

HCPC major change process report

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| Education provider | University of Southampton |
| Name of programme(s) | BSc (Hons) Healthcare Science (Audiology), FT (Full time) MSci Healthcare Science (Audiology), FT (Full time) |
| Date submission received | 16 October 2018 |
| Case reference | CAS-13713-F1T7H4 |

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Executive Summary

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

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

Section 1: Our regulatory approach

Our standards

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

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

How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint [partner visitors](#) to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC).

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

HCPC panel

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

| | |
|----------------|---|
| Elizabeth Ross | Hearing aid dispenser |
| Angela Duxbury | Radiographer - Therapeutic radiographer |
| John Archibald | HCPC executive |

Section 2: Programme details

| | |
|------------------------|---|
| Programme name | BSc (Hons) Healthcare Science (Audiology) |
| Mode of study | FT (Full time) |
| Profession | Hearing aid dispenser |
| First intake | 01 September 2013 |
| Maximum learner cohort | Up to 30 |
| Intakes per year | 1 |
| Assessment reference | MC04060 |

We undertook this assessment to consider whether the programme continues to meet our standards, following changes reported to us via the major change process. The following is an overview of the changes from the information received via this process.

The education provider has made multiple changes to the way the programme meets the SETs. The programme has been redesigned to address insufficient learner numbers, low scores on the National Student Survey, and inefficiency. The education provider has made several changes which could impact on the curriculum of the programme, and to several elements with the practice-based learning provision. The education provider has also refined the learning outcomes for the first year of the programme and is now offering optional modules.

| | |
|------------------------|-------------------------------------|
| Programme name | MSci Healthcare Science (Audiology) |
| Mode of study | FT (Full time) |
| Profession | Hearing aid dispenser |
| First intake | 01 September 2015 |
| Maximum learner cohort | Up to 15 |
| Intakes per year | 1 |
| Assessment reference | MC04061 |

We undertook this assessment to consider whether the programme continues to meet our standards, following changes reported to us via the major change process. The following is an overview of the changes from the information received via this process.

The education provider has made multiple changes to the way the programme meets the SETs. The programme has been redesigned to address insufficient learner numbers, low scores on the National Student Survey, and inefficiency. The education provider has made several changes which could impact on the curriculum of the programme, and to several elements with the practice-based learning provision. The education provider has also refined the learning outcomes for the first year of the programme and is now offering optional modules.

Section 3: Requirements to commence assessment

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

| Required documentation | Submitted |
|--|-----------|
| Major change notification form | Yes |
| Completed major change standards mapping | Yes |

Section 4: Outcome from first review

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

Further evidence required

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

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

2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.

Reason: The visitors noted the programme specification stated the level of IELTS required if the applicant's first language is not English. The information from the internet link in the student brochure differed as, although it included details of the level of IELTS required, it did not clearly state whether this is the requirement if the applicant's first language is not English. Therefore, the visitors are unclear if applicants have the information they need in order to make a fully informed decision about taking up a place on the programmes and so require further evidence to be sure this standard continues to be met.

Suggested evidence: The visitors require evidence that shows that potential applicants have access to clear information on IELTS requirements.

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

Reason: Substantial changes to the course structure have been proposed by the education provider for the next intake. The visitors noted the education provider had also undertaken a programme validation procedure. The visitors noted the programmes were suspended for the 2018-9 academic year. The documentation provided indicated this was due to issues around viability of student numbers, staffing and placement availability. The visitors are therefore unable to ascertain whether the programmes have a secure place in the education provider's business plan.

Suggested evidence: The visitors need to see evidence to make sure there is a future for the programmes, that they are currently secure and are supported by all stakeholders involved.

3.2 The programme must be effectively managed.

Reason: The visitors considered substantial changes are being proposed to the programmes. Several issues were noted within the rationale document such as staffing changes, learner numbers and workload issues. The lines of responsibility document also indicated staff members had multiple roles. It was unclear how the management of the programmes is to address these issues given fewer staff and multiple roles. The visitors are unable to see whether there is effective management and clear responsibility for the programme.

Suggested evidence: The visitors want to see evidence to clarify the management structure for both programmes within the education provider's planning, given the changes to staffing and workforce numbers.

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

Reason: From the documentation, the visitors noted the education provider is proposing substantial changes to the programmes and that three members of teaching staff have now left. The visitors were unclear about learner numbers on the programmes. The visitors were also uncertain how the workload within the team would support the programmes and if all aspects of the curriculum could be covered by the remaining staff alongside their management roles. The visitors could not be sure there are an appropriate number of staff to deliver the programmes effectively.

Suggested evidence: The visitors require evidence that the education provider's will ensure the number of appropriately qualified and experienced staff will be in place to deliver taught modules and practical clinical sessions.

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

Reason: From the documentation, the visitors noted the education provider is proposing substantial changes to the programmes and that three members of teaching staff have now left. The visitors were unclear how the workload within the team would support the programmes and if all aspects of the curriculum could be covered by the remaining staff alongside their management roles. In the SETs mapping document the education provider said they will receive support from Implant Centre and local services staff. However, the visitors were unclear as to the roles and expertise of these support staff as no documents were provided to detail their qualifications and teaching experience. The visitors considered they were unable to ensure educators have the necessary knowledge and expertise to deliver their parts of the programme effectively and so require further information to be sure this standard continues to be met.

Suggested evidence: The visitors need to see evidence that staff with relevant specialist expertise and knowledge will be in place to deliver the programmes effectively.

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

Reason: The education provider is proposing substantial changes to the programmes, including changes in delivery and changes to staff members. With these changes, the visitors were unsure how continuing professional development and research development would be supported. The visitors could not be sure there is an appropriate plan in place to make sure educators continue to develop and maintain their professional and academic skills so they are able to deliver the programme effectively. Therefore, the visitors need to see further evidence to ensure this standard continues to be met.

Suggested evidence: The visitors need to see evidence of a plan for staff development to ensure continuing professional development and research development.

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.

Reason: From the documentation, the visitors noted the education provider has made changes to the curricula. The visitors were provided with descriptors from some of the modules from the programmes. However, the visitors did not have evidence which showed a full and detailed mapping of the modules from both programmes. With the changes proposed the visitors were unable to ascertain if the programmes would continue to meet the standards for proficiency for hearing aid dispensers and so need to see further evidence to ensure learners who complete the programmes are able to meet the SOPs.

Suggested evidence: The visitors require further documentation showing how the SOPs for hearing aid dispensers continue to be met.

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.

Reason: The visitors noted issues around practice-based learning were highlighted in the rationale document. This included learner dissatisfaction, changes to NHS audiology provision in acute centres, private sector difficulties in providing full range of audiology tests, provision and staffing. The education provider provided information which showed the structure of practice-based learning changing from a 'notional' 40 week practice-based learning to a 27 week practice-based learning. However, the visitors were unable to determine how the proposed structure would continue to meet the standard to ensure the way practice-based learning is designed allows learners to achieve the learning outcomes of the programme and the SOPs.

Suggested evidence: The visitors would like to see evidence from the education provider to show how issues from practice-based learning have been addressed and how the proposed length of practice-based learning and availability of clinical practice procedures would allow learners to fulfil the requirements of module learning outcomes.

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.

Reason: The visitors also noted changes were to be made to the structure of the Individual Record of Clinical Practice. Some changes appeared to be proposed because the education provider found difficulties in giving students access to these procedures in the clinical situation rather than the need for students to observe / undertake these procedures. However, the document provided did not fully map the new and old logbook in detail. Therefore the visitors were not able to determine how learners would have the opportunity to complete the full range of required core / special clinical procedures and so need to see further information to make sure this standard continues to be met.

Suggested evidence: The visitors would like to see evidence from the education provider to show how issues from practice-based learning have been addressed and how the proposed length of practice-based learning and availability of clinical practice procedures would allow learners to fulfil the requirements of module learning outcomes.

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

Reason: The visitors noted the rationale documentation described issues around the recruitment of NHS Band 5 staff in clinics. This had led to learners feeling that while on practice-based learning they had to help services meet targets and contracts rather than receive guidance and training from experienced clinical staff. The visitors also noted the education provider recognised the impact of staffing on the quality of learner experience on training and placement capacity. However, the visitors could not see evidence of how this issue was being addressed with the proposed changes to the structure of practice-based learning. The visitors could not see evidence of how this issue was being addressed and therefore the visitors need to see further evidence this SET is continuing to be met.

Suggested evidence: The visitors would like to see further information from the education provider on provision of sufficient practice educators and appropriately qualified and experienced staff.

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.

Reason: From the documentation, the visitors noted the education provider has made changes to the assessment strategy and design. The visitors were provided with descriptors from some of the modules from the programmes. However, the visitors did not have evidence which showed a full and detailed mapping of the modules from both programmes. With the changes proposed the visitors were unable to ascertain if the assessment strategy and design of the programmes would continue to ensure learners meet the standards for proficiency for hearing aid dispensers. The visitors therefore need to see further evidence to ensure learners who complete the programmes are able to meet the SOPs.

Suggested evidence: The visitors require further documentation showing how the assessment strategy and design ensure learners continue to meet the SOPs for hearing aid dispensers.

Section 5: Outcome from second review

Recommendation of the visitors – approval visit required

The education provider responded to the request for further evidence set out in section 4. Following their consideration of this response, the visitors were not satisfied that there was sufficient evidence that the following standards continue to be met, for the reason(s) detailed below.

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

Reason: From the initial evidence provided, the visitors were made aware the programmes had been revalidated internally. In their initial submission, the education provider provided as evidence an internal email confirming this. The visitors were also made aware the education provider decided not to run the programme in the 2018-19 academic year. The decision not to run was based on financial planning, low student numbers for at least one year of the undergraduate programme, and the number of

students compared with the number of staff. The visitors received assurance of the revalidation of the programmes but did not receive information which showed all stakeholders supported the programme and so that the programmes were sustainable.

In response, the education provider confirmed the programme had been fully validated, which would happen if the programmes were new, as opposed to revalidated. The education provider explained the process of full validation ensures rigorous scrutiny of the programme, including financial scrutiny within the context of the Faculty's business plan. They said the programme's revalidation indicated it has a secure plan in the Faculty's business plan. However, the visitors received no information to show all stakeholders supported the programme nor how the validation decisions were reached. The approval process will require a documentary submission and review, and meetings with various stakeholders in the programme. Therefore a visit is the most appropriate process to gather evidence to ensure the programme continues to meet this standard.

3.2 The programme must be effectively managed.

Reason: From the initial evidence provided, the visitors considered that substantial changes are being proposed to the programmes and noted issues such as staffing changes, learner numbers and workload issues. In their initial submission, the education provider provided documentation which indicated staff members had multiple roles. In their initial assessment, the visitors considered it was unclear how the programmes would be managed to address these issues given fewer staff and multiple roles. The visitors were unable to see whether there is effective management and clear responsibility for the programme.

In response, the education provider explained the decision not to recruit for the academic year 2018-19 was made based on financial planning, low student numbers for at least one year of the undergraduate programme, and the number of students compared with the number of staff. The visitors were unclear about the roles of academic staff due to changes made as a consequence of not recruiting to the programme in 2018-19, and whether the programme management structure will be effective when the programmes are delivered in 2019-20. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

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

Reason: The visitors noted from the initial documentation the education provider is proposing substantial changes to the programmes and three members of teaching staff had left. From their initial review, the visitors were unclear about learner numbers on the programmes and how the workload within the team would support the programmes and if all aspects of the curriculum could be covered by the remaining staff alongside their management roles. The visitors could not be sure there are an appropriate number of staff to deliver the programmes effectively. The visitors required evidence to demonstrate how the education provider would ensure the number of appropriately qualified and experienced staff in place to deliver taught modules and practical clinical sessions would be adequate.

In response, the education provider explained the decision not to recruit for this academic year was made based on financial planning, low student numbers for at least one year of the undergraduate programme, and the number of students compared with the number of staff. The education provider provided information on staff roles and adjustments due to changes as a consequence of not running the programme in academic year 2018-19. However, the visitors were unclear of the number and qualifications of staff delivering practical sessions. The visitors noted the documentation mentioned future staffing and financial considerations were discussed in stage 1 of the validation process. However, the visitors did not receive any information on this. The visitors were unclear as to whether there is an adequate number of appropriately qualified and experienced staff for the programme. Considering the issues raised and the evidence provided to support this standard, the visitors consider there to be outstanding issues. Therefore a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

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

Reason: From the initial documentation, the visitors noted the education provider is proposing substantial changes to the programmes and that three members of teaching staff have now left. From their initial review, the visitors were unclear how the workload within the team would support the programmes and if all aspects of the curriculum could be covered by the remaining staff alongside their management roles. The education provider said they will receive support from Implant Centre and local services staff. However, the visitors were unclear as to the roles and expertise of these support staff as no documents were provided to detail their qualifications and teaching experience. The visitors considered they were unable to ensure educators would have the necessary knowledge and expertise to deliver their parts of the programme effectively and so required further information to be sure this standard continued to be met.

In response, the education provider supplied information about how staff from outside the core teaching team were to be involved in the delivery of the programme, specifically in lecturing. The education provider also provided the curriculum vitae of a new member of staff with practice experience. The visitors did not see information about the core teaching staff as the education provider said they are unable to provide curricula vitae at this stage as they do not know what staff will be involved in the programme in 2019-20. The visitors therefore could not determine how the education provider plans to ensure suitably qualified staff will be in place to ensure the programmes will be delivered effectively. At this stage of the process, a visit is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes.

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.

Reason: From the initial documentation, the visitors noted the education provider has made changes to the curricula. The visitors were provided with descriptors from some of the modules from the programmes. However, the visitors did not have evidence which showed a full and detailed mapping of the modules from both programmes. With

the changes proposed, from their initial review the visitors were unable to ascertain if the programmes would continue to deliver the standards for proficiency for hearing aid dispensers. Therefore, they requested further evidence to ensure learners who complete the programmes are able to meet the SOPs.

In response, the education provider supplied a SOPs mapping document. However, the education provider did not provide detailed module descriptors and information of the learning outcomes for each of the new modules. The visitors could not therefore determine if the learning outcomes ensure that those who successfully complete the programme meet the standards of proficiency for hearing aid dispensers. Therefore the approval process is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes. The approval process will require a documentary submission and review and meetings with various stakeholders in the programme.

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

Reason: From the education provider's initial submission, the visitors noted the rationale documentation described issues around the recruitment of NHS Band 5 staff in clinics. This had led to learners feeling that while on practice-based learning they had to help services meet targets and contracts rather than receive guidance and training from experienced clinical staff. In their initial review, the visitors noted the education provider recognised the impact of staffing on the quality of learner experience on training and placement capacity. However, the visitors could not see evidence of how this issue was being addressed with the proposed changes to the structure of practice-based learning. The visitors wanted to see further information from the education provider on provision of sufficient practice educators and appropriately qualified and experienced staff.

The education provider responded with information about placements and the learner experience. The education provider said any impacts on learner education are mitigated through the preparation for practice-based learning they provide and the processes they have to support individuals within the practice-based learning setting. However, from this information the visitors could not see details on the provision of practice educators and appropriately qualified and experienced staff. The visitors were therefore unclear as to how the education provider ensure that the number of staff is adequate for the number of learners, and for the level of support needed. Considering the issues raised and the evidence provided to support this standard, the visitors determined there were outstanding issues for this standard to continue to be met. Therefore a visit is the most appropriate process to gather evidence to ensure the programme continues to meet this standard.

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.

Reason: From the initial documentation, the visitors noted the education provider has made changes to the assessment strategy and design. The visitors were provided with descriptors from some of the modules from the programmes. However, the visitors did not have evidence which showed a full and detailed mapping of the modules from both programmes. With the changes proposed, from their initial review the visitors were unable to ascertain if the assessment strategy and design of the programmes would

continue to ensure learners meet the standards for proficiency for hearing aid dispensers.

In response, the education provider supplied a SOPs mapping document. However, the education provider did not provide detailed module descriptors and information of the assessment of the learning outcomes in each of the new modules. The visitors could not therefore determine if the assessment strategy and design ensures students who successfully complete the programme meet the standards of proficiency for hearing aid dispensers. Therefore the approval process is the most appropriate process to gather evidence to ensure that the programme continues to meet this standard along with other standards that may be impacted by the proposed changes. The approval process will require a documentary submission and review and meetings with various stakeholders in the programme.

Email from Daniel Rowan (received 10 April 2019), senior lecturer on the programmes, in response to the final visitors' report:

3.1. The Visitors indicated: "However, the visitors received no information to show all stakeholders supported the programme nor how the validation decisions were reached." On 17/01/2019 in our response to the Outcome of the First Review, we provided a link to the university's full programme validation policy and procedure that details the process for including stakeholders and how validation decisions are made, including instructions for how to access the correct documents. We also provided a summary, including dates, of the (ten) consultation meetings feeding into the validation process. We provided evidence that the course had been validated/approved by the university in submissions on 21/08/2018, 09/10/2018 and 04/02/2019.

3.2. The Visitors indicated: "The visitors were unclear about the roles of academic staff." We provided a list of core teaching staff and lines of responsibility to HCPC in submissions on 21/08/2018 and on 09/10/2018, the CVs of all of which have been provided to HCPC previously. We also provided additional information about roles of some core teaching staff on 17/01/2019. The module profiles indicate which staff lead which module; see our response to 4.1 and 6.1 below.

3.5. The Visitors indicated: "However, the visitors did not receive any information on this [staffing and financial considerations discussed in stage 1 of validation process]". On 17/01/2019 in response to the Outcome of the First Review, we provided a link to the university's full programme validation policy and procedure that details the considerations at each stage, including instructions for how to access the correct documents. We provided evidence that the course had been validated/approved by the university in submissions on 21/08/2018, 09/10/2018 and 04/02/2019.

3.6. The Visitors indicated: "The visitors did not see information about the core teaching staff as the education provider said they are unable to provide curricula vitae at this stage as they do not know what staff will be involved in the programme in 2019-20." This relates to our response to the Outcome of the First Review sent on 17/01/2019. When discussing "staff outside of the core teaching team" from our Auditory Implant Service who contribute to some practicals (i.e. not the core teaching team), we indicated that we couldn't provide all CVs at this stage because we do not know which of those staff will be involved in practicals during 2019-20 yet. We did explain how the staff would be selected (e.g. required qualifications) and mentored. We had already provided a list of core teaching staff and lines of responsibility to HCPC in submissions on 21/08/2018 and on 09/10/2018, the CVs of all of which have been provided to HCPC previously. We also provided additional information about roles of some core teaching staff in the submission on 17/01/2019.

4.1 and 6.1. The Visitors indicated: "However, the education provider did not provide detailed module descriptors and information of the learning outcomes for each of the new modules." The detailed module descriptors including information of the learning outcomes were provided to HCPC in submissions on 21/08/2018 and on 09/10/2018. The emails sent on 09/10/2018 were confirmed by HCPC as having been received on 16/10/2018. The Outcome of the First Review sent to us on 20/12/2018 indicates explicitly that module descriptors had been received.