and entry criteria, including evidence of ability to write, read and speak commensurate with the level of study'.

Manchester Metropolitan University suggested that understanding English should also be a requirement which was specifically mentioned. They suggested the SET should read: 'The admissions procedures must apply selection and entry criteria, including evidence of a good command of reading, writing, speaking and understanding English.'

#### **Comments on the guidance**

Three key themes emerged from the consultation responses.

1. When do the English language requirements apply?

At the education provider seminars, some participants said the guidance should be clarified so education providers were clear when they should apply the English language requirements.

The College of Occupational Therapists said it was important to state the level of English language proficiency that the HPC considers to be 'good' at the start of the programme, rather than on completion.

A number of respondents including the University of Bradford were unsure whether an IELTS level 7.0, or equivalent, was required on entry or exit to the programme. The Chartered Society of Physiotherapy said ‘...this has been raised at almost every event in the last three years by HPC visitors and is always at odds with current practice in HEIs whereby students are assessed at the beginning of the programme (and accepted with 6.5)’.

Alternatively, Northumbria University said an entry requirement of IELTS level 7.0 needed to be clearly stated because it is the minimum standard for practice which would include practice placements. The North East Strategic Health Authority also said that ‘...the minimum standards for entry these should be consistent with the standard required on completion of the programme if there were to be no further testing of these skills prior to qualifying’.

## 2. Who do the language requirements apply to?

The British Psychological Society said the guidance was unclear about whether the English requirements applied to all applicants, or just to those for whose first language is not English. At the education provider seminars, some participants queried whether language requirements could be applied to applicants from the European Economic Area (EEA) as well as international applicants. They were unclear as to whether EEA applicants should, or could legally, be treated the same as UK applicants.

## 3. Who should undertake the testing and what methods should be used?

At the education provider seminars, some participants said the guidance should clarify who was responsible for testing students’ and prospective registrants’ English language ability and the assessment processes they should use.

The University of Ulster questioned how the level of spoken English could be determined, while some participants at the education provider seminars said the guidance should make clear what education providers were expected to do about spoken English skills without interviewing applicants.

Both UNISON and the Association for Perioperative Practice said more guidance should be provided with a statement relating to understanding English.

### **Our comments**

#### 1. When do the English language requirements apply?

Most education providers already have English language requirements and the SET is in place to make sure that a student can succeed on the programme (i.e. that they can cope with the theory and practise parts, at the appropriate level of the programme). At the end of the programme the student must be able to meet our standard of proficiency on English language.

Education providers are responsible through their admissions procedures for checking evidence that applicants have ‘a good command of reading, writing and spoken English’. An education provider should determine the suitable English language level for the delivery of their programme and they should specify the level they require in their admissions procedures.

On entry to a programme, we do not expect education providers to enforce the IELTS level we specify in the standards of proficiency, nor do we expect education providers to test on completion to get an IELTS level. We would not take action if the programme design or placement requirements stipulate a higher IELTS level on entry.

Our requirement relates specifically for someone who has completed an approved programme and applying to join the Register. At this point they must be able to meet the required level of English proficiency for the standards of proficiency for their profession.

## 2. Who do the language requirements apply to?

The SET applies to all applicants; this includes those whose first language is English and EEA applicants. The guidance clearly states that the evidence ‘...of a good command of reading, writing and spoken English’ may differ, but this does not remove the requirement for all applicants to meet the level set by the education provider.

## 3. Who should undertake the testing and what methods should be used?

We recognise that education providers need to be able to determine the appropriate level of English required for a student to be able to participate in their programme.

Education providers must determine the most appropriate method for their programme of assessing prospective registrants’ English language ability, this includes which assessment processes they choose to use. This may include requiring an appropriate level of qualification, but could also include interviewing applicants.

We feel it is unnecessary to add ‘...understanding English’ when this can be assumed though the appropriate level of ‘...reading, writing and spoken English’.

### **Our changes**

The SET will be renumbered as SET 2.2.

We will amend the guidance to clarify the flexible nature of the requirements an education provider can make regarding the level of English required to begin a programme.

We will also clarify to whom the language requirements apply.

## **SET 2.2.2**

The admissions procedures must: 2.2 apply selection and entry criteria, including: 2.2.2 criminal convictions checks;
---

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

Two themes emerged from the consultation responses.

#### 1. Level of checks and appeals.

The draft guidance states that a criminal conviction check should be made on all applicants. A programme coordinator said it was unnecessary to run criminal conviction checks on all applicants and that it should be sufficient to run checks on successful applicants only.

A response from the University of Bradford stated that ‘...HPC should form a panel to provide definitive advice to HEIs on how to respond to individual prospective students when issues such as convictions and/or cautions are revealed.’

The British Psychological Society said additional guidance was required to clarify whether a specific check was required for entry to the programme or whether the education provider could accept a certificate obtained for another purpose.

At the visitor training days, some participants said the guidance should be more definite regarding the requirements for enhanced disclosure. They said it should be changed to say that ‘...all disclosures should be at an enhanced level’.

A senior education advisor said there needed to be additional guidance as to who meets the cost of the criminal conviction check.

#### 2. Criminal convictions and registration.

The British and Irish Orthoptic Society said that a criminal convictions check should also be repeated in the final year of the course.

Both Manchester Metropolitan University and UK Council for Psychotherapy argued that having a criminal record should not prevent someone from training

and practising. The UK Council for Psychotherapy said people with criminal records **often** come from backgrounds that help to **often** bring a depth of understanding that is vital to the work and the development of the professions. They said further guidance was required on enhanced disclosure to address issues of rehabilitation and restitution.

The Association for Perioperative Practice expressed concern that the guidance was not clear enough about accepting a student or continuing to educate a student with a criminal record that would potentially bar the student from clinical placements and subsequent registration. They said this would not be in the student's, or the institution's best interests.

### **Our comments**

The education provider should treat each applicant on an individual basis. We agree that it is only necessary to run checks on applicants who are initially successful. The education provider should decide, on receipt of all the relevant information, whether an applicant will be able to undertake all aspects of the programme. They should also decide whether they wish to rely on a valid, in date criminal conviction check which was obtained for another purpose.

We do not require disclosures to be at an 'advanced level'. We believe that education providers are able to decide the appropriate level required to undertake their programme.

To help education providers the guidance makes specific reference to an applicant declaring a criminal conviction. The guidance says: 'If you are considering an application from someone who has a criminal conviction, you may find it helpful to refer to our standards of conduct, performance and ethics, and consider if any criminal conviction might affect that person's ability to meet those standards.' We recognise that making these decisions can be difficult and are currently consulting on guidance for applicants, registrants, and education providers about health and character.

At the point of entry to the Register we require applicants to declare their criminal convictions. For this reason we feel it is disproportionate and unnecessary to require education providers to carry out a criminal conviction checks at the end of programmes.

We recognise that it is possible for someone with a criminal record to practise a profession safely and effectively and we have only turned down a small number of applicants who have declared their criminal convictions at the point of registration.

We consider the information we receive about applicants when they apply for registration on a case by case basis. As a result, we can not provide a list of convictions and cautions that would definitely lead to an application for

registration being rejected. As a result, we also can not provide a list of convictions or cautions that would definitely lead to a rejection of an application by education providers. Between June 2005 and December 2007, 560 declarations on admission or renewal to the Register were considered by the HPC and concluded.

However, there are certain types of offences which we believe are usually incompatible with being a registered health professional. The types of convictions which might result in a registrant being struck off the Register usually relate to offences of a sexual nature or dishonesty or deception. It is likely that applicants with these types of convictions would also not be able to register with us.

### **Our changes**

The SET will be renumbered as SET 2.3.

We will add to the guidance to clarify that an appropriate and relevant criminal conviction check should be carried out by the education provider.

### **SET 2.2.3**

The admissions procedures must: 2.2 apply selection and entry criteria, including: 2.2.3 compliance with any health requirements;
---

#### **Comments on the SET**

The British Psychological Society said ‘...appropriate to the profession’ should be added to the end of the SET.

#### **Comments on the guidance**

A programme leader and some participants at the visitor training days, said more clarification was needed over what programmes should require and what visitors should look for around health requirements. The programme leader said it would be ‘...unethical (and unreasonable) to accept a student on such a course if the student will not be able to practice’.

At the education provider seminars, some participants said clearer guidance was needed on how education providers should respond to applicants with disabilities and how they should link reasonable adjustments to fitness to practice.

Both the College of Occupational Therapists and some participants at the education provider seminars said clearer guidance was required on the occupational health process. They also both said that clearer guidance was required on what reasonable adjustments an education provider could and should make.

At the education provider seminars, some participants said some example questions in the area of equality and diversity, and disability would be useful.

They also said there should be guidance on how they should deal with students who have significant periods of illness midway through the programme.

### **Our comments**

We feel it is important that the SETs are clear in the requirements they make. The SETs must be appropriate to all of the professions we regulate. We feel it is unnecessary to add ‘...appropriate to the profession’ to the end of the SET because we assess the individual programme against this SET and it is as open to interpretation as the current wording.

When we talk about ‘health’ we mean health conditions which may affect either an applicant’s or a registrant’s fitness to practise. We are not asking whether an applicant or registrant is ‘healthy’. This is because someone may be unwell, they may have a condition which they need treatment for or they may be disabled, but they will still be able to practise their profession safely.

We recognise that there is a debate around disabilities and how far these are considered to be issues of ‘health’. For example, some disabled people may be in excellent health. Some disabled people may have a health condition which is not related to their disability. At the point of entry to the Register, we do not require information about the disability or health condition unless it affects an applicant’s or registrant’s fitness to practise.

There are different views about this and we recognise that some disabled people may have a health condition as well as their disability, or they may consider themselves to have a health issue rather than a disability.

All health requirements must be appropriate to the programme content and delivery; this may include necessary requirements such as immunisations. All health requirements should be in line with the Disability Discrimination Act (1995) and should not prevent anyone from training when all reasonable adjustments have been made. The education provider should not be basing their decision on whether they think ‘the student will not be able to practice’ upon completing the programme.

We have provided guidance with the SET which should be used along with additional publications we have produced, ‘A disabled person’s guide to becoming a health professional’ and ‘Information about the health reference’. These documents provide further information about reasonable adjustments and the necessity for someone to show insight and understanding of their health condition.

We do not feel it would be appropriate or beneficial to produce further guidance on what reasonable adjustments an education provider should make. Reasonable adjustments must be made on a case-by-case basis looking at each individual’s circumstances and requirements. We would expect education

providers to apply this reasoning when the health of a student changes once they are enrolled on the programme.

### **Our changes**

The SET will be renumbered as SET 2.4.

We have produced a document 'Information about the health reference' which covers many of the issues raised by the responses. No changes will be made to the SETs or guidance.

### **SET 2.2.4**

The admissions procedures must:

2.2 apply selection and entry criteria, including:

2.2.4 appropriate academic and/or professional entry standards;

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

At the education provider seminars, some participants said more guidance was needed on numeracy skills.

#### **Our comments**

The guidance for this SET currently begins with: 'We will want to be assured that your academic and professional entry standards, including those regarding literacy and numeracy, are appropriate to the level and content of the programme'. We feel the guidance is clear and allows for variation depending on the programme.

### **Our changes**

The SET will be renumbered as SET 2.5.

### **SET 2.2.5**

The admissions procedures must:

2.2 apply selection and entry criteria, including:

2.2.5 accreditation of prior (experiential) learning and other inclusion mechanisms.

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

No comment.

### **Our changes**

The SET will be renumbered as SET 2.6.

### **SET 2.3**

The admissions procedures must:

2.3 ensure that the education provider has equality and diversity policies in relation to applicants and students, together with an indication of how these will be implemented and monitored.

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

No comment.

#### **Our changes**

The SET will be renumbered as SET 2.7.

## **SET 3. Programme management and resource standards**

### **Overall comments**

The Higher Education Academy suggested that we add the following example questions:

- 'Do all those who help the students learn have a teaching qualification? If not, how do you ensure that the student learning experience is an effective one?
- What staff development is offered in order to enhance teaching?'

### **Our comments**

We are happy to add the additional example questions.

### **Our changes**

The additional questions will be added.

## **SET 3.1**

3.1 The programme must have a secure place in the education provider's business plan.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

A quality manager said it was important for the relevant Strategic Health Authority Education Commissioning Team documentation to be included as evidence of award of contract.

Both Cardiff University and the National Leadership and Innovations Agency for Healthcare (NLIAH) said NLIAH should be included in the list of commissioners. NLIAH also informed us that the Higher Education Funding Council for Wales (HEFCW) does not fund any of the groups that we regulate.

### **Our comments**

Not all programmes we approve will be commissioned by a Strategic Health Authority. Therefore, it would not be appropriate for us to require the documentation in the guidance, however, we will add this in as an example of the kind of information that could be provided as a source of evidence.

### **Our changes**

We will add NLIAH to the list of groups who may provide funding or planning information.

## **SET 3.2**

3.2 The programme must be effectively managed.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

At the education provider seminars, some participants said the guidance should be expanded to acknowledge the role of the management of placement providers in the overall management of the programme.

### **Our comments**

We feel the guidance acknowledges the role of the management of placement providers in the overall management of the programme in the first paragraph of the guidance. The paragraph reads: 'We will want to see evidence of the programme management structure. This may include the lines of responsibility and the links to the management of practice placement providers, highlighting the roles and responsibilities of all parties.'

### **Our changes**

No changes will be made.

## **SET 3.3**

3.3 The programme must have regular monitoring and evaluation systems in place.

### **Comments on the SET**

The University of Greenwich said the addition of this SET made the SETs '...much more robust'.

The College of Radiographers said the SET should be changed to read: 'The programme must have regular internal and external monitoring and evaluation systems in place'.

### **Comments on the guidance**

The University of Ulster and the some participants at the education provider seminars said there should be further guidance to clarify who was '...responsible for producing a critical review, the process for its production, its tone and purpose, the documentation required, and what it should include'.

The British Psychological Society welcomed the commitment to avoid duplication.

At the education provider seminars, some participants said we should dictate the frequency of audits/monitoring exercises. The British Society of Haematology also said the guidance regarding the minimum level of monitoring which is required was too vague and should be more clearly specified.

At the visitor training days, some participants said further guidance was required to explain that along with monitoring and evaluating, we would also check what happened with the information and ensure it was acted upon.

### **Our comments**

Both internal and external monitoring and evaluation systems may be used to demonstrate how education providers meet this SET. However, the amount of internal and external monitoring and evaluation systems they go through varies. We do not feel it would clarify the SET to include 'internal and external' but will make sure the guidance refers to both internal and external monitoring and evaluation systems.

We try to avoid the duplication of internal and external processes. The reference to critical review is an example of evidence that may be included to show how education providers meet the SET. We believe if we were to specify '...who is responsible for producing a critical review, the process for its production, its tone and purpose, the documentation that will be required, and what it should include', we would be asking the education providers to duplicate processes they may already be carrying out.

We also do not want to make the SETs or guidance too prescriptive. Different programmes will develop systems of auditing and monitoring that are appropriate and effective for them. Specifying a minimum level of auditing would not be appropriate for all programmes, this is why we ask that '...the monitoring and evaluation systems (for example, internal quality audits, external examiner reports, and student feedback) are appropriate to, and effective for, the programme.'

### **Our changes**

We will add to the guidance to explain that along with regular monitoring and evaluating we will also want to see how education providers make sure the information is acted upon.

We will include service user engagement in the guidance.

### **SET 3.4**

3.4 There must be a named person who has overall professional responsibility for the programme who should be appropriately qualified and experienced and, unless other arrangements are agreed, be on the relevant part of the Register.
--

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

At the education provider seminars, some participants praised the guidance for the flexibility that this SET gave. They suggested examples of appropriate scenarios would help to elaborate the guidance.

The response from Bangor University and from some participants at the visitor training days said guidance was required to state that if a programme leader was

not on the Register then at least one member of support staff/wider programme team should be on the Register.

### **Our comments**

We use examples in the guidance to provide a broad outline of the type of information we may look for. We want to avoid making the guidance more prescriptive than necessary and feel if we add too many examples we run the risk of making the guidance more prescriptive.

This SET concerns the person with overall responsibility for the programme, not the support team. The guidance must clearly relate to the SET so we do not specify that a member of the support team must be on the Register because this would not result in us setting conditions against this SET. However, the support team must have the relevant specialist expertise and knowledge which may include being on the Register. The support team is covered by SET 3.6.

### **Our changes**

The 'should' in the SET will be changed to 'must'.

## **SET 3.5**

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

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

The Association of Heads of Psychology Departments, some participants education provider seminars, The Chartered Society of Physiotherapy, and the College of Radiographers all said there should be clear guidance on how we interpret 'adequate' and 'appropriately'.

### **Our comments**

The guidance is clear that we do not set staff/students ratios. Each programme is different and has different staffing requirements. It is for each programme to determine and justify the number of staff in place and how they are appropriately qualified and experienced.

### **Our changes**

We will add additional guidance on how we will interpret 'adequate' and 'appropriate'.

## SET 3.6

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

### Comments on the SET

The College of Radiographers suggest adding ‘...and qualifications’ to the end of the SET.

### Comments on the guidance

The Association of Heads of Psychology Departments said the guidance was ambiguous about how expertise will be determined and would like there to be more detail on this.

At the visitor training days, some participants said the guidance should include expectations for part-time staff, visiting lecturers and quality assurance roles.

The UK Council for Psychotherapy said they currently require a recommendation for ‘...good professional standing’ of all those involved with programme delivery. They said this should be required to meet this SET.

### Our comments

We received few comments about this SET but two points were raised. The first point concerned how we determine expertise. We feel it is for education providers to determine the expertise and knowledge of the staff (including part-time staff and visiting lecturers) they require for delivering the programme. We do not specify the precise expertise and knowledge that are needed to deliver certain aspects of a programme, as we feel that this may change as good practice develops.

The second point relates to the evidence we require to demonstrate that staff are not in disrepute in their profession. We would expect that all those involved with the delivery of a programme are in good standing in their profession. Employers should make all attempts to ensure that they are.

### Our changes

No changes will be made.

## SET 3.7

3.7 A programme for staff development must be in place to ensure continuing professional and research development.

### Comments on the SET

We did not receive any comments on this SET.

### Comments on the guidance

At the education provider seminars, some participants said the guidance was geared towards higher education institutions especially when the terms

'continuing professional development and research development' and 'visiting lecturers' were used.

### **Our comments**

Many of the programmes we approve are based in higher education institutions but there is no requirement for them to be. The examples in the guidance are not intended to be definitive but need to be understood by most education providers. We will check through the document to make sure the language used is appropriate to all those who use it.

### **Our changes**

No changes will be made.

## **SET 3.8.1**

3.8 The resources to support student learning in all settings:  
3.8.1 must be effectively used;

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

At the education provider seminars, some participants said the guidance should include examples of how they could demonstrate that their resources are used effectively.

### **Our comments**

The demonstration of using resources effectively must be appropriate to each programme and is dependant on the available resources in each setting. We feel that providing further examples would make the guidance more prescriptive.

### **Our changes**

The SET will be renumbered as SET 3.8.

Our Education Department provided feedback which said there was occasionally confusion as to what was meant by 'all settings' in this SET. We will clarify in the guidance what we mean by 'all settings'.

## **SET 3.8.2**

3.8 The resources to support student learning in all settings:  
3.8.2 must effectively support the required learning and teaching activities of the programme.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

No comment.

### **Our changes**

The SET will be renumbered as SET 3.9.

### **SET 3.9**

3.9 The learning resources (including the stock of periodicals and subject books), and IT facilities (including internet access), must be appropriate to the curriculum and must be readily available to students and staff.
--

#### **Comments on the SET**

At the education provider seminars, some participants said learning resources and information technology facilities were not separate. They said the word 'and' should be replaced by 'including'.

#### **Comments on the guidance**

The British and Irish Orthoptic Society said the guidance should include detail on the access to core texts and online facilities at clinical placement sites, and if possible, suggest a funding stream.

### **Our comments**

We accept that IT facilities and learning resources are often the same thing and aid learning. We agree that using the word 'including' rather than 'and' will strengthen the SET.

The guidance states: 'We will also want to know how the students will be able to access the learning resources wherever their learning is based.' We feel this clearly expresses our requirements about the accessibility to learning resources at placement sites.

Our role is not to suggest possible funding streams. This would form part of the education provider's financial plan, discussions with relevant funding bodies and possible contact with the professional bodies.

### **Our changes**

The SET will be renumbered as SET 3.10.

In light of the comments we feel that it would be clearer and more inclusive to remove the bracketed elements and add them to the guidance.

The SET will be changed to read:

'The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to students and staff.'

### **SET 3.10.1**

3.10 There must be:

3.10.1 adequate and accessible facilities to ensure the welfare and wellbeing of students in all settings;

#### **Comments on the SET**

The University of Manchester argued that it was not possible to 'ensure' welfare and well-being. They suggested the SET should be altered to 'support/facilitate'.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

We accept that education providers could only support or facilitate the welfare and wellbeing of students rather than 'ensure' it.

#### **Our changes**

The SET will be renumbered as SET 3.11.

We will amend the SET by changing 'ensure' to 'support'.

We will clarify in the guidance what we mean by 'all settings'.

### **SET 3.10.2**

3.10 There must be:

3.10.2 a system of academic and pastoral student support in place;

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

No comment.

#### **Our changes**

The SET will be renumbered as SET 3.12.

### **SET 3.10.3**

3.10 There must be:

3.10.3 a student complaints process in place.

#### **Comments on the SET**

At the visitor training days, some participants said that this was an important SET and should be '...a stand alone standard' to highlight its importance.

The Council of Deans said the SET should be reworded to: ‘...a formal student complaint process in place, of which the students will be made aware’.

### **Comments on the guidance**

The University of Greenwich said the guidance should state that the ‘complaint procedure’ should also be made readily available to the students via the Programme Handbook.

The University of Bradford suggested a rewording of the guidance to make it clear that this SET also applies to practice placement areas.

Cardiff University said there should be caution about having this SET. They argue that ‘...formalising of complaints procedures may discourage students from reporting the very issues the standard is attempting to address’. They suggest removing the SET or addressing this in the guidance.

### **Our comments**

All of the SETs are of equal importance. In this case, three have been drawn together because of the similarities required in guidance and their place in the education providers’ processes. Approval will still be sought against each individual SET.

The SET and guidance strikes a balance between being prescriptive and making sure there is a formal complaints process in place that students should know about. We feel that the SET allows for different systems whilst ensuring there is one in place.

### **Our changes**

The SET will be renumbered as SET 3.13.

## **SET 3.11**

3.11 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.
--

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

The UK Council for Psychotherapy said the issue of ‘...preventing emotional distress’ should be treated with caution because it is sometimes necessary to confront those in training with issues that are difficult or painful. They said one aspect of the work of psychotherapists was to learn how to be with their own distress.

Both the Council of Deans and National Leadership and Innovations Agency for Healthcare said the bullet point on ‘...biomechanical assessments of the arms and legs’ should have the reference to ‘arms and legs’ removed. They argue it

should be left as 'biomechanical assessments' or 'biomechanical assessments of the body'. This point was also addressed by Cardiff University who said the example activity '...patient positioning through manipulation of bony anatomical landmarks' did not accurately reflect patient positioning activities.

At the visitor training days, some participants said the guidance should include references to confidentiality.

### **Our comments**

We agree that there may be scenarios during a persons' training that they may need to confront difficult or painful issues. The current guidance concerns itself with preventing emotional distress. We feel that preventing unnecessary emotional distress is essential, however, where emotional distress is demonstrated as a necessary element of training it should be managed effectively.

We accept the examples of biomedical assessment and body positioning could be less restrictive. We also agree it would be useful to refer to the confidentiality of student participants in the guidance.

### **Our changes**

The SET will be renumbered as SET 3.14.

We will include '...preventing or managing' before '...emotional distress' in the guidance.

We will remove '...of the arms and legs' from 'bio-mechanical assessments', and change '...patient positioning through manipulation of bony anatomical landmarks' to 'patient positioning activities'.

We will include additional guidance on confidentiality for student participants and provide a link to our guidance on confidentiality.

## **SET 3.12**

3.12 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.
---

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

The second paragraph of the guidance reads:

'You should provide information to us to show when attendance is compulsory, and when it is not. You should show us how you monitor attendance, for example, by a class register. You must show the systems you have in place for

doing this, for example, the action that you will take if students do not go to the compulsory parts of the programme. Where attendance is linked to assessment, you must explain the systems in place for monitoring assessments.’

The Council of Deans said this paragraph was confusing and suggested it be reworded to:

*‘You should provide information on which aspects of the programme are compulsory, and the systems you have in place for monitoring attendance at such times. Information must also be provided to show us what action you will take if students fail to attend compulsory aspects of the programme. For example, if compulsory attendance is linked to assessments or practice, you must explain the systems used to monitor attendance during assessments or practice and indicate the consequences and action required if students fail to attend.’*

### **Our comments**

We agree the suggested wording is clearer than the current guidance.

### **Our changes**

The SET will be renumbered as SET 3.15.

Subject to Plain English editing we will change the second paragraph of the guidance to the wording suggested by the Council of Deans.

### **SET 3.13**

3.13 There must be a process in place throughout the programme for dealing with concerns about students’ profession-related conduct.
--

#### **Comments on the SET**

A number of respondents welcomed the addition of this SET stating that it was ‘...very necessary’ and ‘...an excellent development’.

The British and Irish Orthoptic Society said the term ‘profession-related conduct’ was not clear.

Some respondents said the SET should be reworded. The Council of Deans said the SET should have ‘...and suitability’ added to the end. Whilst the University of Manchester would prefer ‘...issues related to professional conduct’ instead of ‘...profession-related conduct’.

#### **Comments on the guidance**

At the education provider seminars, some participants said the guidance needed to include more real life examples.

The College of Occupational Therapists said they would ‘...welcome a more detailed statement to which professional bodies would be happy to align and to which they could add any other profession-specific requirements’.

The Open University focussed on how the SET could be met and the potential issues that may arise. They argued that they ‘...would need to ensure that an appropriate group was set up with due process to evaluate the alleged evidence of profession-related conduct which also includes attitudes and values not commensurate with the profession. Sensitivity towards confidentiality of patients or clients involved in such cases would need to be demonstrated.’

### **Our comments**

This is a new SET which was highlighted as being necessary early in the review process. The aim of the SET is to put in place a provision for education providers to raise and act upon concerns about the conduct of a student, and therefore their suitability for practicing a regulated profession, rather than their academic ability. We used the term ‘profession-related conduct’ but agree that ‘issues related to professional conduct’ provides a clear, broad definition that focuses on the conduct expected of a future professional.

The SET and guidance need to be tempered with ensuring that all students are given a fair chance to address any issues identified and that any process is open and transparent. Each case should be treated on its own merits so we do not feel it would be appropriate to include further examples. We do not insist on one type of process for dealing with complaints and feel it could be beneficial for professional bodies to work with education providers to support the processes they have in place.

### **Our changes**

The SET will be renumbered as SET 3.16.

We feel the wording suggested by the University of Manchester is a sound change. The SET will now read:

‘There must be a process in place throughout the programme for dealing with concerns about students’ issues related to professional conduct.’

We have also produced guidance on student conduct and ethics, and guidance on the health and character process. We will make reference to these along with the processes of the education providers and professional bodies in the guidance.

## **SET 4. Curriculum standards**

### **Overall comments**

The Higher Education Academy requested the following to be added to the more information section: 'The Higher Education Academy and its Subject Centres, in particular The Health Sciences and Practice Subject Centre.'

### **Our comments**

We are happy to add further appropriate detail into the 'More information' sections throughout the document.

We agree there could be a difference in interpretation between teaching 'methods' and 'approaches'. We will check that all example questions in the document are consistent with the SETs.

### **Our changes**

We will add 'The Higher Education Academy and its Subject Centres' to the 'More information' section.

## **SET 4.1**

4.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards of proficiency for their part of the Register.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

No comment.

### **Our changes**

No changes will be made.

## **SET 4.2**

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

### **Comments on the SET**

At the education provider seminars, some participants said some professional bodies do not have curriculum guidance and said both the SET and guidance needed to be rewritten to clarify that curriculum guidance does not only mean professional body curriculum guidance.

### **Comments on the guidance**

The British Psychological Society welcomed the emphasis on professional body involvement.

At the visitor training days, some participants said more information should be made available about the relevance and appropriateness of the national occupational standards for allied health professions and the Quality Assurance Agency (QAA) subject benchmarks.

A number of respondents said additional information should be added to the 'Other sources of guidance' section. The UK Council for Psychotherapy wanted '...training in diversity and equalities work (including sexual minorities)' added to the bullet points. The Higher Education Academy requested being added to the 'Education and quality' section.

Skills for Health said the current wording: 'You may choose to consult the competency framework from Skills for Health, the Sector Skills Council' should be revised to read: 'We advise that you consult the competence frameworks, National Occupational Standards (NOS), Learning Design Principles and the Enhancing Quality in Partnership (EQuIP) model for Quality Assurance available from the web-site of Skills for Health, the Sector Skills Council for the UK health sector.'

### **Our comments**

We agree that the current wording of the SET may be interpreted as only professional body guidance rather than all appropriate guidance. We acknowledge that there are some professional bodies that do not have curriculum guidance, and that there are sometimes more than one professional body for a profession producing curriculum guidance.

The guidance and further sources of guidance refer to the national occupational standards for AHP and the QAA subject benchmarks. We do not feel it would add to the guidance to include further detail on their relevance and appropriateness.

### **Our changes**

We will change the SET so it reads:

'The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.' We will then expand on what is meant by 'relevant' in the guidance.

We will make sure the guidance does not give the impression that we solely define 'curriculum guidance' as that issued by some professional bodies.

We will add a section to the guidance to provide information on how we will interpret the reflective aspect of the SET.

We will add 'National Occupational Standards (NOS), Learning Design Principles and the Enhancing Quality in Partnership (EQuIP) model for Quality Assurance' before Skills for Health.

We will add 'The Higher Education Academy' to the 'Education and quality' bullet points.

### **SET 4.3**

4.3 Integration of theory and practice must be central to the curriculum.

#### **Comments on the SET**

The British Psychological Society welcomed the integration of theory and practice.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

No comment

#### **Our changes**

No changes will be made.

### **SET 4.4**

4.4 The curriculum must remain relevant to current practice.

#### **Comments on the SET**

An academic lead said '...and be informed by stakeholders' should be added to the end of the SET.

#### **Comments on the guidance**

Skills for Health said the guidance required a stronger emphasis on employer engagement from the whole of the health sector.

At the education provider seminars, some participants said it would be more appropriate to use the term 'graduate' rather than 'student' in the guidance.

A Director of Education said the bullet points should include '...evidence that the programme team participate in CPD'.

The Chartered Society of Physiotherapy said the current wording in the guidance: '...remains relevant to current practice' should be enhanced by making it clear that programme providers should be '...delivering education that equips graduates with the knowledge, skills and understanding to make a positive contribution to patient/client care in a rapidly changing healthcare environment.'

#### **Our comments**

The SET relates to the relevancy of the curriculum. We feel that adding '...and be informed by stakeholders' would distract from the main point of the SET.

We find listing stakeholders to be problematic because of their number and variety, this includes listing employer engagement.

Not all of the programmes we approve lead to formal awards delivered or validated by a Higher Education Institution. Therefore, the term 'graduate' does not apply in all circumstances and would not be appropriate to use in the guidance.

### **Our changes**

We will begin the guidance with the sentence:

'Practice may develop over time. We expect you to provide evidence of how you make sure the curriculum remains relevant. Evidence may include:...'

We will add two bullet points: 'Evidence that the programme team participate in CPD', and 'You should demonstrate how the programme design and delivery equips students with the knowledge, skills and understanding to make a positive contribution for their service users'.

### **SET 4.5**

4.5 The curriculum must make sure that students understand the HPC's standards of conduct, performance and ethics, and their impact on practice.
--

#### **Comments on the SET**

The Council of Deans suggested the wording of the SET should be changed to: 'The curriculum shall include the HPC's standards of conduct, performance, and ethics and their impact on practice as learning outcomes.'

At the visitor training days, some participants said unlike the other SETs the proposed SET was based on input rather than output. They suggested the wording of the SET should be changed to: 'The curriculum must make sure that students understand the implications of the HPC's standards of conduct, performance and ethics'.

Cardiff University said the SET was unnecessary because '...the standards of conduct, performance and ethics are implicit in the various professions'

#### **Comments on the guidance**

The draft guidance states: 'We recommend that you include the standards of conduct, performance and ethics in your reading lists'. A response from a biomedical scientist said the guidance should be more specific and state that the standards of conduct and ethics 'must' be on the reading list.

Some participants at the visitor training days and Northumbria University said the guidance did not specify where the SET would be assessed in the programme or what role assessment would take in this SET. They said the use of the word 'taught' in the guidance was too prescriptive. Northumbria University also queried

how students would demonstrate an understanding of the standards of conduct, performance and ethics.

UK Council for Psychotherapy suggested additional guidance was required to show that students understand how to apply the standards and use them in their decision making process. They also wanted the guidance to state that students could demonstrate ‘...that they have the capacity for ethical decision making, in relation to all aspects of their practice.’

The University of Greenwich said there should be some additional guidance about the importance of students understanding, the value of life long learning and continuing professional development.

At the education provider seminars, some participants said they would appreciate a student related code of conduct.

### **Our comments**

We agree that the suggested amendment to the SET made by participants at the visitor training days clarifies the SET.

We do not intend to instruct programmes where they must fit this requirement into the curriculum other than it must be in the most appropriate place for the programme. However, we do agree that further guidance may be useful on the application of the standards of conduct, performance and ethics in their practice.

The word ‘taught’ is used in a wide sense in the guidance and we do not feel it makes the guidance too prescriptive. We also don’t feel this guidance is the appropriate place to situate guidance on CPD or life-long learning. Student conduct is also covered in a number of other SETs and we are currently producing separate guidance on student conduct.

We do not state that the standards of conduct, performance and ethics ‘must’ be on the reading lists because we would not make a condition against a programme if this was the case. It is the understanding and application of the standards of conduct, performance and ethics which is addressed by this SET.

### **Our changes**

The SET will be changed to read:

‘The curriculum must make sure that students understand the implications of the HPC’s standards of conduct, performance and ethics’.

We will add ‘...including how and when they apply’ to the end of the second paragraph in the guidance.

We are currently consulting on conduct and ethics guidance for students. We will include a reference to the guidance and when it becomes available.

## **SET 4.6.1**

4.6 The delivery of the programme must:

4.6.1 support and develop autonomous and reflective thinking:

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

The first section of the guidance states: 'Students should be encouraged to consider:

- their own practice;
- the limits of their safe and effective practice; and
- their responsibility to make sure that they are safe practitioners when they complete the programme.'

The Higher Education Academy said '...how they will relate to other practitioners' should be added to the list.

### **Our comments**

We agree the suggestion should be included.

### **Our changes**

The SET will be renumbered as SET 4.6.

We will add 'How they will relate to other practitioners' to the list that students are encouraged to consider.

## **SET 4.6.2**

4.6 The delivery of the programme must:

4.6.2 encourage evidence based practice.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

No comment

### **Our changes**

The SET will be renumbered as SET 4.7.

## SET 4.7

4.7 The range of learning and teaching approaches used must be appropriate to the effective delivery of the curriculum.

### Comments on the SET

The College of Radiographers suggest adding ‘...and level’ so that the SET reads: ‘The range of learning and teaching approaches used must be appropriate to the effective delivery and level of the curriculum’.

### Comments on the guidance

The British Psychological Society said additional guidance would be useful on how this SET might apply in work based learning settings.

### Our comments

Other SETs deal with academic awards, so we do not feel that including ‘...and level’ adds to the robustness of this SET.

The guidance is applicable to all learning settings. We do not feel it is necessary for the SET to provide specific guidance on how it might apply in work based learning settings.

### Our changes

The SET will be renumbered as SET 4.8.

## SET 4.8

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

### Comments on the SET

At the education provider seminars, some participants questioned why the SET was a specific requirement and said it was not clear what the purpose of the SET was.

### Comments on the guidance

NHS Education for Scotland said the SET and guidance was ‘...a well balanced addition relating to interprofessional learning’. However, other respondents, including Cardiff University said the guidance appeared to be discouraging interprofessional learning.

The College of Occupational Therapists said the guidance states that interprofessional learning is not a requirement which they said was contradictory and should be removed.

Skills for Health and the Centre for the Advancement of Interprofessional Education said a positive endorsement of interprofessional learning was needed. The Centre for the Advancement of Interprofessional Education added two observations. ‘...First, in 2004 the Department of Health said interprofessional

learning was from then on mandatory. Second, whilst accepting that it may have been difficult for some institutions to provide interprofessional learning in the past, that position is no longer tenable. Collaborative arrangements are now firmly established throughout the UK to facilitate interprofessional learning between programmes within the same or across HEIs'. They said the guidance should state that '...an element of Interprofessional learning for the enhancement of collaborative practice is required'.

### **Our comments**

The focus of the SET is in ensuring that where interprofessional learning does exist that it does not detract from the profession-specific learning outcomes being met.

Our role is to make sure that the SETs allow people who complete an approved programme are able to meet the standards of proficiency for their profession. We feel that the standards of proficiency cover relationships with other professionals.

We agree that interprofessional learning often has a positive impact in helping students develop the abilities necessary to work effectively as part of a multi-disciplinary team.

Some of the education and training programmes are unable to offer interprofessional learning as part of the programme but are able to stress its importance in the wider care environment. Because of this we do not make it a requirement, however, interprofessional learning is imbedded in the standards of proficiency (particularly 1b) and the standards of conduct, performance and ethics (particularly 6 and 7).

### **Our changes**

The SET will be renumbered as SET 4.9.

We will amend the guidance to make our statements more positive in relation to interprofessional working.

## **SET 5. Practice placement standards**

### **Overall comments**

The responsibilities of the education providers and practice placement providers were queried by Canterbury Christ Church University and the University of Exeter. Canterbury Christ Church University said the placement provider should have equal responsibility in providing an effective learning environment, whilst the University of Exeter were concerned that education providers were likely to end up being responsible for things the placement should be providing. They said the guidance should specify that education providers ‘...must retain responsibility for all placement learning’.

The Higher Education Academy asked for ‘The Higher Education Academy Health Sciences and Practice Subject Centre’ to be added to the ‘More information’ section.

The British Psychological Society were concerned that the references to ‘clinical’ and ‘patient’ in the overall guidance needed to be amended so they are applicable to all current and future professions.

### **Our comments**

We recognise the roles and responsibilities of all those involved in the education and training of future health professionals and the importance of working in partnership for all involved. Our processes allow us to approve education and training programmes through the education providers. We do not approve practice placement providers; therefore, the conditions made against any of these SETs can only be done so against the education provider.

We will check this section and the rest of the document to make sure any references to ‘clinical’ and ‘patient’ are amended so they are applicable to all current and future professions.

### **Our changes**

We will add ‘The Higher Education Academy Health Sciences and Practice Subject Centre’ to the ‘More information’ section.

## **SET 5.1**

5.1 Practice placements must be integral to the programme.
--

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

A quality manager said the guidance should state that responsibility for placements should rest with education providers and practice placement providers jointly, including auditing and evaluations.

### **Our comments**

We approve the programme delivered by the education provider, not individual placements. Education providers and practice placement providers must work together to make sure the quality of the practice placement is robust and effective. We state in the overall guidance that education providers must retain ultimate responsibility for all placements. Whilst we recognise that education providers work in partnership with practice placement providers, the SETs seek to ensure that education providers have overall responsibility and accountability for placement learning, and that there are adequate systems in place to support learning.

### **Our changes**

No changes will be made.

### **SET 5.2**

5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.
--

#### **Comments on the SET**

NHS Education for Scotland said the SET should be more explicit in requiring that education providers ensure there are adequate placements before accepting students onto their programme.

#### **Comments on the guidance**

The duration of placements was an issue that some respondents, such as Cardiff University, said was not addressed sufficiently by the draft guidance. Bedford Hospital said ‘...HPC along with the profession's governing body should decide a minimum of simulated and practice placement hours that educational providers include within their programmes’.

At the education provider seminars, some participants recommended rewriting the guidance to include references to professional body guidance on the number of hours in placements. The College of Occupational Therapists agreed, suggesting the guidance include a statement with reference to the requirements of the professional bodies.

The Board of Community Health Councils Wales said the guidance should address whether the placements premises should be insured or licensed for any untoward incidents.

### **Our comments**

We do not set the number, length or range of placements that must be included in a programme. However, education providers must show that there are an adequate number of placements available to support the delivery of the programme. This also applies to ensuring there are adequate placements before they accept students onto their programme.

The number, duration and length of practice placements must be appropriate to the curriculum design as well as the number of students. The guidance from professional bodies in this area would be covered by SET 4.2.

The issue of insurance or licensing for untoward incidents is better addressed in SET 5.3 which requires practice placements to provide a safe and supportive environment.

### **Our changes**

We will clarify in the guidance that the number, duration and length of practice placements must be appropriate to the curriculum design.

## **SET 5.3**

5.3 The practice placement settings must provide a safe and supportive environment.

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

A quality manager said the guidance should address checking the quality of practice placements. They said the check should be a robust system that included student evaluations, audits and a quality framework.

At the visitor training days, some participants said the terms 'incident reporting' and 'emotional stress' should be clarified further in the guidance or reworded.

Some participants at the visitor training days and a response from a paramedic said the Ambulance Service Association no longer exists and should be removed from 'Other sources of guidance'.

### **Our comments**

One of the ways we check the quality of practice placements is by taking account of student evaluations; we also look at other communication between the education provider and practice placement providers. We feel the guidance for this SET and 5.4 clearly addresses the variety of ways that could be used to demonstrate how the quality of practice placements is checked.

The issues raised in the list in the guidance are issues that may be considered and will be done so as part of the overall health and safety systems or on a case-by-case basis. Further guidance on specific aspects of the list would not make the guidance clearer.

### **Our changes**

We have removed 'the Ambulance Service Association' from the 'Other sources of guidance'.

## SET 5.4

5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.

### Comments on the SET

We did not receive any comments on this SET.

### Comments on the guidance

A quality manager said that prior to approval of placements, it was important that there was an agreed, robust auditing process in place.

At the education provider seminars, some participants said it was unclear what was required by the HPC from this SET and what kind of evidence education providers could provide. They said guidance on how placements were audited; the frequency of audits and the interprofessional context would be useful.

Bedford Hospital said practice placement providers would benefit from a national assurance framework so that any arising issues with the education providers may be reported independently.

### Our comments

We agree that the auditing of practice placements should be robust. How they are approved and monitored is the responsibility of education providers and how this takes place depends on the type and location of the placement. We feel the guidance is clear in this area and do not intend to provide more prescriptive guidance which may limit the approval and monitoring processes that education providers may want to use.

### Our changes

No changes will be made.

## SET 5.5

5.5 The placement providers must have equality and diversity policies in relation to students, together with an indication of how these will be implemented and monitored.

### Comments on the SET

Manchester University said the SET should be re-worded to make it clear that students will come under the equality and diversity policy which covers all of the placement provider's activities.

### Comments on the guidance

We did not receive any comments on the guidance for this SET.

### Our comments

A placement provider may have an equality and diversity policy that applies to all their staff, including students, or they may have a separate policy for students on

placement. In both cases this would cover all of the placement provider's activities.

### **Our changes**

No changes will be made.

## **SET 5.6**

5.6 There must be an adequate number of appropriately qualified and experienced staff at the practice placement setting.
--

### **Comments on the SET**

NHS Education for Scotland said the term 'staff' restricted the appropriately experienced to having to be in paid employment. They suggested using a more generic term such as 'individuals', 'people' or 'personnel'.

Play Therapy UK and the British Association of Play Therapists said the SET should allow sufficient flexibility and not be prohibitive and were concerned that professions that may be regulated by HPC would not be able to meet this SET because of the types of placements available to them. Play Therapy UK suggested adding '...or access to adequate clinical supervision external to the placement', to the end of the SET.

### **Comments on the guidance**

At the education provider seminars, some participants said the guidance to this SET should provide more definitive answers. This is also said by the British and Irish Orthoptic Society who wanted to know whether it was possible to give a ratio of staff to students, or provide detail on what constitutes an adequate number of appropriately qualified and experienced staff.

### **Our comments**

We use 'staff' in a similar manner to the use of the word 'student' throughout the document. Rather than changing this in the document we will add 'staff' to the 'Glossary' to explain our understanding and use of 'staff'.

There are different models of practice-based learning and the level of supervision can vary between the professions we regulate. For these reasons, we do not specify how many staff must be present at each placement or that the staff must be registered with us.

As with SET 3.5, the guidance is clear that we do not set staff/students ratios. Each placement is different and has different staffing requirements. It is for each placement to determine and justify the number of staff in place and how they are appropriately qualified and experienced.

### **Our changes**

We will amend the guidance to explain what we mean by '...at the placement setting'.

We will add a sentence to the guidance about the active role some of the professional bodies take in this area.

### **SET 5.7.1**

5.7 Practice placement educators must:

5.7.1 have relevant knowledge, skills and experience;

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

At the visitor training days, some participants said the guidance was not clear on whether the education provider or placement provider was responsible for ensuring that these SETs were met. This was confirmed by some participants at the education provider seminars who wanted the guidance to be rewritten to show that these areas were the education providers' responsibility.

#### **Our comments**

The education provider is responsible for making sure that practice placement educators have the relevant skills and knowledge and agree to make this clearer in the guidance.

#### **Our changes**

The SET will be renumbered as SET 5.7.

We will make it clear in the guidance that it is the responsibility of the education provider to set the levels of knowledge, skills and experience and for making sure they are met.

### **SET 5.7.2**

5.7 Practice placement educators must:

5.7.2 undertake appropriate practice placement educator training;

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

Bedford Hospital said an opportunity to standardise the underpinning training for the staff referred to as '...appropriately qualified and experienced' had been missed. The North East Strategic Health Authority was also concerned with training. They said the guidance should recommend how regular the refresher training should take place and what the minimum requirements would be.

#### **Our comments**

The training provided for practice placement educators is the responsibility of the education provider and will vary depending on the type of profession and programme as well as the skills and knowledge required. We do not intend to be

prescriptive in standardising the training provided or providing minimum timescales when training must take place.

### **Our changes**

The SET will be renumbered as SET 5.8.

### **SET 5.7.3**

5.7 Practice placement educators must:

5.7.3 unless other arrangements are agreed, be appropriately registered.

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

No comment.

### **Our changes**

The SET will be renumbered as SET 5.9.

### **SET 5.8**

5.8 There must be collaboration between the education provider and the practice placement provider.

#### **Comments on the SET**

The College of Radiographers suggested adding ‘...regular and effective’ so the SET would read: ‘There must be regular and effective collaboration between the education provider and the practice placement provider.’

#### **Comments on the guidance**

Northumbria University were unsure what ‘collaborate’ meant in the context of this SET and said a clearer statement was necessary.

The University of Teesside said further consideration should be given to strengthening the importance of partnership working between education providers and placement providers.

#### **Our comments**

We agree that the collaboration between the education provider and practice placement provider should be regular and effective. We state this in the guidance but recognise it may strengthen the requirement by adding this to the SET.

Collaboration and working in partnership are addressed with examples in the guidance. We do not feel that defining their definitions any more would add to the guidance and risks the guidance becoming prescriptive.

### **Our changes**

The SET will be renumbered as SET 5.10.

We will add ‘...regular and effective’ into the SET.

### **SET 5.9.1**

5.9 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

5.9.1 the learning outcomes to be achieved;

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

Skills for Health said the guidance should ‘...recommend employer input to defining learning outcomes (leading to registrants who are not just fit to practice but fit for purpose) through the implementation of the Skills for Health Learning Design Principles.’

#### **Our comments**

Placement providers and education providers are required to work collaboratively and may collaborate to define the learning outcomes. However, the SET is aimed at making sure students are fully prepared for placements so we do not feel that recommending that they define learning outcomes through the implementation of the Skills for Health Learning Design Principles is appropriate in this guidance.

### **Our changes**

The SETs will be listed without being grouped using numbers. The SET will be renumbered as SET 5.11.

We will add ‘Skills for Health Learning Design Principles’ to a section titled ‘Other sources of guidance’.

### **SET 5.9.2**

5.9 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

5.9.2 the timings and the duration of any placement experience and associated records to be maintained;

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

The British and Irish Orthoptic Society requested an expansion of the guidance relating to the need for timely notice to be given to students and placement

providers of the date of placements and the names and details of the visiting students.

### **Our comments**

The guidance does state that students and placement providers need to provide details of the dates of placements.

### **Our changes**

The SETs will be listed without being grouped using numbers. The SET will be renumbered as SET 5.11.

We will add to the guidance to state that placement providers should to be given the names and details of the visiting students.

## **SET 5.9.3**

5.9 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

5.9.3 expectations of professional conduct;

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

No comment.

### **Our changes**

The SETs will be listed without being grouped using numbers. The SET will be renumbered as SET 5.11.

## **SET 5.9.4**

5.9 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

5.9.4 the assessment procedures including the implications of, and any action to be taken in the case of, failure;

### **Comments on the SET**

At the education provider seminars, some participants said the word 'failure' focussed attention a bit too late, they said '...failure to progress' was more appropriate.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

'Failure' can apply in both the failure to progress or in failure at the end of the programme. We agree that adding '...failure to progress' will help to clarify this SET.

### **Our changes**

The SETs will be listed without being grouped using numbers. The SET will be renumbered as SET 5.11.

We will add '...failure to progress' to the end of the SET

### **SET 5.9.5**

5.9 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

5.9.5 communication and lines of responsibility.

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

No comment.

### **Our changes**

The SETs will be listed without being grouped using numbers. The SET will be renumbered as SET 5.11.

### **SET 5.10**

5.10 Learning, teaching and supervision must encourage safe and effective practice, independent learning and professional conduct.

#### **Comments on the SET**

At the education provider seminars, some participants said the SET should do more than 'encourage' safe and effective practice. They said the SET and guidance should be reworded.

#### **Comments on the guidance**

The College of Paramedics and individual paramedics responded with concerns that this SET needed to make clear reference to the need for supervised and supernumerary practice in clinical placements. They said clearer guidance was needed on how much control the educator and student have in developing a supportive environment rather than the obligations under an employed contract. They said it is not unusual in paramedic placements for the placement hours to be insufficient, the placements to not occur as supernumerary posts, or in some

cases even both. They said manning an ambulance was often seen as more important than the experience gained.

The Board of Community Health Councils Wales said the guidance should state that ‘...patient treatment records should be signed by both student and tutors so that both can be identified if needed.’

### **Our comments**

When a student completes an approved programme they must be able to meet the standards of proficiency and therefore practice safely and effectively, be able to learn independently and be professional in their conduct. The aim of this SET is to make sure that the teaching, learning and supervision allows students to meet these requirements. The term ‘encourage’ is used because the SET needs to apply to students at all stages of their learning, for example, students in their first placement may not be undertaking independent learning.

The type of placement will affect the amount of autonomy a student and educator may have. The guidance should not be too prescriptive and must apply to all of the professions on our Register. We do not want to limit the ability of education providers and practice placement providers to provide for safe and effective practice.

We do not require students to be supernumerary and referring to the need for supervised and supernumerary practice in clinical placements would not apply across all of the professions we regulate. Concerns with the type of practice, the number of hours, or the type of supervision are issues that individual programmes should be addressed with placement providers. If the education provider is still not satisfied once they have attempted to address their concerns with the placement provider they should contact us.

The standards of conduct, performance and ethics specify that all registrants supervising students must make sure, as far as possible, that records completed by students are clearly written, accurate and appropriate. We encourage education providers to be aware of, and keep to the local protocols of the placement provider.

### **Our changes**

The SET will be renumbered SET 5.12.

### **SET 5.11**

5.11 A range of learning and teaching methods that respect the rights and needs of service users and colleagues must be in place throughout practice placements.
--

### **Comments on the SET**

The College of Radiographers suggest adding ‘...for the level’ so the SET would read: ‘A range of learning and teaching methods for the level that respect the

rights and needs of service users and colleagues must be in place throughout practice placements.'

### **Comments on the guidance**

At the education provider seminars, some participants said the guidance should be reworded. In particular, they were concerned that the wording '...service users are aware' does not recognise service users rights to decline and when service users do not have the capacity to give consent.

### **Our comments**

The purpose of this SET is to make sure the methods being used to teach and learn respect the rights and needs of service users and colleagues. It should not be affected by 'the level' of the programme. The type of learning and teaching methods varies across the professions, programmes and placements. We do not feel it is necessary to specify that the learning and teaching methods should be set 'for the level' of the programme.

We agree it is important that consent should be obtained where possible.

### **Our changes**

The SET will be renumbered SET 5.13.

We will add '...and have given appropriate consent' after the final paragraph.

## **SET 6. Assessment standards**

### **Overall comments**

The Higher Education Academy requested that 'Learning and Teaching Support Network, Generic Assessment Series' should be merged with Higher Education Academy where these documents can now be found.

### **Our comments**

No comment.

### **Our changes**

We will make the requested amendment to the document.

## **SET 6.1**

6.1 The assessment strategy and design must ensure that the student can achieve the standards of proficiency for their part of the HPC Register.
--

### **Comments on the SET**

Some participants at the education provider seminars, the University of Greenwich, and the University of Manchester welcomed the link to the standards of proficiency.

The Council of Deans suggested rewording the SET so it reads:  
'The assessment strategy and design must ensure that the student who successfully completes the course has met the standards of proficiency for their part of the HPC Register.'

### **Comments on the guidance**

At the education provider seminars, some participants said more guidance on compensation and on the averaging of assessment components within modules/units was needed, whilst some participants at the visitor training days said further guidance was needed over re-sits.

A quality manager said there should be guidance on placement involvement and agreement with regards to assessment strategy and re-sits related to practice.

Feedback from the visitor training days said 'pre and co-requisites' were old terms and that people were moving away from them.

### **Our comments**

We agree that the wording proposed by the Council of Deans is technically correct. We will change the SET with their wording in mind, as well as the wording of SET 4.1.

We feel that the guidance around re-sits is clear. It is the responsibility of the education provider to strike '...a suitable balance between the need to support students, and the need to make sure that those who successfully complete the

programme achieve the standards of proficiency.’ The education provider may decide to involve placement providers in this assessment or not.

The terms pre and co-requisites are still used by some education providers and we feel that their inclusion in the guidance is still appropriate.

### **Our changes**

The SET will be changed to read:

‘The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.

We will add a statement to the guidance regarding compensation and re-sits. It will make clear that we are happy for individual education providers to devise their own requirements, follow the requirements of other educational and training providers, or the requirements made by professional bodies.

### **SET 6.2**

6.2 All assessments must provide a rigorous and effective process by which compliance with external-reference frameworks can be measured.
---

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

The draft guidance is: ‘You should provide information about how your assessment methods are thorough and effective, and also about how your programme meets any relevant, external-reference frameworks. An example of this would be if your programme is a pre-registration Masters programme: showing how your programme meets the requirements of a Masters programme as well as meeting the standards of proficiency could be part of the evidence for this SET.’

An occupational therapist suggested the following rewording of the guidance: ‘You should provide information about how your assessment methods are thorough and effective, and also about how your programme meets any relevant, external-reference frameworks. *The academic level of entry to the register for the professions are not the same, and therefore the expectations of, in particular, the generic standards of proficiency will be different. An example of this would be 2b.1 ‘be able to use research....’ where the academic experience should be very different for a Masters’ programme than for a Bachelors degree and both will be different again from a Certificate in Higher Education You will need to show how your programme meets the standards of proficiency at the appropriate academic level.*’

### **Our comments**

Each profession has standards of proficiency and they are the required standards that a registered professional must keep to. The standards of proficiency do not vary according to the academic level normally required to meet the threshold level for entry to the Register.

The SET is about fitness for academic award rather than fitness to practice. We also feel the guidance needs to be linked to a level of typical academic attainment rather than receipt of a specific award.

### **Our changes**

We will amend the guidance to read:

‘You should provide information about how your assessment methods are thorough and effective, and also about how your programme meets any relevant, external-reference frameworks. An example of this would be if your programme is a pre-registration Masters programme: showing how your programme meets the requirements of a Masters programme as well as meeting the standards of proficiency could be part of the evidence for this SET.’

*The levels of threshold academic attainment for entry to the Register are not the same for all professions and, therefore, the expectations for each will be different, particularly in relation to the generic standards of proficiency. For example, standard 2b.1 requires applicants to ‘be able to use research...’. If the threshold level of academic attainment for a profession is equivalent to the Masters level then students’ academic experience may be very different from those in professions where the required level of attainment is equivalent to a Bachelors degree or Certificate in Higher Education.’*

### **SET 6.3**

6.3 Professional aspects of practice must be integral to the assessment procedures in both the education setting and practice placement setting.
--

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

At the visitor training days, some participants said there were inconsistencies between the wording in the SET and the wording in the guidance. The SET included the phrase ‘must be’ whilst ‘could’ and ‘may’ were used in the guidance.

#### **Our comments**

We do not feel that the SET and guidance are inconsistent. We use ‘could’ and ‘may’ in the guidance because there are a number of assessment procedures that can be used. We do not want to limit education providers’ ability to meet this SET by prescribing which assessment procedures they must use.

### **Our changes**

No changes will be made.

### **SET 6.4**

6.4 Assessment methods must be employed that measure the learning outcomes and skills required to practise safely and effectively.

#### **Comments on the SET**

We did not receive any comments on this SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

#### **Our comments**

We feel the second half of the SET is unnecessary and propose to remove the wording so the SET is clearer.

### **Our changes**

The SET will be changed to read: 'Assessment methods must be employed that measure the learning outcomes'.

### **SET 6.5**

6.5 The measurement of student performance must be objective and ensure fitness to practise.

#### **Comments on the SET**

The University of Greenwich are in favour of emphasising importance of fitness to practise.

Both Northumbria University and the University of Bradford queried why 'fitness to practice' has not been replaced by the 'standards of proficiency' as it has been in SET 6.1.

The Council of Deans suggested change 'ensure' fitness to practise to 'test' fitness to practise.

#### **Comments on the guidance**

At the education provider seminars, some participants said the guidance should be amended to include the role of external examiners. They also said there needed to be more clarity in the guidance over the distinction between '...meeting the standards of proficiency' and '...being fit to practice'.

The British and Irish Orthoptic Society said the guidance needed to be expanded to reflect the cases when clinical placement tutors have real concerns about students and yet the students manage to pass the written examinations.

#### **Our comments**

Students who complete a programme must be able to demonstrate that they are safe and effective to practise. The terminology 'fitness to practise' is specific to the process that professionals who are registered have to maintain. This includes the standards of proficiency, the standards of conduct, performance and ethics, and the health and character requirements of registration.

Concerns about profession-related conduct are addressed by the proposed new SET 3.13.

### **Our changes**

We will clarify the distinction between meeting the standards of proficiency and being fit to practice in the guidance.

## **SET 6.6**

6.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.

### **Comments on the SET**

At the education provider seminars, some participants said 'evaluation' was used in the wrong context and should be rewritten.

The College of Radiographers suggest adding '...internal and external' so the SET would read: 'There must be effective monitoring and internal and external evaluation mechanisms in place to ensure appropriate standards in the assessment.'

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

The term 'evaluation' is used in a broad sense in this SET and applies to a number of possible different mechanisms. We do not feel it needs to be changed. The broadness of the mechanisms also means we do not feel it is necessary to state that the mechanisms could be 'internal and external'.

### **Our changes**

No changes will be made.

## **SET 6.7.1**

6.7 Assessment regulations must clearly specify requirements for:  
6.7.1 student progression and achievement within the programme;

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

No comment.

### **Our changes**

The SET will be renumbered SET 6.7.

### **SET 6.7.2**

6.7 Assessment regulations must clearly specify requirements for:

6.7.2 approved programmes being the only programmes which contain any reference to an HPC protected title or part of the Register in their named award;

#### **Comments on the SET**

The University of Greenwich said the rewording of this SET makes it clearer.

At the visitor training days, some participants said exit award titles would not necessarily be included as part of an education providers' assessment regulations. They said they were normally 'stand alone' procedures or policy documents and as such, the visitors said it would be more appropriate if they were moved out of the overriding SET 6.7 and included as a stand alone SET.

#### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

All of the SETs are of equal importance and a number overlap with each other. For clarity we agree that the SETs that have been together will become 'stand alone' SETs,

### **Our changes**

The SET will be renumbered SET 6.8.

We will add '...or other relevant policies' after 'Assessment regulations' in the SET.

### **SET 6.7.3**

6.7 Assessment regulations must clearly specify requirements for:

6.7.3 an aegrotat award not to provide eligibility for admission to the Register;

#### **Comments on the SET**

At the education provider seminars, some participants said not all education providers would have the ability to award an aegrotat award, they said the SET should reflect this possibility.

Roehampton University said aegrotat awards may not be understood by members of the public and may create a loop-hole by which non-registered practitioners can (legitimately) claim an award which, nonetheless, does not entitle them to use the protected titles. Whilst the British and Irish Orthoptic

Society suggested it may be better to have a generic title for the qualification gained when the candidate is not eligible to be admitted to the Register.

### **Comments on the guidance**

The Board of Community Health Councils Wales said the guidance was not clear that any student awarded an aegrotat status can complete the degree on recovery from illness.

### **Our comments**

We accept that some education providers do not have the ability to award an aegrotat award. We will reflect this in the guidance rather than the SET.

Titles and awards should be clear and should not mislead as to which lead to eligibility to register. If an education provider offers an aegrotat award it must not contain any reference to a protected title, this is covered by SET 6.8. The individual education provider must decide on a case-by-case basis whether someone could complete a programme after receiving an aegrotat award.

### **Our changes**

The SET will be renumbered SET 6.9

We will add 'Where you are able to provide an aegrotat award' to the start of the guidance.

### **SET 6.7.4**

6.7 Assessment regulations must clearly specify requirements for: 6.7.4 a procedure for the right of appeal for students;
--

### **Comments on the SET**

We did not receive any comments on this SET.

### **Comments on the guidance**

At the visitor training days, some participants said appeal procedures would not necessarily be included as part of an education providers' assessment regulations. They said they were normally 'stand alone' procedures or policy documents and as such, the visitors said it would be more appropriate if they were moved out of the overriding SET 6.7 and included as a stand alone SET.

### **Our comments**

All of the SETs are of equal importance and a number overlap with each other. For clarity we agree that the SETs that have been together will become 'stand alone' SETs.

### **Our changes**

The SET will be renumbered SET 6.10.

## **SET 6.7.5**

6.7 Assessment regulations must clearly specify requirements for:

6.7.5 the appointment of at least one external examiner from the relevant part of the Register, unless other arrangements are agreed.

### **Comments on the SET**

At the education provider seminars, some participants were concerned that the current wording of this SET meant that being on the Register qualified a person to be an external examiner, rather than there being any check or safeguard on their experience of external examining or subject specialist knowledge. The attendees suggested a rewording of the SET.

### **Comments on the guidance**

We did not receive any comments on the guidance for this SET.

### **Our comments**

The guidance states that we expect the external examiner 'is appropriately experienced and qualified'. We agree that the SET would be strengthened by adding this to the wording of the SET.

### **Our changes**

The SET will be renumbered SET 6.11.

The SET will read: 'Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who should be appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.'

## **Respondents**

Below is a list of the organisations that responded to our consultation.

We received responses from 54 organisations, 27 individuals (or where it was not possible to tell if the response was from an individual or on behalf of their organisation) and two responses were collated from feedback we received from events we ran with visitors and education providers.

Where we have quoted from these organisations in the text, we have attributed the quotation. Where the quotation used is from the response of an individual, it has not been attributed.

Association for Clinical Cytogenetics  
Association of Heads of Psychology Departments  
Association for Perioperative Practice  
Bangor University  
Bedford Hospital  
Board of Community Health Councils Wales  
British Academy of Audiology  
British Association of Counselling and Psychotherapy  
British Association of Play Therapists  
British Dietetic Association  
British and Irish Orthoptic Society  
British Psychological Society  
British Society of Echo  
British Society of Haematology  
British Society of Hearing Aid Audiologists  
Canterbury Christ Church University  
Cardiff University  
Centre for the Advancement of Interprofessional Education  
Chartered Society of Physiotherapy  
College of Occupational Therapists  
College of Paramedics  
Council of Deans  
De Montford University  
General Optical Council  
Greater Manchester West Mental Health Trust  
Heads of Radiography Education group  
The Higher Education Academy  
Institute of Biomedical Sciences  
The Institute of Chiropodists and Podiatrists  
Lactation Consultants of Great Britain  
LIFE-FORCE  
Manchester Metropolitan University  
National Leadership and Innovations Agency for Healthcare  
NHS Education for Scotland

North East Strategic Health Authority  
Northumbria University  
The Open University  
Play Therapy UK  
Roehampton University  
Royal Bolton Hospital  
Royal Pharmaceutical Society of Great Britain  
Sheffield Hallam University  
Skills for Health  
Society and College of Radiographers  
The Society of Sports Therapy  
UK Council for Psychotherapy  
UNISON  
University of Bradford  
University of Cumbria  
University of Exeter  
University of Greenwich  
University of Lincoln  
University of Manchester  
University of Teesside  
University of Ulster  
Wales Nursing and Midwifery Committee

We would like to thank all those who responded to this consultation for their time and comments.

# **Standards of education and training**

## **Introduction**

This document sets out the standards of education and training (SETs). These are the standards against which we assess education and training programmes.

A programme which meets the SETs allows a student who successfully completes that programme to meet the standards of proficiency. They are then eligible to apply to the Health Professions Council (HPC) for registration.

The Education Department is responsible for conducting approval visits to education providers to ensure their programmes meet the SETs. If a programme meets the SETs we grant open-ended approval, subject to ongoing monitoring.

Annual monitoring is a retrospective, documentary process to determine whether a programme continues to meet the standards of education and training. If any changes are made which significantly impact on the provision of the programme we consider these via our major change process to make sure that the SETs continue to be met.

We have also produced supplementary information documents for education providers when preparing for an approval visit, completing annual monitoring submissions, or making significant changes to programmes. These documents give more information about the processes we use to assess and monitor programmes against the SETs.

## **1. Level of qualification for entry to the Register**

1. 1 The Council normally expects that the threshold entry routes to the Register will be the following:

Bachelor degree with honours for:

- biomedical scientists (with the Certificate of Competence awarded by the Institute of Biomedical Science, or equivalent);
- chiropodists / podiatrists;
- dietitians;
- occupational therapists;
- orthoptists;
- physiotherapists;
- prosthetists / orthotists;
- radiographers; and
- speech and language therapists

Masters degree for arts therapists.

Masters degree for clinical scientists (with the Certificate of Attainment awarded by the Association of Clinical Scientists, or equivalent).

Diploma of Higher Education for operating department practitioners.

Equivalent to Certificate of Higher Education for paramedics.

## **2. Programme admissions**

- 2.1 The admissions procedures 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.
- 2.2 The admissions procedures must apply selection and entry criteria, including evidence of a good command of reading, writing and spoken English.
- 2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.
- 2.4 The admissions procedures must apply selection and entry criteria, including compliance with any health requirements.
- 2.5 The admissions procedures must apply selection and entry criteria, including appropriate academic and/or professional entry standards.
- 2.6 The admissions procedures must apply selection and entry criteria, including accreditation of prior (experiential) learning and other inclusion mechanisms.
- 2.7 The admissions procedures must ensure that the education provider has equality and diversity policies in relation to applicants and students, together with an indication of how these will be implemented and monitored.

### **3. Programme management and resource standards**

3.1 The programme must have a secure place in the education provider's business plan.

3.2 The programme must be effectively managed.

3.3 The programme must have regular monitoring and evaluation systems in place.

3.4 There must be a named person who has overall professional responsibility for the programme who must be appropriately qualified and experienced and, unless other arrangements are agreed, be on the relevant part of the Register.

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

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

3.7 A programme for staff development must be in place to ensure continuing professional and research development.

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

3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.

3.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to students and staff.

3.11 There must be adequate and accessible facilities to support the welfare and wellbeing of students in all settings.

3.12 There must be a system of academic and pastoral student support in place.

3.13 There must be a student complaints process in place.

3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.

3.15 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.

3.16 There must be a process in place throughout the programme for dealing with concerns about students' issues related to professional conduct.

## **4. Curriculum standards**

- 4.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards of proficiency for their part of the Register.
- 4.2 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.
- 4.3 Integration of theory and practice must be central to the curriculum.
- 4.4 The curriculum must remain relevant to current practice.
- 4.5 The curriculum must make sure that students understand the implications of the HPC's standards of conduct, performance and ethics.
- 4.6 The delivery of the programme must support and develop autonomous and reflective thinking.
- 4.7 The delivery of the programme must encourage evidence based practice.
- 4.8 The range of learning and teaching approaches used must be appropriate to the effective delivery of the curriculum.
- 4.9 When there is interprofessional learning the profession-specific skills and knowledge of each professional group must be adequately addressed.

## **5. Practice placement standards**

- 5.1 Practice placements must be integral to the programme.
- 5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.
- 5.3 The practice placement settings must provide a safe and supportive environment.
- 5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.
- 5.5 The placement providers must have equality and diversity policies in relation to students, together with an indication of how these will be implemented and monitored.
- 5.6 There must be an adequate number of appropriately qualified and experienced staff at the practice placement setting.
- 5.7 Practice placement educators must have relevant knowledge, skills and experience;
- 5.8 Practice placement educators must undertake appropriate practice placement educator training.
- 5.9 Practice placement educators must be appropriately registered, unless other arrangements are agreed.
- 5.10 There must be regular and effective collaboration between the education provider and the practice placement provider.
- 5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:
- the learning outcomes to be achieved;.
  - the timings and the duration of any placement experience and associated records to be maintained;
  - expectations of professional conduct;
  - the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and
  - communication and lines of responsibility.
- 5.12 Learning, teaching and supervision must encourage safe and effective practice, independent learning and professional conduct.
- 5.13 A range of learning and teaching methods that respect the rights and needs of service users and colleagues must be in place throughout practice placements.

## **6. Assessment standards**

- 6.1 The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.
- 6.2 All assessments must provide a rigorous and effective process by which compliance with external-reference frameworks can be measured.
- 6.3 Professional aspects of practice must be integral to the assessment procedures in both the education setting and practice placement setting.
- 6.4 Assessment methods must be employed that measure the learning outcomes.
- 6.5 The measurement of student performance must be objective and ensure fitness to practise.
- 6.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.
- 6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme;
- 6.8 Assessment regulations, or other relevant policies, must clearly specify requirements for approved programmes being the only programmes which contain any reference to an HPC protected title or part of the Register in their named award.
- 6.9 Assessment regulations must clearly specify requirements for an aegrotat award not to provide eligibility for admission to the Register.
- 6.10 Assessment regulations must clearly specify requirements for a procedure for the right of appeal for students.
- 6.11 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who should be appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.

# Standards of education and training guidance

## Contents

Introduction .....	3
About this document.....	3
About us (the Health Professions Council) .....	3
Our key functions .....	4
Documents published by other organisations.....	4
Working with professional bodies .....	4
The structure of this document.....	5
SET 1: Level of qualification for entry to the Register .....	6
Summary .....	6
Overall guidance .....	6
More information .....	6
Example questions .....	6
SET 2: Programme admissions .....	8
Summary .....	8
Overall guidance .....	8
More information .....	8
Example questions .....	9
SET 3: Programme management and resource standards.....	14
Summary .....	14
Overall guidance .....	14
More information .....	14
Example questions .....	14
SET 4: Curriculum standards .....	25
Summary .....	25
Overall guidance .....	25
More information .....	25
Example questions .....	25
SET 5: Practice placement standards.....	33
Summary .....	33
Overall guidance .....	33
Example questions .....	34
More information .....	34
SET 6: Assessment standards.....	43
Summary .....	43
Overall guidance .....	43
Example questions .....	43

More information .....	43
Glossary .....	50
Further information.....	53

## **Introduction**

### **About this document**

This document has been written to supplement our approval and monitoring processes. It provides guidance on our standards of education and training (SETs), in order to give more information about how we will assess and monitor programmes against our standards. It is written for education providers who are preparing for an approval visit, for a major change submission, or for their annual monitoring submission. This document will also be useful for practice placement providers with whom education providers work in collaboration.

Throughout the document, 'we' refers to the Health Professions Council, and 'you' refers to staff working on an approved programme, or a programme that is seeking approval. Where the abbreviation 'SET' followed by a number is used, this refers to a specific standard of education and training.

We have used the term 'student' throughout this document. We use this to mean anyone studying on a programme which leads to eligibility to apply to join our Register. The term includes trainees or practitioners in training.

We have used the term 'staff' throughout the document. We use this to mean anyone involved in the delivery of education or training to a student. The term applies to those in unpaid, as well as paid positions.

As part of our approval and monitoring processes we assess the programme against the SETs to ensure that upon qualification, all students meet our standards of proficiency. This document provides guidance on the SETs. The detail provided against each SET suggests how you could show that you meet the SETs.

Although you do not have to use this document, we recommend that you do so, as it has been put together to give you advice on the evidence you will need to refer to when going through any of the approval and monitoring processes.

### **About us (the Health Professions Council)**

We are the Health Professions Council (HPC) and we were set up to protect the public. To do this, we keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

Health professionals on our Register are called 'registrants'. We currently regulate 13 health professions.

- Arts therapists
- Biomedical scientists
- Chiropodists / podiatrists
- Clinical scientists

- Dietitians
- Occupational therapists
- Operating department practitioners
- Orthoptists
- Paramedics
- Physiotherapists
- Prosthetists / orthotists
- Radiographers
- Speech and language therapists

We may regulate other professions in the future. For an up-to-date list of the professions we regulate, please see our website at [www.hpc-uk.org](http://www.hpc-uk.org)

Our Register is available on our website for anyone to search, so that they can check the registration of their health professional.

### **Our key functions**

In order to protect the public, we:

- set standards for the education and training, professional skills, conduct, performance, ethics, and health of registrants;
- keep a register of health professionals who meet those standards;
- approve programmes which health professionals must complete in order to register with us; and
- take action when health professionals on our Register do not meet our standards.

The Health Professions Order says that we must set our standards to protect the public, and that we must set standards which are necessary for safe and effective practice. This is why our standards are set at a 'threshold' level.

When you are developing your programme, you may also want to refer to documents published by other organisations which take a role in developing good practice, for example, professional bodies, the Quality Assurance Agency (QAA) for Higher Education, QAA Scotland and NHS Education for Scotland (NES).

### **Documents published by other organisations**

For your information, throughout this document we have mentioned other documents that may be useful to you in providing extra information. This does not mean that we have 'approved' these documents, but they may be helpful when you are collecting evidence to show how you meet our SETs.

### **Working with professional bodies**

Professional bodies have an important role in promoting and representing their professions. In particular, professional bodies may develop the learning and

curriculum frameworks for their profession. In this document, we have referenced the curriculum documents published by professional bodies which will provide useful information, background and context.

### **The structure of this document**

We have divided up the body of this document into six sections, to reflect the six sections of the SETs.

Under the title of each SET is a summary, which summarises the areas that the SET is concerned with. There is then a heading called 'Overall guidance' which gives guidance for the whole section of the SET, including information about how you can show that you meet the SETs – the type of documents you can provide for the approval and monitoring process, or who we may want to meet on an approval visit.

This is followed by a heading called 'More information'. Here we mention any other documents which may be useful to education providers in finding more information related to the whole of the SET. Certain documents, like the professional body curriculum, may have relevant information in them which relates to so many SETs that, in order to save space, we have not referenced them every time, but instead we have listed them at the end of the document.

We have also provided a list of 'Example questions' for our approval and monitoring processes. We will not normally ask about all of these questions, and may not use them at all, but we have provided them to give you an idea of the sort of questions that may arise during the approval and monitoring process. Please note that the list of questions is not a complete list, and other areas of consideration may be focussed on to make sure that the SETs are being met.

The final and most substantial section is called 'Detailed guidance'. Here, we have broken down each SET into its individual, numbered parts. Each part is in a table like the one below.

<b>This box contains the SET title, for example, 'Assessment standards'</b>
This box contains the full text of the relevant SET.
<b>Guidance</b> This box contains guidance on the SET. This may include the rationale behind the SET, and examples and suggestions of the type of evidence to provide.
<b>Other sources of guidance</b> This box occurs after some of the SETs and lists other documents which may contain more background information on ways of meeting the SET.  Here, as with the 'More information' for the whole of the SET, you will find that certain documents may have relevant information in them which relates to so many SETs that we have not referenced them against each one separately, but instead have given a list at the end.

## SET 1: Level of qualification for entry to the Register

### Summary

This SET is concerned with the qualifications needed to be eligible to apply to register with us.

### Overall guidance

This does not apply.

### More information

- Quality Assurance Agency for Higher Education, A framework for higher education qualifications in England, Wales and Northern Ireland
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- QAA Scotland, A framework for higher education qualifications in Scotland
- QAA Scotland, Scottish benchmark statements
- National Qualifications Framework in England, Wales and Northern Ireland
- Credit and Qualifications Framework in Wales
- Scottish Credit and Qualifications Framework

### Example questions

- How is the MA different from the PG Dip?
- Is there an exit route other than BSc (Hons) or MA?

### Detailed guidance

#### 1 Level of qualification for entry to the Register

1. 1 The Council normally expects that the threshold entry routes to the Register will be the following:

Bachelor degree with honours for:

- biomedical scientists (with the Certificate of Competence awarded by the Institute of Biomedical Science, or equivalent);
- chiropodists / podiatrists;
- dietitians;
- occupational therapists;
- orthoptists;
- physiotherapists;
- prosthetists / orthotists;
- radiographers; and
- speech and language therapists.

Masters degree for arts therapists.

Masters degree for clinical scientists (with the Certificate of Attainment awarded by the

Association of Clinical Scientists, or equivalent).

Diploma of Higher Education for operating department practitioners.

Equivalent to Certificate of Higher Education for paramedics.

**Guidance**

This SET sets out the threshold levels of qualification which we have identified as being the level which typically delivers the standards of proficiency for the professions.

We expect that most of the programmes on our approved list will be at the standard which we have outlined above, but we realise that there may be some exceptions. We have set the level above for each profession, based on what we think is needed for people who successfully complete the programme to meet all of the standards of proficiency.

This SET contains the word 'normally' and some of the entry routes include the word 'equivalent'. This is to show that you may be able to design a programme which leads to a different qualification from that above, but which meets the rest of the SETs, and the standards of proficiency, so can still be approved by us. This may include programmes set at a level above those specified.

We could not lawfully refuse to approve a programme solely on the basis of the form of award. The term 'normally' is necessary for programmes providing an award not set out in this SET which nonetheless is capable of delivering the standards of proficiency.

**Other sources of guidance**

- Guidance on prescribing rights can be found on our website:  
[www.hpc-uk.org/aboutregistration/medicinesandprescribing/](http://www.hpc-uk.org/aboutregistration/medicinesandprescribing/)

## **SET 2: Programme admissions**

### **Summary**

This SET is about the admissions procedures for your programme, including the selection procedure and the information provided to those involved.

### **Overall guidance**

Examples of the kind of information that you could provide include:

- the information that is made available to applicants;
- information handed out at open days or interviews;
- any 'welcome pack' or 'information pack' provided to successful applicants;
- a copy of your advertising material; or
- a relevant website address.

We will want to be assured that you review your admission procedures to ensure they are effective. So, you may want to provide information about how you analyse application and admission patterns.

It is important that your admissions staff and your applicants understand that, when you assess applications, you are checking that person's suitability to do your programme, and that you are not assessing or giving any assurances about whether they will eventually be registered. This particularly applies to the sections of this SET which refer to criminal conviction checks and health requirements.

Admissions staff and applicants should be aware that the offer of a place is not a guarantee of HPC registration at the end of the programme.

When someone applies to us for registration, we will look at their application individually, and make a decision about their registration based on their individual circumstances. We cannot offer future guarantees of registration, or decide that a future application for registration would definitely not be successful.

### **More information**

- Health Professions Council, Standards of conduct, performance and ethics
- Health Professions Council, A disabled person's guide to becoming a health professional
- Health Professions Council, Information about the health reference
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education: Admissions to Higher Education
- Quality Assurance Agency for Higher Education, Guidelines on the accreditation of prior learning

- Quality Assurance Agency for Higher Education, Code of practice for assurance of academic quality and standards in Higher Education: students with disabilities

### Example questions

- What information do you give to applicants about the programme, and in what formats?
- What are your English language requirements?
- Have you explained your criminal convictions check?
- What arrangements do you have to make initial health checks and any immunisations that are needed?
- Do you give credit to applicants with accredited prior (experiential) learning (AP(E)L)?
- What is the process for assessing an applicant's AP(E)L? How often do you do it?
- How do you monitor your equality and diversity policies?
- How do you tell applicants and students about your equality and diversity policies?

### Detailed guidance

#### 2 Programme admissions

2.1 The admissions procedures 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.

##### Guidance

All of your entry requirements should be clearly set out in the information you make available to interested applicants.

You will need to provide information to show how you tell applicants about the costs and how they are funded. You will need to provide information on:

- funding arrangements (such as bursaries and loans);
- accommodation costs; and
- other costs (such as criminal record checks, health checks, immunisations, or personal therapy for arts therapists).

You will also need to provide information to show how you tell applicants about placements. You will need to provide information on:

- the length and possible location of practice placements;
- whether they will need to stay away from the main site of programme delivery; and
- their travel, and how this is funded.

We will want to know what information you request from an applicant and your reason for requesting that information. We do not specify detailed information that you must request from an applicant, but we will want to be satisfied that it is sufficient for an appropriate choice to be made as to whether or not to offer a

place on a programme.

You should make sure that your documents clearly tell applicants and students that completing the programme means they are 'eligible to apply' for registration with us. Phrases like 'completing this programme entitles you to be registered with the HPC' or 'once you have completed this programme, you will be registered' are misleading, as all students need to apply to register after they have completed their programme.

You must make sure applicants understand that an offer of a place does not show that they automatically meet our standards, or that they will be registered with us in the future. Please see the guidance under the rest of SET 2 for more guidance on this issue.

#### **Other sources of guidance**

- Regulatory status advertising protocol for education providers can be found on our website:

<http://www.hpc-uk.org/education/providers/download/>

## **2 Programme admissions**

2.2 The admissions procedures must apply selection and entry criteria, including evidence of a good command of reading, writing and spoken English.

### **Guidance**

Your English language requirements should be clearly set out in the information made available to all applicants. These requirements should be appropriate to the level and content of the programme. Your requirements can apply to all applicants including those from the European Economic Area.

We realise that the requirements for applicants who do not have English as their first language will differ to native English speakers. Applicants whose first language is English may be required by you to have passed English at GCSE or equivalent but will not normally need to provide evidence of meeting an IELTS standard or equivalent.

So that students can take full advantage of a programme from the start, we will want to see that your selection and entry criteria contain a rigorous process to assess a student's understanding of English through their reading, written and oral skills. We do not require you to do this by interviewing all applicants to your programme, it is for you to determine your entry criteria.

Any English language requirements you set at the beginning of the programme should take account of the fact that at the end of the programme, all students must meet the required level of English proficiency for the standards of proficiency for their profession. Please refer to the standard of proficiency 1b.3 that outlines English communication requirements for registrants. You are not required to test the students for our English requirements on completion of the

programme but your programme should be designed to show that a student can meet the standards of proficiency.

## **2 Programme admissions**

2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.

### **Guidance**

You should run appropriate and relevant criminal convictions checks on all applicants. These would normally be through the Criminal Records Bureau, Disclosure Scotland, Access Northern Ireland, or, where appropriate, an equivalent international body. We would expect that this would normally be an 'enhanced' level disclosure or equivalent, due to the positions of responsibility in which health professionals are placed.

See the comments above in the general guidance for this SET, about the role of your staff in assessing applicants for your programme, and not for registration. It is for you to determine who should meet the cost of carrying out the criminal convictions checks

We will want to see what you would do if an applicant declares a criminal conviction. If you are considering an application from someone who has a criminal conviction, you may find it helpful to refer to our standards of conduct, performance and ethics, and consider if any criminal conviction might affect that person's ability to meet those standards.

You may also find it helpful to consult your practice placement providers to find out if they would be willing to offer an applicant with a criminal conviction a place. We will want to see what procedures you have in place if practice placement providers are not willing to offer a student a place after you have already accepted them as a student.

Although we do not require that criminal conviction checks continue through the length of the programme, please see SET 3.16 for more guidance on this issue.

### **Other sources of guidance**

- Health Professions Council, Guidance on health and character (publication expected November 2009)

## **2 Programme admissions**

2.4 The admissions procedures must apply selection and entry criteria, including compliance with any health requirements.

### **Guidance**

Your health requirements should be clearly set out in the information made available to applicants. These requirements should be appropriate to the programme content and delivery, including the practice placements. Such requirements could include vaccinations and occupational health assessments.

Requirements vary across the professions and we will want to see that you give applicants clear information. For example, some programmes will need students to have immunisations while others will not.

It is your responsibility to make sure all reasonable steps have been taken to comply with any health requirements and that all reasonable adjustments are made for those covered by equality and diversity legislation.

Our guidance document, 'A disabled person's guide to becoming a health professional', provides information for disabled people applying to approved programmes, and for admissions staff considering applications from disabled people.

We have also published a document called 'Information about the health reference' with information for applicants and doctors about the health reference.

See the comments in the general guidance for this SET, about the role of your staff in assessing applicants for your programme, and not for registration.

**Other sources of guidance**

- Health Professions Council, Guidance on health and character (publication expected November 2009)

**2 Programme admissions**

2.5 The admissions procedures must apply selection and entry criteria, including appropriate academic and/or professional entry standards.

**Guidance**

We will want to be assured that your academic and professional entry standards, including those regarding literacy and numeracy, are appropriate to the level and content of the programme. We will want to view evidence of how these standards are communicated to applicants and how they are applied.

**2 Programme admissions**

2.6 The admissions procedures must apply selection and entry criteria, including accreditation of prior (experiential) learning and other inclusion mechanisms.

**Guidance**

We will want to be assured that your AP(E)L scheme and inclusion mechanisms (such as Foundation Degrees, direct entry, feeder routes, advanced standing, Higher National Diplomas and Higher National Certificates) are made available to applicants and students. We will also want to make sure that students who are eligible for AP(E)L or another inclusion mechanism are able to meet the standards of proficiency for their profession when they successfully complete the programme. We will need to be assured that students' prior learning is mapped against the learning outcomes for a programme or individual modules.

You may want to show how you explain your AP(E)L and inclusion policies to applicants and students, the policy and procedure for agreeing and awarding credits, indication of limits and the associated costs.

**Other sources of guidance**

- European Credit Transfer System
- Quality Assurance Agency for Higher Education, Guidelines on the accreditation of prior learning
- Quality Assurance Agency for Higher Education, Facilitating credit-based links in Scottish higher education: Guidelines to support colleges and higher education institutions

See the back of this document for a list of publications.

**2 Programme admissions**

2.7 The admissions procedures must ensure that the education provider has equality and diversity policies in relation to applicants and students, together with an indication of how these will be implemented and monitored.

**Guidance**

We will need to be assured that you have appropriate equality and diversity policies.

Your department, school or programme may have its own equality and diversity policies, or your education provider may have a policy that applies to you. We will want enough evidence to show that you have policies in place and that they are put into practice and monitored.

We will also want to be assured that these policies are made available to students (for example, in the student handbook or on a website) with information about what an applicant or student should do if they feel that they have been discriminated against.

## **SET 3: Programme management and resource standards**

### **Summary**

This SET is about managing the programme, and the resources available to the academic, support and placement staff, and to the students on the programme.

### **Overall guidance**

On an approval visit, we will usually take note of the on-site resources available during the tour of resources. You might want to use the tour to tell us about facilities which you feel meet the SETs particularly effectively. In the annual monitoring and major change processes, documentary evidence such as building plans and lists of resources available could be provided.

We will want you to provide evidence about how well the policies and procedures that you outline in your documents are working. Evidence regarding how practice placement educators manage placements, and the resources available during placements, may be relevant to this SET as well.

We may require information from your senior managers regarding SET 3.

### **More information**

- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in Higher Education

### **Example questions**

- Do you use visiting lecturers? If so, how do you include them in your quality assurance systems?
- Do you have annual staff appraisals?
- Do you use peer-observation as part of staff development? If so, do you use comments in staff appraisals?
- Do students participate, as service users, in teaching? If so, how do you get their consent?
- How do you monitor student attendance?
- If students do not attend, how do you deal with this?
- Can students access information technology and library resources when off site or at weekends?
- Do all those who help the students learn have a teaching qualification? If not, how do you ensure that the student learning experience is an effective one?
- What staff development is offered in order to enhance teaching?

## Detailed guidance

### 3 Programme management and resources

#### 3.1 The programme must have a secure place in the education provider's business plan.

##### Guidance

We would normally want to see a business plan, to make sure that the programme is secure within the education provider, is not under any threat, and that it has enough support.

A 'secure place' means that:

- the education provider is committed to providing enough resources to deliver the programme;
- the risks or threats to delivering the programme are currently minimal; and
- there is a future for the programme.

The information for this SET may need to be requested from senior managers of your education provider. There must be clear information about partnerships with other education providers.

As part of your documents, you may want to include funding or planning information as returned to the Higher Education Funding Council for England (HEFCE), Scottish Funding Council (SFC), National Leadership and Innovations Agency for Healthcare (NLIAH), Higher Education Funding Council for Wales (HEFCW), Department for Employment and Learning Northern Ireland (DELNI), Strategic Health Authority Education Commissioning Team (SHAECT) or Department of Health Commissioners, if appropriate.

You could, for example:

- explain the context of your programme, in terms of how it fits with its research profile and strategy;
- show how you manage programmes with providers of practice-based learning, to make sure that they are effectively developed, delivered and reviewed; or
- explain your processes for reviewing the way your programme is delivered and the related need for development.

### 3 Programme management and resources

#### 3.2 The programme must be effectively managed.

##### Guidance

We will want to see evidence of the programme management structure. This may include the lines of responsibility and the links to the management of practice placement providers, highlighting the roles and responsibilities of all parties.

If the programme proposal is new, we must be convinced that there are effective systems in place to manage the programme and that individuals involved have the skills and expertise they need to work within these systems.

If there is a partnership with another person or organisation to deliver the theoretical content of the programme (for example, another education provider, or where an employer employs the academic staff as well as the practice placement educators), we will ask to see the partnership agreement and find out which regulations and procedures apply to students and staff. We will want to be assured that there are clear procedures to deal with any problems in this area, and these should be clearly written into any partnership agreement.

Evidence might include:

- the programme handbook;
- an outline of the management structure; and
- role descriptions.

### **3 Programme management and resources**

#### **3.3 The programme must have regular monitoring and evaluation systems in place.**

##### **Guidance**

You must provide evidence of your monitoring and evaluation systems, including evidence of service user engagement. We will also want to see how you make sure the information gathered through your monitoring and evaluation systems is acted upon.

Evidence might include:

- annual or routine monitoring requirements and reports;
- external examiners' reports and your response to these reports;
- a critical review of current arrangements;
- analysis of student feedback through module evaluations, placement evaluations, programme committees, and staff-student liaison committees;
- analysis of service user feedback through programme committees, employer liaison groups, local or national forums, and questionnaires;
- feedback through placement audits and evaluations, and partnership meetings;
- analysis of tutor feedback through module evaluations, programme committees, and annual reports;
- quality assurance audits of practice placements; and
- clear action plans and evidence of the action taken.

We will want you to explain how you carry out a self-evaluation of the programme's effectiveness. Once a programme is approved we will use the documents from your monitoring and evaluation system (including internal and external evaluations) in our annual monitoring of the programme.

To avoid duplication, you may use the same documentation you use for internal processes or give to other bodies. We will want to see that the monitoring and evaluation systems (for example, internal quality audits, external examiner

reports, and student feedback) are appropriate to, and effective for, the programme. You should show how you use the systems you currently have in place, rather than develop new systems.

### **3 Programme management and resource standards**

3.4 There must be a named person who has overall professional responsibility for the programme who must be appropriately qualified and experienced and, unless other arrangements are agreed, be on the relevant part of the Register.

#### **Guidance**

You must show how the named person with overall professional responsibility for the programme is 'appropriately qualified and experienced'.

Along with a copy of that individual's curriculum vitae (CV), you might want to include evidence of:

- previous effective programme leadership;
- an ability to effectively organise the delivery of the programme;
- a professional qualification; or
- an educational qualification.

This person will normally be registered with us. However, we recognise that it may be possible for a programme to be led by someone who is not registered on the relevant part of the Register. If this is the case, you should include more detail about their qualifications and experience. If they are not registered, you must make sure that their job title does not include a protected title or give the impression that they are registered with us.

If the named person with overall responsibility for the programme is registered with us, but is not registered in the relevant profession, we will want to see how you make profession-specific information and resources available to support them in their role.

### **3 Programme management and resource standards**

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

#### **Guidance**

We will want to be sure that the number of staff is appropriate for the effective delivery of the programme. We do not set staff to student ratios. Instead, we will look at the staffing within the overall context of your education provision.

By 'adequate' we mean that you can justify the number of staff in place in relation to the number of students. We will want to see that their qualifications and experience are 'appropriate' for the delivery of the programme. This would include, for example, looking at the involvement of your staff in other programmes in the same profession, your expected research, or your interprofessional learning and teaching. We will need information on what administrative, pastoral,

management or technical staff are in place to support the programme and, if appropriate, information on their experience and qualifications.

We will also consider the number of students on the programme and the frequency that the programme runs.

We will also want to make sure that there are contingency provisions in place. These should show how you deal with situations such as staff absence.

You will probably want to take account of the practical requirements of your programme, and the possible need for teaching in small groups, when deciding how many staff are needed. You may also want your staff to have clinical as well as academic experience.

The information that you give us about staffing at your placements will also be relevant to this SET. Please see SET 5.6 for more guidance on this issue.

### **3 Programme management and resource standards**

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

#### **Guidance**

The CVs of your staff will probably contain the information required for this SET.

You will need to show us that the staff on the programme team (including part-time staff), and any other people who help to deliver the programme (such as sessional or guest lecturers), are qualified to deliver the programme. We do not specify the precise expertise and knowledge that are needed to deliver certain aspects of your programme, as we feel that this may change as good practice develops.

We will also consider the input from specialist visiting lecturers and the expertise and knowledge that they bring to the programme, balanced against the quality of delivery and continuity of students' experience. If visiting lecturers teach on your programme, we will want to know how you guarantee the quality of their teaching.

### **3 Programme management and resource standards**

3.7 A programme for staff development must be in place to ensure continuing professional and research development.

#### **Guidance**

It is important that all staff, including part-time staff, practice placement educators and visiting lecturers, have the opportunity to develop and maintain their professional skills. It is particularly important that skills appropriate to the relevant profession are kept up-to-date, to allow them to continue to deliver the programme effectively.

We will want to be assured that there is a staff development policy and that individuals keep up-to-date with guidance from relevant professional bodies. This could be supported by examples of:

- staff-development strategies;
- CVs;
- staff-appraisal systems;
- staff profiles;
- professional-development portfolios; and
- keeping up-to-date with professional body guidance.

We will want to see evidence from members of your programme team about how this works, and how accessible and available staff development is. This information could be documentary or from meetings with staff on an approval visit. We may want evidence from practice placement educators about how you support them in their development. We will also want to know about any peer-observation or mentoring schemes that are run and what training is available to new lecturers.

### **3 Programme management and resource standards**

**3.8 The resources to support student learning in all settings must be effectively used.**

#### **Guidance**

By 'all settings' we assume that this covers the theoretical setting as well as the practice placement setting. 'All settings' could also refer to a second site where parts of the programme are delivered or where programmes are delivered by a franchise arrangement. In cases such as these, we will need to see evidence of the resources that are available and used by students.

'Resources' in this context may include:

- student handbooks and module guides;
- information technology (IT), virtual learning environments and other specialist programmes;
- academic and support staff;
- buildings;
- texts and journals;
- equipment; and
- materials.

This SET means that resources must be used effectively. You could provide information about the resources students have access to, including how equipment booking systems are used, or how laboratory resources are used. We will also want to be sure that resources are effectively used on placements, so, as part of your evidence to show that you meet this SET, you could show us how you support student learning in a practice placement setting.

We will want to see evidence of how you monitor the use and effectiveness of the

resources through your regular monitoring and evaluation systems. Please see SET 3.3 for more guidance on this issue.

The evidence supplied here may also be relevant to SET 3.9.

### **3 Programme management and resource standards**

3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.

#### **Guidance**

By 'all settings' we assume that this covers the theoretical setting as well as the practice placement setting. 'All settings' could also refer to a second site where parts of the programme are delivered or where programmes are delivered by a franchise arrangement.

This SET means that resources must be available and appropriate for the delivery of the programme. You should show us evidence of available resources, which may include:

- IT facilities;
- lecture theatres;
- tutorial rooms
- presentation equipment;
- specialist labs;
- skills labs;
- studio space; and
- equipment.

We will want to see evidence of how you monitor the use and effectiveness of the resources through your regular monitoring and evaluation systems (See SET 3.3).

The evidence supplied here may also be relevant to SET 3.8.

### **3 Programme management and resource standards**

3.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to students and staff.

#### **Guidance**

You should provide information about the learning resources provided for students, and for staff. On an approval visit you may also want to point out learning resources directly to us during the course of the tour of the library and facilities, including information technology (IT) facilities and any profession-specific resources. For the annual monitoring and major change processes, documentary evidence such as photographs of resources or library stock listings can be provided.

We will want to check the quantity, accessibility and currency of resources. We

will want to be assured that

- stocks are kept up-to-date;
- there is enough money to replace stocks;
- there are enough core texts available (or that arrangements are made such as reserving certain titles for reference only, or short-term loan only); and
- opening hours mean that the facilities are available to students and staff.

We will also want to know how the students will be able to access the learning resources wherever their learning is based.

We will also need to make sure that your IT facilities are appropriate and readily available. If you are using a virtual learning environment such as WebCT or Blackboard, it can be helpful to provide evidence of how they are used.

### **3 Programme management and resource standards**

3.11 There must be adequate and accessible facilities to support the welfare and wellbeing of students in all settings.

#### **Guidance**

By 'all settings' we assume that this covers the theoretical setting as well as the practice placement setting. 'All settings' could also refer to a second site where parts of the programme are delivered or where programmes are delivered by a franchise arrangement.

We will want to see how your systems support all students, including mature students, disabled students, those not studying full-time, or those with caring responsibilities. You should provide evidence of the support available for students during periods of sick leave, carers' leave, or any other planned or unplanned leave. You may also like to provide details of financial help available, counselling and specialist teaching or learning facilities.

You will need to provide evidence of:

- the facilities available for student support;
- how students are informed about these facilities; and
- how accessible these facilities are.

Appropriate support facilities could include:

- a counselling service;
- a health centre; and
- the provision of medical advice.

<b>3 Programme management and resource standards</b>
3.12 There must be a system of academic and pastoral student support in place.
<p><b>Guidance</b></p> <p>We want to see that the system of academic and pastoral support you have in place is available to students in both the theoretical setting and practice placement setting. We will also want to see how students are able to access the support from both settings.</p> <p>If you use a ‘personal tutor’ system, you will probably want to provide information about how this works to show how you meet this SET. You could also show how you support students with learning difficulties, including how they are supported during their placements. We may ask for evidence from students about how well they feel the support systems are working.</p> <p>For more information about support for students on practice placements, please see SET 5.</p>

<b>3 Programme management and resource standards</b>
3.13 There must be a student complaints process in place.
<p><b>Guidance</b></p> <p>We will want to see that there is a formal student complaints process in place and how the students are informed about the process. This process would apply to all areas of the education provider. We would expect the complaints process to detail how students’ concerns about the programme or a related service are dealt with, as well as how allegations such as harassment or discrimination are dealt with. Complaints would differ from ‘appeals’ which are solely around the request for a review of a decision about progression, assessment or award.</p> <p>For more information about appeals, please see SET 6.10.</p> <p><b>Other sources of guidance</b></p> <ul style="list-style-type: none"> <li>• Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education – Section 5: Academic appeals and student complaints on academic matters</li> <li>• Office of the Independent Adjudicator for Higher Education Scottish Public Services Ombudsman</li> </ul> <p>See the back of this document for a list of publications.</p>

<b>3 Programme management and resource standards</b>
3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.

**Guidance**

This SET is mainly concerned with preventing physical injuries and preventing or managing emotional distress, and helps to make sure that education and placement providers acknowledge risk factors. The level of involvement of students will vary between programmes, and from profession to profession. Professional bodies may have information about this.

Examples of activities where you will need to have guidelines for gaining students' consent include:

- disclosure of personal information;
- role play;
- bio-mechanical assessments;
- patient positioning activities;
- practising profession-specific techniques; and
- experiential groups.

You should tell students how involved they are expected to be in the programme, taking account of, for example, cultural differences or the medical health of the individual. We will want to know how and where this is made clear to students and applicants.

We will want to check that there are systems in place for gaining informed consent from students. Documentary evidence such as a copy of a consent form or the relevant guidelines will normally be required. We will also want to see that students have been advised of their right to confidentiality. On an approval visit we may also ask questions about this during meetings with students or practice placement providers.

**Other sources of guidance**

- Health Professions Council, Confidentiality - guidance for registrants

**3 Programme management and resource standards**

3.15 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.

**Guidance**

We will want to make sure that all students can meet all of the standards of proficiency, in order to be able to practise safely and effectively. This means, for example, that aspects of the programme which are essential to make sure that students meet the standards of proficiency will need to be compulsory. Attendance must be monitored, and lack of attendance should be followed up to make sure that students gain this knowledge before they complete the programme.

You should provide information on which aspects of the programme are compulsory, and the systems you have in place for monitoring attendance at such

times. Information must also be provided to show us what action you will take if students fail to attend compulsory aspects of the programme. For example, if compulsory attendance is linked to assessments or practice, you must explain the systems used to monitor attendance during assessments or practice and indicate the consequences and action required if students fail to attend.

We will want to be assured that your requirements, and any consequences of missing compulsory teaching, are clearly communicated to students. This might be included, for example, in a student handbook or equivalent.

Please see SET 5.12 for more guidance on this issue.

### **3 Programme management and resource standards**

3.16 There must be a process in place throughout the programme for dealing with concerns about students' issues related to professional conduct.

#### **Guidance**

The purpose of this SET is to ensure that education providers play a role in identifying students who may not be fit to practise and assist them to address any concerns about their profession-related conduct. The process should focus on identifying and helping to address concerns, but should also afford an appropriate range of outcomes, including providing for an award which does not provide eligibility to apply to the Register (please see SET 6.9 for more guidance on this issue).

We will want to see evidence to support your choice of process, which must be appropriate to the programme and its delivery. It is important that there is accountability for any decision made and that the process is robust, fair and transparent.

We will want to see the process of communication between you, practice placement providers and practice placement educators. It will be important that you show the process is fair, that you have made all attempts to allow the student to address any issues of conduct and that a clear rationale is shown for all decisions made.

To show that you meet this SET, you could refer us to where the process is laid out, and how students are informed. This might be included, for example, on your website, or in your student handbook. You may want to use our standards of conduct, performance and ethics to inform your process.

#### **Other sources of guidance**

- Health Professions Council, Standards of conduct, performance and ethics
- Health Professions Council, Guidance on conduct and ethics for students (publication expected November 2009)
- Health Professions Council, Guidance on health and character (publication expected November 2009)

## **SET 4: Curriculum standards**

### **Summary**

This part of the SETs is about the curriculum, making sure that people who complete the programme meet our standards for their professional skills and knowledge, and are fit to practise. We have created a set of curriculum standards which will allow you to design your own programme.

### **Overall guidance**

We set broad enabling standards so that you can design a programme that takes account of relevant curriculum frameworks. The curriculum frameworks you choose to use should take account of changes in the profession and ensure that anyone who undertakes the programme is able to meet the standards of proficiency upon completion. We do not set more detailed standards for developing a curriculum or about the content of programmes and how they are delivered.

Relevant curriculum frameworks are often designed by professional bodies. Different professional bodies are at different stages in relation to curriculum frameworks. Some have been involved in this for some time, others are beginning to develop this, and some professional bodies may not get involved in this area. For a list of documents, please see the back of this document, or visit [www.hpc-uk.org](http://www.hpc-uk.org).

### **More information**

- Health Professions Council, Standards of proficiency
- Health Professions Council, Standards of conduct, performance and ethics
- The Higher Education Academy and its Subject Centres
- Professional body:
  - curriculum outlines; and
  - codes of professional conduct.See the back of this document for a list of publications.
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education
- QAA Scotland, Scottish benchmark statements
- Enhancement Themes initiative (Scottish higher education)

### **Example questions**

- What drives the design of your curriculum?
- How would you explain the overall programme and how a student progresses from day one to completion?

- Can you explain how the learning outcomes of the programme meet the standards of proficiency?
- Would you explain how your students will be able to use a range of approaches in their practice after they qualify?
- What learning and teaching approaches do you use, and why?
- What is the reasoning behind the programme content, and the balance between the number of hours for different subjects?
- How do you make sure your curriculum stays relevant to current practice?

## Detailed guidance

### 4 Curriculum standards

4.1 The learning outcomes must ensure that those who successfully complete the programme meet the standards of proficiency for their part of the Register.

#### Guidance

This is one of the most crucial areas within the SETs. For an approval visit you will be asked to show how your learning outcomes meet the individual standards of proficiency by completing the standards of proficiency mapping document that we provide. In this document, please make sure that you cross-reference against the generic, as well as the profession-specific, parts of the standards. Depending on the nature of any changes made to your programme, you may be asked to complete an updated version of the mapping document for the annual monitoring or major change processes.

You should refer us to the learning outcomes and module assessments which show how all of the standards of proficiency are covered by successfully completing the programme. These could be in module or unit descriptors.

We will want to make sure that every student completing the programme can meet all of the standards of proficiency, no matter what option modules they choose, or if they have postponed their study.

You should also be aware that in considering how your students can meet the standards of proficiency at the end of their programme, you can take into account any reasonable adjustments you have made to the way that you deliver the programme to disabled students.

We recommend you include the standards of proficiency in your reading lists.

#### Other sources of guidance

- Health Professions Council, Standards of proficiency
- Health Professions Council, A disabled person's guide to becoming a health professional

## **4 Curriculum standards**

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

### **Guidance**

By using the word 'reflect' we are drawing a distinction between reflect and adhere. The intention of the SET is to allow for changes in the philosophy, core values, skills and knowledge base of a profession.

If the programme does not reflect the available curriculum guidance, then we would need to gather evidence about how, without reflecting the curriculum guidance, you feel the students completing your programme are able to practice safely and effectively.

In meeting this SET, you may refer to any relevant documents such as those produced by professional bodies and the QAA benchmark statements for the profession. We will want to see how any guidance is reflected in the programme.

### **Other sources of guidance**

Profession-specific sources of guidance may include professional bodies':

- curriculum frameworks;
- practice placement standards;
- good-practice guidelines;
- clinical guidelines; and
- codes of practice.

You may also choose to consult competency frameworks, National Occupational Standards (NOS), Learning Design Principles and the Enhancing Quality in Partnership (EQuIP) model for Quality Assurance from Skills for Health, the Sector Skills Council for the UK health sector.

Examples of multi-professional reference frameworks could include the following:

### **Education and quality**

- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education
- Quality Assurance Agency for Higher Education, A framework for higher education qualifications in England, Wales and Northern Ireland
- QAA Scotland, A framework for higher education qualifications in Scotland
- Scottish Credit and Qualifications Framework
- National Qualifications Framework in England, Wales and Northern Ireland
- Credit and Qualifications Framework in Wales
- QAA Scotland, Scottish benchmark statements
- The Higher Education Academy

## **Legislation**

- Disability Discrimination Act 1995
- Human Rights Act 1998
- Health and Safety at Work etc. Act 1974, and associated regulations
- The Children Act 2004

## **Health and social care policy**

- National Service Frameworks
- National Occupational Standards
- NHS Knowledge and Skills Framework
- A High Quality Workforce: NHS Next Stage Review
- Modernising Allied Health Professions (AHP) Careers: a Competence-based Career Framework

See the back of this document for a list of publications.

## **4 Curriculum standards**

### **4.3 Integration of theory and practice must be central to the curriculum.**

#### **Guidance**

We will be looking for evidence within your curriculum that theory and practice are combined within both the theoretical and practical elements of your programme.

You could show how you meet this SET specifically through your programme design. Also, your quality assurance and enhancement systems may provide evidence of how you meet this SET, and you could highlight specific aspects of your programme.

Please see SETs 5.1 and 5.12 for more guidance on this issue.

## **4 Curriculum standards**

### **4.4 The curriculum must remain relevant to current practice.**

#### **Guidance**

Practice may change over time. We expect you to provide evidence of how you make sure the curriculum remains relevant. Evidence may include:

- evidence of regular contact with employers;
- staff CVs (which might include information about how you maintain the relevance of the curriculum through the ongoing clinical or research experience, or professional activity of members of the programme team);
- evidence that the programme team participate in CPD
- evidence of how research and scholarly activity affect the programme, and programme development;
- peer-reviewed journals used in the curriculum;
- QAA reports;
- evidence of the contribution that stakeholders (placement educators, employers, practitioners, past and present students, service users, and strategic health authorities) make in the programme planning process; and

- evidence of how changes in policy and health and social care developments affect your programme's development.

You may want to provide information about how current frameworks influence the profession, and so influence the education and training that you provide. You should demonstrate how the programme design and delivery:

- predicts or reflects change in health and social care and its organisation, changes in the law, and in service user need;
- reflects developments in a profession's research base and technological advances;
- develops students' ability to respond to changes in practice;
- enables students to initiate change in practice to ensure continuing safe and effective practice; and
- equips students with the knowledge, skills and understanding to make a positive contribution for their service users.

#### **4 Curriculum standards**

4.5 The curriculum must make sure that students understand the implications of the HPC's standards of conduct, performance and ethics.

##### **Guidance**

The standards of conduct performance and ethics are broad, generic standards that all people registered by us must adhere to. These standards must be taught and met throughout a programme. For example, they could be covered as part of a module on ethics or could be integrated into the curriculum as a whole.

We will want to see that the curriculum makes specific reference to the standards of conduct, performance and ethics, and that students understand these standards including how and when they apply.

We recommend that you include the standards of conduct, performance and ethics in your reading lists.

Please see SET 3.16 for more guidance on this issue.

##### **Other sources of guidance**

- Health Professions Council, Standards of conduct, performance and ethics
- Health Professions Council, Guidance on conduct and ethics for students (publication expected November 2009)

#### **4 Curriculum standards**

4.6 The delivery of the programme must support and develop autonomous and reflective thinking.

##### **Guidance**

Students should be encouraged to consider:

- their own practice;
- the limits of their safe and effective practice;

- how they will relate to other practitioners; and
- their responsibility to make sure that they are safe practitioners when they complete the programme.

We will look for evidence of autonomous and reflective thinking through student-centred and independent learning, teaching and assessment strategies. Evidence could include:

- self-appraisal with planning and writing action plans;
- discussion groups;
- workshops;
- practice simulation and debriefing;
- reflective diaries or logs;
- professional development portfolios or personal development plans; and
- practice placement reviews.

#### **Other sources of guidance**

- Professional body:
  - codes of ethics; and
  - guidance on reflective practice.

See the back of this document for a list of publications.

## **4 Curriculum standards**

4.7 The delivery of the programme must encourage evidence based practice.

### **Guidance**

Students do not have to write a dissertation to meet this SET. Evidence-based practice could be demonstrated, for example, by a course on research methods, or by producing a research proposal.

We will look for evidence of evidence-based practice through student-centred and independent learning, teaching and assessment strategies. Evidence could include:

- self-appraisal with planning and writing action plans;
- discussion groups;
- workshops;
- practice simulation and debriefing;
- reflective diaries or logs;
- professional development portfolios or personal development plans; and
- practice placement reviews.

## **4 Curriculum standards**

4.8 The range of learning and teaching approaches used must be appropriate to the effective delivery of the curriculum.

### **Guidance**

‘Appropriate’ means appropriate to the learning outcomes needed, both in terms of theoretical knowledge and the practical skills needed in professional practice.

You will need to show that you use a 'range' of learning and teaching approaches in delivering the programme. We do not specify how many approaches you should adopt, but it is unlikely that a programme which relied on a single learning and teaching approach would be able to give evidence to show that it met this SET.

This area of SET 4 refers to both the theoretical and practice placement environments, so the information that you provide here may also be used to show how you meet SET 5 (which is concerned with practice placements).

The evidence supplied here may also be relevant to SETs 4.3, 4.4, 4.6 and 4.7.

**Other sources of guidance**

- The Higher Education Academy ([www.heacademy.ac.uk](http://www.heacademy.ac.uk))

See the back of this document for a list of publications.

**4 Curriculum standards**

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

**Guidance**

Successful interprofessional learning can develop students' ability to communicate and work with other health and social care professionals, potentially improving the care environment for service users and professionals. Where interprofessional learning does exist, you must make sure that the learning of profession-specific skills and knowledge of each professional group is not compromised.

We appreciate that you may not be able to offer interprofessional learning because of factors beyond your direct control. It is therefore not a requirement. However, interprofessional working is embedded in the standards of proficiency (particularly 1b) and the standards of conduct, performance and ethics.

To show how you meet this SET, you might provide information about which parts of the curriculum are shared, and which are not, with the reasons behind this. You may also wish to comment on how you see interprofessional education developing, and how it benefits those groups which are involved.

You should be aware that SET 4.1 and SET 6.1 require those who successfully complete the programme to meet the standards of proficiency for their part of the Register. The standards of proficiency contain interprofessional requirements such as the requirement to work with other professionals. It is therefore essential to know the importance of working with, and as part of, the wider health and social care team.

**Other sources of guidance**

- UK Centre for the Advancement of Interprofessional Education ([www.caibe.org.uk](http://www.caibe.org.uk))

- Creating an Interprofessional Workforce Framework (2007)
- The Higher Education Academy ([www.health.heacademy.ac.uk/ipe](http://www.health.heacademy.ac.uk/ipe))
- The European Interprofessional Education Network (EIPEN)  
([www.eipen.org](http://www.eipen.org))

See the back of this document for a list of publications.

## **SET 5: Practice placement standards**

### **Summary**

This section of the SETs is about your practice placements. We do not normally need to approve individual practice placements, but we may visit practice placements if specific questions have been raised about whether your placements meet our SETs.

You must retain ultimate responsibility for all placements. Whilst we recognise that you will work in collaboration with practice placement providers and educators, this SET seeks to ensure that you have overall responsibility and accountability for placement learning, and that adequate systems are in place to support it. We will want to see what systems you have put in place for approving and monitoring placements. If you share practice placement arrangements with another education provider, you will both need to separately show the approval and ongoing quality assurance of placements. You should also have arrangements in place to make sure that students can still achieve the learning outcomes that are specific to your programme. You should also have robust and effective systems surrounding the role of practice placement educators.

We need to see evidence of how you:

- manage your placements;
- manage assessments in placements;
- provide support;
- provide information to your students and practice placement providers;
- and
- monitor the placements to make sure that they continue to meet our SETs.

### **Overall guidance**

To make sure that you meet all of the SETs for practice placements, we will normally want to see:

- a practice placement handbook for students; and
- a practice placement handbook for practice placement educators and coordinators.

You may produce documents which have a different title, or this information may be published in some other form, for example with other documents or online. As long as you can demonstrate that you meet all of the requirements of this SET, the format of this information is unimportant.

On an approval visit we would normally meet with practice placement educators, and we may ask questions about the information in the documents you have provided, or any areas which raised queries.

Please note that we do not have specific guidelines for the length, structure, organisation or timing of placements. Other organisations may have set requirements of a certain number of hours of contact, or a number of weeks that a placement must last. While you may want to meet these, you should be aware that these are not compulsory and you do not necessarily have to meet these for your programme to be approved by us. However, you must show that whatever structures you have in place meet the SETs and standards of proficiency. See SET 5.2 for more information on this.

We will want to make sure that there is evidence of governance within practice placement settings. This will normally be through the three main themes of:

- improving care – informed choice, philosophy of care, managing risk;
- professional development of staff – continuing professional development (CPD), education and training (lifelong learning) and investment in staff; and
- organisational development – showing evidence-based practice (research basis of care planning and delivery) and examples of good practice (making changes).

Overall governance should be seen as a process for reviewing and improving the service user's experience. So, we will need to make sure that there is evidence of a quality assurance system to support both the student and the service user within the practice placement setting.

### **Example questions**

- How do you ensure you have sufficient placements and practice placement educators?
- How do you ensure that practice placement educators are trained and prepared to effectively supervise students?
- What form of contact do you maintain with practice placement educators?
- How often do you meet with practice placement providers?
- How do you ensure the quality of the placements provided?
- What support mechanisms do you have in place for practice placement educators?
- How do you measure student progression?

### **More information**

- Health Professions Council, Standards of conduct, performance and ethics
- Professional body practice placement guidelines (where available)
- NHS Education for Scotland, The development of quality standards for practice placements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education: placement learning
- Department of Health, Placements in focus: guidance for education in practice for health care professions

- Northern Ireland Department of Health, Social Services and Public Safety, Review of clinical placements for the allied health professions
- The Higher Education Academy Health Sciences and Practice Subject Centre

## Detailed guidance

### 5 Practice placement standards

5.1 Practice placements must be integral to the programme.

#### Guidance

The structure of your programme must show that practice placements are an important part of the programme. You could show this by referring to:

- your ongoing partnership arrangements with your practice placement educators;
- the way that practice placement staff are supported and encouraged to take part in developing programmes;
- the way that the practice- placement learning outcomes and progression are in line with the rest of the programme; and
- your reasons for your placement structure.

It is good practice to have a formal arrangement with practice placement providers, wherever possible.

Please see SETs 3.1 and 4.3 for more guidance on this issue.

### 5 Practice placement standards

5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

#### Guidance

We will want to be sure that there are clear reasons for the chosen number, length and range of placements. We do not set the number, length or range of placements that you must include in your programme to meet our SETs. However, you must show that the number, duration and range of practice placements must be appropriate to the curriculum design as well as the number of students.

We will want to see that all students gain access to a wide range of learning experiences in a variety of practice environments which reflect the nature of modern practice, and the range of practice settings of the profession which they are preparing to enter. You may want to show how you support students in recording the way in which their practice placement environment relates to the main areas of practice of that profession.

We will also want to know how students are expected to progress in terms of their practical skills during the placements, and how the learning outcomes for the first

placement are different from those of the final one. Evidence that could be provided might include a 'map' of the programme and details of assessment.

## **5 Practice placements**

### **5.3 The practice placement settings must provide a safe and supportive environment.**

#### **Guidance**

A 'safe and supportive environment' means one where staff and students have carried out relevant assessments of risk within the area of practice. It is also a place where safety policies and procedures are in place, and where policies and procedures are in place to support student learning.

In showing how you meet this SET, you may include evidence of how you consider issues such as:

- physical risk from equipment;
- manual handling;
- risk from substances hazardous to health;
- radiation risk;
- fire safety;
- infection control;
- aggression;
- emotional stress; and
- lone working.

Placement induction processes should explain how students will be told about risks and safety issues.

Placements should follow all elements of clinical governance to protect the public.

You should also provide information about how you check the quality of your placement providers. It is good practice for practice placement providers to give you information about their health and safety policies. Information that you have provided for SET 3 about student support may also be relevant here, and you may want to cross-reference it.

You could also show how you help students to assess risk in practical situations, and to make professional decisions. The evidence supplied here may also be relevant to SETs 4.6 and 4.7.

Please see SET 5.12 for more guidance on this issue.

#### **Other sources of guidance**

Health and safety documents produced by:

- education providers;
- professional bodies;
- the NHS; and
- the IHCD (Part of Edexcel).

See the back of this document for a list of publications.

## **5 Practice placements standards**

5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.

### **Guidance**

You will need to give us information about how you approve placements before you use them; how they are subsequently monitored on a regular basis; and also how they have links to the management of the programme. We will also want to see that you have policies in place to respond appropriately when any difficulties arise.

We do not normally visit placement settings, and give open-ended approval to programmes subject to monitoring. If the placement is with another organisation, you will need to show that you assess this effectively. We will want to see evidence of collaborative working with placement providers.

The evidence to support this could include:

- policies and processes for approving placements;
- examples of how these policies and processes are put into practice;
- details of systems for ongoing monitoring and assessment of placement providers;
- an explanation of how feedback from students is collected, analysed and acted upon;
- details of how you gain feedback from practice placement educators and coordinators, and make sure that channels of communication are clear;
- details of how you use feedback to inform processes; and
- copies of policies or details of processes for dealing with placement providers where difficulties arise.

Please see SETs 3.13 and 5.5 for more guidance on this issue.

## **5 Practice placement standards**

5.5 The placement providers must have equality and diversity policies in relation to students, together with an indication of how these will be implemented and monitored.

### **Guidance**

You should give us information about how you make sure that equality and diversity policies are in place and that they cover all of the placement providers' activities. There will need to be an indication that students on placements know how they can access these policies and what they should do if they feel that they have been discriminated against. We would normally expect that you have an audit/monitoring process for your placement providers and this will be part of that process.

Please see SET 5.4 for more guidance on this issue.

**Other sources of guidance**

- Disability Discrimination Act 2005
- The Commission for Equality and Human Rights  
([www.equalityhumanrights.com](http://www.equalityhumanrights.com))

See the back of this document for a list of publications.

**5 Practice placements**

5.6 There must be an adequate number of appropriately qualified and experienced staff at the practice placement setting.

**Guidance**

We will want to make sure that there are enough members of staff to support the students in their learning in a safe practice environment. We realise that there are different models of practice-based learning and the level of supervision at the placement can vary between the professions we regulate. Therefore, we do not say how many staff must be present at each placement, nor that those staff must be registered with us.

We will look for evidence in documents and, in the case of an approval visit, at meetings with the programme team and practice placement educators that you have clearly justified what you consider to be enough staff. This will include whether the number of staff is appropriate for the size of the student cohort. This may vary according to the level of support needed by the student. For example, a one-to-one relationship may be ideal for many professions whereas there may be four or five students to one practice placement educator in others.

If any of your practice placement educators are not registered with us, you may want to provide information about their professional qualifications (and their registration with other regulators or organisations, if appropriate). You should also show how their qualifications are appropriate to the practice placement, and to the learning outcomes of the programme as a whole. We may want to see job descriptions of practice placement educators and the recruitment policies of the placement providers so that we can see how the practice placement educators are qualified to teach or supervise students.

Some professional bodies play an active role in providing advice on staff/student ratios. Please contact the individual professional bodies if you want further guidance in this area.

**5 Practice placement standards**

5.7 Practice placement educators must have relevant knowledge, skills and experience.

**Guidance**

We will want to be sure that your practice placement educators have the knowledge, skills and experience to support students and that they provide a safe environment for effective learning. We do not set specific requirements about the

qualifications and experience that they must have, but, we will want to see how you make sure they have the relevant knowledge, skills and experience.

Please see SETs 5.6 and 5.13 for more guidance on this issue.

## **5 Practice placement standards**

**5.8 Practice placement educators must undertake appropriate practice placement educator training.**

### **Guidance**

We expect that you will train all new practice placement educators, and follow this up with regular refresher training. We will want to see evidence of the content, broad learning outcomes and any assessments or qualifications from all practice placement educator training. Where practice placement educators are involved in assessment, we will want to see how they are prepared to deliver both formative and summative assessment, and how you ensure consistency across all placements.

We do not set specific requirements for this training, either in terms of length or content, as we feel that this level of detail is best decided by individual education providers. You may choose to follow the example of other education providers, or follow best-practice advice published by other organisations. Your training may take a variety of forms, which may include:

- attendance at your site;
- training in the workplace;
- online support;
- written support; and
- peer-support through workshops and meetings.

Professional bodies may offer accreditation schemes for practice placement educators which you may want to adopt. If you take part in one of these schemes, you could give us information about how it works and how it is implemented.

## **5 Practice placement standards**

**5.9 Practice placement educators must be appropriately registered, unless other arrangements are agreed.**

### **Guidance**

Normally, your practice placement educators will be registered with us in the relevant profession. However, there are other entirely appropriate practice placement educators who do not have a profession-specific background which matches that of the student. For example, occupational therapists may supervise physiotherapy students in areas such as hand therapy, and nurses may supervise radiographers in aseptic techniques. If you choose to use practice placement educators who are not registered with us, you will need to give us information about their experience, qualifications and training relevant to the practice placement.

## **5 Practice placement standards**

5.10 There must be regular and effective collaboration between the education provider and the practice placement provider.

### **Guidance**

We will need to be sure that you regularly work together with your practice placement providers and educators, and that the collaboration and communication happens in both directions. This might take the form of regular meetings or other channels of communication with your practice placement providers and educators. You may also use a system where providers comment on their experience of supervising students on placement, or develop ways in which practice placement providers and educators influence the structure of the practice placements or feed into programme planning and design. Any information that you can provide which shows a partnership and ongoing relationship, and not one that only happens around the time of programme approval and routine monitoring, will help to show us how you collaborate effectively with practice placement providers.

## **5 Practice placement standards**

5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

- the learning outcomes to be achieved;
- the timings and the duration of any placement experience and associated records to be maintained;
- expectations of professional conduct;
- the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and
- communication and lines of responsibility.

### **Guidance**

You will need to show not only that information is provided to students, practice placement providers and practice placement educators, but also that this information is accessible to them, in an appropriate format. You should also show that information is provided in a timely fashion – to allow enough time to answer any questions before practice placements commence.

You might want to show how the information is provided, and how you make sure that all parties have understood the information. This might be through follow-up training, teaching, or opportunities for discussion. Information could be in your student handbook, practice placement handbook, or equivalent. We may look for evidence to show that the students and practice placement educators feel well-informed about what is expected of them and their responsibilities during a placement, as well as providing placement providers with the names and details of the visiting students. It is good practice to have in place a formal arrangement with placement providers, wherever possible.

Examples of practical information to provide to students could include:

- dates, times and venues;
- placement induction materials; and
- location details, such as maps.

Please see SET 5.10 for more guidance on this issue.

**Other sources of guidance**

- Skills for Health, Learning Design Principles

See the back of this document for a list of publications.

**5 Practice placement standards**

5.12 Learning, teaching and supervision must encourage safe and effective practice, independent learning and professional conduct.

**Guidance**

We will want to be sure that your placements prepare your students for entry into their profession. You should provide evidence of how your programme prepares your students for independent learning on their placement, and show how they are equipped with the resources and skills to work more independently. We will want to see information about how students learn about the behaviour expected of them on their placement. You could relate this to any teaching about our standards.

The evidence that you could refer to might include:

- reflective logs or diaries;
- professional development portfolios;
- tutorial records; and
- placement reports.

The evidence supplied here may also be relevant to SETs 4.6, 4.7 and 5.11.

**Other sources of guidance**

- Health Professions Council, Standards of conduct, performance and ethics
- Health Professions Council, Standards for continuing professional development
- Professional body standards of conduct and codes of ethics

See the back of this document for a list of publications.

**5 Practice placement standards**

5.13 A range of learning and teaching methods that respect the rights and needs of service users and colleagues must be in place throughout practice placements.

**Guidance**

Students may learn on placement in different ways, and different practice placement educators may structure the learning and teaching according to their own preferences and experience, or the individual needs of the students. It is important that whatever the methods used, these must respect the needs of service users and colleagues.

We will want to see evidence that you have a system in place which makes sure that, wherever possible, service users are aware that students are involved in their care and have given appropriate consent.

## **SET 6: Assessment standards**

### **Summary**

This part of the SETs is about how you assess your students, to make sure that they:

- meet the requirements of your programme;
- meet our standards of proficiency; and
- are assessed fairly and consistently.

### **Overall guidance**

You may want to give us a copy of your assessment strategy, or equivalent, as well as any other information about how you assess your programme.

We will need to see how you make sure that assessment of practice placements is thorough, consistent and fair. So, information about how you train practice placement educators, and how marks are moderated, will also be relevant here.

### **Example questions**

- Why have you chosen particular types of assessment for each module?
- What is your policy on resits, for both theoretical and placement components?
- How does your assessment meet external reference frameworks?
- Is there a system for continuous assessment and ongoing feedback for students on a practice placement?
- What happens if a student is failing in practice placements but is doing well in academic subjects?
- How does the design of your assessment procedure produce students who are fit to practise?
- Do you have the option to award an aegrotat award? If so, do you make it clear that an aegrotat award means you cannot register with us?
- In the absence of special circumstances, do students have the right to appeal assessment decisions?
- Is your external examiner appropriately qualified and experienced and registered with us?

### **More information**

- Health Professions Council, Standards of proficiency
- Health Professions Council, Standards of conduct, performance and ethics
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education, assessment of students
- Quality Assurance Agency for Higher Education, Subject benchmark statements

- Quality Assurance Agency for Higher Education, A framework for higher education qualifications in England, Wales and Northern Ireland
- QAA Scotland, A framework for higher education qualifications in Scotland
- Higher Education Academy, Learning and Teaching Support Network, Generic Centre Assessment Series

## Detailed guidance

### 6 Assessment

6.1 The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.

#### Guidance

When you assess a student, you must make sure that you are testing not only theoretical learning and knowledge, but also the practical application of skills to enable the student to practise their profession safely and effectively.

We will want to make sure that, on completing the programme, students meet the standards of proficiency of their profession.

We will want to make sure that your documentary evidence clearly sets out your assessment strategy and includes direct reference to the learning outcomes and associated assessment methods. This provides a direct link to fitness to practise. We would expect each module descriptor to explain the assessment methods used for that module.

We will need to see information about the:

- pre- and co-requisites in your programme;
- compulsory and optional modules;
- individual module pass marks;
- number of resit attempts allowed (and within what period of time);
- number of module resits allowed within any one year;
- maximum number of resits allowed every year for practice placement modules;
- compensation and condonement regulations;
- maximum length of a programme; and
- maximum time a student can take to complete the programme.

Although we do not set limits on the number of resit attempts or compensation allowed, you should show us how your policies strike a suitable balance between the need to support students, and the need to make sure that those who successfully complete the programme achieve the standards of proficiency.

You can devise your own requirements regarding re-sits and compensation, follow the requirements of other education providers, or the requirements made by professional bodies.

## **6 Assessment standards**

6.2 All assessments must provide a rigorous and effective process by which compliance with external-reference frameworks can be measured.

### **Guidance**

You should provide information about how your assessment methods are thorough and effective, and also about how your programme meets any relevant, external-reference frameworks. An example of this would be if your programme is a pre-registration Masters programme: showing how your programme meets the requirements of a Masters programme as well as meeting the standards of proficiency could be part of the evidence for this SET.

The levels of threshold academic attainment for entry to the Register are not the same for all professions and, therefore, the expectations for each will be different, particularly in relation to the generic standards of proficiency. For example, standard 2b.1 requires applicants to 'be able to use research...'. If the threshold level of academic attainment for a profession is equivalent to the Masters level then students' academic experience may be very different from those in professions where the required level of attainment is equivalent to a Bachelors degree or Certificate in Higher Education.

### **Other sources of guidance**

- Any relevant internal regulations
- Professional body guidelines
- Quality Assurance Agency for Higher Education, Subject benchmark statements
- Quality Assurance Agency for Higher Education, Code of practice for the assurance of academic quality and standards in higher education, assessment of students
- Knowledge and Skills Framework (Department of Health 2003)
- Scottish benchmark statements

See the back of this document for a list of publications.

## **6 Assessment standards**

6.3 Professional aspects of practice must be integral to the assessment procedures in both the education setting and practice placement setting.

### **Current guidance**

'Professional aspects of practice' may include, for example, the students' familiarity with:

- autonomy and accountability;
- values and ethics; or
- their understanding of the nature of professional regulation, and the responsibilities this involves.

You could provide information about how your assessment procedures assess this area of learning. For example, you may provide information about a specific

module which covers professional issues, with information about how this is assessed. Alternatively, this information may be included in the placement handbook, learning log and other relevant parts of the curriculum.

**Other sources of guidance**

- Health Professions Council, Standards of conduct, performance and ethics
- Health Professions Council, Standards of proficiency

**6 Assessment standards**

6.4 Assessment methods must be employed that measure the learning outcomes.

**Guidance**

You will need to provide information about your chosen assessment methods, including your reasons for using the different assessment methods that are used for different parts of the programme. You should show how your chosen methods are in line with the learning outcomes of each module. We will need to be assured that, whatever assessment methods are applied, they ensure that those who successfully complete the programme can practise safely and effectively.

**6 Assessment standards**

6.5 The measurement of student performance must be objective and ensure fitness to practise.

**Guidance**

We will want to see information about how you monitor and measure student performance, and what criteria you use to assess students who are at different stages in their learning. We will also want to see how your guidelines or objective criteria are used to ensure students are fit to practise.

Your assessment strategy may contain information about the criteria used for assessment. The moderation of marks, and the way that students are assessed on their practice placement, may also be relevant here.

We do not normally expect to see samples of students' work. However, on an approval visit we may ask students about the level of feedback they receive on their assignments and whether they feel it is enough.

A student who completes a programme must meet the standards of proficiency. The terminology 'fitness to practise' is specific to the process that professionals who are registered have to maintain. This includes the standards of proficiency, the standards of conduct, performance and ethics, and the health and character requirements of registration.

## **6 Assessment standards**

6.6 There must be effective monitoring and evaluation mechanisms in place to ensure appropriate standards in the assessment.

### **Guidance**

You will need to provide information about how your programme is monitored. This might include, for example, information about your validation or review process (if this applies), or how you use comments from your external examiner. We will want to be assured that your criteria are consistently applied, and that they are appropriate for:

- your programme;
- the students' progression; and
- making sure that students can meet the standards of proficiency when they complete the programme.

We will want to see that internal and external moderation is carried out. Internal moderation would normally cover marking and double-marking systems. External moderation would cover the role and responsibilities of external examiners or advisors. You could give us copies of your regulations and policies as well as the external examiner's reports and responses to these reports. We may want to see the details of your attrition rates which would normally be included in your own internal monitoring documents.

We will use curriculum vitae and staff profiles to assess whether educators from the programme team have experience in assessment (for example, where staff act or have acted as external examiners for other education providers). We will then be able to see how internal moderation systems of the education provider compare with external standards.

## **6 Assessment standards**

6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.

### **Guidance**

Your assessment regulations must make it clear how you assess students to make sure of, and recognise, their continuing progression within the programme. These regulations must be clear so students can understand what is expected of them at each stage of the programme, and must also ensure that staff can apply assessment criteria consistently to students' work. We will also want to see how you decide what prevents a student from progressing and the options that are available for a failing student.

We will want to see how information about the overall requirements of your programme is made available to students. It should be clear to students what they are expected to achieve. This may include credit and non credit related elements.

## **6 Assessment standards**

6.8 Assessment regulations, or other relevant policies, must clearly specify requirements for approved programmes being the only programmes which contain any reference to an HPC protected title or part of the Register in their named award.

### **Guidance**

It is important that there is no confusion about which programmes are approved by us, and which are not. Students who are not eligible to apply for registration should not be given an award that makes a reference to a protected title. Step-off or exit awards should be named in such a way as to make it clear they do not lead to eligibility to apply for registration. Some education providers give these students awards with titles like 'Healthcare studies' which reflects the academic content achieved, but does not give the impression that they are eligible to apply for registration. We will want to see that programme titles are clear, and that applicants, students, staff and the public understand who is eligible to apply for registration with us, and who is not.

## **6 Assessment standards**

6.9 Assessment regulations must clearly specify requirements for an aegrotat award not to provide eligibility for admission to the Register.

### **Guidance**

Where you are able to provide an aegrotat award, it must be clear to students and staff that students who are awarded an aegrotat award are not eligible to apply for registration. To show that you meet this SET, you could refer us to where this policy is laid out, and how students are informed, for example on your website or in your student handbook.

## **6 Assessment standards**

6.10 Assessment regulations must clearly specify requirements for a procedure for the right of appeal for students.

### **Guidance**

You should give us information about your appeals procedure. An appeals procedure should outline how a student can request a review of a decision made on their assessment, progression or achievement. We will want to make sure that students are told about the appeals procedure. This should cover how the procedure works, how it is judged, and by whom.

We will also expect to see clear information for students about where they should go for advice on your appeals procedure.

## **6 Assessment standards**

6.11 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who should be appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.

### **Guidance**

The assessment regulations must require at least one external examiner for each programme. They must be appropriately experienced and qualified, and be on the relevant part of the Register. We will want to be sure that there is an appropriate reason for appointing an examiner who is not from the relevant part of the Register and that you have agreed this with us in advance.

If you do not have an external examiner in place at the time of an approval visit, we will want to be sure that your regulations show that one will be appointed. We do not play any part in their appointment.

## **Glossary**

This appendix defines or explains terms used in this document.

### **Aegrotat**

An award to a student who was unable to complete the degree due to illness.

### **Accreditation of prior (experiential) learning (AP(E)L)**

The process for accessing and, where appropriate, recognising prior (experiential) learning. In a credit-based system, this recognition normally results in students being awarded credit which can be counted towards the completion of a programme. Experiential learning recognises learning achieved outside of a formal education or training system. The process is often referred to as 'credit transfer'.

### **Annual monitoring**

Our annual process to ensure approved programmes continue to meet our SETs and standards of proficiency.

### **Approval**

The process of validation and accreditation that leads to decisions about the ability of a programme to meet the requirements of the standards of education and training of the regulatory body.

### **Council**

The Health Professions Council.

### **Curriculum**

A structured plan of intended learning outcomes, underpinning knowledge, skills, behaviour and associated learning experiences. The learning plan is generally organised as a sequenced combination of modules so that a student can achieve specified educational and training outcomes. The curriculum includes the syllabus, teaching guides, an assessment guide and required learning resources.

### **Education and Training Committee**

The statutory committee at the Council with responsibility for education and training matters.

### **Education provider**

The establishment at which a programme is delivered or by which a qualification is awarded.

### **External examiners**

Appointed by you to monitor the assessment process for the theory and the practice elements of programmes and to ensure that professional and academic standards are met.

**External reference framework**

This term encompasses any legislative and external standards.

**Major change**

A change to a programme which has a significant impact on teaching and learning or resources and on our SETs and standards of proficiency.

**Major change process**

Our process for assessing if a change to a programme is major.

**Open-ended approval**

Where we approve programmes for an unlimited period depending on satisfactory monitoring.

**Partners**

Registrants in each of the professions we regulate who provide the expertise we need for decision making

**Practice placement**

A period of clinical or practical experience that forms part of an approved programme.

**Practice placement educator**

A person who is responsible for the education of a student during their period of clinical or practical experience.

**Practice placement provider**

The organisation that provides a period of clinical or practical experience for a student.

**Programme**

The academic provision, practice placements, assessment, qualification and other provisions of the education provider, which in totality form the programme for approval purposes.

**Programme leader**

Person who has the overall professional responsibility for a programme.

**Register**

The Register kept by Council or any part or parts thereof.

**Registrant**

A person who is currently on the HPC Register.

**Service user**

Anyone who uses or is affected by the services of registrants or students.

**Site**

A location where the programme or part of the programme is delivered.

**Staff**

Anyone involved in the delivery of education or training to a student. The term applies to those in unpaid, as well as paid positions.

**Standards of conduct, performance and ethics (SCPE)**

A statement of standards which registrants must read and agree to abide by in order to remain on the Register.

**Standards of education and training (SETs)**

The standards which education providers must meet to ensure that all those completing an approved programme meet the standards of proficiency.

**Standards of proficiency (SOPs)**

The standards required of registrants and those applying for registration for the safe and effective practice of their profession.

**Student**

Anyone studying on a programme which leads to eligibility to join our Register. The term includes trainees or practitioners in training.

**Visitor**

An HPC 'partner' we have appointed to visit, approve and monitor education programmes for the professions we regulate.

## Further information

The following references and links to education documents are provided for information only and their inclusion on our website is not an endorsement or recommendation by the HPC of any organisation or of the information or views they may contain. The HPC cannot accept any responsibility for the availability or contents of any of these materials or linked websites. The list is not intended to be definitive and proposed changes may be sent to the Policy and Standards Department by emailing [policy@hpc-uk.org](mailto:policy@hpc-uk.org).

Document	Publisher	Date published	Available from
Diploma (HE) in Operating Department Practice Curriculum Document	College of Operating Department Practitioners	2006	<a href="http://www.codp.org">www.codp.org</a>
Curriculum Guidelines for Music Therapy	Association of Professional Music Therapists	2007	<a href="http://www.apmt.org">www.apmt.org</a>
Code of Professional Ethics and Conduct	Association of Professional Music Therapists	2003	<a href="http://www.apmt.org">www.apmt.org</a>
Professional Competencies	Association of Professional Music Therapists	2005	<a href="http://www.apmt.org">www.apmt.org</a>
Requirements and directions for approval of courses and institutions in the UK for purposes of state registration as prosthetists and orthotists	British Association of Prosthetists and Orthotists (published by the Prosthetists and Orthotists Board)	2001	<a href="http://www.bapo.org">www.bapo.org</a>
Guideline No. 1: The Role of the Prosthetist / Orthotist	British Association of Prosthetists and Orthotists	2000	<a href="http://www.bapo.org">www.bapo.org</a>
Guideline No. 2: Communication and Teamwork	British Association of Prosthetists and Orthotists	2000	<a href="http://www.bapo.org">www.bapo.org</a>
Guideline No. 3: Clinical Records	British Association of Prosthetists and Orthotists	2002	<a href="http://www.bapo.org">www.bapo.org</a>

Guideline No. 4: Assessment Review	British Association of Prosthetists and Orthotists	2003	www.bapo.org
Guideline No. 5: The Clinical Environment	British Association of Prosthetists and Orthotists	2002	www.bapo.org
Pre-registration Education and Training	The British Dietetic Association (published by the Dietitians Board)	2000	www.bda.uk.com
Professional Standards for Dietitians	The British Dietetic Association	2004	www.bda.uk.com
Curriculum Guidance	British Paramedic Association	2008	www.britishparamedic.org
Curriculum Framework for Qualifying Programmes in Physiotherapy	Chartered Society of Physiotherapy	2002	www.csp.org.uk
Core Standards of Physiotherapy Practice	Chartered Society of Physiotherapy	2005	www.csp.org.uk
Developing a portfolio: a guide for CSP members in brochure format	Chartered Society of Physiotherapy	2001	www.csp.org.uk
Keeping a CPD Portfolio using your CD-ROM	Chartered Society of Physiotherapy	2005	www.csp.org.uk
Learning in the practice environment in qualifying programmes of physiotherapy: guidance on its organisation, delivery and recognition	Chartered Society of Physiotherapy	2005	www.csp.org.uk
Accreditation of Clinical Educators: Scheme Guidance	Chartered Society of Physiotherapy	2004	www.csp.org.uk
Clinical Education Placement Guidelines	Chartered Society of Physiotherapy	2003	www.csp.org.uk
Rules of Professional	Chartered	2002	www.csp.org.uk

Conduct (second edition)	Society of Physiotherapy		
Expectations of Master's Level Programmes Within Qualifying Physiotherapy Education	Chartered Society of Physiotherapy	2004	<a href="http://www.csp.org.uk">www.csp.org.uk</a>
Curriculum Framework for Pre-Registration Education	College of Occupational Therapists	2004	<a href="http://www.cot.org.uk">www.cot.org.uk</a>
Guidance on Disability and Learning	College of Occupational Therapists	2005	<a href="http://www.cot.org.uk">www.cot.org.uk</a>
Accreditation of prior learning	College of Occupational Therapists	2006	<a href="http://www.cot.org.uk">www.cot.org.uk</a>
Pre-registration Education Standards	College of Occupational Therapists	2008	<a href="http://www.cot.org.uk">www.cot.org.uk</a>
Handbook of the Joint Validation Committee (Radiography) Revision 2004	College of Radiographers (published by the Radiographers Board)	2004	<a href="http://www.sor.org">www.sor.org</a>
The Scope of Practice	College of Radiographers	2003	<a href="http://www.sor.org">www.sor.org</a>
Education and Professional Development: Moving Ahead	College of Radiographers	2003	<a href="http://www.sor.org">www.sor.org</a>
Standards for Professional Conduct	College of Radiographers	2002, revised 2004	<a href="http://www.sor.org">www.sor.org</a>
Guidance on Approval and Accreditation of Practice Placements at all levels of Pre-registration Education	College of Radiographers	2005	<a href="http://www.sor.org">www.sor.org</a>
National Service Frameworks	Department of Health	(launched 1998)	<a href="http://www.dh.gov.uk">www.dh.gov.uk</a>
Placements in Focus: Guidance for education in practice for health care professions	Department of Health	2001	<a href="http://www.dh.gov.uk">www.dh.gov.uk</a>
High Quality Workforce : NHS Next Stage Review	Department of Health	2008	<a href="http://www.dh.gov.uk">www.dh.gov.uk</a>

Modernising Allied Health Professions (AHP) Careers: a Competence-based Career Framework	Department of Health	2008	<a href="http://www.dh.gov.uk">www.dh.gov.uk</a>
Creating and Interprofessional Workforce Framework	Department of Health	2007	<a href="http://www.dh.gov.uk">www.dh.gov.uk</a>
Outline curriculum for training programmes to prepare Allied Health Professionals as Supplementary Prescribers	Department of Health	2004	<a href="http://www.dh.gov.uk">www.dh.gov.uk</a>
A disabled person's guide to becoming a health professional	Health Professions Council	2006	<a href="http://www.hpc-uk.org">www.hpc-uk.org</a>
Information about the health reference	Health Professions Council	2006	<a href="http://www.hpc-uk.org">www.hpc-uk.org</a>
Standards of proficiency	Health Professions Council	2007	<a href="http://www.hpc-uk.org">www.hpc-uk.org</a>
Standards of conduct, performance and ethics	Health Professions Council	2008	<a href="http://www.hpc-uk.org">www.hpc-uk.org</a>
Health Sciences and Practice Occasional Papers on IPE	The Higher Education Academy	2008	<a href="http://www.health.heacademy.ac.uk">www.health.heacademy.ac.uk</a>
European Dietetic Benchmark Statement	European Federation of the Association of Dietitians (EFAD)	2005	<a href="http://www.efad.org">www.efad.org</a>
Case studies in Dietetics, Occupational Therapy, Physiotherapy and Radiography	Making Practice-Based Learning Work	2005	<a href="http://www.practicebasedlearning.org">www.practicebasedlearning.org</a>
The Development of Quality Standards for Practice Placements	NHS Education for Scotland	2002	<a href="http://www.nes.scot.nhs.uk">www.nes.scot.nhs.uk</a>
Review of Clinical Placements for Allied Health Professions	Department of Health, Social Services and Public Safety,	2004	<a href="http://www.dhsspsni.gov.uk">www.dhsspsni.gov.uk</a>

	Northern Ireland		
Subject benchmark statement: arts therapy	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Subject benchmark statement: biomedical sciences	Quality Assurance Agency for Higher Education	2002	www.qaa.ac.uk
Subject benchmark statement: clinical sciences	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Subject benchmark statement: dietetics	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Subject benchmark statement: occupational therapy	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Subject benchmark statement: operating department practice	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Subject benchmark statement: orthoptics	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Subject benchmark statement: paramedic science	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Subject benchmark statement: physiotherapy	Quality Assurance Agency for Higher	2001	www.qaa.ac.uk

	Education		
Subject benchmark statement: podiatry	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Subject benchmark statement: prosthetics and orthotics	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Subject benchmark statement: radiography	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Subject benchmark statement: speech and language therapy	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
A framework for higher education qualifications in England, Wales and Northern Ireland	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
A framework for higher education qualifications in Scotland	QAA Scotland	2001	www.qaa.ac.uk
Guidelines on the accreditation of prior learning	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 1 Postgraduate research programmes	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 2 Collaborative provision and flexible and	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk

distributed learning (including e-learning)			
Code of practice for the assurance of academic quality and standards in higher education : 3 Students with disabilities	Quality Assurance Agency for Higher Education	1999	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 4 External examining	Quality Assurance Agency for Higher Education	2004	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 5 Academic appeals and student complaints on academic matters	Quality Assurance Agency for Higher Education	2007	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 6 Assessment of students	Quality Assurance Agency for Higher Education	2006	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 7 Programme approval, monitoring and review	Quality Assurance Agency for Higher Education	2006	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 8 Career education, information and guidance	Quality Assurance Agency for Higher Education	2001	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 9 Work-based and placement learning	Quality Assurance Agency for Higher Education	2007	www.qaa.ac.uk
Code of practice for the assurance of academic quality and standards in higher education : 10	Quality Assurance Agency for Higher	2006	www.qaa.ac.uk

Admissions to higher education	Education		
Guidelines on the accreditation of courses leading to a qualification in Speech and Language Therapy	Royal College of Speech and Language Therapists (published by the Board of Speech and Language Therapists)	2002	<a href="http://www.rcslt.org">www.rcslt.org</a>
Guidance on competence for newly qualified therapists	Royal College of Speech and Language Therapists	2005	<a href="http://www.rcslt.org">www.rcslt.org</a>
National Standards for Practice-based Learning	Royal College of Speech and Language Therapists	2006	<a href="http://www.rcslt.org">www.rcslt.org</a>
Clinical guidelines	Royal College of Speech and Language Therapists	2005	<a href="http://www.speechmark.net">www.speechmark.net</a>
Communicating Quality 3 - Professional Standards for Speech and Language Therapists	Royal College of Speech and Language Therapists	2006	<a href="http://www.rcslt.org">www.rcslt.org</a>
Regulations and Guidance for the Accreditation of Pre-registration Education in Podiatry – Handbook	Society of Chiropodists and Podiatrists	2005	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
Minimum Standards of Clinical Practice	Society of Chiropodists and Podiatrists	2003	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
Patient Confidentiality	Society of Chiropodists and Podiatrists	2004	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
Guidelines on Patient Records	Society of Chiropodists and Podiatrists	2004	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
Health and Safety Guidelines	Society of Chiropodists and Podiatrists	2001	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
Guidelines for Needlestick Injury	Society of Chiropodists and	2005	<a href="http://www.feetforlife.org">www.feetforlife.org</a>

	Podiatrists		
Disposal of Clinical Waste	Society of Chiropodists and Podiatrists	2005	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
Code of Conduct	Society of Chiropodists and Podiatrists	2001	<a href="http://www.feetforlife.org">www.feetforlife.org</a>
The Health Professions Order 2001	The Stationery Office	2001	<a href="http://www.hpc-uk.org">www.hpc-uk.org</a> and <a href="http://www.tso.co.uk/bookshop">www.tso.co.uk/bookshop</a>
Interprofessional education	UK Centre for the Advancement of Interprofessional Education	2002	<a href="http://www.caipe.org.uk">www.caipe.org.uk</a>