

Visitors' report

<b>Name of education provider</b>	New School of Psychotherapy & Counselling & Middlesex University
<b>Validating body / Awarding body</b>	Middlesex University
<b>Programme name</b>	DPsych (Existential Counselling Psychology and Psychotherapy)
<b>Mode of delivery</b>	Full time
<b>Relevant part of HPC Register</b>	Practitioner psychologist
<b>Relevant modality / domain</b>	Counselling psychologist
<b>Date of visit</b>	14 – 15 February 2012

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## Executive summary

The Health Professions Council (HPC) approve educational programmes in the UK which health professionals must complete before they can apply to be registered with us. The HPC is a health regulator and our main aim is to protect the public. The HPC currently regulates 15 professions. All of these professions have at least one professional title which is protected by law. This means that anyone using the title 'Practitioner psychologist' or 'Counselling psychologist' must be registered with us. The HPC keep a register of health professionals who meet our standards for their training, professional skills, behaviour and health.

The visitors' report which follows outlines the recommended outcome made by the visitors on the ongoing approval of the programme. This recommended outcome was accepted by the Education and Training Committee (Committee) on 5 July 2012. At the Committee meeting on 5 July 2012 the ongoing approval of the programme was re-confirmed. This means that the education provider has met the condition(s) outlined in this report and that the programme meets our standards of education and training (SETs) and ensures that those who complete it meet our standards of proficiency (SOPs) for their part of the Register. The programme is now granted open ended approval, subject to satisfactory monitoring.

## Introduction

The HPC visited the programme at the education provider as the practitioner psychology profession came onto the register in July 2009 and a decision was made by the Education and Training Committee to visit all existing programmes from this profession. This visit assessed the programme against the standards of education and training (SETs) and considered whether those who complete the programme meet the standards of proficiency (SOPs) for their part of the Register.

This visit was part of a joint event. The professional body considered their accreditation of the programme. The professional body and the HPC formed a joint panel, with an independent chair supplied by the education provider. Whilst the joint panel participated in collaborative scrutiny of the programme and dialogue throughout the visit; this report covers the HPC's recommendations on the programme only. As an independent regulatory body, the HPC's recommended outcome is independent and impartial and based solely on the HPC's standards. A separate report, produced by the professional body, outlines their decisions on the programme's status.

## Visit details

Name of HPC visitors and profession	Allan Winthrop (Counselling psychologist) Ruth Baker (Clinical psychology)
HPC executive officers (in attendance)	Lewis Roberts
Proposed student numbers	48 (3 intakes of 16 students)
First approved intake	January 2004
Effective date that programme approval reconfirmed from	September 2012
Chair	Tracey Cockerton (Middlesex University)
Members of the joint panel	Kimberley Wilson (British Psychological Society) Brian Sheenan (British Psychological Society) Lucy Kerry (British Psychological Society)

## Sources of evidence

Prior to the visit the HPC reviewed the documentation detailed below, sent by the education provider:

	Yes	No	N/A
Programme specification	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Descriptions of the modules	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SETs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Mapping document providing evidence of how the education provider has met the SOPs	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Practice placement handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Student handbook	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Curriculum vitae for relevant staff	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
External examiners' reports from the last two years	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

During the visit the HPC saw the following groups or facilities:

	Yes	No	N/A
Senior managers of the education provider with responsibility for resources for the programme	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Programme team	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Placements providers and educators/mentors	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Students	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Learning resources	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Specialist teaching accommodation (eg specialist laboratories and teaching rooms)	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Recommended outcome

To recommend a programme for ongoing approval, the visitors must be assured that the programme meets all of the standards of education and training (SETs) and that those who complete the programme meet our standards of proficiency (SOPs) for their part of the Register.

The visitors agreed to recommend to the Education and Training Committee that a number of conditions are set on the programme, all of which must be met before the ongoing approval of the programme is reconfirmed.

The visitors agreed that 36 of the SETs have been met and that conditions should be set on the remaining 21 SETs.

Conditions are requirements that the education provider must meet before the programme can be recommended for ongoing approval. Conditions are set when certain standards of education and training have not been met or there is insufficient evidence of the standard being met.

The visitors have also made a number of recommendations for the programme.

Recommendations are observations on the programme or education provider which do not need to be met before the programme is recommended for ongoing approval. Recommendations are normally set to encourage further enhancements to the programme and are normally set when it is felt that the particular standard of education and training has been met at, or just above the threshold level.

## Conditions

### **2.1 The admissions procedures 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 revisit all programme documentation, including advertising materials, to ensure that potential applicants are made aware of any likely additional costs associated with the programme.

**Reason:** From a review of the programme documentation the visitors noted that students may be expected to self-fund a number of additional costs associated with taking up a place on the programme. The visitors noted that the course fees were stated on the programme website. However reference to other potential additional costs such as those associated with personal therapy, indemnity insurance, CRB checks, resources such as books and the internet, potential supervisor fees and costs associated with travel to placements were less clearly stated. The visitors therefore require the education provider to ensure that, as with the course fees, the potential additional costs associated with the programme are clearly stated to demonstrate that this standard has been met.

### **2.1 The admissions procedures 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 revisit all programme documentation, including advertising materials, to clearly highlight to potential applicants that students on the programme are responsible for organising their own practice placements, in partnership with the education provider.

**Reason:** From a review of the programme documentation the visitors noted that students on the programme are responsible for choosing and identifying practice placements and ensuring they are appropriate. In particular the visitors noted page 5 of the 'Clinical Placement Handbook for Doctoral programmes', where the flowchart states that a "student chooses from [placement] list, or identifies [placement] independently" and a "student ensures placement is appropriate". The visitors also noted discussions with the programme team where it was stated that students are supported throughout this process and the education providers Placement Coordinator ensures placements meet the education provider's criteria. The visitors require the education provider to clearly highlight within the programme documentation and advertising materials that students on the programme will be responsible for organising practice placements in partnership with the education provider.

### **2.1 The admissions procedures 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 revisit all programme documentation, including advertising materials, to ensure that the terminology in use is reflective of the language associated with statutory regulation and the HPC.

**Reason:** The documentation submitted by the education provider prior to the visit did not fully comply with the advertising guidance issued by HPC. The visitors noted that in the 'Programme Specification' and in the module outlines that HPC was referenced as 'accrediting' the programme. The HPC does not 'accredit' education programmes instead we 'approve' education programmes. The visitors also noted that in the 'Programme Handbook' (p26) it was stated that completion of the programme will "entitle you to chartering with the BPS and registration as a counselling psychologist with the HPC". All students need to apply to the HPC Register after they have successfully completed the programme in order to use the protected titles. As such the language the education provider uses needs to reflect this and ensure that applicants and students are clear that successful completion of the programme means they are only eligible to apply to the Register. The visitors require all programme documentation, including advertising materials, to be amended to remove any instance of incorrect or out-of-date terminology to ensure consistency and avoid any potential confusion.

## **2.2 The admissions procedures must apply selection and entry criteria, including evidence of a good command of reading, writing and spoken English.**

**Condition:** The education provider must revisit all programme documentation, including advertising materials, to ensure that the International English Language Testing System (IELTS) entry criteria are clear.

**Reason:** From a review of the documentation submitted the visitors could not determine what evidence the programme team required to ensure that applicants had a good command of reading writing and spoken English. At the visit, and in discussions with the programme team, it was indicated that the International English Language Testing System (IELTS) entry criteria for entry to the programme is demonstration of competence at level 7 or higher. The visitors therefore require further evidence to demonstrate that the programme documentation clearly states the English-language requirements on entry to the programme, to ensure that this standard is met.

## **2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.**

**Condition:** The education provider must revisit the admissions procedures to ensure that students entering the programme have undergone appropriate criminal convictions checks.

**Reason:** From a review of the documentation provided and in discussion with the programme team the visitors ascertained that the education provider does not facilitate criminal convictions checks as part of the admissions process. The visitors noted in discussions with the programme team that the admissions procedures requires applicants to evidence an enhanced CRB check but that this is not normally undertaken by the education provider. The visitors noted in discussions that a number of students stated that they provided evidence of

criminal convictions checks undertaken by an employer before enrolling on the programme. However, some students stated that they had checks undertaken after they had enrolled on the programme, before the start of their first placement. The visitors highlighted that as criminal checks may not be undertaken at admission some students may not have disclosed any relevant convictions and that they may start the programme and possibly have to terminate study if a conviction was disclosed at a later point.

The visitors therefore require the education provider to provide evidence that they run appropriate and relevant criminal conviction checks on all applicants as part of the admissions procedure. They also require evidence of what processes the education provider has in place for dealing with an applicant who discloses a criminal conviction or a situation where the CRB status of a student changes as they progress through the programme.

## **2.5 The admissions procedures must apply selection and entry criteria, including appropriate academic and/or professional entry standards.**

**Condition:** The education provider must revisit the admissions documentation to ensure the entry criteria are clear and consistent.

**Reason:** From a review of the programme documentation the visitors noted that the programme entry criteria outline that applicants to the programme must have completed an introductory course in psychotherapy or counselling, such as the one offered by the education provider and have experience in caring work. However, the visitors were unclear as to the criteria used by the education provider to make a judgement on what an appropriate introductory course constitutes and what is acceptable in terms of experience of caring work. The visitors were also unclear as to how this set of criteria was communicated to potential applicants by the programme team. The visitors therefore require evidence of what any prior learning and teaching would need to cover in order to meet the programme's entry requirements and what criteria the education provider uses to assess applicants experience of caring work. The visitors also require further evidence of how this criterion is communicated to applicants and applied during the admissions procedures to ensure that this standard continues to be met.

## **3.1 The programme must have a secure place in the education provider's business plan.**

**Condition:** The education provider must provide formal clarification that all students enrolled on the programme will be supported by Middlesex University should the education provider's business plan become unsustainable.

**Reason:** In discussions with the senior management team the visitors noted that a representative from Middlesex University stated that should the education provider's business plan become unsustainable, Middlesex University would take responsibility for all students enrolled on the programme. The visitors noted evidence of an insurance policy provided by the education provider that would support this transfer should the education provider no longer be able to support students on the programme. The visitors were satisfied with the current financial stability of the programme but noted that the education provider runs a range of



programmes and is a small independent education provider. The visitors therefore require evidence of the formal agreement between Middlesex University and the education provider which clearly states that Middlesex University would support all students in the completion of the programme should the education providers business plan become unsustainable.

### **3.6 Subject areas must be taught by staff with relevant specialist expertise and knowledge.**

**Condition:** The education provider must outline the mechanisms in place to ensure the quality of specialist visiting lecturers teaching is guaranteed.

**Reason:** From a review of the programme documentation and from discussions with the programme team the visitors noted that specialist visiting lecturers are integral to the delivery of the curriculum. The visitors noted discussions with the programme team where it was stated that specialist visiting lecturers are interviewed and can be subject to peer review. The visitors also noted discussions with the students where it was stated that they provide feedback to the specialist visiting lecturers. However, the visitors were unclear as to how the education provider guarantees the quality of this teaching, which is integral to the programme. The visitors therefore require further evidence to demonstrate how the education provider guarantees the quality of teaching delivered by visiting lecturers. The visitors therefore require further evidence of the policies or procedures the education provider uses to guarantee and safeguard the quality of the teaching of the specialist visiting lecturers.

### **3.14 Where students participate as service users in practical and clinical teaching, appropriate protocols must be used to obtain their consent.**

**Condition:** The education provider must ensure that where students participate as service users in practical teaching, appropriate protocols are used to obtain their consent.

**Reason:** From discussions with the students the visitors noted that they participate as service users in practical teaching. However, the visitors were unable to determine any formal protocols for obtaining students consent within the documentation. From the discussions with the programme team, the visitors learnt that verbal consent is obtained during practical teaching and that participation is not mandatory. The programme team also discussed how they made applicants to the programme clear about what level of involvement was expected during the course of the programme.

The visitors highlighted as that there was no formal protocol in place to record that students' consent had been obtained this may have an impact on how the programme team are able to manage situations where students declined from participation. In light of this, the visitors did not have sufficient evidence of appropriate protocols used to gain informed consent from students or what processes are in place to manage situations where students declined to participate. The visitors therefore require the education provider to provide evidence of appropriate formal protocols for obtaining consent from students and for managing situations where students decline from participating.

**3.15 Throughout the course of the programme, the education provider must have identified where attendance is mandatory and must have associated monitoring mechanisms in place.**

**Condition:** The education provider must revisit the programme documentation to clearly identify the minimum attendance requirements for time on placements and the associated monitoring mechanisms in place.

**Reason:** The visitors noted that over the duration of the programme students are required to undertake a minimum of 450 hours of supervised clinical work in a placement setting. However, the visitors did not have sufficient evidence of the student attendance expectations whilst on placement or what monitoring mechanisms are in place to ensure that students complete this requirement. The visitors noted discussions with the programme team where it was stated that a supervisor report is completed at the end of each term and that any attendance issues would be highlighted.

However, from the evidence received the visitors could not identify how these minimum attendance requirements were being fully communicated to the students and placement providers. In addition the visitors were unable to identify any formal monitoring of students' attendance on placement. The visitors also noted that if all stakeholders were not fully aware of the threshold requirement, it would be difficult for the education provider to monitor and step in to take action to ensure absence does not affect a students learning and development on placement. The visitors highlighted that this could affect students' ability to meeting the learning outcomes associated with placement and therefore the relevant standards of proficiency.

The visitors therefore require further evidence of how the programme team ensure that they communicate to students and placement providers, clearly identifies the minimum attendance requirements for time on placements. This should also include the threshold level at which the education provider would take action if attendance dropped and the associated monitoring mechanisms to record students' attendance.

**3.16 There must be a process in place throughout the programme for dealing with concerns about students' profession-related conduct.**

**Condition:** The education provider must provide evidence of a formal fitness to practice process to clearly and consistently deal with concerns regarding student's profession-related conduct.

**Reason:** From the documentation, and in discussion with the programme team, the visitors identified that there was no formal process in place for dealing with concerns about student's profession-related conduct. The discussions with the programme team highlighted verbally the process for dealing with any concerns about a student's profession-related conduct. It was noted that concerns could be raised about a student's conduct and that those concerns would be dealt with via various meetings to include the student, supervisor and education provider. Measures were then put in place to deal with the conduct of the student and these measures would be reviewed at the regular meetings, which the student would attend to allow them to reflect on the issues. If a student was deemed as

not fit to practice they would be asked to leave the programme. However, the visitors did not have any written evidence of this process and what formal procedures are implemented to ensure that any issues of this sort were dealt with clearly and consistently.

The visitors therefore require further evidence of a clear and open formal process which is implemented to deal with concerns regarding student's profession-related conduct, to ensure that this standard is met.

### **5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.**

**Condition:** The education provider must revisit the programme documentation to clearly highlight that students must undertake an appropriate range of placements to ensure a wide range of learning experiences and the achievement of the learning outcomes.

**Reason:** From a review of the programme documentation the visitors noted that students must undertake more than one practice placement. The visitors noted discussions with the programme team where it was stated that students were encouraged to seek a range of practice placement experiences whilst on the programme but must always undertake a minimum of two different placements. The programme team stated that the Placement Co-ordinator monitored the range of placement experiences that students were undertaking to ensure that they are appropriate to support the learning outcomes. The visitors noted the importance of students gaining a wide range of learning experiences as a number of the standards of proficiency require breadth of experience. The visitors were unable to determine how the education provider communicates this requirement to students. The visitors therefore require the education provider to clearly highlight within the programme documentation that students must undertake practice placements that offer a range of learning experiences that are sufficient to support the achievement of the standards of proficiency.

### **5.3 The practice placement settings must provide a safe and supportive environment.**

**Condition:** The education provider must revisit the programme documentation and outline the process for approving and monitoring practice placements to ensure they are safe and supportive.

**Reason:** From a review of the documentation and discussions with the programme team the visitors could not find evidence of any formal mechanisms in place to check the quality of practice placements before they are used. The visitors noted the flowchart in the 'Clinical Placement Handbook for Doctoral programmes' (p5) that outlines the process for approving practice placements. However, from the evidence provided the visitors highlighted that the education provider's role in approving placements appear limited and that students are responsible for ensuring that their placements meet the education provider's requirements. The visitors noted that the education provider role in the placement approval process is to contact placements to discuss the placement agreement form and sign off the placement if it is deemed appropriate. The visitors also

noted in the 'Clinical Placement Handbook for Doctoral programmes' (p6) it states that "NSPC takes no responsibility for clinical governance in the placement sites".

The visitors therefore require further evidence of the auditing process and the guidelines in place to ensure that the education provider can make a judgement on whether practice placements provide safe and supportive environments. The education provider must also provide evidence of guidelines which articulate what constitutes an inappropriate practice placement environment and demonstrate that they take ownership of the approval and monitoring of practice placements.

#### **5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.**

**Condition:** The education provider must provide evidence of a thorough and effective system in place for approving and monitoring practice placements.

**Reason:** From the documents submitted and discussions with the programme team the visitors were not able to clearly define the formal policies and processes that the education provider uses to approve and monitor placements. The visitors noted the flowchart in the 'Clinical Placement Handbook for Doctoral programmes' (p5) that outlines the process for approving practice placements. However, from the evidence provided the visitors highlighted that the education provider's role in approving placements appears limited and students are responsible for ensuring that their placements meet the education provider's requirements. The visitors noted the 'Development Plan for Doctoral Placements 2012/2013' that states that an objective is to "increase quality assurance with each current placement provider".

The visitors therefore require further evidence of the auditing process and the guidelines in place to ensure that the education provider can make a judgement on whether practice placements are appropriate. The education provider must also provide evidence of guidelines which articulate what constitutes an inappropriate practice placement environment and demonstrate that they take ownership of the approval and monitoring of practice placements.

#### **5.5 The placement providers must have equality and diversity policies in relation to students, together with an indication of how these will be implemented and monitored.**

**Condition:** The education provider must provide evidence of how they ensure equality and diversity policies are in place, implemented and monitored within practice placements.

**Reason:** From the documents submitted and discussions with the programme team the visitors were not able to clearly define the formal policies and processes that the education provider uses to approve and monitor placements. The visitors could therefore not determine what mechanisms are in place for the programme team to ensure that practice placements have equality and diversity policies in place and that they are implemented and monitored. The visitors therefore require the education provider to provide evidence outlining how they ensure

equality and diversity policies are in place, implemented and monitored within practice placements.

#### **5.6 There must be an adequate number of appropriately qualified and experienced staff at the practice placement setting.**

**Condition:** The education provider must provide evidence outlining how they ensure an adequate number of appropriately qualified and experienced staff is in place at the practice placement setting.

**Reason:** From the documents submitted and discussions with the programme team the visitors were not able to clearly define the formal policies and processes that the education provider uses to approve and monitor placements. The visitors were made aware of a number of informal mechanisms that were in place to audit placements. However, the visitors were unclear as to how the programme team ensures that there are an adequate number of appropriately qualified and experienced staff in place at each practice placement. As such the visitors could not determine what criteria is used to decide if a practice placement has an adequate number of appropriately qualified and experienced staff or any process for dealing with a practice placement that does not meet these criteria. The visitors therefore require further evidence of any formal approval and monitoring mechanisms to ensure that each practice placement meets the criteria for staffing as well as any process that will be implemented taken if this situation changes.

#### **5.7 Practice placement educators must have relevant knowledge, skills and experience.**

**Condition:** The programme team must provide further evidence of how they ensure supervisors have relevant knowledge, skills and experience.

**Reason:** Documentation provided prior to the visit included the placement agreement form, supervisors CV's and general information regarding selection of supervisors. The visitors considered these to be useful indicators that the education provider was aware of the need to monitor the knowledge, skills and experience of supervisors. The visitors also noted discussions with the programme team that outlined a number of informal quality mechanisms that are in place. However, the visitors were not presented with formal policies and processes that support the approval and selection of supervisors. The visitors require further evidence of the selection process, details of selection criteria and details of threshold levels of skills and experience that the education provider require someone to have before becoming a supervisor. The visitors also require further information of the mechanisms in place to monitor the performance of supervisors.

#### **5.8 Practice placement educators must undertake appropriate practice placement educator training.**

**Condition:** The education provider must clearly articulate the mechanisms they use to ensure practice placement educators undertake appropriate practice placement educator training and are informed about the specifics of the programme in advance of receiving students.

**Reason:** From discussions with the programme team the visitors noted that the education provider facilitates a yearly supervisor workshop. However, from discussion with the practice placement educators, the visitors noted that a number of practice placement educators present, had not received practice placement educator training prior to receiving students on placement. The visitors therefore require further evidence to articulate how the mechanisms used by the programme team ensures that practice placement educators undertake appropriate practice placement educator training. In this way the visitors can be sure that practice placement educators allied to the programme and are informed about the specifics of the programme in advance of receiving students and that this standard continues to be met.

**5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:**

- **the learning outcomes to be achieved;**
- **the timings and the duration of any placement experience and associated records to be maintained;**
- **expectations of professional conduct;**
- **the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and**
- **communication and lines of responsibility.**

**Condition:** The education provider must clarify the mechanisms in place that ensure students and supervisors have an understanding about the competencies that should be achieved within each practice placement.

**Reason:** The visitors noted discussions with the supervisors in which it was stated that on occasion they were uncertain about what competencies should be achieved during a placement. The visitors also noted in discussions with the programme team that the 'Supervisor Evaluation Form' and 'Practice Log' is a key mechanism to ensure that students demonstrate progression. The visitors highlighted that these documents are fairly general and do not provide a clear indication of the framework the programme uses to map a student's progression through the programme and from one placement to another. As such in reviewing the programme documentation the visitors were not able to associate specific competencies to specific practice placements and where students would be expected to meet certain competencies or learning outcomes. The visitors therefore require the education provider to provide further evidence of how the mechanisms in place ensure that students and supervisors have an understanding about the competencies that should be achieved within each practice placement.

**6.1 The assessment strategy and design must ensure that the student who successfully completes the programme has met the standards of proficiency for their part of the Register.**

**Condition:** The education provider must demonstrate how the assessment strategy for practice placements ensures that competencies are assessed that a student meets them all to progress and successfully complete the programme.

**Reason:** The visitors noted discussions with the programme team where it was stated that the 'Supervisor Evaluation Form' and 'Practice Log' is a key mechanism to ensure that students demonstrate progression. The visitors considered these documents to be very general and do not provide a clear framework to map progression. As such in reviewing the programme documentation the visitors were not able to associate specific competencies to specific practice placements and where students would be expected to meet certain competencies or learning outcomes. The visitors could therefore not determine how the programme team expects a student to progress through the programme and meet all of the standards of proficiency. The visitors therefore require the education provider to provide further evidence of how the assessment strategy and design associated with practice placements ensures that all of the competencies are assessed. The visitors also require further evidence of how the assessment of these competencies ensures that a student who successfully progress through the programme can meet all of the relevant standards of proficiency..

**6.7 Assessment regulations must clearly specify requirements for student progression and achievement within the programme.**

**Condition:** The education provider must revisit the programme documentation to clearly specify the requirements for progression and achievement within the programme, providing clearer evidence of the criteria for failure of placement and what implications this has for student's progression through the programme.

**Reason:** From a review of the programme documentation the visitors noted page 44–47 of the programme handbook where details of assessment processes and student progression are outlined. The visitors were unable to find assessment processes associated with placement failure. The visitors therefore require further details outlining the criteria that would be used to fail a student on placement and details of the consequences of placement failure.

**6.9 Assessment regulations must clearly specify requirements for an aegrotat award not to provide eligibility for admission to the Register.**

**Condition:** The education provider must revisit the programme documentation to clearly state that aegrotat awards do not confer eligibility to apply to the Register.

**Reason:** From the documentation provided the visitors could not determine where there was a clear statement regarding aegrotat awards. The visitors could therefore not determine how the programme team ensured that students understood that aegrotat awards would not enable them to be eligible to apply to the Register. The visitors therefore require further evidence to ensure that there is a clear statement included in the programme documentation regarding aegrotat awards and that this is accessible to students.

**6.11 Assessment regulations must clearly specify requirements for the appointment of at least one external examiner who must be appropriately experienced and qualified and, unless other arrangements are agreed, be from the relevant part of the Register.**

**Condition:** The education provider must revisit the programme documentation to clearly articulate that at least one external examiner appointed to the programme must be HPC registered unless alternate arrangements have been agreed.

**Reason:** In the documentation submitted by the education provider there was insufficient detail concerning the recruitment of external examiners to the programme. The visitors were happy that the current external examiner meets the requirement of the HPC. However, this standard requires that the assessment regulations of the programme must state that any external examiner appointed to the programme needs to be appropriately registered or that suitable alternative arrangements should be agreed. Therefore the visitors require evidence that HPC requirements regarding the appointment of external examiners to the programme have been included in the documentation, specifically in the programme regulations, to ensure that this standard is met.



## Recommendations

### **2.3 The admissions procedures must apply selection and entry criteria, including criminal convictions checks.**

**Recommendation:** The education provider should consider amending the admissions procedures relating to criminal conviction checks.

**Reason:** From a review of the SETs mapping document the visitors noted that it states that “we cannot normally accept applicants whose enhanced CRB check shows that they have a criminal conviction”. The same document also states that should an applicant disclose a criminal offence “we cannot accept you on the programme unless the HPC has indicated that you would be eligible for registration as a counselling psychologist”. The HPC has processes in place for assessing an individual’s ability to meet the standards of conduct, performance and ethics when they apply to the HPC Register and all applications are dealt with on a case by case basis. However, the visitors noted that the education provider has a role in assessing applicants for the programme and not for registration.

The education provider may want to refer to the HPC standards of conduct, performance and ethics when considering whether a criminal conviction might affect that person’s ability to meet those standards. The education provider may also want to review the HPC ‘Guidance on health and character’ publication to help inform any judgement. The education provider should therefore consider amending the criminal conviction processes in place for dealing with an applicant or student who has a criminal conviction to highlight that the education provider takes ownership of any judgement that is made during the programme admissions process.

### **2.4 The admissions procedures must apply selection and entry criteria, including compliance with any health requirements.**

**Recommendation:** The education provider should consider revisiting the programme documentation to enhance the information about the support available and what reasonable adjustments can be made to support individuals with any health requirements.

**Reason:** From a review of the programme documentation, and from discussions with the programme team, the visitors are satisfied that this standard has been met. The visitors noted that in the discussions with the programme team the policies and processes in place to support reasonable adjustments on the programme were clearly outlined. The visitors did, however, note an apparent discrepancy between the discussions with the programme team and the information made available within the programme documentation. The visitors highlighted that information on reasonable adjustments and support mechanisms that the programme team were operating could be made more explicit in the programme documentation to ensure that the options and services available to individuals with health requirements are more clearly and consistently referenced.

**2.7 The admissions procedures must ensure that the education provider has equality and diversity policies in relation to applicants and students, together with an indication of how these will be implemented and monitored.**

**Recommendation:** The education provider should consider taking a more strategic approach in the monitoring and implementation of its equality and diversity policies.

**Reason:** From a review of the programme documentation and from discussions with the programme team the visitors are satisfied that this standard has been met. The visitors did however articulate that the programme team may consider taking a more strategic approach to the way it monitors and implements its equality and diversity policies. In this way the education provider may be better able to formulate an equality and diversity strategy at a programme level to ensure that the work that is currently being undertaken around equality and diversity is more easily conducted in a consistent, transparent and measured way.

**3.7 A programme for staff development must be in place to ensure continuing professional and research development.**

**Recommendation:** The education provider should consider making a formal teaching qualification a professional development requirement for staff on the programme.

**Reason:** The visitors noted discussions with a representative from Middlesex University where it was stated that all their staff have the opportunity to undertake a formal teaching qualification. The visitors noted that the education provider currently has no such arrangement in place and does not require teaching staff to hold a formal teaching qualification. The visitors recommend that the education provider may want to review the programme for staff development to further enhance and encourage the provision of formal teaching qualifications.

**3.10 The learning resources, including IT facilities, must be appropriate to the curriculum and must be readily available to students and staff.**

**Recommendation:** The education provider should consider reviewing the provision of core texts that are available to students on the programme.

**Reason:** From discussions with the programme team the visitors noted that students are able to access library facilities at both the education provider and the validating body. The visitors were therefore satisfied that this standard continues to be met. However, the visitors noted discussions with students where it was stated that due to the specialist nature of the subject material it can often be difficult to access core texts. The students commented that copies of the core texts at the education provider can be limited and the library at the validating body does not always hold copies. The students also commented that because of this limited provision they often bought copies of the core texts. The visitors therefore recommend that the education provider should consider reviewing the provision of core texts that are available to students on the programme to better support students in their teaching and learning.

**4.8 The range of learning and teaching approaches used must be appropriate to the effective delivery of the curriculum.**

**Recommendation:** The education provider should inform the HPC if the range of e-learning and teaching approaches is further developed.

**Reason:** From a review of the programme documentation and from discussions with the programme team the visitors noted that e-learning and distance learning is central to the delivery of the curriculum. The visitors were satisfied that the current range of learning and teaching approaches is appropriate to the effective delivery of the curriculum. However, the visitors also noted discussions with the programme team where it was stated that they intended to further develop e-learning within the programme. The visitors therefore recommend that should the learning and teaching approaches be further developed towards e-learning and distance learning the education provider inform the HPC through the major change or annual monitoring processes.

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