
Education and Training Committee

Risk assessment: Pausing annual monitoring in 2020-21 academic year

Introduction

This paper set out a risk assessment of the proposal to pause the annual monitoring process for the 2020-21 academic year. The Committee is asked to consider this risk assessment to inform any decisions it makes regarding this matter.

Background

The HCPC is changing its approach to the quality assurance of education programmes. This follows a significant investment working alongside stakeholders since 2019 to develop our thinking in this area. A proposal to commence a pilot based on a new quality assurance model was considered and approved by the Committee in June 2020¹.

As part of these proposals, the Committee was asked to consider the merits of pausing the annual monitoring process in 2020-21. At that time the Committee agreed that a risk assessment should be documented for them to consider further to inform any decisions.

Proposal

To deliver the pilots successfully we must ensure the necessary resource internally, and that our education stakeholders are properly positioned to engage with and buy into the new quality assurance model. We propose the following course of action to achieve these objectives:

The annual monitoring audit process is paused for all education providers in the 2020-21 academic year. Instead, all education providers will be required to submit an annual monitoring declaration.

Benefits

We consider pausing annual monitoring audits is a suitable proposal to support our objectives for this work, as it:

- enables dedicated resources within the Education Department to be focused on the pilot delivery without the need to increase the budget envelope;
- sets out a clear position for education providers around the HCPC's intent to shift focus towards the new quality assurance approach;
- recognises the perception education providers have regarding the limitations and shortfalls of the current audit process;
- recognises the pressure within the education sector post C-19 and with this, the limited capacity it has to engage with existing and new approaches to monitoring simultaneously; and,

¹ <https://www.hcpc-uk.org/globalassets/meetings-attachments3/education-and-training-committee/2020/4.-11.06.2020/enc-02---education-quality-assurance-model-and-pilot-proposals.pdf>

- maintains proportionate engagement with education providers in the interim through other existing quality assurance mechanisms.

Risks

We have identified and assessed 3 key risks regarding this proposal:

1. Programmes which no longer meet HCPC standards are not identified
2. Education providers fail to engage with the HCPC regarding significant changes
3. HCPC is criticised for pausing a regulatory process.

Our overall assessment is that one or more of these risks materialising would cause significant negative reputational impact (broadly in relation to strategic risks 1 & 3²). However, when factoring in the current operating environment and sector specific challenges, alongside our trends analysis of past audit outcomes and further mitigating actions we would normally have in place, there is a very low likelihood that any issues would actualise in relation to these risks.

1. Programmes which no longer meet HCPC standards are not identified

There is a risk we do not identify and engage with programmes which are falling below the threshold required to meet our education standards. Whilst the impact should this occur be significant, the outcomes achieved through annual monitoring historically suggest its likelihood to be very low.

Trend in outcomes achieved through AM audits since 2014-15

Academic year	Number of programmes	% of all programmes in process
2014-15	4	1.0%
2015-16	1	0.3%
2016-17	3	0.6%
2017-18	0	0.0%
2018-19	2	0.4%

The table above illustrates that we can expect less than 1 per cent of programmes to be referred to the approval process in any given audit cycle. To date, no programmes referred to the approval process have had their approval subsequently withdrawn. This suggests pausing the audit process would have minimal overall impact on the quality assurance we would normally apply within the sector specifically as it relates to programmes not meeting standards. This possible impact is also further mitigated through the operation of all other quality assurance processes during the pilot, including annual monitoring declarations. Furthermore, as the pause is for one academic cycle only, this further mitigates the risk by time limiting any impacts.

2. Education providers fail to engage with the HCPC regarding significant changes

There is a risk that education providers no longer notify us of significant changes and issues which impact on the way they meet our standards. This may occur if education providers perceive the HCPC to be reducing its quality assurance of programmes as a result of the pause of audits and decide to deprioritise regulatory engagement going forward.

² Strategic risk 1. Failure to deliver effective regulatory functions, Strategic risk 3. Failure to be a trusted regulator and meet stakeholder expectations (HCPC Strategic Risks – May 2020)

In considering this risk further we note the wider context that will exist during the pilot period, in that all education providers will still be required to:

- Submit an annual declaration – this provides the opportunity for accountable individuals for each approved programme to confirm it continues to meet our education standards. Where this isn't the case, they are required to notify us immediately to enable further discussion around any programme issues.
- Submit major changes – providers will still be required to flag retrospective and prospective changes which impact significantly on the education standards.
- Engage with concerns raised about programmes – we will still operate our concerns process and will require all providers to engage with this as necessary.
- Engage with approval processes triggered by concerns and significant change – we will still undertake approval visits where necessary out of the above processes to determine on-going programme approval.

This risk of low or no engagement is also further mitigated through the implementation of the pilot itself. Through the preparation and implementation phases of this work we will regularly engage with providers to increase their understanding, influence and buy-in for the new quality assurance direction.

Whilst the impact of non-engagement is high, with these normal operating procedures and further mitigations in place, we assess the likelihood of this occurring to be very low.

3. HCPC is criticised for pausing a regulatory process

There is a risk that a decision to pause annual monitoring audits draws criticism to us from within the education and regulatory sectors. Whilst the impact would be high, we assess the likelihood of this occurring to be low. We reach this conclusions based on the following points.

- Wide stakeholder support is already in place for our work to date to review our existing quality assurance approach and our plans to make a fundamental change to the way this operates.
- Stakeholder feedback has criticised the annual monitoring audit process itself, particularly regarding the administrative burden it creates for providers.
- The education and regulatory sectors are working to manage key challenges following the peak of Covid-19, indicating a temporary pause in the way programmes are monitored during this time will be well received.
- We will continue our engagement directly with the PSA around our new model through annual performance reviews. Our work to date, including this risk assessment will be used as evidence of the decisions we have made as we look to implement the new QA model.

Alternatives

Different options to deliver the objectives underpinning the preferred option include:

- Backfill of relevant department resources

This is the backup option should the risks regarding the above proposal be unacceptable. This option would be subject to further internal discussion with the Executive Team and would likely result an increase (circa 80k) in overall payroll allocation for the department budget. However, there is a risk that sector engagement is not as effective as a result of operating the existing audit process (for the reasons articulated earlier).

- Do nothing

This option would mean we delay the delivery of the new QA model until the following financial year due to unavailble resource. This would enable forward planning around resources to be made. HOwever, it would mean we are more likely to receive criticism for any delays in implementing the new QA model from education and regulatory stakeholders.

Decision

The Committee is asked to consider the risk assessment to inform its discussions and decision regarding the proposal to pause annual monitoring audits in the next academic year.

15 June 2020