

## HCPC approval process report

Education provider	Sheffield Hallam University
Name of programme(s)	BSc (Hons) Occupational Therapy, Full time BSc (Hons) Physiotherapy, Full time
Approval visit date	22-24 January 2019
Case reference	CAS-13561-B7S2D4

### Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	4
Section 3: Requirements to commence assessment.....	4
Section 4: Outcome from first review.....	5
Section 5: Outcome from second review.....	10
Section 6: Visitors' recommendation.....	12

### 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:

Bernadette Waters	Occupational Therapist
Kathyrn Campbell	Physiotherapist
Joanne Watchman	Lay
Rabie Sultan	HCPC executive

### Other groups involved in the approval visit

This was a multi-professional visit with four HCPC panels:

- Panel 1 – BA (Hons) Social Work and BSc (Hons) Nursing (Learning Disability) and Social Work
- Panel 2 – BSc (Hons) Physiotherapy and BSc (Hons) Occupational Therapy
- Panel 3 – BSc (Hons) Diagnostic Radiography and BSc (Hons) Radiotherapy and Oncology
- Panel 4 – BSc (Hons) Operating Department Practice and BSc (Hons) Paramedic Science

For the physiotherapy and occupational therapy programmes there were representatives from their respective bodies, Chartered Society of Physiotherapy and College of Occupational Therapists. For the paramedic and operating department

practice programmes there were representatives from their respective bodies, College of Paramedics and College of Operating Department Practitioners. The education provider appointed an internal panel who reviewed each of the programmes.

<b>Internal panel members</b>		
Elaine Buckley	Independent chair (supplied by the education provider)	Sheffield Hallam University
Chloe Corbett	Secretary (supplied by the education provider)	Sheffield Hallam University
David Owen	Internal panel member	Sheffield Hallam University
Claire Lockwood	Internal panel member	Sheffield Hallam University
Mary Dawson	Internal panel member	Sheffield Hallam University
Jill LeBihan	Internal panel member	Sheffield Hallam University
Lorraine Cookson	Internal panel member	Sheffield Hallam University
<b>Professional body panel members</b>		
Paul Townsend	Professional body representative	College of Paramedics
Bob Willis	Professional body representative	College of Paramedics
Nina Paterson	Professional body representative	Chartered Society of Physiotherapy
Barry Pryer	Professional body representative	Chartered Society of Physiotherapy
Alison Hampson	Professional body representative	College of Occupational Therapists
Suzie Boyd	Professional body representative	College of Occupational Therapists
Mike Donnellon	Professional body representative	College of Operating Department Practitioners
<b>HCPC Social work panel members</b>		
Richard Barker	Social worker	HCPC visitor
Kate Johnson	Social worker	HCPC visitor
Roseann Connolly	Lay	HCPC visitor
Eloise O'Connell	HCPC executive	HCPC – panel lead
Jamie Hunt	HCPC executive	HCPC – observer
<b>HCPC Diagnostic Radiography and Therapeutic Radiography panel members</b>		
Shaaron Pratt	Diagnostic radiographer	HCPC visitor
Kathryn Burgess	Therapeutic radiographer	HCPC visitor
Susanne Roff	Lay	HCPC visitor
John Archibald	HCPC executive	HCPC – panel lead
<b>HCPC Occupational therapy and Physiotherapy panel members</b>		
Bernadette Waters	Occupational therapist	HCPC visitor
Kathryn Campbell	Physiotherapist	HCPC visitor
Joanne Watchman	Lay	HCPC visitor
Rabie Sultan	HCPC executive	HCPC – panel lead

<b>HCPC Operating Department Practice and Paramedic panel members</b>		
Julie Weir	Operating department practitioner	HCPC visitor
John Donaghy	Paramedic	HCPC visitor
Manoj Mistry	Lay	HCPC visitor
Niall Gooch	HCPC executive	HCPC – panel lead

## Section 2: Programme details

Programme name	BSc (Hons) Occupational Therapy
Mode of study	FT (Full time)
Profession	Occupational therapist
First intake	01 September 1994
Maximum learner cohort	Up to 72
Intakes per year	1
Assessment reference	APP02003

Programme name	BSc (Hons) Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
First intake	01 September 1997
Maximum learner cohort	Up to 140
Intakes per year	1
Assessment reference	APP02002

We undertook this assessment via the approval process, which involves consideration of documentary evidence and an onsite approval visit, to consider whether the programme continues to meet our standards. We decided to assess the programme via the approval process due to the outcome of a previous assessment.

The education provider informed the HCPC through the major change process that they were making several changes to the programmes to accommodate further curriculum integration. From the information provided, the education provider's approach to the way the programmes will be managed, resourced, delivered and assessed will be significantly different from the currently approved programmes. We decided that the introduction of an integrated curricula could have significant impact on the way the standards will continue to be met. Therefore, we decided the most appropriate way to assess changes to the programmes was via the approval process.

## Section 3: Requirements to commence assessment

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

we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

Required documentation	Submitted
Programme specification	Yes
Module descriptor(s)	Yes
Handbook for learners	Yes
Handbook for practice based learning	Yes
Completed education standards mapping document	Yes
Completed proficiency standards mapping document	Yes
Curriculum vitae for relevant staff	Yes
External examiners' reports for the last two years, if applicable	Yes

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

Group	Met
Learners	Yes
Senior staff	Yes
Practice education providers	Yes
Service users and carers (and / or their representatives)	Yes
Programme team	Yes
Facilities and resources	Yes

## Section 4: Outcome from first review

### Recommendation of the visitors

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

### Conditions

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

We expect education providers to review the issues identified in this report, 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 28 March 2019.

## **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 demonstrate how they will ensure that potential applicants to the programme are given full and clear information about how the foundation year works.

**Reason:** From discussions at the visit the visitors were aware that the education provider was introducing a foundation year across all the allied health programmes. In meetings, the senior team and the programme team gave some verbal assurances that applicants would be given information about this year. However, from these conversations, the visitors were not clear about what information would be provided, in what format, at what stage of the application process. The initial documentary submission had not included evidence relating to the information about the foundation year provided to applicants. In particular, it was not clear how the education provider would clarify for applicants that there were no credits, and no award, available at the completion of the foundation year, and that it was intended solely as a route on to the degree-level programmes. The visitors were therefore unable to determine whether the standard was met, and require the education provider to submit evidence showing how applicants will have access to all appropriate information about the foundation year.

## **2.2 The selection and entry criteria must include appropriate academic and professional entry standards.**

**Condition:** In relation to the proposed foundation year, the education provider must demonstrate how they will ensure that the programmes have appropriate academic entry standards.

**Reason:** From discussions at the visit the visitors were aware that the education provider was introducing a foundation year across all the allied health programmes. Information about this had not been included in the initial documentary submission. It was therefore not clear to the visitors how the foundation year would be integrated into the programmes as a whole. During the visit, the programme team and the senior team gave verbal reassurances about how the foundation year would work. This included clarifying that the foundation year was intended to provide an access point to the programmes for learners who did not achieve the necessary grades but who were judged to have the potential to complete the programme. The visitors considered that what they were told about the foundation year seemed appropriate, but as they had not been provided with documentary evidence relating to the foundation year they were unable to determine whether the standard was met. They therefore require further evidence demonstrating that learners coming on to the programmes via the foundation year will meet appropriate academic standards.

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

**Condition:** The education provider must provide further information to demonstrate there is effective management and clear responsibility for the programme.

**Reason:** Prior to the visit, the visitors were made aware the design of the programmes builds on pre-existing inter-professional education and moves towards an integrated care curricula (ICC). Under ICC there will be an integrated approach to the

programmes' learning, teaching and assessment strategies. Themes which underpin the concept of the ICC will be threaded into the programmes. From a review of the documentation prior to the visit, the visitors were made aware of the responsibilities of the various roles within the programmes, such as course leader and clinical liaison officer, and the skills and expertise of those staff members involved in the programmes. However, from the information provided beforehand and discussions at the visit, the visitors could not determine whether there was a programme management structure in place with clear roles and responsibilities for the ICC constituents of the programmes. As such, the visitors could not determine whether the programme was effectively managed. The visitors require more information about the lines of responsibility for decisions relating to ICC components of the programmes.

### **3.3 The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.**

**Condition:** The education provider must demonstrate how the process for identifying and appointing an appropriately qualified and experienced person to hold overall professional responsibility for the programme is appropriate.

**Reason:** For this standard, the visitors were directed to the curriculum vitae of the current programme leaders for the programmes. From the information provided, the visitors were aware of the individuals who will have overall professional responsibility of the programmes. The visitors noted that the staff identified were appropriately qualified and experienced, and on the relevant part of the Register. In the programme team meeting, the visitors were informed that there is a process in place to ensure that they identify and appoint an appropriately qualified and experienced person holding overall professional responsibility for the programme. The visitors were informed that this process includes selecting a programme leader from the current staff provision, and the role is recruited to on a rotating basis. However, the visitors were not given the process, and therefore could not determine that it is appropriate to ensure that the education provider will continue to appoint a suitable person and, if necessary, a suitable replacement. As such, the visitors require the education provider to demonstrate that they have an effective process for ensuring that the person with overall professional responsibility for the programme is appropriately qualified and experienced

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

**Condition:** The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff in place to deliver the BSc (Hons) Physiotherapy programme.

**Reason:** Prior to the visit, the visitors noted varying maximum learner numbers for the BSc (Hons) Physiotherapy programme as per the information on the visit request form and various other documentation. The current existing programme has an approval of 105 learners. At the visit, the programme team confirmed that there would be a maximum of 140 learners per cohort with an annual intake and the student staff ratio will be twenty two to one. During the meeting with learners, the learners in year one commented that there were twenty-four learners in each practical group. From the information provided, the visitors were not clear how the education provider plans to

manage and support this increase in learner numbers, in relation to staffing resources on the programme. On review of the documentation provided as evidence for this standard, including staff curricula vitae (CV), the visitors noted that not all of the information appears to be up to date, as present staff were not included. In addition to this, the visitors were not clear what the roles and responsibilities of each staff member on the programme were, or which staff members are contracted full time or part time. The visitors also did not see evidence about current staff vacancies, and what plans were in place for recruitment. Additionally, the CVs for module leaders Amy France, Sue Dale and Gerry Scott were not included in the documentation. Considering the increase to learner numbers for this programme, without having sufficient information about staffing for the programme as mentioned above, the visitors were unable to make a judgement on how the programme will remain sufficiently staffed. Therefore, the education provider must demonstrate how they will ensure that there is an adequate number of staff in place to deliver an effective programme for all learners, in the first and subsequent years.

### **3.18 The education provider must ensure learners, educators and others are aware that only successful completion of an approved programme leads to eligibility for admission to the Register.**

**Condition:** For the BSc (Hons) Occupational Therapy programme, the education provider must revise their documentation to ensure that learners, educators and others are aware that only successful completion of an approved programmes leads to eligibility for admission to the Register.

**Reason:** The visitors reviewed the documentation for the BSc (Hons) Occupational Therapy programme and noted that page 6 of the programme specification under section 1.2.6 states 'This is a full time BSc honours degree leading to eligibility for professional registration with the UK Health and Care Professions Council as an Occupational Therapist.' This could be misleading for the learners as it is not clear that graduates of the programme must apply to HCPC for registration, and submit further information through this process. The visitors noted that interim exit awards for this programme include a Certificate of Higher Education Occupation and Wellbeing and a Diploma of Higher Education Occupation and Wellbeing. In discussion with the programme team, the visitors established that neither of the exit awards – or any aegrotat or posthumous awards would confer eligibility for learners to apply for HCPC registration. However, from the documentation, it was not clear how learners, educators and the public is made aware that those exit awards will not lead to eligibility for admission to the HCPC Register. As such, the education provider must revisit the programme documentation to clearly state that successful completion of the BSc programme confers eligibility for HCPC registration and if an exit award is awarded to any learner, it does not confer eligibility for admission to the HCPC Register.

### **6.3 Assessments must provide an objective, fair and reliable measure of learners' progression and achievement.**

**Condition:** The education provider must provide further evidence which demonstrates the assessment load for the 'Assessing and addressing complexity' module is a reliable measure of learners' progression and achievement.

**Reason:** At this multi-professional visit, the social work panel from HCPC raised with the programme team for the social work programmes that they found the assessment



load for learners for some 40 credit modules, at level four and level five, were comparatively low to other modules on the programmes. One of the modules the visitors were referring to is the 'Assessing and addressing complexity' module at level five, which is a shared module for all programmes within the Integrated Care Curricula. This was not picked up at the visit by the other HCPC panels, and so it was not discussed at the visit for these programmes. However, on reflection, considering the broader impact of the condition required by the social work visitors, we found it appropriate to require a response relating to all programmes within the Integrated Care Curricula.

For the 'Assessing and addressing complexity' module, the social work visitors noted the assessment for this module was a poster presentation and an essay of 1500 words. The social work visitors discussed this with the social work programme team at the visit, who acknowledged they were unaware of the details of assessment load on the module and could not give a rationale without looking further into it. As such, from the information provided, the visitors could not determine what the rationale was for the assessment load on the module, which would ensure a reliable measure of learners' progression and achievement. By 'reliable' we mean that assessments are consistent and thorough enough to allow learners to demonstrate how far they have progressed during the course of the programme and achieve the learning outcomes. Without understanding the rationale for the assessment on this module, the visitors could not determine how the assessment load would ensure a thorough enough assessment. As this is a shared module, we now require further evidence on this for these programmes. Therefore, the visitors require further information about the rationale for the assessment load for the 'Assessing and addressing complexity' module, which demonstrates that the assessment will provide a reliable measure of learners' progression and achievement.

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

**Condition:** The education provider must revise their documentation to ensure it clearly specifies the requirements for progression and achievement for the BSc (Hons) Physiotherapy programme.

**Reason:** On page 7 of the course handbook for the BSc (Hons) Physiotherapy programme, the visitors read that if a learner fails their placement, they would be exempted from 're registration', meaning they cannot progress further on the programme. However, the programme team confirmed at the visit that new arrangements are in place that will allow learners to be able to re-register for the placement, to continue on the programme if they fail the placement the first time. From the information provided on the schedule for the programme, the visitors were not clear how a learner would have sufficient time to re-take the full eight week placement. As information regarding the new arrangements was not available to view, nor was this reflected in the documentation provided, the visitors were unable to determine how learners will be aware of the requirements for progression on this programme. Therefore, the visitors require further evidence that the programme documentation clearly reflects the requirements for progression and achievement within the programmes and how this will be communicated to learners. In this way, the visitors can make determinations about whether the programme meets this standard.

#### **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.

## **2.2 The selection and entry criteria must include appropriate academic and professional entry standards.**

**Recommendation:** The visitors recommend the education provider should consider monitoring and auditing the progression of learners with lower academic level intake for both programmes.

**Reason:** The visitors noted that the admissions criteria for both programmes is 112 UCAS points with a minimum 3 GCSE passes. Though the visitors were satisfied that this entry criteria was met at threshold level, the visitors note this is quite low as compared to general entry requirements for similar programmes elsewhere in the UK. The visitors recommend if progression of learners with lower academic levels could be monitored and audited on a regular basis by the education provider to note any learners with lower academic entry levels do not struggle progressing through the programme and if required might reconsider the minimum entry criteria required to join these 2 programmes.

## **3.17 There must be an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.**

**Recommendation:** For this standard, the visitors recommend the education provider considers clearly labelling the 'student behaviour' document for the BSc (Hons) Physiotherapy programme so that learners will know how to find the appropriate information.

**Reason:** The visitors noted that the student behaviour document for the BSc (Hons) Physiotherapy programme is labelled as 'appendix 5 in the student handbook'. The visitors felt that this is a very important piece of information which addresses this standard, however as it does not have a clear label, the visitors found the learners may have difficulty finding the document if they require the information contained within it. Therefore, the visitors recommend the education provider consider labelling the document with a relevant title for the student behaviour.

## Section 5: Outcome from second review

### **Second response to conditions required**

The education provider responded to the conditions set out in section 4. Following their consideration of this response, the visitors were satisfied that the conditions for several of the standards were met. However, they were not satisfied that the following conditions were met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following conditions are met, they require further evidence.

### **3.3 The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.**

**Condition:** The education provider must demonstrate how the process for identifying and appointing an appropriately qualified and experienced person to hold overall professional responsibility for the programme is appropriate.

**Reason condition not met at this time:** From reviewing the evidence provided as response to the condition for this standard, the visitors are satisfied regarding the process in place to appoint a suitable person who will hold overall professional responsibility for the programme. However, from viewing the appendix 5 document consisting of curriculum vitae submitted for the BSc Occupational therapy staff, the visitors noted Theresa Baxter and Nick Pollard are both noted as Professional Lead. At the visit, the visitors were told Shirley Masterton was the new programme lead, but she is noted as a senior lecturer in the evidence submitted. Additionally, the visitors noted in the 'PL & CL roles' document reference to the roles and responsibilities of the professional lead and course leader. However, the visitors could not distinguish which of the two job titles is responsible for the programme leader role. Therefore, the education provider must provide clarity regarding whether the professional lead or the course leader is the correct terminology used for the programme leader for this programme.

**Suggested documentation:** Updated curriculum vitae reflecting the relevant job titles of staff holding professional responsibility for the BSc Occupational Therapy programme. Additionally, the education provider must demonstrate the difference between a professional lead and a course leader, and which title is used for the programme leader for the BSc Occupational Therapy programme.

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

**Condition:** The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff in place to deliver the BSc (Hons) Physiotherapy programme.

**Reason condition not met at this time:** In response to this condition, the education provider submitted an updated list of staff curricula vitae (CV) and information highlighting staff roles and working hours. The visitors could not find any information regarding what plans are in place to manage and support a proposed maximum of 140 learners per cohort annually. From reviewing the evidence, the visitors were not clear as to what the staffing levels and their respective time equivalents are for the Bsc (Hons) Physiotherapy programme only, which needs to be distinguished from their commitment to other programmes being taught in the education provider. Due to this, the visitors were not clear how this justifies what was noted at the visit that student staff ratio will be twenty two to one. As per the requirement for this standard, the education provider must be able to demonstrate what arrangements are in place to review the number of staff involved in the programme and to deal with situations such as staff absences. Additionally, the education provider has not submitted relevant evidence regarding the recruitment plans of the two vacant posts mentioned in the staffing list provided. The visitors also noted some inaccuracies about the CVs provided in the submission document contradicting with the staffing list provided. Kim Palmer's name is mentioned in the staffing list but no CV provided, whilst Jessica Brinkley's CV has been provided but is not mentioned on the staffing list. Therefore, the education provider must provide accurate up to date CVs and demonstrate how they will ensure there is

adequate number of staff for the BSc (Hons) Physiotherapy programme, and what plans are in place to manage a maximum cohort of 140 learners.

**Suggested documentation:** Information demonstrating the plan in place to review staff numbers for the BSc (Hons) Physiotherapy programme, to be able to manage 140 learners per cohort. Evidence demonstrating staffing levels and their time equivalents for the Bsc (Hons) Physiotherapy programme only, and the recruitment plans for the vacant posts. In addition to providing Kim Palmer's CV, the education provider must also provide accurate and up to date CVs of staff who will be involved in teaching the BSc (Hons) Physiotherapy programme.

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

**Condition:** The education provider must revise their documentation to ensure it clearly specifies the requirements for progression and achievement for the BSc (Hons) Physiotherapy programme.

**Reason condition not met at this time:** As per the updated statement provided on page seven of the student handbook under appendix 4, the education provider has now made it clear that the BSc (Hons) Physiotherapy programme is exempt from compensation modules; meaning all learners must pass all modules to progress through the programme. However, the visitors noted it was previously stated at the visit, that a resit could be taken for this programme. As per the requirement for this standard, the education provider must make sure that learners understand what is expected of them at each stage of the programme to be able to progress and what might prevent them from progressing. Therefore, the education provider must demonstrate how will they have this information communicated to both learners and educators, and have this information available on all relevant documents, such as programme specification.

**Suggested documentation:** The education provider must demonstrate how progression policies are clearly communicated to both learners and educators. Information regarding progression should be clearly mentioned across all relevant course documentation.

### **Section 6: Visitors' recommendation**

Considering the education provider's response to the conditions set out in section 4 and 5, the visitors are satisfied that the conditions are met and recommend that the programmes are approved.

This report, including the recommendation of the visitors, will be considered at the 04 July 2019 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#)