

## HCPC major change process report

Education provider	De Montfort University
Name of programme(s)	Foundation Degree in Hearing Aid Audiology, Full time Foundation Degree in Hearing Aid Audiology (Degree Apprenticeship), Full time
Date submission received	13 November 2019
Case reference	CAS-15746-X0D2B3

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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 major change process undertaken by the HCPC to ensure that programmes 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).

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process report. 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:

Elizabeth Ross	Hearing aid dispenser
Kathryn Burgess	Radiographer - Therapeutic radiographer
John Archibald	HCPC executive

## Section 2: Programme details

Programme name	Foundation Degree in Hearing Aid Audiology
Mode of study	FT (Full time)
Profession	Hearing aid dispenser
First intake	01 January 2008
Maximum learner cohort	30 across both programmes
Intakes per year	1
Assessment reference	MC04496

Programme name	Foundation Degree in Hearing Aid Audiology (Degree Apprenticeship)
Mode of study	FT (Full time)
Profession	Hearing aid dispenser

First intake	01 October 2019
Maximum learner cohort	30 across both programmes
Intakes per year	1
Assessment reference	MC04613

We undertook this assessment to consider whether the programme continues to meet our standards, following changes reported to us via the major change process. The following is an overview of the changes from the information received via this process.

The education provider has informed us they are incorporating the Foundation Degree in Hearing Aid Audiology programme within an apprenticeship programme. The apprenticeship programme appears to widely represent the existing programme due to the way the Foundation Degree in Hearing Aid Audiology is set up. However, there will be some changes to the existing programme to incorporate the set of apprentice learners.

### 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
Major change notification form	Yes
Completed major change standards mapping	Yes

### Section 4: Outcome from first review

In considering the evidence provided by the education provider as part of the initial submission, the visitors were not satisfied that there was sufficient evidence that our standards continued to be met at this time, and therefore require further evidence as noted below.

#### **Further evidence required**

In order to determine whether the standards continue to be met, the visitors require further evidence for the following standards for the reasons noted below.

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programme(s), and then provide any further evidence to demonstrate how they meet the standards.

#### **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.**

### **2.3 The admissions process must ensure that applicants have a good command of English.**

### **2.4 The admissions process must assess the suitability of applicants, including criminal conviction checks.**

**Reason:** For these SETs, the visitors were informed the education provider had added more information online, during its open / information day and during the application process. The visitors considered there were inconsistencies and a lack of clarity in the documentation given to applicants.

In regards to English and Maths requirements, the visitors were made aware the process remains the same but that there had been additions made to meet the apprenticeship standards. As part of the mapping document, the visitors were referred to the programme webpage. The visitors considered there was a lack of clarity in regards to the education provider's requirements in regards to the applicant's level of English. The visitors were made aware information from Specsavers indicated that for those whose first language is not English, they must demonstrate the ability to communicate in English to the standard of level 7 of the IELTS. However, the apprenticeship programme handbook said applicants who have qualified outside of the UK, whose first language is not English, need to be able to demonstrate the ability to communicate in English to the standard equivalent to level 7 of the IELTS, with no element below 6.5. The visitors need clarity of the information given to applicants regarding the level of English required to meet entry requirements to the programme.

Also, the apprenticeship programme handbook stated the standard entry requirements are 'GCSEs grade c or grade 4 in Maths, English (or equivalent to level 2 qualifications). A different reference in the same document said the requirement was 'level 2 English and Maths required prior to the EPA'. The visitors considered this was unclear whether the English language requirements were needed in order to enrol onto the programme, or whether they were just needed before learners take the EPA.

In regards to criminal conviction checks, the visitors were informed that there was no change to the way the programme meets this SET. The visitors were referred to the apprenticeship programme handbook and an extract from the programme webpage. The programme handbook said one of the standard entry requirements was to 'have a *satisfactory* [emphasis added] DBS status or equivalent'. However, the Specsavers Apprenticeship FAQs said the criteria was '*enhanced* [emphasis added] DBS check, [which] needs to be cleared by the university'. The visitors were therefore unclear what level of criminal conviction checks an applicant was required to complete. The visitors need to see further information of the criminal conviction checks the applicant is required to complete in order to be accepted onto the course.

The visitors were made aware from the programme handbook that the minimum age of learners is 18. However, the visitors were informed in the eligibility criteria document that the minimum age of learners for funding is 16. The visitors were therefore unclear what the minimum age of learners is, and considered that it would not be clear to applicants.

Although the visitors were informed the education provider had added more information the visitors were unclear which documents applicants could access and when they could access them.

The visitors were aware the supporting information for apprentices document stated that the apprenticeship programme is offered to employees of Specsavers. However, the visitors were also made aware the Foundation Degree has worked with other partners such as Hidden Hearing, Amplifon and the NHS. The visitors were unclear whether there are other apprenticeship partner organisations and, if so, what documentation was provided by them.

The visitors were unsure if the arrangements for apprenticeship applicants and non-apprenticeship applications were dealt with equitability. As applicants from the non-apprenticeship route still need an employer in place to provide supervision the visitors were unclear how the entry routes would work together within the admission process.

The visitors were made aware the End Point Assessment (EPA) sits outside of the approved programme and cannot be taken until completion of this. The visitors understood the EPA is arranged by the employer and undertaken by an independent provider. However, the visitors could not see clear and specific information applicants had about the EPA before applying for a place on the programme. The visitors were made aware of the methods of EPA but could not see information about how this assessment would be organised in terms of timescales and reassessment options. A weblink to the EPA plan for Hearing Aid Dispenser apprenticeship standard was given in the apprenticeship programme handbook, however the visitors were unclear if a new applicant would have the understanding at this early stage to clearly follow this information.

The visitors therefore need further information:

- clarifying the roles within the admissions process for both learners and the education provider;
- clarifying the minimum age of learners on the programme;
- clarifying whether or not the education provider is working with other partner organisations as well as Specsavers;
- of what documents are available to applicants and when applicants can access them;
- of the criteria in regards to Maths requirements;
- of the criteria in regards to what level of criminal conviction checks the applicant is required to complete in order to be accepted onto the course;
- clarifying the information which is given to applicants about the EPA to ensure that the education provider has overall responsibility for overseeing the admissions process;
- how the admissions process for the apprenticeship programme works in tandem with that of the non-apprenticeship FD programme;
- clarifying the level of English required to meet entry requirements to the programme; and
- whether the English language requirements were needed in order to enrol onto the programme, or whether they were just needed before learners take the EPA.

**Suggested evidence:** The education provider needs to provide further information

- clarifying the roles within the admissions process for both learners and the education provider;
- clarifying the minimum age of learners on the programme;
- clarifying whether or not the education provider is working with other partner organisations as well as Specsavers;

- of what documents are available to applicants and when applicants can access them;
- of the criteria in regards to Maths requirements;
- of the criteria in regards to what level of criminal conviction checks the applicant is required to complete in order to be accepted onto the course;
- clarifying the information which is given to applicants about the EPA to ensure that the education provider has overall responsibility for overseeing the admissions process;
- how the admissions process for the apprenticeship programme works in tandem with that of the non-apprenticeship FD programme.
- clarifying the level of English required to meet entry requirements to the programme; and
- whether the English language requirements were needed in order to enrol onto the programme, or whether they were just needed before learners take the EPA.

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

**Reason:** To meet this standard, the visitors were informed the entry criteria remains the same but that there had been additions made to meet the apprenticeship standards. However, the visitors were unsure who has final control over the admissions process between the education provider and the employer partners. The visitors considered the lines of responsibility in the application process between employer partners and the education provider were unclear. The visitors were unable to see information on how the decision to accept onto the programme would be made, taking into consideration the two organisations involved. The visitors need to see further evidence to show that the education provider has overall responsibility for overseeing the admissions process, and that this information is available for employers, applicants and the education provider.

**Suggested evidence:** The education provider needs to provide further information how the decision to accept onto the programme would be made, taking into consideration the two organisations involved, and which demonstrates to employers, applicants and the education provider that the education provider has overall responsibility for overseeing the admissions process.

## **2.7 The education provider must ensure that there are equality and diversity policies in relation to applicants and that they are implemented and monitored.**

**Reason:** To evidence this SET, the visitors were informed the education provider has a range of policies which come from its equality and diversity charter. The visitors were provided with a copy of, and a weblink to, this charter, and information about how the programme was reviewed in terms of its equality and diversity policies. However, the visitors could not find information about the equality and diversity policies in place which relate specifically to the admissions process and how they are monitored. The visitors therefore require further information as to the policies in place to ensure the admissions process is open and impartial and does not discriminate unfairly against certain applicants.

**Suggested evidence:** The education provider must provide further evidence of the equality and diversity policies in place which relate specifically to the admissions process and how they are monitored

### **3.1 The programme must be sustainable and fit for purpose.**

**Reason:** To evidence this SET, the visitors were informed the education provider is on the Register of Apprenticeship Training Providers and has been approved by the Education Skills Funding Agency to deliver apprenticeships. The visitors were made aware the programme handbook said that Specsavers is the programme's initial apprenticeship partner. However, the visitors were also made aware the Foundation Degree has worked with other partners such as Hidden Hearing, Amplifon and the NHS. The visitors were unclear if new practice partners are planned. The visitors were also unclear if the current employer / practice partners have formally committed to employing apprentices and are committed to this programme being their Registered Training Organisation. The visitors therefore need further information to clarify whether further employer partners are planned, and whether the current employer / practice partners have formally committed to employing apprentices and are committed to this programme being their Registered Training Organisation.

**Suggested evidence:** The education provider needs to provide information to clarify whether further employer partners are planned, and whether the current employer / practice partners have formally committed to employing apprentices and are committed to this programme being their Registered Training Organisation.

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

**Reason:** To meet this SET, the visitors were informed there was no change to the way the programme meets the SET. The visitors were referred to information about the education provider's processes for monitoring of programmes, and the process for raising concerns in practice-based learning and involvement in the programme. The visitors were unable to see information specifically about the collaboration between the education provider and practice education providers. The visitors require further evidence of how the education provider works in regular partnership with those who provide practice-based learning.

**Suggested evidence:** The education provider must provide further evidence of how they work in regular partnership with those who provide practice-based learning, for example, through meetings, asking for feedback and other communication.

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

**Reason:** To meet this SET, the visitors were informed that entry onto the course is subject to the learner either being employed or sponsored by a suitable employer / organisation. The visitors were unsure if the anticipated larger intake would have an effect on placement capacity for non-apprentice programme learners, who would be employed or sponsored by the same organisation as apprentice learners. The visitors therefore require more information about how the education provider ensures the availability of practice-based learning for all learners.

**Suggested evidence:** The education provider needs to provide more information about how it ensures the availability of practice-based learning for all learners.

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

**Reason:** From the evidence for this SET, the visitors were informed the education provider has several academic staff who are all clinically qualified and who are experienced across all sectors of audiology. The visitors were also informed the education provider intends on recruiting at least one other lecturer in the short term. The visitors were informed there are also additional support and roles. The visitors received contact information as to the roles of individuals on the programme at the education provider. The visitors also received details of the management structure on the programme.

However, the visitors were not clear if the apprentice numbers are additions to the non-apprentice numbers and whether they are taught together or in different cohorts. The visitors were also unclear about the timescale of recruitment and, considering the potential size of the planned intakes, what plans were in place regarding staffing numbers to effectively deliver the programme.

The visitors therefore require further information about the programme management and details of the teaching of learners on the programme in relation to those on the non-apprenticeship programme. The visitors therefore require further information about the timescales of recruitment to ensure there is an appropriate number of staff who are able and equipped to deliver the programme effectively.

**Suggested evidence:** The education provider needs to provide further information about the programme management and details of the teaching of learners on the programme in relation to those on the non-apprenticeship programme. The education provider also needs to submit further information about the timescales of recruitment to ensure there is an appropriate number of staff who are able and equipped to deliver the programme effectively.

### **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.**

**Reason:** To evidence how the programme meets this SET, the visitors were made aware that the education provider will have Individual Learner Record and Individual Learner Plans. The visitors also saw other information about resources on the programme. However, the visitors could not find information how the apprenticeship programme will be delivered alongside the non-apprentice Foundation Degree programme, to ensure the resources to support learning in all settings will be accessible to all learners. The visitors therefore need to see further information about how the programme will be delivered alongside the non-apprentice Foundation Degree programme to ensure resources are readily available to learners and educators and are used effectively to support the required learning and teaching activities of the programme.

**Suggested evidence:** The education provider needs to provide further information about how the programme will be delivered alongside the non-apprenticeship



Foundation Degree programme, to ensure resources are readily available to learners and educators and are used effectively to support the required learning and teaching activities of the programme.

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

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

**Reason:** The visitors were unsure how the programme structure would accommodate the requirements of both the apprenticeship programme and the non-apprenticeship cohort. It was noted that the apprenticeship learners undertake three components within the programme. Non-apprenticeship learners would not undertake all of these components. The visitors were unclear if these extra components impacted on the teaching within the non-apprenticeship programme. The visitors were also not clear whether the current arrangements for the non-apprenticeship programme will also be applied or will be appropriate for apprentice learners, particularly within the requirements of programmes structure in terms of time in employment and time in formal training laid out by the Institute for Apprenticeships (IfA).

The visitors need to see evidence of the structure of the course delivery to meet IfA and the education provider's requirements and if this will give an effective course delivery to all learners, apprenticeship and non-apprenticeship. The education provider needs to provide further evidence of any impact of the extra components for the apprenticeship learners within the teaching of the programme.

**Suggested evidence:** The education provider needs to provide further evidence of the structure of the course delivery to meet IfA and the education provider's requirements and if this will give an effective course delivery to all learners, apprenticeship and non-apprenticeship. The education provider needs to provide further evidence of any impact of the extra components for the apprenticeship learners within the teaching 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.**

**Reason:** The visitors were informed that how the education provider met this SET was enhanced by the apprenticeship requirements. With different employer / partners involved in providing practice based learning, the visitors were unclear if this would lead to different contractual arrangements between different placement providers. The visitors need to receive further information how practice provision would be provided in an equal manner to the whole student cohort.

**Suggested evidence:** The education provider needs to provide further evidence how practice provision would be provided in an equal manner to the whole student cohort.

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

**Reason:** Although the education provider noted no change to this SET, the visitors noted the education provider has introduced new assessments teaching elements to the programme, for example the Individual Learner Record (ILR) and Individual Learner

Plan (ILP). The documentation cited in the SET mapping did not all relate to these new assessments and the visitors could not assess what changes these introductions would make to the assessment structure. The education provider indicates the ILP and ILR are tripartite between learner, employer and education provider. The visitors were unclear how this would operate for the non-apprenticeship cohort.

The visitors need to see information given to learners and within the documentation from the education provider regarding the ILP and ILR and its assessment structure, as well as information on consistency across student cohorts with regard to the ILP and ILR.

**Suggested evidence:** Information given to the student and within the documentation from the education provider regarding the ILP and ILR and its assessment structure. Information on consistency across student cohorts with regard to the ILP and ILR.

## Section 5: Visitors' recommendation

In considering the evidence provided by the education provider as part of the initial submission, the visitors were satisfied that there is sufficient evidence that our standards continue to be met, and therefore recommend that the programme(s) remain approved.

This report, including the recommendation of the visitors, will be considered at the 25 March 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](#).