HCPC approval process report

Education provider	University of Derby
Name of programme(s)	BSc (Hons) Prosthetics and Orthotics, Full time BSc (Hons) Prosthetics and Orthotics Degree Apprenticeship, Work based learning
Approval visit date	15 July 2021
Case reference	CAS-16941-X4D8M9

Contents

Executive Summary

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

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

Section 1: Our regulatory approach

Our standards

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

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

How we make our decisions

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

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

HCPC panel

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

Hazel Anderson	Prosthetist / orthotist
Angela Duxbury	Radiographer - Therapeutic radiographer
John Archibald	HCPC executive

Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Sarah Digby	Independent chair (supplied by the education provider)	University of Derby
Clare Webb	Secretary (supplied by the education provider)	University of Derby
Patrick Barber	Internal Panel Member	University of Derby
Sharon Bell	Internal Panel Member	University of Derby

Stacey Care	External Panel Member	Kent and Medway NHS and Social Care Partnership Trust
Simon Dickinson	External Panel Member	Talarmade Ltd
Christian Gerstner	Centre for Quality Assurance Representative	University of Derby
Ann Minton	Cross Bench (Apprenticeships)	University of Derby

Section 2: Programme details

Programme name	BSc (Hons) Prosthetics and Orthotics
Mode of study	FT (Full time)
Profession	Prosthetist / orthotist
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 30 across both programmes
Intakes per year	1
Assessment reference	APP02333

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time

Programme name	BSc (Hons) Prosthetics and Orthotics Degree Apprenticeship
Mode of study	WBL (Work based learning)
Profession	Prosthetist / orthotist
Proposed first intake	01 January 2022
Maximum learner cohort	Up to 30 across both programmes
Intakes per year	1
Assessment reference	APP02334

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

Section 3: Requirements to commence assessment

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

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	No	Only requested if the programme (or a previous version) is currently running

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	No	The education provider was unable to source learners to meet with us at the visit. The visitors explored areas relating to learners at other, appropriate meetings.
Service users and carers (and / or their representatives)	No	Since the move to virtual visits, we do not ask to meet with service users and carers. The visitors explored areas relating to service users and carers at other, appropriate meetings.
Facilities and resources	No	Since the move to virtual visits, we do not ask to have a meeting related specifically to facilities and resources. The visitors explored areas relating to facilities and resources at other, appropriate meetings.
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

Section 4: Outcome from first review

Recommendation of the visitors
In considering the evidence provided by the education provider as part of the initial submission and at the virtual approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 26 August 2021.

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.

Condition: The education provider must provide further evidence to demonstrate that information provided throughout the admissions process is clear and thorough, and allows informed decision-making.

Reason: To meet this standard, the education provider provided a draft of the information to be available for applicants on the website about these programmes. The education provider also gave details of the contents page for the apprenticeship handbook.

The visitors noted that information on the draft webpage did not accurately reflect the role of a prosthetist or orthotist. For instance, it said prosthetists and orthotists 'take a lead role in ensuring a patient is safe during their journey through the operating theatre'. The visitors considered this did not accurately represent the role of a prosthetist or orthotist, and the programme team confirmed this was a draft version of the webpage which required updating.

The visitors were also informed the degree apprenticeship programme was in the process of developing a handbook for apprentices. The education provider informed the visitors the apprenticeship handbook is currently in draft status, and provided the visitors with an outline of the contents. Although the visitors were able to see from this outline every aspect that will be covered, they did not have an understanding that the information was clear and thorough.

Therefore, the visitors were not able to see that information provided throughout the admissions process is clear and thorough, and allows informed decision-making. The visitors need to make sure that the education provider provides applicants with all the information on the programme that they need to make a fully informed decision about taking up a place on a programme.

4.5 Integration of theory and practice must be central to the programme.

Condition: The education provider must provide further evidence to ensure that theory and practice are linked and support each other.

Reason: To meet this standard, the education provider said both programmes are predominately work-based learning programmes and the integration of theory and practice is integral to successful completion of both. This will be assessed by the supervisors throughout the learner's time on the programmes. At the visit the programme team informed the visitors that the programmes offered flexibility available to practice educators and employers in regards to the timing of assessments. The visitors considered this had the potential to mean that theory and practice would not complement each other. The visitors were therefore unsure how learners are able to apply knowledge to practice as a basic part of being prepared and competent to practise their profession. The visitors need more information to make sure that theory and practice are combined within both the theory and practical parts of the programmes so they link and support each other.

6.4 Assessment policies must clearly specify requirements for progression and achievement within the programme.

Condition: The education provider must provide further information to demonstrate that learners understand what is expected of them at each stage of the programme and educators can apply assessment criteria consistently.

Reason: To meet this standard, the education provider informed the visitors that the assessments for the programmes will be in line with the education provider's assessment regulations to ensure that all learners are fairly and objectively assessed, and that they meet the progression and achievement required within the programmes. At the visit the programme team informed the visitors that the programmes offered flexibility available to practice educators and employers in regards to the timing of assessments. However, the visitors considered this could mean learners would be assessed on the same learning outcomes at different times. This would also mean learners may not fully understand what it is they need to achieve and by when. The visitors therefore require more information to demonstrate that learners understand what is expected of them at each stage of the programme and educators can apply assessment criteria consistently. The visitors also require evidence of how this is clearly communicated to both learners and educators.

HCPC approval process report

Education provider	Sheffield Hallam University
Name of programme(s)	MA Art Psychotherapy, Full time MA Art Psychotherapy, Part time
Approval visit date	05 August 2021
Case reference	CAS-16943-X7T8V1

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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

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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:

Philippa Brown	Arts therapist - Art therapist
Kim Dee	Arts therapist - Art therapist
Catherine Mackenzie	Speech and language therapist
Rabie Sultan	HCPC executive
Naomi Nicholson	HCPC executive (observer)

Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

David Owen	Independent chair (supplied by the education provider)	Sheffield Hallam University
Chloe Corbett	Secretary (supplied by the education provider)	Sheffield Hallam University
Bee Yee Gan	Internal panel member	Sheffield Hallam University
Chris Pryor	Internal panel member	Sheffield Hallam University

Claire Louise	Professional body representative	British Associations of Art Therapists
Val Huet	Professional body representative	British Associations of Art Therapists

Section 2: Programme details

Programme name	MA Art Psychotherapy
Mode of study	FT (Full time)
Profession	Arts therapist
Modality	Art therapist
First intake	01 January 2022
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02335

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

Programme name	MA Art Psychotherapy
Mode of study	PT (Part time)
Profession	Arts therapist
Modality	Art therapist
First intake	01 January 2022
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02336

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

Section 3: Requirements to commence assessment

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

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	

Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	
Internal quality monitoring documentation	No	As these programmes have not yet commenced, this was not required

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

Group	**Met**	**Comments**
Learners	Not Required	We decided it was unnecessary to meet with this group, as visitors were satisfied with the information provided in the documentary submission regarding learners' involvement.
Service users and carers (and / or their representatives)	Not Required	We decided it was unnecessary to meet with this group, as visitors were satisfied with the information provided in the documentary submission regarding service users and carer involvement.
Facilities and resources	Not Required	As the visit was virtual and the visitors were able to determine through the programme documentation that standards related to resources had been met, we decided it was unnecessary to have a virtual tour of the facilities and resources.
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

Section 4: Outcome from first review

Recommendation of the visitors
In considering the evidence provided by the education provider as part of the initial submission and at the virtual approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 22 September 2021.

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.

Condition: The education provider must ensure that appropriate, clear and consistent information is available to applicants to help them make an informed choice about whether or not to take up a place on the relevant programme.

Reason: For the proposed programmes, visitors reviewed the weblinks provided in the mapping document. The weblinks made reference to the education provider's various existing programmes but not the proposed programmes. The education provider submitted additional documents before the visit containing information relating to the proposed programmes and confirmed that this information will be available to applicants on the education provider's website, once the programmes have been granted approval by the HCPC. From their review, visitors noted that applicants will be interviewed online as part of the recruitment process. Additionally, there was information regarding additional costs such as compulsory therapy sessions during taught weeks, regarding which learners will be made aware during their induction process.

At the visit, the programme team said there are further costs that learners will need to undertake as part of the proposed programmes which included travel to practice-based learning sites and purchasing of art materials. However, costs such as journeying to practice-based learning sites and any accommodation can be claimed back as expenses by learners. Additionally, the programme team mentioned that details regarding the interview process for applicants will include a checklist document highlighting the required criteria for interview selection. The programme team confirmed that going forward, all admissions information regarding the programmes, including the detailed information about additional costs and interview selection criteria checklist, will be available within a prospectus. As the visitors did not see information regarding the additional costs mentioned at the visit, it was not made clear what monetary value was related to the additional costs and how applicants will be made aware of these during

the admissions process stage. Additionally, as visitors have not seen the interview selection criteria checklist, they could not consider how useful it will be and what important information will be conveyed to applicants. As such, the visitors were unable to determine how important and relevant information would be appropriately communicated to prospective applicants for the proposed programmes. Therefore the education provider must demonstrate and provide further details regarding the additional costs and interview process selection criteria. From this, the visitors will be able to determine whether applicants for the proposed programmes, will have the relevant information they need to make an informed choice about taking up the offer of a place on the relevant programmes.

3.1 The programme must be sustainable and fit for purpose.

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

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

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

Condition: The education provider must provide further evidence of their staff recruitment plans, to ensure adequate support with relevant knowledge and expertise, including timelines and contingency plans, to demonstrate the programmes' sustainability.

Reason: From their review of the initial submission and additional documents submitted prior to the visit, visitors were provided with curricula vitae of teaching staff for the proposed programmes. This included existing staff from other professions and newly recruited staff from an art therapy background. The education provider confirmed they have intentions to recruit staff currently employed by Sheffield Health and Social Care NHS (SHASC) to support the delivery of the proposed programmes at Sheffield Hallam University.

As the existing programme at SHASC will no longer be accepting new learners, the education provider wanted to ensure there will be a smooth transition period which will ensure the rolling out of the current programme is carried out in a way which ensures the necessary support will be provided to new learners enrolling on to the proposed programmes at Sheffield Hallam University from January 2022.

As part of the additional information received before the visit, the education provider confirmed that regular meetings with human resources (HR) have taken place between the senior management team at SHASC and Sheffield Hallam University. The education provider also provided evidence confirming a one year provisional transitional arrangement of staff to be transferred from SHASC to Sheffield Hallam University. The transitional arrangement confirmed the transfer dates of staff such as tutors and practice-based learning leads will happen in 2022 but the dates were yet to be confirmed. The transitional plans also mentioned about future recruitment to be undertaken, but no specific details were provided about when this will be done and how

many staff this will include. From this, the visitors were not clear how many staff will transfer onto the proposed programme.

At the visit, the senior team stated that consultations with HR have only started recently and it has been identified that six staff from SHASC will be seconded in the first instance, whilst a further four staff have been identified to be transferred during year one of the programme in 2022. From further queries, such as work time equivalents and timelines, the senior team confirmed that they are unable to provide updates as the consultations have only recently begun. From this, visitors were not clear at what point the first six staff will transfer over and whether this will be before the start date of January 2022. Additionally, it was stated in the mapping document that an overview of staff allocation to modules will be provided at the approval visit, but this wasn't available as the staffing arrangements were not yet confirmed.

Considering the evidence submitted and discussions held at the visit, the visitors were unclear how many staff will be involved in teaching from January 2022; what the timelines are for the consultations to conclude; and what contingency plans are in place should the consultations not be successful. Without specific details of the staff identified as part of the consultations to be transferred to the education provider, visitors could not make a judgement on whether they had the appropriate knowledge and experience to deliver effective programmes. As such, the visitors could not determine whether there are an appropriate number of staff who are able and equipped with the necessary knowledge and expertise to deliver their parts of the programmes effectively, and support up to 40 learners across both pathways from January 2022. The visitors were unsure how the education provider will effectively manage any possible risks around staffing challenges, in terms of numbers and experience, should they be unsuccessful in their transitional and recruitment plans. Due to the lack of clarity on staffing resources and without plans on how to manage this risk, there was a potential for this causing an impact on the delivery of the programmes and how it was managed effectively. Therefore, the visitors considered these standards are not met as they could not determine whether the programme will be sustainable.

Therefore, the education provider must demonstrate how it will ensure there will be an adequate number of staff with the relevant knowledge and experience to support up to 40 learners across both programmes from January 2022 by clarifying:

- the breakdown of staff currently recruited, including their qualifications and experience, allocation to teaching the relevant modules;
- the breakdown of staff to be transferred from SHASC, including their qualifications and experience, allocation to teaching the relevant modules and timeframes associated with the transfer;
- timelines of recruiting future additional staff, that was mentioned in the transitional plan;
- contingency plans should the consultations with HR be unsuccessful or delayed for any reason; and
- how the above mentioned points ensure the proposed programmes will be sustainable.

4.11 The education provider must identify and communicate to learners the parts of the programme where attendance is mandatory, and must have associated monitoring processes in place.

Condition: The education provider must clarify and demonstrate the attendance requirements for taught sessions, including how will this be monitored and communicated to learners.

Reason: The visitors were directed to review the placement handbook, course handbook and 'MSc Overview' document for this standard. From their review of the placement handbook, visitors were clear that the minimum attendance requirement for practice-based learning was 80 percent and about the details regarding how this will be monitored. However, from reviewing the course handbook and 'MSc Overview' document visitors could not see details regarding the minimum attendance requirements for taught sessions conducted on campus. Visitors could also not see any information regarding the consequences for learners who do not meet the minimum taught attendance requirement, including any details on how will this be monitored.

Prior to the visit, the education provider stated that there is a system in place that can monitor learners' attendance at lectures conducted on campus and online. Any concerns about attendance will be picked up by the learner's academic advisor and course leader, where continuous non-attendance can result in the learner being removed from the programme. However, the visitors remained unclear about the minimum attendance requirement and the monitoring system in place.

At the visit, the programme team said that the minimum attendance requirement will possibly be 85 percent and learners will be told about this during their induction. Additionally, they stated there is an electronic access code currently in use which will help monitor learners attendance. It was acknowledged by the programme team that all this information will need to be added to the course handbook, so that learners are made aware of this requirement and are able to demonstrate they meet all the standards of proficiency. As the information conveyed prior to the visit and the discussions held at the visit is yet to be updated within the programme documentation, the visitors considered this standard is not met as they have not seen this information and were therefore not clear what the exact minimum attendance requirement is for taught lessons. Additionally, visitors had also not seen information regarding how learners will be made aware of the consequences of falling below the minimum attendance requirement. This meant that visitors were unable to make a judgment on the minimum attendance requirements for taught lessons and how will this clearly be communicated to learners.

Therefore, the education provider must clarify and demonstrate within their documentation:

- the minimum attendance requirement for lectures taught online and on campus;
- the consequences of when a learners' attendance falls below the threshold level;
- details regarding how attendance will be monitored and reviewed; and
- how the above mentioned points be communicated to learners.

5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

Condition: The education provider must demonstrate how they ensure practice educators undertake appropriate regular training and how this will be monitored.

Reason: For this standard, visitors were directed to page 61 of the placement handbook which mentioned that practice education providers are invited to attend placement supervisor days with the programme team. Additionally, it was stated in the mapping document that a weblink for Art Therapy placement related information is being set up, and that there are plans to devise a schedule of roadshows and joint practice educators' events. Within the mapping document there was a reference to an example of how the occupational therapy weblink for placement related information currently looks. From reviewing this and the placement handbook, visitors could not find any details on the specifics of what training will be offered during the practice educator events and placement supervisor days. From querying this prior to the visit, the education provider confirmed the training sessions offered to practice educators will not be mandatory.

At the visit, the practice educators mentioned how training is undertaken currently whilst supporting learners at SHASC at their individual practice-based learning site. Some of the examples mentioned included practice educators receiving refresher training packs and attending yearly supervisor training days. The programme team confirmed there will be a detailed information pack that placement supervisors within their respective practice-based learning site, will discuss and that they will complete a checklist with practice educators. However it was not clear to visitors what areas will be covered during this training, for example, how practice educators will be trained to assess learners. Additionally, it was not clear how regular the training will be and how participation will be monitored. The visitors acknowledged there are intentions to provide training opportunities for practice educators but were unable to see how individual placement educator's training is monitored. As per the requirement of this standard, the HCPC expects that all new practice educators are trained and that is followed up with regular refresher training and support. This is to ensure all practice educators are appropriately prepared so they can support learning and assess learners effectively. To ensure this standard is met the visitors require the education provider to clearly articulate the training requirements for placement educators, how regular this will be and the processes in place for ensuring these requirements are met and monitored.

Recommendations
We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

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

Recommendation: The education provider should continue to develop its methods for maintaining regular and effective collaboration with practice education providers.

Reason: Throughout the submission, visitors noted the education provider made references to a number of meetings they had with practice education providers by providing agendas as evidence. However, visitors could not see information such as minutes of meetings or action points noted from these meetings. From further querying this prior to the visit and at the visit, the visitors learnt these meetings were conducted informally and no formal notes or minutes were recorded. The visitors considered from the discussions at the visit that there is collaboration between the two stakeholders and considered the standard is met at threshold level. However, they recommend that

important discussions held within these meetings such as feedback and action points are noted going forward as these could help in enhancing the ongoing improvement and quality of the programme. Visitors also considered that going forward this could help in demonstrating the effectiveness of the partnership arrangements during future HCPC monitoring processes.