

## Performance review process report

British Psychological Society, Review Period 2021 - 2023

#### **Executive summary**

This is a report of the process to review the performance of the British Psychological Society. This report captures the process we have undertaken to consider the performance of the institution in delivering HCPC-approved programmes. This enables us to make risk-based decisions about how to engage with this provider in the future, and to consider if there is any impact on our standards being met.

#### We have

- Reviewed the institution's portfolio submission against quality themes and found that we needed to undertake further exploration of key themes through quality activities
- Reviewed the institution's portfolio submission to consider which themes needed to be explored through quality activities
- Undertaken quality activities to arrive at our judgement on performance, including when the institution should next be reviewed
- Recommended when the institution should next be reviewed

#### Through this assessment, we have noted:

- The areas we explored focused on:
  - Quality activity 1 Visitors reviewed the reflections the education provider submitted via the portfolio. They noted the reflections submitted outlined processes and strategies, but did not provide details of actions taken in relation to these. In addition to this, they also found the reflections to be limited and focused on the overarching profession of practitioner psychology rather than the modalities offered through the qualifications. These were addressed through the quality activity and further reflections were provided on the other modalities the education provider delivers.
  - Quality activity 2 Visitors noted the reflections provided in relation to the revised standards of proficiency (SOPs) were brief and it was not clear if all the SOPs had been embedded across all the qualifications for new learners by the deadline of September 2023. Through the additional reflections provided visitors were unclear if all the SOPs had been embedded across all the qualifications and therefore referred this area for further exploration through the focused review process.
  - Quality activity 3 Visitors noted some learners had been on the programmes for 17 years. This raised some concerns regarding how the education provider ensured learners were working to the appropriate SOPs and if they were up to date. This was discussed further with the education provider at the visit, where they provided some additional clarification and

- subsequent documentary evidence. Based on the evidence received, it was still not clear to visitors if learners had completed qualifications that were fully aligned to the appropriate SOPs at the time of their study. We were therefore unclear about how the education provider ensured the programmes remained relevant to current practice. We therefore agreed this area would be explored further through the focused review process.
- Quality activity 4 Visitors acknowledged the education provider was in the process of a restructure and alongside this there was a consultation taking place relating to the potential closure of programmes. Through this quality activity they considered the impact of the restructure on resources and if the education provider was appropriately resourced to deliver the programmes. Visitors noted the changes that had taken place to staffing as a result of the restructure and were concerned how the outcome of the programme consultation may impact staffing. They were also cognisant the consultation had been delayed and as such, were unable to reach a conclusion on this theme within the timeframe of this assessment. We therefore agreed this area would be explored further through the focused review process.
- The following areas should be referred to another HCPC process for assessment:
  - Ensuring the revised standards of proficiency (SOPs) were embedded for new learners by the deadline of September 2023. The revised SOPs had been considered across all the qualifications and updates had been made, however some updates were still ongoing and it was therefore not clear to the visitors if all the revised SOPs had been embedded by September 2023. It was therefore considered appropriate to explore this area further through the focused review process.
  - Ensuring the relevancy of the curriculum to ensure learners could practice safely and effectively in line with current practice - there appeared to be a gap with understanding how the education provider had ensured learners had completed the relevant SOPs during their period of study and ensured their practice and knowledge was relevant to current practice. It was therefore considered appropriate to explore this area further through the focused review process.
  - Resourcing, including financial stability there were concerns relating to the programme consultation outcomes and the impact these outcomes may have on staffing, particularly in relation to delivering and assessing the programmes, and overall sustainability of the programmes. It was therefore considered appropriate to explore this area further through the focused review process.
- The provider must next engage with monitoring in two years, the 2025-26 academic year, because:
  - Due to the lack of established data points we shall work with the education provider to develop the required data. This data will then be available to be used at their next performance review (2025-26)

Previous consideration

Not applicable. The performance review process was not referred from another process.

#### Decision

The Education and Training Committee (Panel) is asked to decide:

- when the education provider's next engagement with the performance review process should be
- whether issues identified for referral through this review should be reviewed, and if so how

## Next steps

Outline next steps / future case work with the provider:

- Subject to the Panel's decision, the provider's next performance review will be in the 2025-26 academic year
- Subject to the Panel's decision, we will undertake further investigations as per section 5

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#### Section 1: About this assessment

#### About us

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.

This is a report on the performance review process undertaken by the HCPC to ensure that the institution and practice areas(s) detailed in this report continue to meet our education standards. The report details the process itself, evidence considered, outcomes and recommendations made regarding the institution and programme(s) ongoing approval.

#### **Our standards**

We approve education providers and programmes that meet our education standards. Individuals who complete approved programmes will meet proficiency standards, which 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.

#### Our regulatory approach

We are flexible, intelligent and data-led in our quality assurance of programme clusters and programmes. Through our processes, we:

- enable bespoke, proportionate and effective regulatory engagement with education providers;
- use data and intelligence to enable effective risk-based decision making; and
- engage at the organisation, profession and programme levels to enhance our ability to assess the impact of risks and issues on HCPC standards.

Providers and programmes are <u>approved on an open-ended basis</u>, subject to ongoing monitoring. Programmes we have approved are listed <u>on our website</u>.

## The performance review process

Once a programme institution is approved, we will take assurance it continues to meet standards through:

- regular assessment of key data points, supplied by the education provider and external organisations; and
- assessment of a self-reflective portfolio and evidence, supplied on a cyclical basis

Through monitoring, we take assurance in a bespoke and flexible way, meaning that we will assess how an education provider is performing based on what we see, rather than by a one size fits all approach. We take this assurance at the provider level wherever possible, and will delve into programme / profession level detail where we need to.

This report focuses on the assessment of the self-reflective portfolio and evidence.

#### Thematic areas reviewed

We normally focus on the following areas:

- Institution self-reflection, including resourcing, partnerships, quality, the input of others, and equality and diversity
- Thematic reflection, focusing on timely developments within the education sector
- Provider reflection on the assessment of other sector bodies, including professional bodies and systems regulators
- Provider reflection on developments linked to specific professions
- Stakeholder feedback and actions

#### 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 <u>partner visitors</u> to design quality assurance assessments, and assess evidence and information relevant to the assessment. Visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make the 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 takes decisions through different levels depending on the routines and impact of the decision, and where appropriate meets in public. Their decisions are available to view on our website.

#### The assessment panel for this review

We appointed the following panel members to support a review of this education provider:

Lyn McLafferty	Lead visitor, Practitioner Psychologist
Fiona McCullough	Lead visitor, Dietitian
Sheba Joseph	Service User Expert Advisor
Tracey Samuel-Smith	Education Manager
Saranjit Binning	Education Quality Officer
Lisa Marks Woolfson	Advisory visitor, Practitioner Psychologist

We encourage reflections through portfolios to be made at the institution level wherever possible. The performance review process does not always require profession level scrutiny which requires all professionals to be represented in the assessment panel. Rather, the process considers how the education provider has performed at institution level, linked to the themes defined in section 1. Lead visitors have the option to appoint additional advisory partners where this will benefit the assessment, and / or where they are not able to make judgements based on their own professional knowledge.

In this assessment, we did not require professional expertise across all professional areas delivered by the education provider. We considered this because the lead visitors were satisfied, they could assess performance and risk. However, we did involve an additional advisory visitor to provide them with the opportunity to be involved with the performance review process to expand their knowledge of the process.

## Section 2: About the education provider

#### The education provider context

The education provider currently delivers seven HCPC approved programmes across one profession. They have been delivering HCPC approved programmes since 2001 and are also the professional body for practitioner psychologists in the UK.

All approved qualifications are at a Doctoral level which the education provider considers to be Stage 2 of a learner's journey to become a practitioner psychologist. Stage 1 is normally a MSc programme, which is not approved by us. These programmes are accredited by the education provider and completion of one is a requirement for entry to the approved Doctoral programme. The Qualification in Counselling Psychology (QCoP) operates a slightly different model as it is a blended Stage 1/Stage 2 qualification. Generally, Stage 1 refers to MSc programmes and Stage 2 refers to Doctoral level programmes.

During the performance review process, we learnt about changes occurring at the education provider which had a wider impact on the sustainability and resourcing of the programmes. The below demonstrates the key milestones during this process.

- September 2023 we met with the education provider to discuss the completion of the performance review portfolio and the process.
- November 2023, the education provider informed us they would be restructuring and, because of this some posts would be made redundant.
- February 2024, the education provider informed us they were phasing out the following three programmes:
  - Qualification in Counselling Psychology
  - Qualification in Occupational Psychology (Stage 2)
  - Qualification in Educational Psychology (Scotland (Stage 2))
- Early March 2024, we received the portfolio which included reasoning why the changes announced in November 2023 and February 2024 were being made.

- Mid-March 2024, the education provider announced they were undertaking a review to three qualifications (<u>Review of BPS doctoral-level (Stage 2)</u> qualifications | BPS).
- April 2024, the education provider announced the Chair of the Board of Trustees had resigned (<u>Governance update | BPS</u>). Following this, the education provider announced they were pausing the decision to phase out the three qualifications and would undertake a consultation with members (<u>Statement on qualifications | BPS</u>).
- June 2024, HCPC visited the education provider to discuss the announcements made and determine how this impacted the ongoing sustainability and resourcing of the programmes to ensure effective delivery. Alongside this, we continued to take forward quality activities relating to information received via the performance review portfolio.
- October 2024, the education provider announced that they were extending the consultation period to the summer of 2025 (<u>Update on the progress of our</u> <u>consultation on BPS qualifications | BPS</u>)

## Practice areas delivered by the education provider

The provider is approved to deliver training in the following professional areas. A detailed list of approved programme awards can be found in <u>Appendix 1</u> of this report.

	Practice area	Delivery level	Approved since	
Pre- registration	Practitioner psychologist	□Undergraduate	⊠Postgraduate	2001

## Institution performance data

Data is embedded into how we understand performance and risk. We capture data points in relation to provider performance, from a range of sources. We compare provider data points to benchmarks, and use this information to inform our risk based decisions about the approval and ongoing approval of institutions and programmes<sup>1</sup>.

Data Point	Bench- mark	Value	Date of data point	Commentary
Numbers of learners	766	137	March 2024	The benchmark figure is data we have captured from previous interactions with the education provider, such as through initial programme approval, and / or through previous performance review assessments. Resources available for the benchmark

<sup>&</sup>lt;sup>1</sup> An explanation of the data we use, and how we use this data, is available here

				number of learners was assessed and accepted through these processes. The value figure was presented by the education provider through this submission.  The education provider is recruiting learners below the benchmark.  We explored this further through the Data and reflections section and Quality theme 3.
Learner non continuation	3%	N/A	2019-20	There is no data available for this data point. We asked the education provider to consider if they wanted to establish ongoing data reporting for this and other data points through this performance review assessment.
Outcomes for those who complete programmes	92%	N/A	2021-22	There is no data available for this data point. We asked the education provider to consider if they wanted to establish ongoing data reporting for this and other data points through this performance review assessment.
Learner satisfaction	N/A	N/A	2023	There is no data available for this data point. We asked the education provider to consider if they wanted to establish ongoing data reporting for this and other data points through this performance review assessment.

Section 3: Performance analysis and quality themes

## Portfolio submission

The education provider was asked to provide a self-reflective portfolio submission covering the broad topics referenced in the <u>thematic areas reviewed</u> section of this report.

The education provider's self-reflection was focused on challenges, developments, and successes related to each thematic area. They also supplied data, supporting evidence and information.

## Quality themes identified for further exploration – from the portfolio submission

We reviewed the information provided, and worked with the education provider on our understanding of their portfolio. Based on our understanding, we defined and undertook the following quality assurance activities linked to the quality themes referenced below. This allowed us to consider whether the education provider was performing well against our standards.

## Quality theme 1 – Seeking full completion and reflections in the portfolio

**Area for further exploration**: Visitors reviewed the portfolio and, in general, identified a theme whereby the narrative outlined the processes and strategies the education provider had in place and what had been done in relation to these during the review period. However, reflections were not provided on how these processes / strategies had performed nor on any actions taken and the reasons for these.

In addition, the visitors noted the focus in the portfolio was on the profession of practitioner psychology. They understood the education providers Boards operated within the same structure for the individual modalities, and they ran programmes across six of the seven practitioner psychology modalities. The reflections provided in the portfolio were limited to a small number of the modalities, which meant the visitors were unable to make a judgement on performance across the modalities and institution. It was important to understand these reflections at this level as we approved programmes in each of the modalities at the education provider and, while there were similarities in the delivery model, there were also differences. Reflections were therefore requested in relation to the Boards and modalities for the following sections of the performance review portfolio:

- Partnerships with other organisations
- Academic quality
- Service users and carers
- Equality, diversity and inclusion
- Embedding the revised HCPC standards of proficiency
- Use of technology
- Apprenticeships in England
- Curriculum development
- Practice placement educators

As part of the performance review process education providers were required to supply external examiner reports when they submit the portfolio. These were not submitted with the portfolio. We therefore requested the external examiner reports to

gain a better understanding of the feedback received and how this was actioned and measured.

**Quality activities agreed to explore theme further**: To explore these themes further we considered a response via a written narrative to update relevant sections of the portfolio. We believed documentary evidence would be the most appropriate and proportionate way to address the concerns.

**Outcomes of exploration:** The performance review portfolio was updated and further reflections were provided in the portfolio sections outlined above. These reflections included details about the other modalities, which included Health Psychology and Occupational Psychology. The reflections were supported with examples of some of the actions the education provider had taken and developments that had taken place, such as increased partnerships. Through the examples provided it was evident the education provider was committed to addressing issues and improving academic processes to maintain quality.

Through the documents supplied it was clear the External Examiners and the Qualification Leadership Teams were rigorous and provided feedback relating to academic quality, potential risks and ongoing improvements.

The additional reflections provided in the portfolio focused on the description and detail of the processes, from which the visitors gained an understanding of the processes and how they were applied. The reflections were supported with examples, which provided visitors with further insight and understanding of the education providers provision and performance. The visitors were satisfied with the reflections and examples provided and had no further queries.

# Quality theme 2 – Ensuring the revised SOPs were embedded, for new learners, by September 2023

Area for further exploration: The visitors acknowledged the education provider's mapping exercise, which identified areas that needed updates due to the revised SOPs. This exercise covered all the qualifications, and it was noted that some areas did not require changes. However, the reflections in this section were brief and the visitors were unclear about what specific changes had been made to the qualifications with regards to the revised SOPs and how these changes were implemented. Consequently, the visitors sought more detailed reflections from the education provider on the changes made in relation to the revised SOPs, how they were implemented, and their appropriateness.

Additionally, there was no information provided on the areas where the education provider had made no changes, for example reasoning why they were deemed unnecessary. The visitors therefore requested further reflections on the areas where no changes were made, specifically wanting to understand what was already being done in relation to the revised SOPs and why it was considered this was appropriate and would deliver the revised SOP.

**Quality activities agreed to explore theme further**: To ensure the revised SOPs had been embedded, we agreed to explore this by requesting further reflections via

the portfolio amendments that we requested through <u>Quality theme 1</u>. We considered this would be the most effective method to understand how the revised SOPs had been embedded across the qualifications.

**Outcomes of exploration:** Through the updates made in the performance review portfolio, the education provider supplied further reflections across the programmes and supported these reflections with specific examples.

#### Active implementation of the standards

By way of examples, it was noted the learners on the Qualification in Health Psychology already met the requirements of the revised SOPs. This was because the qualification had always required learners to demonstrate these skills practically in their workplace. However, to ensure both current and new learners were aware of the revised SOPs, the education provider added new material to the virtual learning environment before September 2023. Further information was also provided in relation to the Qualification in Forensic Psychology, where learners demonstrated the revised SOPs through the evidence in their portfolios. Due to the way the qualifications were designed, the education provider stated the revised SOPs were fully integrated and there was no requirement for them to be updated.

Visitors were satisfied with the actions undertaken by the education provider to determine if changes were required or not. However, as outlined later in this quality theme, there remained concerns about whether the identified changes had been implemented, for new learners, by September 2023.

## Promoting public health and preventing ill-health

In their response, we were informed that this revised SOP was already integrated in most of the qualifications. The two qualifications where they considered this was partially integrated were the Qualification in Counselling Psychology and the Qualification in Sport and Exercise Psychology. To ensure this SOP was fully integrated into these two qualifications the education provider was in the process of making updates. For the Qualification in Counselling Psychology, they were amending the competencies and making amendments to the handbook to highlight this SOP. For the Qualification in Sport and Exercise Psychology, the updates included enhancing the coverage of the SOP by including additional content on empowering and enabling individuals to manage their own health and assessment updates. These updates will then ensure this SOP is fully integrated in the two qualifications.

Visitors acknowledged this additional information and considered it helpful, as it provided them with an understanding of the gaps that had been identified with the SOP and the actions taken. However, it was noted the education provider was currently in the process of making these updates and therefore the revised SOPs have still not been entirely implemented to date.

## Equality, diversity and inclusion

In the response received from the education provider they informed us that this revised SOP was already integrated in most of the qualifications. The two

qualifications where they considered this was partially integrated was the Qualification in Occupational Psychology and the Qualification in Sport and Exercise Psychology. To ensure this SOP was fully integrated into these two qualifications the education provider offered a series of webinars that covered topics such as decolonising the curriculum and exploring barriers to mental health. The reasonable adjustment policy was also updated to accommodate learners with a range a learning needs. Visitors were satisfied with the information and examples provided in relation to this SOP and had no further queries.

#### Further centralising the service user

It was noted this revised SOP was fully integrated across all the qualifications and included in the competencies the learners were required to demonstrate. Part of the updates included a requirement for learners to obtain service user feedback to include in their portfolios. Other updates included a requirement for learners to complete a reflective assessment on how service user involvement had contributed to their development as a practitioner. Visitors were satisfied with the information and examples provided in relation to this SOP and had no further queries.

#### Registrants' mental health

To ensure this revised SOP was embedded across all the qualifications, updates were made to the health declaration form. These updates included ensuring learners understood the importance of discussing health issues with their supervisors and accessing support when required. In addition to this, the mental health of learners was also incorporated into the standards. For example, for the Qualification in Occupational Psychology learners were required to attend 40 hours of psychological therapy. Visitors were satisfied with the information and examples provided in relation to this SOP and had no further queries.

#### Digital skills and new technologies

We noted this revised SOP was fully integrated across all qualifications. For example, assessments and submissions were processed through the virtual learning environment (VLE), BPS Learn. Learners also have access to training for using the system, including a CPD course on digital competencies, "Developing Competencies for Digital Clinical Practice," which is free for all BPS members.

Additionally, the qualifications incorporate digital skills and practices in workshops for candidates, supervisors, and assessors, covering the use of BPS Learn systems and sharing best practice tips. This approach ensures that all stakeholders are well-equipped to navigate the digital aspects of the qualifications. Visitors were satisfied with the information and examples provided in relation to this SOP and had no further queries.

#### Leadership

It was noted this revised SOP was integrated across the qualifications. The education provider outlined how through the qualifications, and with the support of their supervisors, learners were required to develop themselves as practitioners. However, it was noted for the Qualification in Forensic Psychology the leadership

standards would be reviewed to ensure these were fully embedded in the competencies.

Visitors acknowledged this additional information and considered it helpful, as it provided them with an understanding of the gaps that had been identified with the SOP and the actions taken. However, it was not clear to them if the review of the Qualification in Forensic Psychology leadership standards was an enhancement or work being undertaken to bring the qualification in line with the revised SOP.

#### Conclusion of SOPs reflections provided in the portfolio

The reflections provided by the education provider were helpful and highlighted the areas where updates were required due to the revised SOPs and the work the education provider undertook to ensure the revised SOPs were embedded across all the qualifications. Visitors reviewed this information and acknowledged the revised SOPs had been considered across all the qualifications and updates had been model. However, they also identified that some updates were still ongoing and therefore it was not clear to the visitors if all the revised SOPs had been embedded, for new learners, by September 2023.

In addition to this, they also noted the following statement the education provider had included in the portfolio reflections:

"We are currently conducting a consultation on our qualifications. Therefore, all of the proposed changes in the sections below [narrative about the revised SOPs] will be actioned following the conclusion of the consultation and will consider any related recommendations".

This statement suggested all the work and developments outlined as having been undertaken, or in progress, may not have been implemented and will not be implemented until the consultation of the qualifications has been completed. As outlined later in the report, the outcome of the consultation has been delayed until summer 2025. Due to this uncertainty, we agreed this area would be explored further through the focused review process as a matter of priority.

# Quality themes identified for further exploration – from the announcements made by the education provider regarding closure of programmes

As outlined earlier in the report, we learnt from conversations with the education provider and announcements on their website about the imminent closure of three programmes and a restructure of the Qualifications, and the Assessment and Awards teams.

While we had asked the education provider to cover these areas in the portfolio, the impact of these developments meant we decided to visit the education provider and meet with the senior and programme teams (Qualifications, and Assessment and Awards teams). We considered this would be the most effective method to understand how the sustainability and resourcing to deliver effective programmes.

Quality theme 3 – relevancy of the curriculum to ensure learners could practice safely and effectively in line with current practice

**Area for further exploration**: As part of the explanation about why the education provider was closing three programmes, we noted that some learners had been on the programmes for a long time. We understood that a small number of current learners had been on the programme(s) for up to 17 years. If this was the case, the learners had started the programme(s) in approximately 2007.

Considering the timescales, the visitors expected that learners who started a programme in approximately 2007, would have been required to meet adapted SOPs previously. This is because the previous SOPs were rolled out in 2015 when the learners had already been on the programme for approximately eight years.

The visitors were concerned as potentially current learners would be undertaking programmes delivering the pre-2015 version of the SOPs. Based on this understanding the visitors were unclear which version of the SOPs any learners who started the programme in 2007, were demonstrating through their programme. The visitors were therefore unclear how the education provider ensured that the programmes were updated to reflect current practice so that they remained relevant and effective in preparing learners for practice.

The revised SOPs were rolled out to new learners from September 2023. The visitors recognised that education providers do not need to deliver the revised standards to learners who started programmes before this date. However, it does mean, that upon application to our Register, they would need to be aware of the most recent version of the SOPs, and undertake continuing professional development where required to develop their skills and knowledge.

**Outcomes of exploration:** At the visit on 24 June 2024, we talked with the senior and programme teams to gain a better understanding about the reasons for this, the specific numbers of individuals involved, and how the education provider ensured currency of learning and assessment (in relation to current practice, and adherence to the relevant SOPs). This was to understand how the approved programmes ensured the SOPs would be met by an individual who successfully completed them.

In relation to the numbers of individuals involved, we understood the following:

- an individual had been on one of the programmes for 17 years and another for 16 years. It was not clear which of the approved programmes these learners had been on. We were informed both learners had "finished" their programme. We were unclear whether this meant they had successfully completed or been removed from the programme.
- there continued to be learners on the Qualification in Forensic Psychology (Stage 2), who had started in 2011.

Specifically, for the Qualification in Forensic Psychology (Stage 2), we heard that progression policies were outlined in the relevant programme handbook, and these included the number of resits possible. However, there appeared to be no policy around the length of time the programme must be completed within.

In relation to currency of practice, when applicants joined a programme, they proceeded through the specific version of the programme in place at that time. For example, applicants who joined the Qualification in Forensic Psychology (Stage 2) in 2011, continued to study the version of the programme which was running in 2011.

As outlined above, the SOPs were updated in 2015 and more recently in 2023. Verbal assurances were received which outlined how the education provider had ensured the previous revisions to the SOPs had been rolled out across their provision to ensure currency of practice. However, due to the length of time some of the learners had been on the programmes, it was possible there had been more than one change to the SOPs during their study period.

To ensure the approved programmes these learners were undertaking, remained relevant to current practice and reflected the revised SOPs from 2023, we required the following:

- For each approved programme, data which illustrated the number of individuals who enrolled before 2015 and remained active. For example, we requested this included their date of enrolment; the programme they are studying; an understanding of why they remain on the programme; and any actions being undertaken in relation to their continued studies.
- Documentary evidence which demonstrated how programmes, such as the 2011 version of the Qualification in Forensic Psychology (Stage 2), ensured they remained relevant to current practice and ensured delivery and assessment of the appropriate SOPs.

**Further quality activities agreed to explore theme further**: To ensure the validity of the impacted programmes, we agreed to explore this by requesting documentary evidence from the education provider. We considered this would be the most effective and appropriate method to understand how the programme demonstrated this area.

**Outcomes of exploration:** In their response, the education provider explained how the older routes for the qualifications in Forensic, Counselling, and Occupational Psychology did not specify a time limit for completion, only a maximum number of resits. However, in response to discussions, these routes now had graduation dates, which meant learners had a specific length of time to complete the programmes within. These dates are as follows:

- 2024 for Qualification in Counselling Psychology
- 2025 for Qualification in Occupational Psychology
- 2026 for Qualification in Forensic Psychology

The education provider confirmed that learners who had been delayed must therefore complete their qualifications by these dates or they would not gain the qualification. This information was useful as it was evident the education provider had clear timeframes in place for learners to complete programmes by. These timeframes would then enable the education provider to maintain currency of learning and assessments of the programmes. The visitors therefore had no further queries about the length of time learners had in which to complete programmes.

However further information was required to ensure the programmes were relevant to current practice and reflected the appropriate SOPs. In response to this request, the education provider supplied us with a spreadsheet that provided details of the number of learners who started programmes before 2015 who were still active. The list consisted of 27 learners across four programmes and provided details of when they commenced the programme and their current status. It was noted how some of these learners had been on the programme since January 2008, so these individual learners would have experienced updates to the SOPs twice.

Lastly, they provided documentary evidence in the form of the Qualification in Forensic Psychology (Stage 2) handbook July 2021 to demonstrate how the handbook had been updated to show how the previous SOPs had been embedded.

The information provided was helpful, however based on this information it was still not clear to visitors if the 27 learners listed on the spreadsheet had undertaken programmes that were fully aligned to the appropriate SOPs over the duration of their learning. There remained a gap within the visitors understanding about how the education provider had ensured learners were learning about and being assessed against the relevant SOPs and therefore current practice. The visitors were therefore unclear about how the education provider ensured their programmes remained relevant to current practice. We therefore agreed this area would be explored further through the focused review process.

# <u>Quality theme 4 – Appropriate resources to deliver and assess the approved programmes</u>

Area for further exploration: As outlined earlier in the report in <a href="section 2">section 2</a> and <a href="Quality themes identified for further exploration">Quality themes identified for further exploration</a>, during this process, we learnt about decisions made by the education provider to pause / close three programmes. Since 2018, the education provider outlined how they had experienced some financial difficulties and in 2024 undertook a review of all areas. This review led to a restructure which aimed to make the education provider financially sustainable and as a result of this a decision was made to close several programmes, as they were not financially sustainable. It was therefore agreed to close the Qualifications in Counselling Psychology, Occupational Psychology and Educational Psychology (Scotland). It was clear from the reflections provided that this decision would affect resources, and we therefore needed to consider the impact of this and ensure the ongoing sustainability of the programmes.

In addition to this, we understood there had been a restructure of the Qualifications and Assessment teams (programme team). It was our understanding these were the main two operational teams who delivered and assessed the programmes. As part of the restructure, we understood that staff levels in both teams had reduced. The Qualifications Team had been streamlined from five to three staff members, supported by a centralised Administration Team. Similarly, the Assessment and Awards Team had been reduced from ten to six staff members. The education provider considered this restructure, and the improved processes and systems being implemented through the Change Transformation programme, would improve the support available to deliver the qualifications more effectively. We were unclear why

these decisions had been reached and sought further information to understand how the staffing levels continued to ensure effective delivery.

**Outcomes of exploration:** From discussions with the senior and programme teams, we learnt the restructure had been delivered on the understanding that three approved programmes would be closed to new intakes. However, in April 2024 we learnt the decision had been made to pause the closure of these programmes in order to undertake a consultation exercise with the membership. As such, the programmes continued to accept new learners. This meant the expected reduction in workload for the Qualification and Assessment teams had not yet transpired, though the restructure had occurred.

From discussions, the administration role from each operational team had been moved into a centralised administration team. Of the four positions in the administration team, two were vacant. The senior team explained how they had been recruiting for two months and had offered the role to four individuals. Each time, the candidate had rejected the offer. As such, the senior team considered what else they could offer and what they expected the role to do. Therefore, at the point of the visit the centralised administration team could not fulfil the activities for the operational teams the department was designed to support.

From the programme team, we learnt about the prioritisation of operational activities the teams were required to focus on. This meant enhancements and innovation had been paused while the backlog was processed. The senior team recognised that, the delay in closing new intakes to the programmes, meant the operational teams required additional, temporary support. To this end, they were in the process of recruiting two fixed term contracts (to last through the consultation exercise with members) to help the operational teams clear the backlog at the time of the visit.

To ensure there are an adequate number of appropriately qualified and experienced individuals to deliver and assess the programmes, the visitors required additional information about:

- The new structure within the Directorate showing where positions remained vacant, and any job sharing being undertaken to bridge the gap.
- Timelines associated with the recruitment of the two fixed term contracts and two permanent administrative staff members. In addition, contingency planning if the roles are not filled.
- Narrative around the expectations of experience / qualifications to undertake these positions.

**Further quality activities agreed to explore theme further**: To ensure appropriate resources for the delivery and assessment of the programmes, we agreed to explore this by requesting documentary evidence from the education provider. We considered this would be the most effective method to understand how the programme demonstrated this area.

**Outcomes of exploration:** In response to our request for further information, the education provider supplied us with the Directorate chart of staff supporting the programmes. This chart provided details of which posts were vacant. They also provided a narrative outlining the timelines associated with recruiting to these posts,

which included recent updates. Based on the updated information provided, they had:

- June 2024 the Head of Practice role was filled, and they started in the role in June 2024.
- July 2024 two permanent administrators started in their roles.
- August 2024 the Head of Education and Training started; the Qualifications Manager (maternity cover) also started; and two temporary Assessment and Awards Officers were employed for 6 months (contract end date January 2025).

At the time of submitting this information the only two posts which remained vacant were the Research, Education and Practice Administrator and the Assessment and Awards Manager. For the Research, Education and Practice Administrator role planned interviews were due to take place in early September. With regards to the Assessment and Awards Manager position, this became vacant in September 2024 and was being reviewed.

The visitors recognised that through this process, the education provider had employed two highly qualified individuals, who were experienced in delivering assessments and qualifications and developing education and training programmes to the senior positions. Additionally, they noted the enhanced expectation for the administrators was to have the necessary skills to perform the role effectively, such as minute taking and undertaking finance related responsibilities.

In the narrative provided, the education provider reflected on how the recruitment of the two permanent Heads and two permanent administrators had been positive, as it enabled them to reduce some of the backlog they had been experiencing with their work. This was further supported by the two temporary Assessment and Awards Officers. However, the visitors recognised that the temporary administrator's roles remained vacant. In addition, they noted that the temporary Assessment and Awards Officer role was for six months, which with the extension to the consultation window would mean they would leave before this exercise was completed.

Visitors acknowledged the financial deficit the education provider had experienced since 2018. To address this issue, they noted the education provider had made the decision to restructure and potentially close some of the programmes they delivered. As a result of this decision, a consultation period commenced, and all the programmes are currently under review. The consultation period will conclude in summer 2025, however in the meantime the education provider has recognised the impact this review may have on learners and has therefore put plans in place to ensure learners are not disadvantaged with the closure of the programmes. Visitors noted the purpose of the restructure and closure of programmes was primarily for financial reasons, however they highlighted how this may affect workforce demand in future. Due to the current uncertainty of the programmes and the timeframes for this consultation, visitors agreed this area would be explored further through the focussed review process to review the updates and changes made.

This section provides information summarising the visitors' findings for each portfolio area, focusing on the approach or approaches taken, developments, what this means for performance, and why. The section also includes a summary of risks, further areas to be followed up, and areas of good practice.

## Overall findings on performance

Quality theme: Institution self-reflection

## Findings of the assessment panel:

## • Resourcing, including financial stability -

- The education provider reflected on the introduction of a new accounting system. Previously they had experienced some challenges with managing financial data, budgeting and forecasting as their previous system had become outdated. The new system therefore enabled them to generate detailed financial reports, which improved decision making. The new system also enabled the education provider to reinvest surplus income into other support initiatives for learners and supervisors. Reflections were provided on the developments taking place with the Qualification in Educational Psychology (Scotland). In coordination with the Scottish Government, the education provider was arranging to enrol two more cohorts in Educational Psychology before transitioning to a Doctorate programme in 2025. The phased closure plan ensured current candidates could complete their qualifications by December 2028, with an additional year for contingencies. This strategic decision aimed to balance financial viability with the commitment to support existing candidates.
- Through the reflections provided, further information regarding the closure of the programmes and the restructure was provided. The education provider outlined the financial reasons for considering the closure of the programmes and the need to restructure teams. This was explored further through <u>Quality theme 4</u> and, due to the extension to the consultation window, referred to the focused review process.

## Partnerships with other organisations –

- The education provider reflected on their partnership with the Ministry of Justice (MoJ). Some challenges were experienced with the inconsistent approach the MoJ had to enrolments prior to 2021, however, in February 2021 this changed when the education provider secured the contract. This enabled the education provider to respond to workforce demands effectively and to establish a structured partnership with them. As a result of this, the education provider was able to provide data returns on a monthly basis and meet on a quarterly basis, which improved communication and enabled them to respond to issues relating to learners and supervisors effectively.
- The benefits of this partnership were recognised with the increase in learner numbers. The contract, which is due to expire in 2029 particularly contributed to improving communication between the education provider and the MoJ and has enabled ongoing discussions about the workforce demands.

- Visitors recognised the positive partnership the education provider had with the MoJ and noted how reflections had only been provided on this one partnership. They further explored this through <u>Quality theme 1</u>. Through the additional reflections provided we noted the education provider had developed new partnerships with NHS England and the Department for Work and Pensions (DWP).
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## • Academic quality -

- O Despite there being no formal teaching on the programmes, the education provider established a comprehensive system to maintain standards as part of the quality assurance process. The use of two assessors to assess and provide feedback ensured fairness and consistency. In addition to this process, the feedback was also moderated by the Head of Assessment. This approach provided learners with consistent and robust decision-making and clear feedback. Annual refresher training for assessors and continuous oversight further supported the standards and assisted with maintaining academic quality.
- Some challenges were identified in the 2021 External Examiner report for the Qualification in Forensic Psychology where feedback from assessors was considered as 'negative and not as constructive as it should be'. The Qualification Leadership Team responded to this issue, with the aim of enhancing the quality of feedback assessors provided, by revising the training they offer assessors. These actions resulted in an improvement in the quality of feedback provided by assessors, whereby it was considered to be 'positive and clear' for learners.
- Other developments from other programmes included discussions about new assessment models to enhance the quality and consistency of assessments. These developments would involve further training and mentoring for assessors and be reliant on feedback from other teams, such as the Internal Quality Assurance Team.
- Visitors noted the strategic developments and acknowledged the ongoing work to maintain academic quality. However, the reflections provided were generic at the profession level and were not supported with any examples. This was therefore further explored through Quality theme 1. Through the additional reflections provided we noted the education provider had experienced an incident relating to plagiarism. As a result of this, they reviewed and updated their Academic Misconduct Policy, which was applied across all the programmes. They also introduced a process to review all academic misconduct cases annually to identify any quality issues.
- The visitors were satisfied with the above reflections, however, there remained concerns related to academic quality. As outlined in Quality theme 3, there remained a gap within the visitors understanding about how the education provider had ensured learners were learning about and being assessed against the relevant SOPs and appropriate current practice. The visitors were therefore unclear about how the education provider ensured their programmes remained relevant to current

practice. We therefore agreed this area would be explored further through the focused review process.

## • Placement quality -

- The education provider reflected on the process of arranging placements and how these were predominantly organised by the learner and their employer. This was mainly because learners were in employment, however this approach also enabled learners to tailor their experiences to their specific areas of study. The education providers role in this process was to ensure that the placements enabled learners to meet the required competencies, which ensured placement quality was being maintained.
- There is a commitment to support learners in their placement and there are appropriate support and training systems in place to do this. These systems include supervisor training and regular communication with supervisors.
- Some challenges were experienced accessing placements due to the learner's specific expertise or location, which impacted the progress. To address these challenges, the education provider established informal agreements with organisations such as the Scottish Government and NHS England. This resulted in learners having better access to placement opportunities and reduced the burden to find multiple placements to fulfil the competencies. Overall, these developments have led to better communication and streamlined processes, benefiting both learners and placement providers.
- Visitors recognised the education providers efforts to increase placement availability to support learners and the links made with organisations. There was a clear commitment to maintaining training, communication and support for learners and supervisors.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## • Interprofessional education -

- Learners engage with interprofessional education (IPE) in their own settings as they are employed. They often engage in IPE with multidisciplinary teams in their employment and through interactions with service users and carers. These interactions can include doctors, health visitors and other health professionals.
- Based on the examples provided, it is clear learners had the opportunity to engage with a range of IPE and they have reflected on the benefits of this. For example, one learner had the opportunity to meet with a dietitian to discuss weight management. As a result of this meeting, they were invited to attend dietetic meetings where they had the opportunity to meet other dietitians and also discussed the health psychology weight management service.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## • Service users and carers -

 The education provider reflected on the importance of service users and carers, who they refer to as the Stakeholder Representative Engagement Groups (SREGs). The use of SREGs to gather and incorporate feedback into monitoring reports ensures that the Qualification Leadership Team (QLT) can make informed decisions and take appropriate action. Alongside this, learners are encouraged to seek feedback from service users, which can then be discussed in supervision sessions.

- The education provider identified that, despite the structured approach to gathering feedback, there were still some challenges with the quality of the feedback received from SREGs and the effectiveness of it. To address this issue, the education provider initiated a review in 2023, however this was delayed due to the organisational restructure. Nevertheless, the education provider demonstrated their commitment to enhancing the effectiveness of feedback mechanisms.
- Visitors acknowledged the engagement with service users and carers, however, were not clear on how the feedback was considered. This was therefore further explored through Quality theme 1. Through the additional reflections provided we acknowledged feedback was considered through the annual reviews by the QLTs. This enabled them to monitor progress and identify any issues and address them. We also noted the development of the SREGs was currently on hold due to the consultation and that it would continue when the outcome of the qualifications was known.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## • Equality and diversity -

- The Equality, Diversity and Inclusion (EDI) Board oversee EDI and are committed to promoting this area across the education provider and profession. They recognise the importance of the Board's role particularly as they are also the professional body for psychology. The structured framework ensured the education provider fulfilled their EDI commitments and action and measured them effectively.
- The education providers strategic plan further supported this commitment to EDI and enabled them to analyse EDI data regularly. In addition to this, the education provider was also involved with various EDI declarations and charters such as the Science Council EDI declaration and The Race at Work charter, which demonstrated how proactive they were in this area.
- BPS qualifications are designed to be flexible and inclusive, accommodating part-time work and personal circumstances, which helps increase accessibility for diverse candidates. The Society's marketing efforts aim to reach a broader pool of prospective candidates, further supporting diversity in the profession. Overall, the Society's initiatives, from promoting the psychology curriculum in schools to ensuring flexible qualification pathways, demonstrate a strong commitment to increasing diversity and inclusion within the field of psychology.
- Through clarification visitors noted the additional reflections provided, which outlined further developments and demonstrated their continued commitment to EDI. For example, in 2023 they introduced EDI data

- collection through the membership information portal, which all BPS members had access to, and worked with the Eleanor Granville Institute on a research project in relation to race and ethnicity.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## • Horizon scanning -

- The education providers approach to horizon scanning is a proactive strategy that aims to anticipate and mitigate risks. The organisation integrates both qualitative and quantitative data obtained from members, volunteers, and various reports to create evidence-based analyses. This approach ensures they remain responsive to emerging trends and potential challenges.
- The importance of horizon scanning was recognised by the education provider and the strategic boards and the Board of Trustees were regularly involved with this. They acknowledged the impact the review of the qualifications and closure of programmes could have on learners and were using a risk-based approach to manage this. With this approach, they aimed to identify any risks and address them, to prevent learners from being disadvantaged with completing their qualifications. The structured evaluation process, with monthly reviews by the Senior Leadership Team and quarterly assessments by the Risk and Assurance Sub-Committee, highlights the commitment to maintaining the effectiveness of their strategies and actions.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

Risks identified which may impact on performance: None.

Outstanding issues for follow up: As outlined in Quality theme 4, visitors acknowledged the financial deficit the education provider had experienced since 2018. To address this issue, they noted the education provider had made the decision to restructure and close some of the programmes they delivered. As a result of this decision, a consultation period commenced, and all the programmes are currently under review. The consultation period will conclude in summer 2025, however in the meantime the education provider has recognised the impact this review may have on learners and has therefore put plans in place to ensure learners are not disadvantaged with the closure of the programmes. Visitors noted the purpose of the restructure and closure of programmes was primarily for financial reasons, however they highlighted how this may affect workforce demand in future. Due to the current uncertainty of the programmes and the timeframes for this consultation, visitors agreed this area would be explored further through the focussed review process to review the updates and changes made.

**Outstanding issues for follow up:** As outlined in <u>Quality theme 3</u>, there remained a gap within the visitors understanding about how the education provider had ensured learners were, learning about, and being assessed against the relevant SOPs and appropriate current practice. The visitors were therefore unclear about how the education provider ensured their programmes remained relevant to current practice.

We therefore agreed this area would be explored further through the focused review process.

### Quality theme: Thematic reflection

## Findings of the assessment panel:

## Embedding the revised Standards of Proficiency (SOPs) –

- The education providers approach to embedding the SOPs into qualifications is both structured and thorough. By having Qualification Leadership Teams (QLTs) report on the extent of integration, this provides them with a clear understanding of each qualification's status. The analysis and mapping of these reports help identify trends and areas for improvement.
- Changes approved by the Qualifications Committee (QC) and ongoing monitoring ensure consistency and quality across all qualifications.
   This approach embeds the SOPs and assists with maintaining high standards and fairness for learners. The requirement for learners to agree to these standards at the submission point further emphasises the education providers commitment to maintaining standards.
- Visitors noted the developments and updates that had been applied to materials such as handbook and portfolio and acknowledged the SOPs had been integrated appropriately. However, the reflections provided were limited and general and were not supported with any examples. This was therefore further explored through <a href="Quality theme 1">Quality theme 1</a> and <a href="Quality theme 2">Quality theme 2</a> and <a href="Quality theme 2">Quality theme 2</a> and <a href="Quality theme 2">Quality theme 2</a> and <a href="Quality theme 2">Q

## Use of technology: Changing learning, teaching and assessment methods –

- The education provider considered the use of Artificial Intelligence (AI) and incorporated it into the Academic Misconduct policy, which applied across all programmes. AI was not a concern during the 2021-2022 review period, but with the introduction of tools like Chat GPT in late 2023, the policy was updated to address the potential for AI-generated text to be used fraudulently.
- The implementation of Turnitin software to detect Al-generated content. This had a threshold set at 15% for the content generated by Al. If at, or above this level, an investigation would take place which demonstrated a commitment to maintaining academic integrity. The policy also acknowledged the limitations of software detection, allowing assessors to identify Al content during the assessment process.
- Since its implementation in 2023, the policy has been tested and refined through live cases, showing flexibility and responsiveness to technological advancements. The Qualifications Committee's annual review of cases and outcomes ensures the policy remains effective and up-to-date. This reflection highlights the education providers

- commitment to develop and update policies in line with technological developments to uphold academic standards.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## • Apprenticeships in England –

- The education provider currently has no plans to develop apprenticeships in the HCPC regulated professions. This is because they deliver doctorate level qualifications, which are not funded by the government. However, it was noted the education provider would consider apprenticeships if changes were made to government funding.
- Visitors were satisfied with the information provided in this section.

Risks identified which may impact on performance: None.

**Outstanding issues for follow up:** As noted above in <u>Quality theme 2</u>, there is a risk relating to the implementation of the revised SOPs across the programmes. The revised SOPs had been considered across all the qualifications and updates had been made, however some updates were still ongoing. It was therefore not clear to the visitors if all the revised SOPs had been embedded by September 2023. It was therefore considered appropriate to explore this area further through the focused review process.

Quality theme: Sector body assessment reflection

#### Findings of the assessment panel:

- Assessments against the UK Quality Code for Higher Education
  - Due to the nature of their provision, the education provider was unable to provide a reflection in this area.
  - This was noted by the visitors and no issues were highlighted.
- Office for Students (OfS) -
  - Due to the nature of their provision, the education provider does not engage with the Office for Students.
  - o This was noted by the visitors and no issues were highlighted.
- Other professional regulators / professional bodies
  - Due to the nature of their provision, the education provider does not engage with other professional regulators / professional bodies.
  - o This was noted by the visitors and no issues were highlighted.

Risks identified which may impact on performance: None.

Outstanding issues for follow up: None.

Quality theme: Profession specific reflection

#### Findings of the assessment panel:

- Curriculum development
  - The education provider reflected on the approach used to deliver qualifications, which highlights a unique model that is different from

- higher education institutions. There is no formal teaching and therefore curriculum development focuses on assessments of competencies rather than structured coursework. Changes due to new Standards of Practice (SOPs) are then reflected in these assessments.
- The education provider includes a section on 'Major or Minor HCPC changes' in their annual monitoring forms, which enables them to monitor the changes required with the SOPs. Additionally, assessment forms are designed to evaluate both profession-specific and general competencies comprehensively. This ensures all competencies are assessed and the appropriate changes are made to accordingly.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

## Development to reflect changes in professional body guidance –

- Due to the nature of their provision, the education provider does not engage with other professional regulators / professional bodies.
- This was noted by the visitors and no issues were highlighted.

## • Capacity of practice-based learning (programme / profession level) -

- Due to the nature of the provision, the education provider is not directly involved with the placement process and are not responsible for managing the capacity of practice-based learning. Their role in this process is to ensure learners meet the required competencies.
- Visitors were satisfied with the information provided in this section.

Risks identified which may impact on performance: None.

Outstanding issues for follow up: None.

Quality theme: Stakeholder feedback and actions

## Findings of the assessment panel:

- Learners -
  - Learner feedback is incorporated into the Stakeholder Policy and is considered through the Stakeholder Representative Engagement Group, which learners are also involved in. This highlighted their commitment to gathering feedback and continuously improving to maintain quality and standards.
  - During this period, it was noted three official complaints were received, which demonstrated the Complaints Policy and Appeals Policy were clear and were being used by learners. They reflected on the actions taken to address the complaints and also acknowledged the changes that were required to processes, such as administrative processes. This enabled them to develop and improve their processes and the provision further.
  - Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

#### Practice placement educators –

 Reflections provided on the feedback process highlighted the two levels of review and action the education provider had. Feedback from practice placement educators was normally reviewed and monitored by the qualification leadership team for each programme. If any issues came to light through these reviews, the issue would be escalated to the Qualifications Committee (QC) for actioning. Actions involved working with education providers to address the issues and draft action plans and to monitor the progress of these. This approach enabled the education provider to maintain effective relationships with practice educators and provide a positive experience for them and learners.

 Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

#### External examiners –

- External examiners are appointed for each programme and ensure assessments and performance data are considered fairly and accurately and provide advice where appropriate. They also highlight best practice and concerns, which the Qualification Leadership Team (QLT) respond to and incorporate into their future planning. This ensures external examiners have oversight and input into all programmes and assists with maintaining standards.
- The education provider reflected on the challenge they experienced with the inconsistent feedback received from assessors on the Qualification in Occupational Psychology (QOP) (Stage 2). To address this issue additional training and moderation were provided and the issue continues to be monitored by the Assessment and Awards Team. As a result of this action, they have seen improvements in the feedback being received and it is consistent.
- It was noted the reflections provided only related to occupational psychology and were not across all modalities. In addition to this, the external examiner reports for all the modalities had not been submitted. This was therefore explored further through <u>Quality theme 1</u>.
- Visitors were satisfied with the information provided in this section, which demonstrated the education provider was performing well in this area.

Risks identified which may impact on performance: None.

Outstanding issues for follow up: None.

## Data and reflections

## Findings of the assessment panel: Learner non continuation:

- During this review the education provider has engaged with the HCPC and has shared details of the number of learners on the programmes interrupting their studies.
- In order to address this, the education provider is working with the HCPC to establish a regular supply of data points that can be used to assess their performance.
- The visitors were satisfied with the education providers performance in this area and acknowledged they were engaging with the HCPC to develop a regular supply of data points.

#### Outcomes for those who complete programmes:

- As above, the education provider recognises the challenges with the lack of data and are working with the HCPC to establish a regular supply of data points that can be used to assess their performance.
- The visitors were satisfied with the education providers performance in this area and acknowledged they were engaging with the HCPC to develop a regular supply of data points.

#### Learner satisfaction:

- As above, the education provider recognises the challenges with the lack of data and are working with the HCPC to establish a regular supply of data points that can be used to assess their performance.
- The visitors were satisfied with the education providers performance in this area and acknowledged they were engaging with the HCPC to develop a regular supply of data points.

## • Programme level data:

- The data provided captured the number of learners who started the programmes in 2022-23. The education provider recognised learner numbers were low on some of the programmes, which was one of the reasons for the consultation of the programme closures taking place.
- In addition to this, we also received data from the education provider summarising the status of learners at different stages of the programmes due to interruptions to their studies. This was explored further through <u>Quality theme 3</u>.
- The visitors were satisfied with the education providers performance in this area and acknowledged they were engaging with the HCPC to develop a regular supply of data points.

**Proposal for supplying data points to the HCPC:** The education provider has confirmed they will continue to work with the HCPC to develop a regular supply of data points. The new updated guidance for establishing data points will be used, as this guidance has been designed to support education providers in this position where data is not captured through the same sources as HEIs due to the nature of their provision.

## Section 5: Issues identified for further review

This section summarises any areas which require further follow-up through a separate quality assurance process (the approval or focused review process).

#### Referrals to the focused review process

#### **Undertake quarter one 2025**

Ensuring the revised standards of proficiency (SOPs) were embedded by September 2023

**Summary of issue:** As noted above in <u>Quality theme 2</u>, there is a risk relating to the implementation of the revised SOPs across the programmes. The revised SOPs had been considered across all the qualifications and updates had been made, however

some updates were still ongoing. It was therefore not clear to the visitors if all the revised SOPs had been embedded by September 2023. It was therefore considered appropriate to explore this area further through the focused review process.

Relevance of the curriculum to ensure learners could practice safely and effectively in line with current practice

**Summary of issue:** As outlined in <u>Quality theme 3</u>, there remained a gap within the visitors understanding about how the education provider had ensured learners were, learning about, and being assessed against the relevant SOPs and appropriate current practice. The visitors were therefore unclear about how the education provider ensured their programmes remained relevant to current practice. We therefore agreed this area would be explored further through the focused review process.

#### Undertake upon completion of the education provider consultation process

Appropriate resources to deliver and assess the approved programmes

**Summary of issue:** As outlined in Quality theme 4, visitors acknowledged the financial deficit the education provider had experienced since 2018. To address this issue, they noted the education provider had made the decision to restructure and close some of the programmes they delivered. As a result of this decision, a consultation period commenced, and all the programmes are currently under review. The consultation period will conclude in summer 2025, however in the meantime the education provider has recognised the impact this review may have on learners and has therefore put plans in place to ensure learners are not disadvantaged with the closure of the programmes. Visitors noted the purpose of the restructure and closure of programmes was primarily for financial reasons, however they highlighted how this may affect workforce demand in future. Due to the current uncertainty of the programmes and the timeframes for this consultation, visitors agreed this area would be explored further through the focussed review process to review the updates and changes made.

## Section 6: Decision on performance review outcomes

#### **Assessment panel recommendation**

Based on the findings detailed in section 4, the visitors recommend to the Education and Training Committee that:

- The education provider's next engagement with the performance review process should be in the 2025-26 academic year
- The issues identified for referral through this review should be carried out in accordance with the details contained in section 5 of this report

#### Reason for next engagement recommendation

- Internal stakeholder engagement
  - The education provider engages with a range of stakeholders with quality assurance and enhancement in mind. Specific groups engaged

by the education provider were learners, service users, practice educators, partner organisations and external examiners.

- External input into quality assurance and enhancement
  - The education provider did not engage with professional bodies. They did not consider professional body findings in improving their provision due to the nature of their provision.
  - The education provider did not engage with any other relevant professional or system regulators. They considered the findings of the HCPC in improving their provision.
  - The education provider considers sector and professional development in a structured way.

## Data supply

- Through this review, the education provider has not established how they will supply quality and performance data points which are equivalent to those in external supplies available for other organisations. Where data is not regularly supplied, we need to understand risks by engaging with the education provider on a frequent basis (a maximum of once every two years).
- What the data is telling us:
  - From data points considered and reflections through the process, the education provider does not consider data in their quality assurance and enhancement processes.
- In summary, the reason for the recommendation of a two year monitoring period is:
  - Due to the lack of established data points. As detailed above we shall work with the education provider to develop the required data. This data will then be available to be used at their next performance review (2025-26).

## Appendix 1 – summary report

If the education provider does not provide observations, only this summary report (rather than the whole report) will be provided to the Education and Training Committee (Panel) to enable their decision on the next steps for the provider. The lead visitors confirm this is an accurate summary of their recommendation (including their reasons) and any referrals.

Education provider	Case reference	Lead visitors	Review period recommendation	Reason for recommendation	Referrals
British Psychological Society	CAS-01384- S5C9L7	Lyn McLafferty & Fiona McCullough	Two years	In summary, the reason for the recommendation of a two year monitoring period is:  • due to the lack of established data points. As detailed above we shall work with the education provider to develop the required data. This data will then be available to be used at their next performance review (2025-26).	Ensuring the revised standards of proficiency (SOPs) were embedded by September 2023  Summary of issue: As noted above in Quality theme 2, there is a risk relating to the implementation of the revised SOPs across the programmes. The revised SOPs had been considered across all the qualifications and updates had been made, however some updates were still ongoing. It was therefore not clear to the visitors if all the revised SOPs had been embedded by September 2023. It was therefore considered appropriate to explore this area further through the focused review

		process.
		Relevance of the curriculum
		to ensure learners could
		practice safely and effectively
		in line with current practice
		in the with current practice
		Summary of issue: As
		outlined in Quality theme 3,
		there remained a gap within
		the visitors understanding
		about how the education
		provider had ensured learners
		were, learning about, and
		being assessed against the
		relevant SOPs and
		appropriate current practice.
		The visitors were therefore
		unclear about how the
		education provider ensured
		their programmes remained
		relevant to current practice.
		We therefore agreed this area
		would be explored further
		through the focused review
		process.
		F. 55555.
		Appropriate resources to
		deliver and assess the
		approved programmes
		approved programmes

		Summary of issue: As
		outlined in Quality theme 4,
		visitors acknowledged the
		financial deficit the education
		provider had experienced
		since 2018. To address this
		issue, they noted the
		education provider had made
		the decision to restructure
		and close some of the
		programmes they delivered.
		As a result of this decision, a
		consultation period
		commenced, and all the
		programmes are currently
		under review. The
		consultation period will
		conclude in summer 2025,
		however in the meantime the
		education provider has
		recognised the impact this
		review may have on learners
		and has therefore put plans in
		place to ensure learners are
		not disadvantaged with the
		closure of the programmes.
		Visitors noted the purpose of
		the restructure and closure of
		programmes was primarily for
		financial reasons, however
		they highlighted how this may
		affect workforce demand in

apacio ana chango mace.			future. Due to the current uncertainty of the programmes and the timeframes for this consultation, visitors agreed this area would be explored further through the focussed review process to review the updates and changes made.
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## Appendix 2 – list of open programmes at this institution

Name	Mode of study	Profession	Modality	Annotation	First intake date
Qualification in Counselling Psychology	FLX (Flexible)	Practitioner psychologist	Counselling psychologist		01/01/2004
Qualification in Educational Psychology (Scotland (Stage 2))	FLX (Flexible)	Practitioner psychologist	Educational psychologist		01/09/2011
Qualification in Forensic Psychology (Stage 2)	FLX (Flexible)	Practitioner psychologist	Forensic psychologist		01/01/2010
Qualification in Health Psychology (Stage 2)	FLX (Flexible)	Practitioner psychologist	Health psychologist		01/01/2001
Qualification in Occupational Psychology (Stage 2)	FLX (Flexible)	Practitioner psychologist	Occupational psychologist		01/01/2007
Qualification in Occupational Psychology (Stage 2) (2019)	FLX (Flexible)	Practitioner psychologist	Occupational psychologist		01/02/2019
Qualification in Sport and Exercise Psychology (Stage 2)	FLX (Flexible)	Practitioner psychologist	Sports and exercise psychologist		01/01/2008



#### Observations on HCPC performance review outcome

#### 1. Inaccuracies

- On page 11: 'They understood the education providers Boards operated differently for the individual modalities.' this is inaccurate. All Qualification Leadership Teams (QLTs) have the same structure.
- On page 14: 1<sup>st</sup> and 3<sup>rd</sup> paragraph, it should say Qualification in Occupational Psychology (not Counselling).
- On the final page: QOP has two routes, 2019 first enrolment was indeed 1/1/2019, but the other is QOP (2012) with first enrolment from 1/1/2012. All enrolments for the earlier QOP were taught out by 31/12/2021.

#### 2. Process report and outcomes

We observe that the performance review itself is based on a more traditional HEI model of delivery and not all areas may necessarily be applicable to the BPS model of qualifications.

There was perhaps some discrepancy between expectation setting in regard to this being an institutional return vs requiring in-depth qualification specific examples on embedding the revised SOPs. One point to note is that most of the SOPs were already fully incorporated into the qualifications. Nevertheless, examples across all modalities were provided to evidence how SOPs were embedded, but the report suggests that there were not enough action-oriented reflections on individual qualifications. By reflecting on existing standards and embedding new standards at a generic practitioner psychology level, we feel that it can be 'taken as read' that this applies to all the BPS qualification modalities. Otherwise there perhaps needs to be clearer guidance on what kind of evidence HCPC are looking for.

We understand that HCPC are looking to carry out a focussed review in some areas, one of which is the relevance of the curriculum to ensure learners could practice safely and effectively in line with current practice. The BPS qualifications do not follow a taught curriculum but are practice based and as such it is difficult to evidence relevance of the curriculum. By being based in practice learners are by definition in line with current practice.

We would welcome a conversational approach to the above focussed review areas.