
Education and Training Committee – 20 August 2020

Non-approval recommendation – University of Chichester – BSc (Hons) Physiotherapy, Full time & MSc Physiotherapy (Pre-registration), Full time

Executive summary and recommendations

The report in appendix 1 sets out a visitors' recommendation to not approve the programmes listed in the report.

These programmes were visited on 22 April 2020. They were visited because they were new programmes. Conditions were placed on the approval of the programmes, which are documented in section 4 of the visitors' report in appendix 1. The visitors' report was agreed by the Committee at its meeting of 01 July 2020. At that meeting, the Committee agree that all conditions must be met in order for the programme to be approved. The decision notice from this meeting can be found as appendix 2.

The education provider was provided with two attempts to meet the conditions placed on the approval of the programmes.

After reviewing the additional evidence provided by the education provider through both conditions responses, the visitors consider that four of the conditions are not met by the programmes. At this stage of the process, the visitors are only able to recommend that the programmes were approved or not approved. As they are not satisfied that a number of conditions are met, they have chosen the second of these two options.

The conditions that the visitors consider are not met are noted through section 6 of the report provided as appendix 1, along with reasoning as to why these conditions are not met.

The education provider has provided observations on this report, including the visitors' recommendation, which are included as Appendix 3.

If the Committee is minded to not approve the programme, the education provider will have a 28 day period to provide observations on this decision, which will then be taken to a future Committee meeting alongside the visitors' report. At that future meeting, the Committee will be asked to make a decision about whether to not approve the programme.

Decision

The Committee is asked to determine whether proceedings for the consideration of non-approval of the programme should be commenced in accordance with Article 18(4) of the Health and Social Work Professions Order 2001.

The Committee may decide to:

- approve the programmes;
- commence non-approval proceedings; or

- direct the executive to undertake any other course of action it deems necessary to inform its decision regarding the approval of the programmes.

In reaching this decision, the Executive asks that the Committee:

- provides reasons for their decision; and
- provides the Executive with any necessary instructions to give effect to the decision.

Background information

- None

Resource implications

- None

Financial implications

- None

Appendices

- Appendix 1 - Visitors' report for the process
- [Appendix 2 – ETP/C decision notice \(1 July 2020\)](#)
- Appendix 3 – Observations provided by the University of Chichester

Date of paper

17 August 2020

HCPC approval process report

Education provider	University of Chichester
Name of programme(s)	MSc Physiotherapy (Pre-registration), Full time BSc (Hons) Physiotherapy, Full time
Approval visit date	22 April 2020
Case reference	CAS-15794-G4F8W8

Contents

Section 1: Our regulatory approach.....	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	3
Section 4: Outcome from first review.....	4
Section 5: Outcome from second review.....	22
Section 6: Visitors' recommendation.....	27

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:

Carol Rowe	Physiotherapist
Joanna Jackson	Physiotherapist
Patrick Armsby	HCPC executive

Other groups involved in the approval visit

There were other groups in attendance at the approval visit as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

Dave Cooper	Independent chair (supplied by the education provider)	University of Chichester
Robert Herniman	Secretary (supplied by the education provider)	University of Chichester
Nina Paterson	Chartered Society of Physiotherapists (CSP) Panel Member	CSP – Professional Body for Physiotherapists
Alison Chambers	Chartered Society of Physiotherapists (CSP) Panel Member	CSP – Professional Body for Physiotherapists

Section 2: Programme details

Programme name	MSc Physiotherapy (Pre-registration)
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed First intake	01 September 2020
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02191

Programme name	BSc (Hons) Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
Proposed First intake	01 September 2020
Maximum learner cohort	Up to 30
Intakes per year	1
Assessment reference	APP02192

We undertook this assessment of two new programmes proposed by the education provider via the approval process. This involves consideration of documentary evidence and an onsite approval visit, to consider whether the programmes meet our standards for the first time.

Section 3: Requirements to commence assessment

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

Type of evidence	Submitted	Comments
Completed education standards mapping document	Yes	
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes	
Descriptions of how the programme delivers and assesses learning	Yes	
Proficiency standards mapping	Yes	
Information provided to applicants and learners	Yes	
Information for those involved with practice-based learning	Yes	
Information that shows how staff resources are sufficient for the delivery of the programme	Yes	

Internal quality monitoring documentation	Not Required	Only requested if the programme (or a previous version) is currently running
---	--------------	--

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

Group	Met	Comments
Learners	No	As these are new programmes the visitors would not be able to meet physiotherapy learners. As many of their issues were very specific to the Physiotherapy programme it was not deemed necessary to meet learners from a different programme.
Service users and carers (and / or their representatives)	No	In the documentary submission the education provider stated that they were currently developing their network of service users and carers. They also gave examples of their involvement in other programmes. The visitors noted in their review that this group has not been involved in the Physiotherapy programme. As many of their issues were very specific to the Physiotherapy programme it was not deemed necessary to meet service users and carers from a different programme.
Facilities and resources	No	As the panel were not visiting on site they were unable to view the facilities and resources in person but had conversations about the availability and capacity of them in the meetings with other groups.
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

Section 4: Outcome from first review

Recommendation of the visitors

In considering the evidence provided by the education provider as part of the initial submission and at the 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 25 June 2020.

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

Condition: The education provider must ensure there is accurate information available for learners to allow them to make an informed choice about whether to take up a place on the programmes.

Reason: Prior to the visit the visitors were able to view the information available to learners on the programme website. Within this the visitors were able to note some inaccuracies when referring to the HCPC. The education provider acknowledged this at the visit and stated they would ensure that the information would highlight that completion of an approved programme allows one to apply for registration with the HCPC. Furthermore, the information provided stated that applicants must have gained work experience in physiotherapy as an entry requirement. The visitors considered the difficulty of securing this experience for many applicants and discussed this with the programme team. The programme team stated that this was not a requirement but would be beneficial for applicants. They stated that their focus was on applicants demonstrating an understanding of the breadth of physiotherapy rather than specifically having work experience. The visitors considered that the information on the website did not state this and could dissuade potential applicant from applying. The education provider must ensure that information available for applicants is accurate of HCPC language and entry requirements for learners.

2.5 The admissions process must ensure that applicants are aware of and comply with any health requirements.

Condition: The education provider must clarify the occupational health screening process and the vaccinations required to ensure learners are fully aware of the health requirements for participating in the programme.

Reason: To evidence this standard the education provider highlighted that applicants will undertake an occupational health assessment at the interview stage which is carried out by an independent supplier. The visitors were also able to see that applicants will be required to pay for vaccinations prior to placements from the information available on the education providers' website. The visitors noted that this information did not detail the vaccinations that would be required or the time that would be required for a course of them to be completed. Furthermore, it was not made clear how the education provider would ensure these vaccinations are followed up with learners to ensure they are able to take part in practice-based learning. The education provider must clarify the requirements for learners and show the information they will provide to learners around these requirements so learners are aware of and comply with any health requirements.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that the programme is sustainable by ensuring learners have access to safe and effective practice-based learning that meets their learning needs.

Reason: To evidence this standard in the documentary submission the education provider highlighted the internal processes that underpin new programmes being

introduced. They also highlighted the Institute of Sports' plans for development of new programmes. This allowed visitors to understand how the programme had developed internally and the relative support for the programme. However, the visitors noted the education provider did not discuss external support in the development of the programme. At the visit the visitors explored the progress of agreements with external partners and their involvement in the programme. The practice educators stated that had been in contact with the education provider and had conversations about parts of the curriculum. They stated that they had not have an overall view of the entire programme curriculum so couldn't comment on its suitability overall. They also stated that the capacity and range of practice based learning had not been finalised. This was confirmed in the programme team meeting. The programme team also added that a practice facilitator would be recruited to ensure this is carried out.

Currently, the programme has not finalised:

- availability and capacity of practice-based learning for all learners
- the range of practice-based learning, the role of practice educators,
- the practice assessment document and
- the audit of practice-based learning.

These issues are brought out in further detail in conditions set for SETS 3.6, 5.1, 5.2, 5.3, 5.4, 5.5, 5.6, 5.7, 6.1, 6.3, 6.4 and 6.5. As practice-based learning is an integral part of the programme this is currently a major risk to the sustainability of the programme. The education provider must finalise their approach to practice-based learning in this area and ensure that it is safe, effective and allows learners to meet the SOPs.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that the programme is fit for purpose by ensuring that the programme meets the needs of learners who will be entering the profession.

Reason: The visitors considered in their review of documentation that the programme had a lack of a physiotherapy influence as such they had concerns about the programme being fit for purpose. Firstly, in discussions around the influence of the programme it was confirmed by the programme team that many of the modules in the programmes are already being taught as part of sports and exercise programmes. At the visit it was confirmed there would be smaller group teaching to contextualise these modules for physiotherapy learners. This was not representative of the documentation and did not confirm the time that would be dedicated to this teaching. As such, the visitors could not currently see how an appropriate amount of time would be available to cover all the necessary physiotherapy teaching, to ensure learners can meet the standards of proficiency and be ready to practice as autonomous professionals.

Further to this the visitors noted that in the BSc programme that learners would take part in a Nutrition based module and only one cardio-respiratory module during the programme. While the visitors could see that the nutrition may be beneficial for the learner experience, it was not wholly relevant to the profession and was potentially at the detriment of key physiotherapy areas such as cardio-respiratory. The programmes also had a large amount of sport and exercise modules that did not display how they would be contextualised for physiotherapy learners. The visitors could not see from this information that learners would have the appropriate breadth and range of learning for

the needs of a physiotherapist. This area of concern also has led to concerns about the mapping of learning outcomes to the SOPs, mainly profession specific, and the mapping of the Chartered Society of Physiotherapy (CSP) framework for physiotherapy practice. Further information and specifics on these concerns can be seen in the conditions set around SETs 4.1, 4.3 and 4.4. The education provider must show that will contextualise the non-physiotherapy modules and ensure that the programme delivers the learning objectives effectively.

3.2 The programme must be effectively managed.

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.

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

Condition: The education provider must clarify their own process for ensuring that the person holding overall professional responsibility has the appropriate profession specific knowledge base to lead the programme.

Reason: To evidence these standards in the documentary submission prior to the visit. The education provider highlighted the institution's levels of management and provided an overview of role profiles for members of staff within the programme structure. The visitors considered the management structure to be appropriate. The education provider stated that the person holding overall professional responsibility, the programme coordinator, would need to meet criteria for senior lecturer as a minimum. The visitors considered the criteria set out in the job profile for a senior lecturer to be sufficient for ensuring the person leading the programme would be suitable. However, when they observed the current programme coordinator's curriculum vitae (CV) they could not understand how the job profile had been met in the area of expertise.

Within the job profile the person is required to 'possess breadth and depth of specialist knowledge in the discipline to develop the curriculum, establish teaching programmes and the provision of learning support'. The programme coordinator's CV showed they were HCPC registered and were able to see sufficient teaching qualifications and experience but related very specifically to lower limb musculoskeletal (MSK) area of physiotherapy. The visitors also noted that the university level teaching experience was part of sports related programmes teaching sports injury modules and MSK modules. The visitors could not see how this constituted a breadth and depth of the discipline of physiotherapy. Therefore the visitors could not determine that the education provider had followed their own criteria for a senior lecturer in physiotherapy.

They also stated that the programme coordinator has gone through undergraduate and postgraduate learning as well as leading on a programme within the institute of sport to make them appropriate for the role. It was not clear to the visitors that the education provider has ensured that has followed its own role profile for a senior lecturer in physiotherapy as they could not determine the current programme coordinator 'possess breadth and depth of specialist knowledge to develop the curriculum, establish teaching programmes and the provision of learning support'. This standard is designed so that visitors do not comment on an individual but how the education provide ensures an

appropriate person is in place. It is not clear to the visitors that they are currently following their own process or how they are amending it in the case of this programme. The education provider must show how they have ensured the person holding overall professional responsibility is appropriately experienced to hold overall professional responsibility for the programme. They must also show how they will support this person should they consider there to be any gaps in their relevant experience.

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

Condition: The education provider must demonstrate that there is regular and effective collaboration with practice education providers.

Reason: In the documentary submission prior to the visit the education provider highlighted a section in the placement handbook which discussed a practice-education steering group that would be formed and operating in the 2020-21 academic year. It was not stated how often this groups would meet and it was stated they would expect current clinical educators to attend. The visitors noted the plans for this group are at a very early stage and the visitors could not see how the practice partners needs would be being considered. The education provider also provided a log of external meetings and communications. The log of communications provided the visitors with an overview of how the education provider had contacted outside partners and a brief overview of their discussions. It contained members of potential practice partners and other physiotherapy education providers. The visitors noted the education provider had had discussions around practice-based learning but could not see that any decisions or plans had been finalised or how they had contributed to the programme.

The practice educators noted that the external partners present had not had oversight of the programme as a whole but had been asked for their input for parts of it. Additionally, in the programme team meeting the visitors were told that there had been discussions with other higher education institutes and practice education providers within the region. The visitors had seen these conversations logged in the documentary submission but could not see the detail of what they entailed. The visitors could not see the detail of the communications and meetings the education provider had already carried out so could not judge how effective the collaboration so far had been. The education provider must show how there will be regular and effective collaboration with practice education providers to ensure the ongoing and quality and effectiveness of the programmes. They must show that the practice education providers are involved in decision making around the plans for collaboration in the future.

3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Condition: The education provider must ensure that there is an effective process to ensure that all learners have access to practice-based learning which meets their learning needs.

Reason: To evidence this standard prior to the visit the education provider highlighted that they had established a health steering group and the deputy vice chancellor was leading on the development of memoranda of understanding (MOUs) with local employers and establishing a network of practice-based learning organisations. The

visitors were provided with a MOUs, letters from two external partners and a log of external meetings and communications.

The documentary submission:

The MOUs provided did not detail the capacity of practice-based learning that was available or that would be required from the education provider. The visitors could see these documents would 'foster opportunities' for the provision of practice-based learning but did not highlight specifics around capacity or logistics of practice-based learning. The visitors noted the MOUs did not guarantee any practice-based learning but indicated an understanding between the education provider and partners about discussing the possibility of them. The letters provided from external partners demonstrated that the education provider had sought feedback around the programme but did not demonstrate how they would ensure the availability and capacity of practice-based learning. The log of communications provided the visitors with an overview of how the education provider had contacted outside partners and an overview of their discussions. The visitors noted the education provider had had discussion around practice-based learning but could not see that any decisions or plans had been finalised. The visitors considered that the evidence provided by the education provider showed they had been in contact with relevant external partners but the information did not show they had finalised arrangements to ensure that all learners on the programmes will have access to practice-based learning that will meet their learning needs.

The visit:

At the visit the visitors enquired about the progress being made with ensuring the capacity and availability of practice-based learning. The programme team highlighted the MOUs that were provided initially and indicated that they would be recruiting a placement facilitator to finalise agreements. The education provider also indicated they were working to include role emerging practice opportunities. However, they had not finalised how many of these there would be or their nature. The visitors considered that the education provider has not confirmed the capacity and availability of practice-based learning for the number of learners entering onto the programme. Furthermore, they stated in the programme team meeting that they had not finalised the structure of practice-based learning to ensure that learners all have opportunity to carry out an appropriate range of practice-based learning. The education provider must show how they will ensure that all learners who enter onto the programmes will have access to practice-based learning that will meet their learning needs.

3.7 Service users and carers must be involved in the programme.

Condition: The education provider must demonstrate how they will ensure meaningful involvement of service users and carers in the programme.

Reason: To evidence this standard in the documentary submission the education provider indicated they are networking to generate service users and carer involvement similar to that of other allied health professions at the education provider. They highlighted the student handbook and example of service user and carer involvement in the social work programme offered at the education provider, but the handbook did not discuss how service users and carers would be involved in the programme. The visitors could see relevant involvement in the social work programme but not if or how this would be adapted for physiotherapy purposes. In the programme team meeting the visitors were told that there had been the intention to involve service user focus groups

but this will not be happening. The programme team highlighted service user and carer involvement is currently a work in progress. They also stated that they are considering using an online resource that provides examples of patients giving an overview of their experiences. The education provider did not detail how these experiences would be relevant for physiotherapy or where they would be taught and so the visitors could not judge how relevant they would be to the learners' experience. This standard is about how service users and carers contribute to the overall quality and effectiveness of a programme and the education provider has not shown that service users and carers are currently involved in the programme. They must show how service users and carers will be involved in the programme to ensure they can contribute to the overall quality and effectiveness of the programme. The education provider must also show how they intend to monitor and evaluate this involvement to ensure it is continuously improving their 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 show that the placement facilitator will be in place to ensure the effective delivery of the programme.

Reason: To evidence this standard the education provider highlighted their staffing resource plan for the next academic year. In conversations around practice-based learning the programme team stated that they would be appointing a placement facilitator. This placement facilitator would be required for duties such as finalising the practice audit form and formalising agreements with practice education providers. The visitors considered these duties to be essential for the successful running of the programme but could not see this member of staff had been mentioned in the documentary submission. The programme stated this person had not been appointed yet and did not state when this would occur. As the placement facilitator will have an important role in ensuring the programme is delivered effectively the visitors considered this standard to currently not be met. The education provider must show how and when they will ensure this member of staff is in place. Furthermore, they must show the duties of this member of staff to ensure that management of practice-based learning is being carried out effectively.

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

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

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

Condition: The education provider must show how they will ensure there are an adequate number of appropriately qualified and experience staff to deliver the parts of the programme that require specialist knowledge and expertise.

Reason: To evidence this standard the education provider highlighted their staffing resource plan for the next academic year. They also highlighted the staff curriculum vitae (CVs), role profiles of members of staff and staff development plan. The visitors noted from documentation there were currently two physiotherapy specific members of

staff both with a Musculoskeletal (MSK) background. As such, for the 2020/2021 year, the education provider indicated they were looking to bring in two extra Lecturer/Practitioners that would be specialists in cardio-respiratory (Cardio) and Neurological (Neuro), alongside other non-physiotherapy specific teaching staff. Both of these members of staff would be 0.2 full time equivalent (FTE). The documentation indicated that these new members of staff would be leading modules on both the MSc and BSc. In discussions with the programme team around how the programme would be taught, they indicated that lectures and some teaching would be delivered by non-physiotherapy teaching staff alongside other programmes from the institute of sports and exercise. The programme team then explained that this teaching would be contextualised for physiotherapy learners in seminars, tutorials and practical sessions by physiotherapy staff. However, the breakdown of hours and time required of the 2.4 FTE physiotherapy members of staff was not provided. The education provider has not detailed who will deliver the hours of contact for each module so the visitors were unable to see how the current staffing plans would ensure that there are an appropriate number of physiotherapy staff to deliver this teaching. Furthermore, as the Cardio and Neuro members of staff are 0.2 FTE, the education provider did not detail how they would ensure that all teaching that requires their specialist knowledge and expertise would be delivered within the time they are available. The education provider must show their physiotherapy specific staff will be sufficient for the required teaching time. Furthermore, they must show how their relative specialities and expertise will be utilised to deliver this teaching effectively.

3.11 An effective programme must be in place to ensure the continuing professional and academic development of educators, appropriate to their role in the programme.

Condition: The education provider must demonstrate that educators will be guaranteed the time to complete professional and academic development as it is required.

Reason: To evidence this standard the education provider highlighted their institution wide approach for staff development. This highlighted how they supported and funded relevant areas for professional and academic development of staff. However, this information did not detail how the education provider ensures this can be carried out alongside the effective delivery of the programmes. During the programme team meeting the education provider indicated that they had not finalised the teaching time that would be required of the physiotherapy members of staff. As such the visitors could not determine there would be sufficient time for members of staff to carry out personal development alongside their responsibilities for delivering the programmes. The education provider must show how they will ensure that the physiotherapy teaching staff for the programmes will have sufficient time for appropriate development should it be required.

3.12 The resources to support learning in all settings must be effective and appropriate to the delivery of the programme, and must be accessible to all learners and educators.

Condition: The education provider must demonstrate that learners will have access to resources that meet their learning needs.

Reason: To evidence this standard in the documentary submission education provider highlighted the student commitment charter, the library services website and information

about the Tudor Hale Centre for Sport facilities. The visitors could see that the institute has a multitude of facilities available for various programmes of study. However, the education provider was not clear how the physiotherapy programme would use these facilities to support learning. The senior team stated that they were able to develop the physiotherapy programme within the bounds of the institute of sport that many of the teaching resources would be drawn from. However, the visitors were not able to see how these resources would be used to support the teaching and learning needs of the programme. While the visitors could understand that the education provider would likely already have many of the resources required, they could not see that some physiotherapy specific equipment (such as that used in electro therapy, for example) would be present. As such they could not confirm that the resources would meet the learning needs of the programmes. The education provider must clarify all the equipment and resources that will be used specifically for the physiotherapy programmes. They must also show if this equipment is shared and how this will be timetabled effectively to ensure physiotherapy learners have appropriate access, to ensure effective support of their learning.

4.1 The learning outcomes must ensure that learners meet the standards of proficiency for the relevant part of the Register.

Condition: The education provider must demonstrate how the learning outcomes ensure that those who successfully complete the programme meet the following standards of proficiency (SOPs) for physiotherapists:

- 1.1: Know the limits of their practice and when to seek advice or refer to another professional
- 4.5: Be able to make and receive appropriate referrals
- 13.6: Understand the following aspects of biological science:
 - normal human anatomy and physiology, including the dynamic relationships of human structure and function as related to the neuromuscular, musculoskeletal, cardio-vascular and respiratory systems
 - patterns of human growth and development across the lifespan
 - factors influencing individual variations in human ability and health status
 - how the application of physiotherapy can cause physiological and structural change
- 13.7: Understand the following aspects of physical science:
 - the principles and theories from physics, biomechanics, applied exercise science and ergonomics that can be applied to physiotherapy
 - the means by which the physical sciences can inform the understanding and analysis of movement and function
 - the principles and application of measurement techniques based on biomechanics or electrophysiology
 - the application of anthropometric and ergonomic principles
- 13.8: Understand the following aspects of clinical science:
 - pathological changes and related clinical features commonly encountered in physiotherapy practice
 - physiological, structural, behavioural and functional changes that can result from physiotherapy intervention and disease progression
 - the specific contribution that physiotherapy can potentially make to enhancing individuals' functional ability, together with the evidence base for this
 - the different concepts and approaches that inform the development of physiotherapy intervention
- 13.9: Understand the following aspects of behavioural science:

- psychological, social and cultural factors that influence an individual in health and illness, including their responses to the management of their health status and related physiotherapy interventions
- how psychology, sociology and cultural diversity inform an understanding of health, illness and health care in the context of physiotherapy and the incorporation of this knowledge into physiotherapy practice
- theories of communication relevant to effective interaction with service users, carers, colleagues, managers and other health and social care professionals
- theories of team working
- 14: Be able to draw on appropriate knowledge and skills to inform practice (This includes all of the standards in this area)
- 15.2: know and be able to apply appropriate moving and handling techniques
- 15.3: be aware of applicable health and safety legislation, and any relevant safety policies and procedures in force at the workplace, such as incident reporting, and be able to act in accordance with these
- 15.4: be able to work safely, including being able to select appropriate hazard control and risk management, reduction or elimination techniques in a safe manner and in accordance with health and safety legislation
- 15.5: be able to select appropriate personal protective equipment and use it correctly
- 15.6: be able to establish safe environments for practice, which minimise risks to service users, those treating them and others, including the use of hazard control and particularly infection control

Reason: To evidence this standard the education provider submitted a standards of proficiency (SOPs) mapping documents for each programme. The visitors could see the education provider had mapped the SOPs to learning outcomes (LOs) and some to the handbooks. In reviewing the mapping the visitors could not determine how the indicative content of the modules would allow the learning objectives and SOPs to be met. The visitors considered the following generic SOPs to not be met:

- **SOP 1.1: Know the limits of their practice and when to seek advice or refer to another professional.**

BSc: This SOP is mapped to 5 LOs from 5 different modules. Each learning objective requires the learner to describe and acknowledge rather than explicitly demonstrate the competency. The mapping to the handbook does not show learning outcome that will highlight this SOP is met.

MSc: This SOP is mapped to 5 LOs from 5 different modules. Each learning objective requires the learner to describe and value rather than explicitly demonstrate the competency. The mapping to the handbook does not show learning outcome that will highlight this SOP is met.

- **SOP 4.5: Be able to make and receive appropriate referrals.**

BSc: This SOP is mapped to 6 LOs from 5 different modules. These LOs require the student to describe, discuss, acknowledge, show awareness, evaluate – they do not directly appear to provide evidence that the student will demonstrate SOP 4.5 and answer the question, “Can the student make and receive appropriate referrals?” In addition, the SOP is mapped to the placement and student handbook, neither of which can evidence that a specific area is delivered and then assessed.

MSc: This SOP is mapped to 2 LOs from 1 module. These LOs require the students to describe and discuss evaluate – they do not directly appear to provide evidence that the student will demonstrate SOP 4.5 and answer the question, “Can the student make and receive appropriate referrals?” In addition,

the SOP is mapped to the placement and student handbook, neither of which can evidence that a specific area is delivered and then assessed.

At the visit, the visitors enquired further about the physiotherapy related nature of the curriculum as a whole. The programme team stated that the overall theme of the programme was exercise and health and the visitors considered that the curriculum was heavily influenced by sport and exercise rather than physiotherapy. This was further displayed as the programme team had indicated that many of the modules are co-taught with the institute of sports' other programmes. The programme team also indicated that the shared modules will be contextualised for physiotherapy learners in practicals and smaller group teaching. The module descriptors were not reflective of this. It is not clear that the learning outcomes and indicative content of the modules currently allow learners to meet the profession specific SOPs. The visitors considered the following profession specific SOPs to not be met:

- **SOPs 13.6, 13.7, 13.8 (both MSc & BSc)**
It is not possible to be reassured that students completing the programme would demonstrate achievement of these LOs as the curriculum does not reflect patient groups frequently encountered in physiotherapy practice, for example older people, mental health service users, and children. There is little time allotted for learning about the application of physiotherapy including a range of interventions. In addition, the SOP is mapped to the student handbook, which cannot evidence that a specific area is delivered and then assessed.
- **SOP 13.9 Understand the following aspects of behavioural science**
The education provider has mapped this SOP to various modules throughout the programme. The visitors noted learners would discuss behavioural science in the physiotherapy and society module. However, this was not clearly followed up and applied to other modules to show an understanding in practice. The visitors also noted there appears to be an absence of behavioural science within both the indicative content and learning objectives. As such they could not discern the programme was including learning around this SOP.
- **SOPs 14 (14.1. – 14.23)**
For both programmes all these SOPs are mapped to university-based modules. They were not mapped to any practice-based learning modules. Reassurance about achievement of these modules needs to be mapped to placement learning particularly in a programme where the content of modules is limited in relation to the breadth and scope of physiotherapy practice. Mapping to the student and/or placement handbook does not provide evidence of achievement of these SOPs.
- **SOPs 15.2, 15.3, 15.4 15.5, 15.6**
For both programmes all these SOPs are mapped to university-based modules. They were not mapped to any practice-based learning modules. Reassurance about achievement of these modules needs to be mapped to placement learning particularly in a programme where the content of modules is limited in relation to the breadth and scope of physiotherapy practice. Mapping to the student and/or placement handbook does not provide evidence of achievement of these SOPs.

The education provider must ensure that learners are able to meet the SOPs listed above to ensure that learners are able to meet the SOPs for physiotherapists.

4.3 The programme must reflect the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

4.4 The curriculum must remain relevant to current practice.

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

Condition: The education provider must demonstrate how the programme reflects the philosophy, core values, skills and knowledge base for current physiotherapy practice.

Reason: To evidence this standard the education provider indicated in their documentary submission that the programmes are closely matched to meet universal conventions, statements and standards on ethics, values and knowledge acquisition. They also stated that modules are designed to ensure that global ideas can be applied to organisational aims which local needs of service users. To evidence this the education provider highlighted the handbook and modules descriptors of each programme. The education provider also mapped the module titles to the Chartered Society of Physiotherapists (CSP) Physiotherapy Framework that describes the behaviours, underpinning values, knowledge and skills expected by the CSP for contemporary physiotherapy practice. The visitors were able to see some areas were being reflected in the curriculum, for example the structure and function of the human body. However, the visitors were unable to see how the curriculum was addressing some other areas articulated in the guidance. For instance the framework states that one must have an understanding of the scientific bases of physiotherapy including behavioural science. When reviewing the module descriptors the visitors were unable to see any mention of behavioural science or psychology being brought out in the teaching. The visitors also noted this when looking at standards of proficiency as noted in the condition around SET 4.1. Furthermore, the visitors were unable to see how certain person specific practical skills were being included in the curriculum such as electrophysical modalities, as this was not mentioned in the curriculum.

The visitors queried how the programme would reflect contemporary physiotherapy practice at the visit. The programme team stated that health and exercise was the theme running through the programme. The visitors, as an example, then questioned how this would ensure learners are prepared to apply their practice across the lifespan and the relative challenges that come with it. The programme team stated that this can be seen in the Fundamentals of Human Physiology module in which learners will be measuring movement. The visitors had noted in their review of this module that the learning outcomes were based around measuring human physical performance in relation to exercise intensity. The visitors considered this learning to be very specific to exercise physiotherapy and questioned how this movement would be contextualised for practice outside exercise or for different parts of the lifespan. The programme team stated that physiotherapy learners would be taught separately within the bounds of the module to ensure this is covered. They also stated that practical sessions will be tailored towards the needs of physiotherapy learners to ensure it is contextualised for them. The visitors were not shown the nature of these sessions or how long they would last within the documentation and so could not judge they would be effective to contextualise this learning for modern physiotherapy practice. Currently the visitors are unclear how the modular content of the programmes reflects guidance set out by the CSP that determines the underpinning values, knowledge and skills they expect for contemporary physiotherapy practice. The education provider has indicated there is teaching to ensure this but this is not currently reflected in the module descriptors. The education provider must show how the programmes are reflective of the CSP's

framework for Physiotherapy practice to show they are current with regard to the philosophy, core values, knowledge and skills of a contemporary physiotherapist.

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must show how they will ensure that the curriculum remains relevant to current practice for both programmes.

Reason: To evidence this standard prior to the visit the education provider stated that the initial physiotherapy teaching team are experienced professionals with ample experience of expert and specialised practice. They also stated that future appointments will be similarly experienced. They highlighted the programme handbooks, module descriptors and recruitment process to evidence this. The visitors were able to see the two current members of the physiotherapy teaching team were specialised in Musculoskeletal (MSK) and sports related application. They could not determine how this team would reflect and apply the breadth of current physiotherapy practice within the programme. At the visit the programme team stated that they intend to run a practice-education steering group that would be formed and operating in 2020-21. But this had not been finalised and the visitors were unaware of the mechanism for ensuring input from current clinical members of the profession. The education provider must show how the programme takes account of and reflects the range of current practice, so that it remains relevant and effective in preparing learners for practice.

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

Condition: The education provider must demonstrate how they will ensure that integration of theory and practice is central to the programme.

Reason: To evidence this standard in the documentary submission the education provider stated that all learning outcomes had been written to ensure that theory can be tested in the classroom and applied in practice. They also stated that they were developing their practice based learning to ensure that links to theory would be equally rigorous. The visitors noted in the documentation that many of the modules did not include aspects of modern physiotherapy practice that the visitors would expect to see, such as mental health and the lifespan. The programme team stated that the modules would be contextualised for physiotherapy learners within practical sessions for the module. The visitors were unable to see nature of these practical sessions within the module descriptors and so could not judge how learners would be ready to apply physiotherapy specific skills and knowledge to their practice-based learning. Furthermore, the education provider stated they had not finalised their approach to practice based learning so could not confirm how they would link the theoretical parts of the programmes to practice-based learning. The education provider must show how all the practical parts of the programme ensure learners are acquiring the appropriate physiotherapy skills to allow them to be applied in practice. They must also ensure that learners will have the opportunity to apply theoretical knowledge in practice.

4.6 The learning and teaching methods used must be appropriate to the effective delivery of the learning outcomes.

Condition: The education provider must provide further evidence that the range of teaching approaches used are appropriate to the effective delivery of the curriculum.

Reason: To evidence this standard prior to the visit the education provider stated that the learning and teaching methods within the institute can be seen in the assessment methods. The education provider highlighted the module descriptors, university regulations and the programme handbooks to evidence this. Upon review of the modules the visitors noted that many of the modules stated there would be various teaching methods used but did not state how the learning objectives would be delivered within these sessions. At the visit, the visitors enquired how teaching would be contextualised in some joint modules for physiotherapy learners, for instance how the shared sports related modules would be applied to physiotherapy practice. The programme team stated that practical sessions and seminars would ensure that teaching from the lectures in Fundamentals of Human Physiology is appropriately contextualised for physiotherapists, rather than focusing on the sport aspect of the learning. The module descriptor does not reflect this information and does not break down the learning or teaching methods to show how this will be achieved, or that there will be sufficient time given to the contextualisation for physiotherapy learners. The education provider indicated there would be more physiotherapy specific teaching sessions than appeared in the module descriptors in many modules. The visitors deemed the contextualisation teaching sessions to be essential for learners and would provide an important indicator to how learners would be gaining physiotherapy specific skills and knowledge. As such the visitors are unable to determine the nature of and time spent on gaining the appropriate theoretical knowledge and the practical skills needed for professional practice. The education provider must clarify all the teaching methods for the programme to ensure that learners are given sufficient time and support to meet the learning outcomes. Furthermore, they must show that adequate time is dedicated to contextualising shared, non-physiotherapy specific modules for learners.

4.7 The delivery of the programme must support and develop autonomous and reflective thinking.

Condition: The education provider must show how the delivery of the programme will ensure learners are ready to practice as autonomous professionals on completion of the programme.

Reason: In the documentary submission prior to the visit the education provider indicated that the teaching and assessment methods are varied and promote autonomy and reflection. The visitors were able to see in some modules that the education provider had stated differing teaching methods but did not state what would be covered in these sessions or the time spent in them. The visitors also considered the learning objectives stated in the practice education module descriptors. The education provider had split the 6 modules into two descriptors, practice education 1-2 and practice education 3-6. Each descriptor had the same set of learning outcomes for all the differing practice education modules they covered. This standard is designed to develop autonomous a reflective thinking throughout the programme rather than teaching at one point. As the learning outcomes do not progress from practice education module 3 the visitors could not see how the delivery of practice education would develop learners' autonomous thinking and prepare them to practise as autonomous professionals at the end of the programme. The education provider must show they will develop learners' autonomous and reflective thinking throughout the programme, to ensure they are ready to practice as independent practitioners.

4.9 The programme must ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Condition: The education provider must demonstrate how they will ensure that learners are able to learn with, and from, professionals and learners in other relevant professions

Reason: To evidence this standard prior to the visit the education provider indicated that as programmes in health develop they intend to offer opportunities for learners from interprofesional backgrounds to be taught together. They also stated they had established links with the Institute of Sport where experienced professionals contribute to the teaching and learning experience. The visitors were unable to determine from the documentation that learners would be undertaking interprofesional education (IPE) in any of the modules. As such they asked the education provider to clarify their strategy and to explain how they would ensure that learners would be able to learn with, and from, professionals and learners in other relevant professions. The programme team indicated they have spoken at length with colleagues involved in the social care programme but also stated this is a work in progress. They also stated that learners will carry out IPE while out on placement. However, they have not finalised the practice-based learning settings for all learners so could not state that all learners would be consistent to an acceptable level. The programme team also indicated they would be looking to include guest lecturers but stated that some of these sessions may be voluntary so some learners may not access them. The education provider has not finalised their approach to IPE and with the information provide the visitors could not confirm that this standard is met. The education provider must show they will ensure that all learners are able to learn with, and from, professionals and learners in other relevant professions.

5.1 Practice-based learning must be integral to the programme.

Condition: The education provider must show that practice-based learning is central to the programme in ensuring learners are prepared for future practice.

Reason: : Upon reviewing the documentation the visitors were able to see that areas related to practice-based learning were in the early stages of development, such as:

- ongoing partnership arrangements with practice education providers;
- the practice assessment tool;
- the availability and capacity of practice based learning;
- the timetabling of practice based learning (all ensure all learners have the appropriate range);
- identification and training of appropriate practice educators; and
- audit of practice based learning environments.

The education provider had split the 6 modules into two descriptors, practice education 1-2 and practice education 3-6. Each descriptor had the same set of learning outcomes for all the differing practice education modules they covered. The visitors noted that the learning objectives for practice education modules did not develop beyond module 3. So the same expectations were being made of learners at practice education module 3 and the end of the programme. This standard is about how practice-based learning is used effectively, as a key part of the programme, to prepare learners for future practice. From the documentary submission the visitors could only determine that learners would have 6 blocks of practice based learning. At the visit the programme team confirmed that many areas related to practice based learning were still to be finalised. The

education provider must show how practice-based learning is central part of the programme, for example:

- how practice-based learning outcomes and progression are in line with learning outcomes for the programme as a whole
- the ongoing partnership arrangements with practice education providers
- the reasons for the design of practice-based learning on the programme and how this ensures learners meet the standards of proficiency.

5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

Condition: The education provider must demonstrate how they will ensure there is an appropriate range of practice-based learning to support the achievement of the learning outcomes and the standards of proficiency (SOPs) for physiotherapists.

Reason: To evidence this standard in the documentary submission the education provider indicated they are making agreements with local employers who would provide appropriate learning opportunities which meet their requirements on number and range of opportunities. The visitors were also able to see memoranda of understanding with various partners. However, these did disclose decisions or plans around an appropriate range of practice-based learning. In the programme team meeting the visitors were told that the education provider has not finalised agreements with practice education providers to ensure that all learners have access to the appropriate range of practice based learning. The education provider must show that all learners will have access to appropriate range of practice-based learning experiences which reflect the nature of modern practice, reflects the range of settings of the profession they are about to enter and supports the achievement of the learning outcomes of the programme.

5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Condition: The education provider must demonstrate that there is an effective system in place for approving and ensuring the quality of practice-based learning.

Reason: To evidence this standard in the documentary submission the education provider indicated they would be drawing on their social work colleagues' experience to develop an audit process for practice based learning. At the visit the visitors enquired about the progress being made with the process. The programme team stated that it had not been finished at the time of the visit and was a work in progress. They also stated that the practice placement facilitator would be developing an audit form to be used. The education provider has not finalised their system for approving and ensuring the quality of practice-based learning so the visitors could not determine that the standard was met. The education provider must finalise their audit process and show how this will make sure that the programmes deliver continued quality of practice-based learning for all learners.

5.4 Practice-based learning must take place in an environment that is safe and supportive for learners and service users.

Condition: The education provider must demonstrate how they will ensure that all practice-based learning will provide a safe and supportive environment for learners and service users.

Reason: To evidence this standard in the documentary submission the education provider indicated they would be drawing on their social work colleague's experience to develop an audit process for practice based learning. At the visit the visitors enquired about the progress being made with the process. The programme team stated that it had not been finished at the time of the visit and was a work in progress. They also stated that the practice placement facilitator would be developing an audit form to be used. The education provider has not finalised their system for approving and ensuring the quality of practice-based learning so the visitors could not determine that the standard was met. The education provider must finalise their audit process and show how this will make sure that practice-based learning settings are suitable and that they support safe and effective learning.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

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

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

Condition: The education provider must demonstrate there will be an appropriate number of appropriately qualified and experienced practice educators in place with the relevant skills and knowledge to effectively support learners in practice-based learning.

Reason: In the documentary submission the education provider stated they would ensure the standards are met as they develop their practice educator network, and will draw on experience from other HCPC approved programmes at the education provider. To evidence these statements the education provider submitted the student handbook, placement handbook, memorandum of understanding and overview of student development process. The visitors could not see from this evidence that the education provider had ensured an appropriate number of practice-based learning staff. Nor did the evidence show the education provider had audited or had plans to audit the members of staff to ensure they had the relevant knowledge, skills and experience to ensure staff can meet the learning needs of learners.

At the visit the visitors enquired about the progress being made with practice based learning and agreements being finalised with external partners. In the practice educators meeting the visitors were told that there are a large number of clinicians who have previously been practice educators for learners from other education providers could be involved for this programme. However, they also stated that agreements have not yet been finalised and the education provider has not used their own quality processes to consider whether these members of staff are suitable as practice educators for this programme. The visitors were also told in this meeting there had been some discussion around expectations for practice educators but this had not been finalised. It was also confirmed in the programme team meeting that agreements had not been finalised around relationship between the practice educators and the

education provider. Therefore the visitors considered the standards related to this were not currently met. The education provider must finalise how they will ensure that practice educators are appropriately experienced and qualified to support effective learning. They must also show how practice educators will be supported with refresher training in the future. The education provider must ensure they oversee and are responsible for all practice-based learning and ensure they have appropriate quality assurance of the staffing involved.

6.1 The assessment strategy and design must ensure that those who successfully complete the programme meet the standards of proficiency for the relevant part of the Register.

6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.

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

Condition: The education provider must demonstrate that the assessment strategy and methods ensure that learner are able to meet the learning outcomes and standards of proficiency for physiotherapists.

Reason: To evidence this standard in the documentary submission the education provider highlighted the programme handbook which gave an overview of the assessments logistics for learners. The visitors were able to view the assessments within the module descriptors that were associated with the relative teaching. The visitors were able to see the learning outcomes were linked to the assessments within the module. However, the visitors considered the nature of the assessments to be vague. For example in the module descriptor for Applied Musculoskeletal Physiotherapy the assessment are stated at examinations but not did not confirm their length or type (such as multiple choice). This level of detail was the same for all module descriptors. The visitors therefore questioned the programme team about the nature of the examinations and if they could provide more information around how the assessments would be carried out to ensure that learners are meeting the standards of proficiency for physiotherapists (SOPs). The programme team stated that the assessments in the module descriptors had not been finalised and they intended to finalise the assessments after the visit with some input from lecture practitioners. As the visitors have not seen the finalised assessment strategy for the programme in both the theoretical and practice setting, they cannot confirm that the programme currently meets the standard. The education provider must show how the assessment strategy and design will ensure that learners who complete the programme have demonstrated the threshold level of knowledge, skills and understanding to practice physiotherapy safely and effectively.

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

Condition: The education provider must demonstrate that assessments will provide an objective, fair and reliable measure of learners' progression and achievement.

Reason: To evidence this standard in the documentary submission the education provider highlighted the programme handbook which gave an overview of the

assessments logistics for learners. The visitors were able to view the assessments within the module descriptors that were associated with the relative teaching. The visitors were able to see the learning outcomes were linked to the assessments within the module. However, the visitors considered the nature of the assessments to be vague. For example in the module descriptor for Applied Musculoskeletal Physiotherapy the assessment are stated at examinations but not did not confirm their length or type (such as multiple choice). This level of detail was the same for all module descriptors. Furthermore, the visitors noted in the Functional anatomy of the Upper-Quadrant module that one assessment looked at disease within tissues but the indicative content did not cover this. The visitors therefore questioned the programme team about the nature of the examinations and if they could provide more information around how the assessments would be carried out to ensure that learners are meeting the standards of proficiency for physiotherapists (SOPs). The programme team stated that the assessments in the module descriptors had not been finalised and they intended to finalise the assessments after the visit with some input from lecture practitioners. As the visitors have not seen the finalised assessment strategy for the programme in both the theoretical and practice setting, they cannot confirm that the programme currently meets the standard. The education provider must show that assessments are effective at deciding whether a learner is fit to practice by the end of the programme.

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.

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

Condition: The education provider must ensure there is accurate information available for learners to allow them to make an informed choice about whether to take up a place on the programmes.

Reason condition not met at this time: In response to this condition the education provider indicated they had made changes to the information provided to applicants. The visitors could see appropriate amends made in relation to the work experience that would be considered at the point of application. However, the amendment made to the information related to the HCPC is not accurate. The information should read 'On completion of this programme you will be eligible to apply for registration as a Physiotherapist with the Health and Care Professions Council (HCPC)'. As the information provided for the learners is incorrect the visitors were not satisfied the standard is currently met. The education provider must ensure that information relating to HCPC registration is correct for applicants.

Suggested documentation: Correction to the language around HCPC registration.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that the programme is sustainable by ensuring learners have access to safe and effective practice-based learning that meets their learning needs.

Reason condition not met at this time: In response to this condition the education provider indicated that they have not been able to receive formal confirmation of availability and capacity. The education provider indicated that a meeting that was due to confirm the capacity and requirements of learners was cancelled. The visitors were also able to see the proposed practice-based learning capacity spreadsheet created by the education provider. The visitors noted that the education provider has demonstrated their efforts to meet this standard. However, ensuring the availability and capacity of practice-based learning is a collaborative commitment and the education provider has not provided evidence of appropriate commitment from their external practice partners. As such the visitors were unable to determine how the education provider would ensure that all learners have access to practice-based learning that meets their learning needs. Learners' access to practice-based learning is essential for the sustainability of the programme which requires appropriate support from external partners. As such the education provider must show how their external partners will be able to meet their demands for safe and effective practice-based learning.

Suggested documentation: Evidence to show there is external support from practice-based learning partners.

3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Condition: The education provider must ensure that there is an effective process to ensure that all learners have access to practice-based learning which meets their learning needs.

Reason condition not met at this time: In response to this condition the education provider indicated that they have not been able to receive formal confirmation of availability and capacity. The education provider indicated that a meeting that was due to confirm the capacity and requirements of learners was cancelled. The visitors were also able to see the proposed practice-based learning capacity spreadsheet created by the education provider. The visitors noted that the education provider has demonstrated their efforts to meet this standard. However, ensuring the availability and capacity of practice-based learning is a collaborative commitment and the education provider has not provided evidence of appropriate commitment from their external practice partners. As such the visitors were unable to determine how the education provider would ensure that all learners have access to practice-based learning that meets their learning needs. The education provider must clarify their process that will ensure all learners will have access to practice-based learning that will meet their learning needs. They must also show appropriate support for this from their practice-based learning partner organisations.

Suggested documentation: Evidence to show that there is appropriate external support from relevant partners in ensuring the availability and capacity of practice-based learning.

4.6 The learning and teaching methods used must be appropriate to the effective delivery of the learning outcomes.

Condition: The education provider must provide further evidence that the range of teaching approaches used are appropriate to the effective delivery of the curriculum.

Reason condition not met at this time: In response to this condition the education provider highlighted the extra indicative content that had not been submitted originally. From this, the visitors were able to see the appropriate content for the programme and the contact hours for each module. The visitors could see in the extra indicative content that various teaching methods would be used. However, the visitors were unable to determine that the methods would be appropriate for the content that was to be delivered. This was because they could not see how the teaching method related to the learning outcomes or indicative content and so could not determine it was appropriate. The education provider must highlight how the teaching methods listed will link to the indicative content in the modules. They must ensure that the teaching methods used are appropriate to the effective delivery of the indicative content and learning outcomes.

Suggested documentation: Evidence to show how the teaching methods will deliver the indicative content and learning outcomes.

5.1 Practice-based learning must be integral to the programme.

Condition: The education provider must show that practice-based learning is central to the programme in ensuring learners are prepared for future practice.

Reason condition not met at this time: In response to this condition the education provider indicated that they have not been able to receive formal confirmation of availability and capacity. The education provider indicated that a meeting that was due to confirm the capacity and requirements of learners was cancelled. The visitors were also able to see the proposed practice-based learning capacity spreadsheet created by the education provider. The visitors noted that the education provider has demonstrated their efforts to meet this standard. However, ensuring the availability and capacity of practice-based learning is a collaborative commitment and the education provider has not provided evidence of appropriate commitment from their external practice partners. As such the visitors were unable to determine how the education provider would ensure that all learners have access to practice-based learning that meets their learning needs. The education provider must show how practice-based learning is central part of the programme by confirming the ongoing partnership arrangements with practice education providers

Suggested documentation: Evidence to show that there is appropriate external support from relevant partners in the finalised design of practice-based learning.

5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

Condition: The education provider must demonstrate how they will ensure there is an appropriate range of practice-based learning to support the achievement of the learning outcomes and the standards of proficiency (SOPs) for physiotherapists.

Reason condition not met at this time: In response to this condition the education provider indicated that they have not been able to receive formal confirmation of availability and capacity. The education provider indicated that a meeting that was due to confirm the capacity and requirements of learners was cancelled. The visitors were also able to see the proposed practice-based learning capacity spreadsheet created by the education provider. The visitors noted that the education provider has demonstrated their efforts to meet this standard. However, finalising the range of practice-based learning is a collaborative commitment and the education provider has not provided evidence of appropriate commitment from their external practice partners. As such the visitors were unable to determine how the education provider would ensure that all learners have access to an appropriate range of practice-based learning that meets their learning needs. The education provider must demonstrate that there is appropriate support from their partner organisations to ensure that all learners will have access to an appropriate range of practice-based learning.

Suggested documentation: Evidence to show practice education providers will be able provide an appropriate range of practice-based learning for all learners.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

Condition: The education provider must demonstrate there will be an appropriate number of appropriately qualified and experienced practice educators in place with the relevant skills and knowledge to effectively support learners in practice-based learning.

Reason condition not met at this time: In response to this condition the visitors were able to see how the education provider would carry out training of practice educators in the future. As such they were satisfied that standard 5.7 was met. However the response did not detail the current provision of practice educators. Furthermore, the visitors noted in response to earlier conditions the education provider indicated that they have not been able to receive formal confirmation of availability and capacity from their practice partners. The education provider indicated that a meeting that was due to confirm the capacity and requirements of learners was cancelled. The visitors were also able to see the proposed practice-based learning capacity spreadsheet created by the education provider. The visitors noted that the education provider has demonstrated their efforts to meet this standard. However, finalising the availability of appropriately qualified and experienced practice educators is a collaborative commitment and the education provider has not provided evidence of appropriate commitment from their external practice partners. As such the visitors were unable to determine how the education provider would ensure that there would be an adequate number of staff involved in practice-based learning. The education provider must show appropriate commitment from their relevant partners to ensure there will be an adequate number of appropriately qualified and experienced staff with relevant skills and knowledge to support safe and effective learning.

Suggested documentation: Evidence to show that there is appropriate external support from relevant partners to ensure that there are appropriate number of appropriately qualified and experienced staff with relevant knowledge and skills involved in practice-based learning.

6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.

Condition: The education provider must demonstrate that the assessment strategy and methods ensure that learner are able to meet the learning outcomes and standards of proficiency for physiotherapists.

Reason condition not met at this time: In response to this standard the education provider indicated that the assessment details in the module specifications are bound by university academic regulations hence the lack of specific detail. However, the visitors noted in the specifications that there was inconsistency in the detail provided. As such some assessments were very detailed and so they could determine this standard was met for certain modules. To provide further detail the education provider submitted assessment maps for both programmes. This highlighted the type of assessment that would be used in each module and the relative weighting for the assessment. The education provider also submitted examples of assessment briefs for 2020-21. The assessment briefs did not highlight all the assessments in the first year but highlighted a range of them. From the evidence provided the visitors could determine that some of the assessments were appropriate to measuring the learning outcomes. However for some modules there was not enough detail for the visitors to make an effective judgment, for example, what activities would be undertaken as part of a practical assessment. The visitors could not see how some of the assessment methods would be utilised in the first year modules, as detailed below:

For BSc:

Functional Anatomy (LQ) –

Written exam, 1 hour 50% - The visitors could not see the details of this exam beyond this. As such they could not see how this method was appropriate to measuring the learning outcomes.

Functional Anatomy (UQ) –

Made up of a written exam, 1 hour 50% and Practical skills assessment 50%. The visitors were not provided with further details of the nature of these assessments. As such they could not see why these methods were appropriate to measuring the learning outcomes.

Principles of MSK –

The example provided was titled Principles of MSK with an overview of the assessment but the marking grid and assessment criteria were provided for the module titled Applied Musculoskeletal Physiotherapy. The visitors could not be certain to which module the assessment related and so could not judge the standard was met for this module.

For MSc:

The education provider submitted one example for the first year of the MSc programme for the module titled Musculoskeletal Physiotherapy (Lower Quadrant) and they provided an assessment map in which the visitors could see the style of assessment such as practical skills assessment and the weighting. However, the visitors were unable to see further details of the nature of the assessments. As such the visitors were unable to judge from these classifications of assessment if they would be an effective measure of the learning outcomes. The visitors require more detail about the nature of

assessment methods in the following modules and how they will measure the learning outcomes:

- Cardio-Respiratory Physiotherapy;
- Principles of Practice of Physical Activity and Public Health.

For the modules listed above the visitors were unsure how the education provider had made decisions that these assessment methods were appropriate to and effective at measuring the learning outcomes. This standard is to ensure that learners who complete the programme can practice safely and effectively. Currently the visitors were unable to determine from the assessment map how the assessments stated would be appropriate for the learning outcomes. The visitors do not expect the level of detail provided in the examples but need to understand the breakdown of the type of assessment. For instance the BSc Functional Anatomy (LQ) is stated as a practical examination in the mapping document but the visitors were able to see it was a practical assessment based on a functional lower limb movement on a live model that learners would have to assess. This allowed visitors to understand the nature of the practical assessment further and that it was appropriate to the measuring of the learning outcomes. However, as mentioned above, the other assessment in this module was stated as a written exam and so the visitors could not judge its appropriateness.

Musculoskeletal Physiotherapy (LQ) -

For this module the visitors were provided with an example practical assessment. Upon reviewing the assessment and marking scheme the visitors were unclear how parts of or certain learning outcomes would be measured as follows:

- Learning outcome (LO) 1 – how learners would discuss ageing
- LO 3 - how learners would explore theoretical models of care
- LO 5 & 6 – how these objectives are measured in the assessment
- LO 7 – how is record keeping and IT measured in the assessment.

The education provider must clarify how these learning objectives will be measured as part of this assessment.

Additionally, the visitors noted in the module specifications that some modules included reassessments that differed to the original assessment set out in the assessment map. For instance practical skills assessments being reassessed as a written exam. If learners are taking part in the reassessment the visitors were unclear how these methods would be appropriate to ensure they are ready to practice safely and effectively. The education provider must clarify how the reassessment methods are appropriate to and effective at measuring the learning outcomes in modules that the reassessment method differs.

Suggested documentation: Information about the nature of the assessment methods for the indicated modules to clearly identify how the method is appropriate at measuring the learning outcomes. Information to show the reassessment of learners is appropriate to and effective at measuring the learning outcomes.

Section 6: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 5, the visitors are not satisfied that the conditions are met for the reason(s) noted below, and recommend that the programme(s) are not approved.

This report, including the recommendation of the visitors, will be considered at the 20 August 2020 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that the programme is sustainable by ensuring learners have access to safe and effective practice-based learning that meets their learning needs.

Reason condition not met: In response to the additional evidence request the education provider submitted letters and emails of support from a range of external practice education providers. Some of the statements noted the number of learners that could be supported, these were:

- Western Sussex Hospitals NHS Foundation Trust (WSHT) – the first email stated an agreement to support the development. The second letter stated capacity for 6 placements in the academic year 2020-21 but did not confirm this would be available in subsequent years. It also confirmed the availability of practice educators and involvement in the design and delivery of the programme.
- Sussex Community NHS Foundation Trust - this email stated that this partner could provide 10-15 placements per year across their services. They also detailed the range of practice-based learning available across these services.
- Sussex healthcare – this partner detailed the capacity for three learners at any one time to take part in practice-based learning in a social care setting
- St Wilfrids Hospice – this email confirmed capacity for 2 learners for a period of 6 weeks in the academic year. This would take place in a palliative care setting.
- Fontwell Physiotherapy – this letter stated that they would be able to provide practice-based learning for 4-6 learners per annum for 6 weeks. They explained they could provide musculoskeletal and Hydrotherapy areas of practice-based learning.

The visitors noted the remaining statements of intent did not provide specific appreciation of the needs of the programmes in terms of capacity and range of practice-based learning. Furthermore, they did not highlight the process by which the education provider will ensure the availability or capacity to meet the demands of both programmes when all years are running at capacity. The visitors had the following comments about each statement:

- West Sussex County Council – this email detailed a potential practice-based learning opportunity for learners in a care home setting. It did not detail the numbers of learners who would be able to take part or for how long. Furthermore, it did not relate how the learning would be relevant to the practice of physiotherapy.
- St Barnabas House and Chestnut Tree House – this email was from a Hospice who stated they would be happy to meet in September to discuss opportunities for learners to carry out practice-based learning at their sites. The visitors could not see a statement of what capacity or range could be provided at this partner.
- Independent lives – this partner stated it would be interested in supporting practice-based learning when the time comes. It was unclear what sort of capacity this would be or the setting of practice-based learning it would provide.

When all years of the programmes are running at full capacity the visitors noted there will be 120 learners requiring practice-based learning across all academic years. From the evidence provided above the visitors could see capacity for 32 learners. While the visitors do not expect to see confirmation of all practice-based learning in place now for all years in both programmes, they need assurance of the process to ensure it is in place for when it is required. From the evidence provided it is unclear how the partnerships highlighted will be able to meet the demands of both programmes. Furthermore, they could not see from the evidence provided there would be an appropriate range of practice-based learning for all learners available at these practice education providers. As such the visitors could not confirm that there was appropriate support from external stakeholders to meet the needs that both programmes will require. As such they could not confirm that all learners who enter onto the programmes would definitely have access to practice-based learning that meets their learning needs.

The visitors' conclusion at the end of this process is that this standard is not met and the programme is not approved.

3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Condition: The education provider must ensure that there is an effective process to ensure that all learners have access to practice-based learning which meets their learning needs.

Reason condition not met: In response to the request for additional information the education provider highlighted statements of support in emails and letters from a range of practice education providers. They also indicated that "work in this area was still ongoing". From the evidence provided it is unclear how the education provider would work with the partnerships highlighted to meet the demands of both programmes. Furthermore, they could not see from the evidence provided how there would be an appropriate range of practice-based learning for all learners available at these practice education providers.

This standard is about the processes in place to make sure that all learners on the programmes have access to practice-based learning that meets their learning needs. While the visitors noted some external partners had acknowledged some specific capacity and types of practice-based learning it was not clear how the education provider would go about ensuring that the demands of both programmes can be met. The visitors noted a document titled placement capacity dates in the original conditions submission which highlighted the education providers' work in arranging and clarifying its practice-based learning needs. However, it was not clear that external providers are consulted or involved in jointly understanding what is required for both programmes. Due to the collaborative nature of securing practice-based learning the visitors would expect practice education providers to be involved to ensure both parties are certain about the needs of the programmes.

The visitors were not clear how the partnerships listed in the evidence would meet the demands of both programmes or how the process by which the education provider would ensure that they would meet the needs in the future. Therefore, the visitors considered this standard to not be met and the programme is not approved.

5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.

Condition: The education provider must demonstrate how they will ensure there is an appropriate range of practice-based learning to support the achievement of the learning outcomes and the standards of proficiency (SOPs) for physiotherapists.

Reason condition not met: In response to the request for additional information the education provider highlighted statements of support in emails and letters from a range of practice education providers. There also indicated that “work in this area was still on-going”. The visitors noted in the evidence provided a number of social care settings and settings that appeared to be role-emerging. While the visitors noted that these settings are valuable as part of the programmes they may not provide an appropriate range to meet the learning outcomes and standards of proficiency on their own. For example, the visitors would expect to see more availability and use of practice-based learning in an acute setting as this is essential for practice as a Physiotherapist. The visitors were unclear from the evidence provided that learners would have adequate access to practice-based learning in the acute setting.

In addition to this, a small number of the statements of intent provided details of the area of physiotherapy study that would be carried out. The visitors noted a deficit in settings that would allow for practice-based learning related to musculoskeletal (MSK) physiotherapy. The visitors could not confirm that all learners would have sufficient access to practice-based learning related to MSK in order to meet the SOPs.

As the visitors were unable to confirm that all learners would have access to a range of practice-based learning that would support the achievement of the learning outcomes and SOPs, they that considered this standard to not be met.

5.5 There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

Condition: The education provider must demonstrate there will be an appropriate number of appropriately qualified and experienced practice educators in place with the relevant skills and knowledge to effectively support learners in practice-based learning.

Reason condition not met: In response to the request for additional information the education provider highlighted statements of support in emails and letters from a range of practice education providers. Upon review of the statements the visitors noted that some of the partners acknowledged their ability to provide practice educators, they were:

- Western Sussex Hospitals NHS Foundation Trust (WSHT) - The email stated an agreement to support the development. The letter stated capacity for 6 placements in the academic year 2020-21.
- Sussex Community NHS Foundation Trust - this email stated that this partner could provide 10-15 placements per year across their services. They also detailed the range of practice-based learning available across these services.

- Sussex healthcare – this partner indicated they have 3 full time physiotherapists and 5 physiotherapy support workers. They also noted learners would spend time with teams of different professions.
- St Wilfrids Hospice – this email confirmed capacity for 2 learners for a period of 6 weeks in the academic year. It did not detail the number of practice educators or how they would be appropriate to support physiotherapy learners
- Fontwell Physiotherapy – this letter stated that they would be able to provide practice-based learning for 4-6 learners per annum for 6 weeks. They explained they could provide a number of staff with experience in the provision of student placements.

The visitors noted that some of the statements of intent did not detail their ability to provide capacity for practice education or the availability of practice educators. They were as follows:

- West Sussex County Council – this email did not detail the number of practice educators or how they would be appropriate to support physiotherapy learners.
- St Barnabas House and Chestnut Tree House – this email was from a Hospice who stated they would be happy to meet in September to discuss opportunities for learners to carry out practice-based learning at their sites. The visitors could not see a statement of what capacity or range could be provided at this partner.
- Independent lives – this partner stated it would be interested in supporting practice-based learning when the time comes. It was unclear what sort of capacity this would be or the setting of practice-based learning it would provide. As such visitors could not determine the number of practice educators or how they would be appropriate to support physiotherapy learners

When all years of the programmes are running at full capacity the visitors noted there will be 120 learners requiring practice-based learning across all academic years. From the evidence provided above the visitors could see capacity for 32 learners. While the visitors do not expect to see confirmation of that all practice educators will be in place now for all years in both programmes, they need assurance they will be in place for when it is required. From the evidence provided it is unclear how the partnerships highlighted will be able to meet the demands of both programmes. The visitors were unclear about how the current agreements with external partners will ensure that all learners are appropriately supported whilst taking part in practice-based learning. Furthermore, they could not see how the education provider will suitably ensure their practice educator needs can be met by their partner organisations in the years to come.

In addition, the visitors noted that some of the agreements in the second list above are with organisations who do not state that they employ physiotherapists or offer a physiotherapy service. As such they are assumed to be role emerging settings. As the role emerging setting (such as social care) is one not commonly associated with Physiotherapy practice it was not clear how the education provider would ensure that learners would be supported by a person with relevant knowledge, skills and experience. The information did not clarify how the education provider would ensure that learners would be appropriately supported to meet their learning needs in the role emerging settings.

As such the visitors considered at the end of this process is that these standards is not met and the programme is not approved.

Education and Training Committee Panel

Programmes in respect of which approval is recommended subject to conditions

Programme name	MSc Physiotherapy (Pre-registration)
Education provider	University of Chichester
Mode of delivery	FT (Full time)
Assessment ref	APP02191
Date of decision	01 July 2020

Panel: Sonya Lam (Chair)
Luke Jenkinson
Maureen Drake

Penny Joyce
Kathryn Thirlaway

Decision
That the Visitors' report (including the conditions and recommendations in the report) should be accepted.
Reasons
The Panel is satisfied that the conditions in the Visitors' report must be met before the programme can be approved or before the ongoing approval of the programme can be confirmed.

Signed:.....  Panel Chair

Education and Training Committee Panel

Programmes in respect of which approval is recommended subject to conditions

Programme name	BSc (Hons) Physiotherapy
Education provider	University of Chichester
Mode of delivery	FT (Full time)
Assessment ref	APP02192
Date of decision	01 July 2020

Panel: Sonya Lam (Chair)
Luke Jenkinson
Maureen Drake

Penny Joyce
Kathryn Thirlaway

Decision
That the Visitors' report (including the conditions and recommendations in the report) should be accepted.
Reasons
The Panel is satisfied that the conditions in the Visitors' report must be met before the programme can be approved or before the ongoing approval of the programme can be confirmed.

Signed:.....  Panel Chair

Observations for consideration by HCPC Education & Training Committee 20/08/2020

University of Chichester Approval MSc Physiotherapy (Pre-registration), BSc (Hons) Physiotherapy

Case reference: CAS-15794-G4F8W8

Executive Summary of Observations:

The University of Chichester (UoC) wishes to assure the ETC that the programmes meet the SETs for the specific conditions 3.1, 3.6, 5.2, 5.5 & 5.6, all of which are linked to practice placements. UoC has demonstrated significant progress achieved towards meeting the standards in the current Covid-19 situation. For the 2020-21 academic year the committee can be assured that the requirements for practice placement provision are confirmed by external partners in the evidence provided (15 MSc learners require a 6 week placement in May 2021), that a range of placements are available and that qualified and experienced practice educators are in place for those placements. UoC's requirement for placements through to May 2022 are also supported by the evidence presented (45 MSc placements required and UoC can evidence 63 confirmed placements in physiotherapy settings with qualified Physiotherapists). The committee can be assured that UoC has effective plans for managing future practice placement requirements to meet all learners needs and is managing risk through staff deployment and employment (1.0 FTE Placement Coordinator) in 2020-21, a funded secondment of a Grade 8a Practice-Placement Coordinator from the local NHS trust and effective processes in establishing and confirming additional partners to support future practice placement needs, including innovative role emerging placements as encouraged by the CSP. The University's strategic expansion into adult Nursing for 2021-22 with significant external funding to establish a new School of Nursing and Allied Health will further strengthen opportunities with all local NHS trusts (UoC has signed MOUs with Western Sussex Hospitals NHS Foundation Trust, Brighton and Sussex University Hospitals NHS Trust, Sussex Community NHS Foundation Trust and Sussex Partnership NHS Foundation Trust) to support the future needs of the programmes.

The ETC can be reasonably assured that the two programmes are sustainable and fit for purpose and that there are effective processes in place to ensure the availability, range, capacity and support for practice-based learning that reflects modern practice for all current (2020-21) and future learners.

Detailed observations to Section 6 of the HCPC Process Approval report.

Conditions 3.1 (The programme must be sustainable and fit for purpose) & 3.6 (There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners).

In the second submission, UoC provided written evidence of stakeholder support for the programme and the work carried out to date in securing practice placements to give reasonable assurance that the capacity for current learners entering the programmes is supported and that the processes are in place and effective. This evidence, we believe, supports the assurance that the programmes are sustainable and fit for purpose.

Placement capacity: We currently have confirmed placements up to January 2022 as evidenced through the documentation provided at second review. Our first three placement periods are May 2021, September 2021 and November 2021, requiring a total of 45 student placements. We currently have 63 confirmed placement offers for this period (not 32 as indicated by the visitors in

their reasoning) and these do not include the long-arm supervised placement opportunities. All confirmed placements will be supervised by HCPC registered Physiotherapists. This capacity is currently calculated on a supervision model of 1:1 and a number of these placement offers have suggested they will look collaboratively to expand these to 1:2 or even 1:3, thus potentially increasing the capacity within these setting three-fold. All providers have been made aware of our intentions in terms of range and capacity and we have shared the document on placement capacity and dates with all confirmed and potential (as yet unconfirmed) providers.

We note in an email sent from Brendon Edmonds, (Head of Education, HCPC) to Gill Rawlinson (CSP assistant director) who raised issues around 'evidence of placements' with HCPC on behalf of new programme HEIs (forwarded to Neil Light and other HEI contacts on 20/07/2020)

“Thanks for getting in touch. On the point broadly around placements, our standards certainly don't require providers to have evidence of signed agreements in place confirming the provision placements to meet the learner numbers being proposed. There is of course always further context which may mean MOUs on their own are not sufficient to take assurance. We've always applied the standards on the basis that our visitors need evidence to take a reasonable level of assurance that these can be secured at the point they are needed and over time thereafter. We of course appreciate that, even at the best of times, the opportunity to secure placements is always challenging and securing commitment often has a short lead in time. I'll note the feedback you've provided with the team to ensure we are continuing to apply this area of the standards in the way I've outlined.”

Our staffing plans for 2020-21 reflect the management of associated risk on securing future placement provision. Our full-time staff will have significantly reduced teaching loads in the first year of operation of both programmes (detailed evidence provided in response to conditions 3.9 & 3.10) to support programme development, including placements. Planned recruitment of an additional 4.0 FTE staff includes a 1.0 FTE Placement coordinator dedicated to Physiotherapy (the Institute of Sport already operates with a placement coordinator for 350+ placements in various settings each year). In addition, the successful Health Education England Strategic Support Fund bid worth £100,000 for facilities, equipment and staff included the commitment from the Western Sussex Hospitals NHS Foundation Trust (WSHT) to support programme delivery with 400 hours secondment of a Practice Placement facilitator (Band 8A Clinical Specialist Physiotherapist) dedicated to placement development in 2020-21. The WSHT letter of support (Louise Mayer, Head of Therapies) states *‘We of course recognise the need to expand on the delivery of placements and would want to work with you, clinical educators and facilitators and Sussex AHP councils, AHP faculty and HEI providers on this.’*

The University of Chichester took a strategic decision in 2017, based on the socio-economic needs of the Coast to Capital area, to broaden its sport and social science provision to embrace aspects of health. Subsequently, it delivered a highly successful collaborative Health project concerned with closure of local skills gaps in support of the Industrial strategy. The proposal for Physiotherapy provision builds on this project, and the excellent reputation of the Institute of Sport to provide a platform for the University to further its health provision development. This includes ambitious plans and investment for Nursing in 2021-22 (<https://www.chichester.co.uk/health/chichester-mp-backs-new-school-health-2934152>), which has received widespread local support. This significant strategic investment in further healthcare programmes will strengthen the opportunities for developing further Physiotherapy practice placements.

Based on the observations above, and previously submitted documentation, UoC seeks a change to the recommendation that the programmes do not meet the standard on Programme governance, management and leadership to one of approval.

Condition 5.2 (The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.)

Our first response to condition 4.1 received a positive outcome from the visitors in terms of mapping learning outcomes and standards of proficiency to practice-based learning. This was also reflected in the positive outcome from our first response to conditions 4.3, 4.4, 4.5, 4.7 & 4.9 and second response to 4.6. At first review we were able to detail our structure, duration and anticipated range of practice-based learning and how this would support the achievement of the LOs and SOPs. Our second response detailed the current collaborative commitment from partners. We stated 'work in this area was still on-going' to reflect the position that we are acutely aware that we require further work, as detailed above, to secure the future number of required placements. We would like to reiterate that the required placements until January 2022 are secured. We have already established strong relationships with a number of NHS trusts and local organisations providing Physiotherapy services. This process has been undertaken coherently with Senior Management establishing MOUs and then Institute Management and Programme Management establishing links with specified role holders relating to Physiotherapy services and education. Our plans are clearly shared with potential providers and we can evidence the success of this approach with the confirmed number of placements to date. Our staffing plans will further support the future provision of practice-education.

Therefore, because of this additional evidence of placements, we respectfully disagree with the visitors reasoning on availability in an acute setting, and that current learners would not have sufficient access to practice-based learning for MSK Physiotherapy.

Acute setting/Musculoskeletal access: A number of the confirmed placement offers offer MSK based services and will see our students completing MSK orientated placements. These currently include Sussex Community NHS Foundation Trust and Fontwell Physiotherapy (both whom clearly state MSK in their respected supporting letters), whilst Western Sussex Hospitals NHS Foundation Trust placements offer a range of MSK services both in-patient and outpatient. Whilst not detailed in the response to visitors, the University of Chichester currently runs its own MSK and Sports Injury clinic in our purpose built 6-bay clinic, currently utilised by a number of HCPC registered Physiotherapists. As part of our wider business and operational planning we intend on using this successful service for student placements. In short, intended and confirmed student placement exposure in MSK has been evidenced.

With regards to acute services, our neighbouring St Richards Hospital in particular provides a number of acute, inpatient services and has outlined (in their supporting letter) the intention of working with us in developing future placement provision. The Western Sussex Hospitals NHS Foundation Trust (WSHT) is part of the Sussex Health and Care Partnership covering East Sussex and West Sussex and Brighton and Hove. The STP will introduce 3 'place' based ICSs with WSHT as the main acute provider in West Sussex. Predicted population increase 2016-2030 is 12% for Coastal West Sussex, with 32.5 to 41.2% increase in over-85s. 6.5% of the Sussex population live alone (over 110,000). The Trust: Runs three hospitals: St Richard's Hospital (Chichester), Southlands Hospital (Shoreham-by-Sea), Worthing Hospital (Worthing); Provides 24-hour A&E, acute medical care, maternity and children's services, day-cases, diagnostics and outpatients; Employs 7,054 people: nursing, midwifery, medical, therapists and scientists; Was awarded the highest possible CQC rating following October 2019 inspection: Outstanding in every category – first Acute Trust to achieve this;

has a nationally recognised cross-organisational fully embedded system for Quality Improvement (Patient First).

The number of placements offered by WSH for the first academic year (6) is reflective of the small number required for 2020-21 and will expand accordingly. Indeed, we have recently been included in a collaborative bid by WSH and Sussex Allied Health Professions Council to [Health Education England](#), for clinical education expansion, based on a fair share placement allocation policy with other HEIs, and signed off by the HR Director for the Sussex system workforce. Finally, our approach to placements reflects the CSP's position regarding placement experiences that Physiotherapy students could or should expect on their programmes. The CSP state (2020) "*There is no such thing as a 'core placement'. Students are encouraged to gain a range of experiences and skills that represent the breadth of physiotherapy in both patient and non-patient facing environments*" and [state \(2020\)](#) that such notions of 'core placements' are "outdated".

Our current and future placement planning is and will continue to reflect the HCPC SET 5 and through the observations above we believe meet condition 5.2, whereby the structure, length and range of placements we are planning are expected to give reasonable assurance that our decisions on the structure, duration and range or practice-based learning support the achievement of the learning outcomes and reflect the standards of proficiency in line with professional body guidance, in our case the CSP.

Conditions 5.5 (There must be an adequate number of appropriately qualified and experienced staff involved in practice-based learning) & 5.6 (Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register).

In the second submission, UoC provided written evidence of stakeholder support from key providers for provision of practice educators that will meet the requirement for the programmes until January 2022. We acknowledge that not all statements we submitted as evidence clearly indicated the placement provider's capacity for practice education or the availability of practice educators. However, to reassure the ETC, each provider has been made aware of our requirements for practice education and we have shared and discussed with them our practice placement handbook and our practice placement audit tool, which has been developed and approved for use with the University of Brighton, School of Health Sciences – Centre for Teaching and Learning and the University of Surrey, Division of Health and Social Care/Surrey and Western Sussex NHS provider organisations. The established process we have chosen to adopt will meet our needs for assuring adequate and appropriate qualified and experienced practice educators in the practice placements we have and are developing.

We provide further observations here in relation to the visitors' reasoning on our decision to develop role emerging and social-work placements as part of our range of placements.

Social work based and role-emerging placements: The visitors' reasoning correctly identifies a number of local adult social care services who have offered or will collaboratively develop future student placements. By following our audit process, it is strongly anticipated that the majority of these placements will be supervised by full-time employed Physiotherapists e.g. Sussex Healthcare, where others utilise Physiotherapy services in day centres and/or accessed when needed. These include users in dementia care, mental illness, end-of-life care, acquired brain injury care amongst others. For some of these placements we will adopt a long-arm supervision. Our plan is to develop robust supervision processes in collaboration with the future providers and in collaboration with our

employed full-time placement coordinator. This process has commenced already to ensure sufficient time to establish safe and effective learning in such placements and is well ahead of the anticipated requirement of such placements (approximately 18 months away). We are currently discussing plans with a local leader/champion of long-arm supervision educator development (Deborah Wilson, Paediatric Physiotherapy Lead for Sussex Community Foundation Trust) and other HEIs who are successfully adopting this approach presently. We have adopted this collaborative approach from the outset with other HEI providers.

In our discussions with the CSP (Nina Paterson CSP Education Advisor – webinar 8th July 2020) on our placement model development, we have been explicitly encouraged to explore social care placements, whether fully supervised or through long-arm supervision. Social care services represent a clear opportunity for students to support people to live well and independently, promoting a number of strategic principles set out in the [CSP corporate strategy 2020-22](#). Furthermore, the CSP has published on the benefits of [Physiotherapy in social care settings](#) and has recently called for more student placements to be experienced in a wider-range of [non-traditional settings](#) emphasising that "*What's important is providing a range of experience that will equip students for a future beyond 2050*".

Finally, we also would like to note that the use of a common placement assessment tool has recently been developed by the CSP to be utilised across a range of settings and environments in health & care, including non-patient facing settings. The form is currently in pilot-testing but is more than likely to be in use way before our need to use any non-traditional Physiotherapy placements.

To summarise, our intention and planning in securing some placements in alternative settings such as social care is reflective of our intention to contribute to the local community and demonstrate contemporary Physiotherapy practice and experiences and look forward to developing these opportunities over the next 18 months.

Concluding statement

The University of Chichester (UoC) wishes to assure the ETC that we feel the programmes meet the SETs for the specific conditions 3.1, 3.6, 5.2, 5.5 & 5.6. UoC has followed guidance received from the HCPC Education Adviser in good faith, which has led to perceived differences in understanding of the status and approach in evidencing practice-placement provision. A high number of placements have already been secured in a wide variety of settings, and has been evidenced accordingly. Building on our existing staff expertise, the University of Chichester remains firmly committed to our Physiotherapy entrants, and to working with the HCPC and CSP to ensure the highest standards of delivery in terms of teaching and placement experiences. Our commitment to invest in other health science courses, such as an adult nursing degree, will further strengthen our existing working relationships with the NHS trusts. UoC has demonstrated significant progress in the current Covid-19 situation and gratefully asks the committee to consider the observations provided here and to recommend approval of the two programmes.