

HCPC approval process report

Education provider	University of Sheffield
Name of programme(s)	BMedSci (Hons) Speech and Language Therapy, Full time MMedSci Speech and Language Therapy, Full time
Approval visit date	21-22 November 2017
Case reference	CAS-11953-Q7P8D7

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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:

Lorna Povey	Speech and language therapist
Catherine Mackenzie	Speech and language therapist
Joanne Watchman	Lay
Eloise O'Connell	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.

Tracey Moore	Independent chair (supplied by the education provider)	Head of Department, School of Nursing and Midwifery, University of Sheffield
Steph Allen	Secretary (supplied by the education provider)	University of Sheffield

Wendy Cohen	External panel member	Representative from the Royal College of Speech and Language Therapists (RCSLT)
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Section 2: Programme details

Programme name	BMedSci (Hons) Speech and Language Therapy
Mode of study	FT (Full time)
Profession	Speech and language therapist
Proposed First intake	01 September 2018
Maximum learner cohort	35
Intakes per year	1
Assessment reference	APP01886

Programme name	MMedSci Speech and Language Therapy
Mode of study	FT (Full time)
Profession	Speech and language therapist
Proposed First intake	01 September 2018
Maximum learner cohort	26
Intakes per year	1
Assessment reference	APP01887

We undertook this assessment of the 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.

The education provider informed the HCPC that their currently approved four year BMedSci (Speech) will be moving to a three-year programme, and that their currently approved MMedSci (Clinical Communication Sciences) will have changes made to the design and delivery of the programme. The education provider has also made changes to the programme titles of both programmes.

Considering the broad scope of changes proposed to speech and language therapy provision at the education provider, we decided the most appropriate way to scrutinise how the two replacement programmes will meet our standards is through the approval process.

As noted in the tables above, the two proposed programmes are:

- a three year BMedSci (Hons) Speech and Language Therapy programme and
- a two year MMedSci Speech and Language Therapy

Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we require certain evidence and information from education providers. The following is a list of

evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence, we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

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

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

Group	Met	Comments
Learners	Yes	We met with learners and graduates on the currently HCPC approved programmes, BMedSci (Hons) Speech, and MEdSci (Clinical Communication Studies).
Senior staff	Yes	
Practice education providers and educators	Yes	
Service users and carers (and / or their representatives)	Yes	
Programme team	Yes	
Facilities and resources	Yes	

Section 4: Outcome from first review

Recommendation of the visitors

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

Conditions

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further

evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 28 February 2018.

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 revise the programme documentation, including advertising materials to clearly articulate any additional costs that learners may be liable to pay when on the programme.

Reason: In a review of the documentation the visitors were unclear what costs in addition to fees would be incurred by learners on the programmes, such as costs associated with practice-based learning. In addition, the visitors were not clear how the prospective learners would be informed of any costs prior to accepting a place on the programme. In the SETs mapping document, the education provider referenced the programme specification documents as well as the education provider's web pages to evidence this standard. At the visit, the visitors heard that there may be additional costs associated with travel to and from placements, and for some learners there may be accommodation costs. The visitors heard that there is some uncertainty around funding for learners on these programmes; the education provider does not know if bursaries will be available or what Higher Education England will cover for additional costs on the programme. At the visit, the programme team explained a number of ways that they convey information about additional costs on the programmes to prospective learners. The visitors heard that this information is given at open days prior to application, presentations at interview days and post-offer open days. The education provider also has a dedicated admissions administrator who would be available to answer any queries prospective learners may have. The visitors understood that information relating to additional costs associated with practice-based learning is mainly given through open days and a presentation at the interview days; however, the visitors have not seen this presentation. The visitors understood that the education provider may not have a clear figure of what the additional costs may be due to uncertainty of funding; however, it must be made clear to applicants that there may be some additional cost involved. The visitors also could not see how those who might not attend an open day would be given pertinent information about potential additional costs associated with the programme prior to taking up an offer of a place on the programme. As such, the education provider must demonstrate how they inform all prospective applicants that there may be additional costs on the programme associated with practice-based learning.

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 demonstrate that there is an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

Reason: From a review of the documentation, the visitors understood that the education provider has arranged placements with the regional speech and language therapy services that are both NHS and independent services. Currently, placements are governed by Health Education England (HEE) and the education provider has commissioning / contractual arrangements with Health Education Yorkshire and Humber (HEYH) and Health Education East Midlands (HEEM) in terms of placement

capacity and quality. At the visit, the visitors heard that the practice education providers only offer placements that they have capacity for, and the programme team noted that in the past there has been an excess of placements available for the BMedSci (Hons) Speech and MMedSci (Clinical Communication Studies) programmes. While the visitors understand that there are arrangements in place and placements have been available throughout the course of the programmes, the visitors have not seen the process that ensures the ongoing availability and capacity of practice-based learning for all learners. The visitors were also unclear on the number of placements that the education provider requires to deliver the programmes, or how the education provider could evidence that the number of placements required would be available. In order for the visitors to make a judgement on whether the standard is met, the education provider must demonstrate that there is a process in place to ensure the availability and capacity of practice-based learning for all learners.

4.11 The education provider must identify and communicate to learners the parts of the programme where attendance is mandatory, and must have associated monitoring processes in place.

Condition: The education provider must define the attendance requirement, how this is communicated to learners and that there is an effective system in place to monitor attendance of learners on the programmes.

Reason: The education provider has stated throughout documentation that attendance is mandatory for all aspects of the programmes. The SETs mapping document references both placement and programme handbooks to evidence this standard. The placement handbook for both programmes states that attendance is mandatory for all aspects of the programmes, and learners must inform a member of teaching staff if they will be absent for any sessions (both academic or in placement). The placement handbook states that if a learner continues to not attend, a staff member will follow this up and “there may be issues arising from this for on-going completion of the programme”. However, the visitors were unclear at which point continued non-attendance would be considered an issue, and how learners are aware of how many absences are permitted before attendance becomes an issue and may affect their ability to complete the programme. At the visit, the programme team confirmed that they stipulate mandatory attendance is required for all aspects of the programmes. From discussions with learners, the visitors heard that they must attend a certain number of hours; however, they could not specify the attendance requirement. The learners understood there is an expectation, by the education provider, that they attend all academic and practice-based learning sessions. The visitors heard from the learners that they are not aware of the exact requirements of attendance in order to complete the programmes. In addition to this, the SETs mapping document refers to a “Central Student Attendance Monitoring (SAM) system” which monitors attendance of all learners through collection of data points such as random checking of learners in timetabled lectures and submission of assignments. At the visit, the visitors heard that there is no system in place to monitor attendance at all lectures. However the visitors were not clear, what system is in place to monitor learners’ attendance on all parts of the programmes, or how the mandatory attendance requirement can be monitored if the SAM monitoring system does not monitor all attendance. In addition, the visitors were not clear what the threshold is for learners that fall below the attendance requirement, and if learners are aware at which point lack of attendance becomes an issue that could affect their ability to complete the programme. In order for the visitors to make a judgement on whether this standard has been met, the education provider must

articulate to the level of attendance required on the programmes, how this is communicated to learners and that there is an effective system in place to monitor attendance in all settings.

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 they have a thorough and effective system in place for approving and monitoring all practice-based learning.

Reason: From a review of the documentation, the visitors understood that the education provider has arranged placements with the regional Speech Language Therapy (SLT) services that are both NHS and independent services. Currently, placements are governed by Health Education England (HEE) and the education provider has commissioning/contractual arrangements with Health Education Yorkshire and Humber (HEYH) and Health Education East Midlands (HEEM). The SETs mapping document states that at a departmental level, the clinical placements team organise and arrange placements with the regional SLT services. The SETs mapping document states that the education provider operates a “student placement feedback mechanism”. This involves the learners completing a placement feedback form upon completion of a placement, which is returned to the education provider who then collate the feedback for that service and/or individual speech and language therapist. Some of the SLT services operate the Practice Placement Quality Assurance (PPQA) which is an online system based on learner feedback. In addition to this, the SETs mapping document states that each regional SLT service has a designated “student placement coordinator SLT” who works with the education provider to ensure safe and effective student learning and placement quality. The visitors heard that the education provider uses an online quality assurance system based on learner feedback, service level agreements with practice educators, and the education provider’s own departmental mechanisms to approve and monitor practice-based learning. During discussions with the programme team and practice educators, the visitors learned that practice education providers largely monitor their own practice-based learning environments, which is largely based on learner feedback. While there are some processes in place to approve and monitor practice-based learning settings, the visitors have not seen the education provider’s overarching process in place that effectively approves and monitors the ongoing quality of all practice-based learning settings. As such, the education provider must demonstrate that there is a well-defined, robust process for approving and ensuring the quality of all practice-based learning settings.

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 that they have a thorough and effective system in place for ensuring that the practice-based learning environment is safe and supportive for learners and service users.

Reason: From a review of documentation, the visitors were unclear what policies the education provider has in place to ensure that the practice-based learning environment is safe and supportive for learners and service users. This relates to the visitors not being clear on what policies are in place to effectively approve and monitor all practice-based learning settings. During discussions with the programme team and practice educators, the visitors learned that practice education providers largely monitor their

own practice-based learning environments, which is largely based on learner feedback. However, the education provider has not demonstrated that the audit process, which is largely based on learner feedback, is effective, or that the education provider has oversight of this process.

At the visit, the visitors heard that the education provider's way of evidencing this standard includes pre-placement training of practice educators, reflective activities for learners, and feedback forms that service users fill in after working with learners. In addition to this, the visitors noted that learners must pass their placement assessments before they move to the next one, to ensure that they are competent trainees. However, the visitors have not seen that education provider has an overarching process in place to ensure that the practice-based learning environments are safe and supportive for learners and service users. As the education provider has not identified an effective system for approving and ensuring the ongoing quality of practice-based learning, the visitors cannot make a judgement about whether the education provider has a system for ensuring that the practice-based learning settings provide a safe and supportive environment for learners and service users. As such, the education provider will need to demonstrate what systems they have in place that will ensure the practice-based learning settings provide a safe and supportive environment for learners and service users.

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

Condition: The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning and that there is sufficient capacity for programme needs.

Reason: On review of the documentation, the visitors were not clear what process the education provider uses to ensure that they have an adequate number of appropriately qualified and experienced practice educators to meet practice-based learning requirements. At the visit, the visitors heard that the education provider has a database of all staff and the numbers of staff is reviewed through this database. The visitors also heard that there is an excess of practice placement capacity, and there is growing involvement of independent practitioners. However, the visitors could not see what the education provider defines as an appropriate number of practice-based learning staff for these programmes, or how the number of practice-based learning staff is monitored by the education provider to ensure that it is suitable for the number of learners and the type of placement. As such, the education provider must demonstrate how they ensure that there is 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 how they ensure that all speech and language therapist practice educators are HCPC registered.

Reason: The placement handbook for both programmes states that all practice educators in Speech and Language Therapy (SLT) services who offer placements to learners on the programmes are "asked to be HCPC registered, a member of RCSLT,

an active SLT and participate in training offered by the department of HCS”. At the visit, the visitors heard that the education provider does require the SLT practice educators to be HCPC registered. The programme team explained that they monitor this through the use of a service level agreement with practice educators; there is a section on the form that they sign that states they are HCPC registered. The agreement is signed and returned to the education provider before placement commences. However, the visitors were not clear how the education provider would monitor ongoing HCPC registration status of the SLT practice educators. In order for the visitors to be able to make a judgement on whether this standard is met, the education provider must demonstrate how they monitor HCPC registration status of SLT practice educators, and that the requirement for SLT practice educators to be HCPC registered is clearly reflected across relevant documentation.

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.

Condition: The education provider must demonstrate that they have a process in place to ensure that all practice educators undertake appropriate initial and update training and that this is recorded and monitored.

Reason: In a review of the documentation, the visitors noted that a training resource for practice educators is available through online portals, which all practice educators are required to engage with prior to supporting learners. The practice educators access the online portal where they can access relevant information, updates and training materials. However, the visitors were not clear about what training materials the practice educators would have access to and therefore could not make a judgement to whether the training is appropriate to their role, and the delivery of the learning outcomes of the programmes.

In addition, the visitors were not clear that the education provider has a process in place to monitor and record what practice educators are undertaking initial and regular training. The SETs mapping document states that the education provider hosts an annual ‘Practice Educator update day’ as a part of their training. The training days are filmed which are added to the online resources available to practice educators. At the visit, the visitors heard that while the education provider records who attends, attendance at the update training days is not mandatory. The visitors heard that the education provider is able to monitor and record which practice educators access the online resources, however currently there is no system in place to follow up with practice educators who are not accessing the resources. From the information provided, the visitors were unable to see what training materials the practice educators have access to or the process in place to monitor and record which practice educators are undertaking regular training. As such, the education provider must demonstrate that they have a process in place to ensure that all practice educators are receiving appropriate initial and update training and that this is recorded and monitored.

5.8 Learners and practice educators must have the information they need in a timely manner in order to be prepared for practice-based learning.

Condition: The education provider must revise their documentation to clearly define the length of a clinical session in practice-based learning.

Reason: The visitors noted discrepancies in the programme documentation regarding the length of a clinical session in practice-based learning. On page 52 of the BMedSci Placement Handbook the visitors noted “all students on the BMedSci must complete a minimum of 150 placement sessions where a session is 3.75 hours on average”. However, on page 68 of the BMedSci Placement Handbook states that a clinical session is 3.5 hours on average. Furthermore, on page 62 of the MMedSci Placement Handbook it states that a clinical session is 3.5 hours on average. At the visit, the visitors heard that there had been some discussion around what the length of a clinical session should be, and it has been decided that a clinical session will be 3.75 hours on average. Due to the disparity in the information provided the visitors could not determine that the learners and practice educators have the information they need in order to be prepared for practice-based learning. As such, the education provider must revise documentation to clearly define the length of a clinical session, and ensure this is consistent across all documentation.

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.

Condition: The education provider must revise documentation to clearly define the maximum time allowed to complete the Masters programme and ensure this information is consistent across all documentation.

Reason: On page 62 of the placement handbook for the MMedSci programme, it states that “for the MMedSci (Clinical Communication Studies), the maximum amount of time from entry to the programme until qualification is normally four years”. However, on page 34 of the MMedSci programme handbook it states that “for the MMedSci (Speech and Language Therapy) the maximum amount of time from entry to the programme until qualification is normally three years”. In the SETs mapping document for the MMedSci it also states the maximum length of the programme is three years in line with the Royal College of Speech and Language Therapists curriculum guidelines. At the visit, the programme team confirmed that the maximum length of the MMedSci programme is four years. As such, the education provider must revise documentation to clearly define the maximum length of the Masters programme and ensure that this is consistently recorded across all documentation.

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

Condition: The education provider must demonstrate how assessment of practice-based learning provides an objective, fair and reliable measure of learners’ progression and achievement.

Reason: This relates to SET 5.7 where the visitors found that the education provider has not demonstrated there is a process in place to ensure all practice educators are receiving regular training appropriate to their role. In a review of the documentation, the visitors were not clear how practice educators are trained in using the assessment criteria and how standards are monitored. At the visit, the visitors heard that practice educators have to complete a ‘practice educator report form’ for learners on placement. The criteria for pass or fail is included in this report. During discussions with the practice educators and the programme team, the visitors heard that the practice educators find it very difficult to fail learners. The programme team noted that they make it clear to the

practice educators that if there are any concerns about learners, these need to be raised early on and that there is support available to practice educators if they find they need to fail a learner. The programme team noted at the visit that it is an ongoing training issue on how to recognise a failing learner. The visitors also heard that there is informal teaching and training in assessments that is carried out internally. However, the visitors have not seen that there is a process in place where the education provider can ensure that practice educators are sufficiently trained to assess learners in practice-based learning. From discussions with both practice educators and the programme team the visitors heard that it is an area of concern in that practice educators have difficulty in recognising and taking action against learners that are failing. As such, the education provider must demonstrate how they ensure that assessment at practice-based learning provides an objective, fair and reliable measure of learners' progression and achievement.

Recommendations

We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

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

Recommendation: The education provider should consider strengthening how they plan and monitor service user and carer involvement, including service user and carer contribution to the governance and continuous improvement of the programmes.

Reason: On review of the documentation, the visitors understood that service users and carers were involved in teaching and learning on the currently approved programmes, and through the in-house Philippa Cottam Communication Clinic. As such, they feel this standard is met. The SETs mapping document states that service users and carers talk to students about the impact of their communication difficulties across a number of modules. At the visit, the visitors met with some of the service users and carers involved in teaching and learning on the current approved programmes. They heard that the service users and carers were not involved in formal consultation on the new programmes at this stage; however, there are plans to involve service users and carers on consultation for modules. While the visitors found that service users and carers are involved in the programmes in various ways, the visitors noted that the education provider could strengthen the planning and monitoring of this involvement to ensure meaningful and ongoing involvement.

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 condition was met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following condition is met, they require further evidence.

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

Condition: The education provider must demonstrate how assessment of practice-based learning provides an objective, fair and reliable measure of learners' progression and achievement.

Reason condition not met at this time: In response to this condition, the education provider stated that "in relation to practice based learning, practice educators have to attend regular training to be able to assess students in their clinical practice". The evidence provided was a practice educator training document, which details the process the education provider uses to ensure practice educators undertake training in order to supervise learners on placements for both programmes. The documentation mentioned that practice educators participate in three mandatory training videos which cover an overview of the programmes, providing constructive feedback to learners and the learner perspective of a 'good placement'. From the information provided, the visitors understand that practice educators undertake training, however the visitors are not clear how this training is used to ensure that practice educators are able to use the assessment criteria associated with practice-based learning in an objective, fair and reliable manner. The visitors also remain unclear how standards in assessment are monitored. As such, the visitors require further evidence on how practice educators are trained to be able to assess learners in practice-based learning in order to provide an objective, fair and reliable measure of learners' progression and achievement, and how standards in assessment are monitored.

Suggested documentation: Evidence on how practice educators are trained to assess learners in practice-based learning to provide an objective, fair and reliable measure of learners' progression and achievement, and how standards in assessment are monitored.

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 satisfied that the conditions are met and recommend that the programme(s) are approved.

This report, including the recommendation of the visitors, will be considered at the 24 May 2018 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).