

Approval process report

St George's University of London and Kingston University, Occupational therapy, 2021-22

Executive summary

The assessment stage is now complete and the visitors have given their recommendation. This follows their assessment of the stage 2 submission, and a very brief quality activity where minor points were clarified with the education provider. These points for further clarification involved access to resources for the learners.

This report uses an older template as it was completed before the new template was standardised.

Visitors have recommended approval of the proposed programme with no conditions.

Next steps: this report will be submitted to the Education and Training Panel for their consideration on 29 July 2022.

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Section 1: About this assessment

About us

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.

This is a report on the approval process undertaken by the HCPC to ensure that the programme(s) detailed in this report meet our education standards. The report details the process itself, evidence considered, outcomes and recommendations made regarding the programme(s) ongoing approval.

Our standards

We approve education providers and programmes that meet our education standards. Individuals who complete approved programmes will meet proficiency standards, which 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.

Our regulatory approach

We are flexible, intelligent and data-led in our quality assurance of programme clusters and programmes. Through our processes, we:

- enable bespoke, proportionate and effective regulatory engagement with education providers;
- use data and intelligence to enable effective risk-based decision making; and
- engage at the organisation, profession and programme levels to enhance our ability to assess the impact of risks and issues on HCPC standards.

Providers and programmes are [approved on an open-ended basis](#), subject to ongoing monitoring. Programmes we have approved are listed [on our website](#).

The approval process

Education providers and programmes must be approved by us before they can run. The approval process is formed of two stages:

- Stage 1 – we take assurance that education provider level standards are met by the education provider delivering the proposed programme(s)
- Stage 2 – we assess to be assured that programme level standards are met by each proposed programme

Through the approval process, we take assurance in a bespoke and flexible way, meaning that we will assess whether providers and programmes meet standards based on what we see, rather than by a one size fits all approach. Our standards are split along education provider and programme level lines, and we take assurance at the provider level wherever possible.

This report focuses on the assessment of the self-reflective portfolio and evidence.

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 design quality assurance assessments, and assess evidence and information relevant to the assessment. Visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make the 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 takes decisions through different levels depending on the routines and impact of the decision, and where appropriate meets in public. Their decisions are available to view [on our website](#).

The assessment panel for this review

We appointed the following panel members to support this review:

Julie-Anne Lowe	Lead visitor, Occupational therapist
Joanna Goodwin	Lead visitor, Occupational therapist
Niall Gooch	Education Quality Officer

Section 2: Institution-level assessment

The education provider context

The education provider does not currently deliver any HCPC-approved programmes. It is a higher education provider.

We were not able to use education provider-level data in this process as they are a new provider.

The route through stage 1

Stage 1 assessment – provider submission

The education provider is new to the HCPC. We therefore determined that we needed to make a judgement that they met education provider-level standards by directly assessing them through a visitor-led review.

The education provider was asked to demonstrate how they meet education provider level standards. They supplied information about how each standard was met, including a rationale and links to supporting information via a mapping document.

Outcomes from stage 1

From their review of the documentary submission, and on exploring themes through quality activity, the visitors were satisfied that education provider-level standards are met, and that assessment should continue to stage 2 of the process.

Findings of the assessment panel:

Admissions

Findings on alignment with existing provision:

Information for applicants – The education provider highlighted ways in which information is available to applicants prior to applying in their approval request form. They highlighted the open days and web pages being the sources of information. The visitors considered that this would enable applicants to have a clear understanding of the programme and to be able to make an informed decision.

Assessing English language, character, and health – The education provider listed the policies in place to support this new provision and ensure standards are being met. The visitors reviewed the materials that would be used in these assessments and concluded that they would enable appropriate and fair assessments to be made.

Prior learning and experience (AP(E)L) – The education provider listed policies in place to support this new provision and ensure standards are being met, including a description of the place of APEL within the programme and a questionnaire available to learners. The visitors were satisfied that these arrangements would enable the standards to be met.

Equality, diversity and inclusion – The education provider had a clear and well-defined approach to education provider EDI policies. For example, they had a specific form for monitoring demographic patterns in recruitment and on the programme and there was a well-laid out procedure for using this data to drive improvement as necessary. The visitors were therefore satisfied that the relevant standards were met.

Management and governance – The education provider also stated in their approval request form that they are working closely with employers to ensure that the programme design meets their needs. Evidence was provided of these ongoing relationships and the visitors were satisfied that they would continue to deliver good governance.

In terms of sustainability, the provider referred to their strategy in relation to this standard. There were specific mechanisms at the provider for monitoring individual programmes and their sustainability, including regular reporting and senior-level oversight of programmes, so the visitors were satisfied that there would be no issues around sustainability.

Effective staff management and development – The education provider referred to their specific policies for ensuring continuous improvement and development among staff. These included regular Continuous Professional Development (CPD) reviews and training days, with individual staff having their own development plans which were monitored and regularly discussed with senior staff.

Practice quality, including the establishment of safe and supporting practice learning environments – The education provider provided evidence of correspondence and other planning documents to show that they were well advanced with the planning of a wide range of placements, including National Health Service (NHS), private and third sector. The visitors considered that these placements would provide an excellent learner experience and that the evidence provided was sufficient to show that the placements would be ready for the learners as required.

Learner involvement – The education provider presented clear policies showing that individual learners would be closely involved with programme development and continuous improvement. Feedback loops would be closed by direct reporting to committees and by consultation with individuals who provided the feedback or suggestions. The visitors therefore considered that the relevant standards were met because learner involvement would be structured, monitored and continuous.

Service user and carer involvement – The provider stated that they had recently started a new steering and co-operation group for service users and carers which would be closely involved with the programme. The visitors were able to view the terms of reference for this group and the kind of people who would be involved with it. They also understood the input it would have into the programme and the training available to members, and determined that this would meet the relevant standard.

Learning with and from other learners and professionals (IPL/E) – The provider was relatively limited in the specific opportunities they were able to give internally but their submission showed that they had reached out to local partners who would be able to provide inter-professional education. This included hospitals, care homes, primary care settings and workplaces. The visitors concluded that this would provide adequate opportunities to learners to learn with and from other learners and professionals.

Risks identified which may impact on performance: None

Outstanding issues for follow up: None

Areas of good and best practice identified through this review:

- The visitors noted that the education provider, who were new to HCPC provision, had engaged well with the process and had shown a strong willingness to adapt and amend their policies, procedures and approach to the standards and expectations of the HCPC. They considered that this was a positive sign for the programme continuing to be delivered effectively after approval.

Outstanding issues: None

Section 3: Programme-level assessment

Programmes considered through this assessment

Programme name	Mode of study	Profession (including modality) / entitlement	Proposed learner number, and frequency	Proposed start date
MSc in Occupational Therapy (Pre-registration)	FTA (Full time accelerated)	Occupational therapy	15 learners per cohort, once a year	1 September 2022

Stage 2 assessment – provider submission

The education provider was asked to demonstrate how they meet programme level standards for each programme. They supplied information about how each standard was met, including a rationale and links to supporting information via a mapping document.

Quality themes identified for further exploration

We reviewed the information provided, and worked with the education provider on our understanding of their submission. Based on our understanding, we defined and undertook the following quality assurance activities linked to the quality themes referenced below. This allowed us to consider whether the education provider met our standards.

Quality theme 1 – Staffing

Area for further exploration: The visitors wished to clarify a possible error in the documentation suggesting that all staff were on fixed term contracts. They considered that if this were the case it might mean a lack of continuity in staffing and might have an impact on longer-term planning, which would affect the sustainability of the programme and its ability to effectively deliver the standards of proficiency.

Quality activities agreed to explore theme further: We had a discussion with the education provider in which they clarified the staffing situation. A discussion was the best way to explore and resolve the issue quickly. The visitors wanted to improve their understanding of the staffing arrangements so that they could make a full and informed decision about whether the standards related to this area were met.

Outcomes of exploration: The visitors were satisfied that the reference to fixed term contracts was a mistake and that the central programme staff were on permanent contracts. The education provider committed to correcting the error. This meant that the programme's sustainability and teaching and learning plans would not be impacted and so the visitors did not pursue the matter.

Section 4: Findings

This section details the visitors' findings from their review through stage 2, including any requirements set, and a summary of their overall findings.

Conditions

Conditions are requirements that must be met before providers or programmes can be approved. We set conditions when there is an issue with the education provider's approach to meeting a standard. This may mean that we have evidence that standards are not met at this time, or the education provider's planned approach is not suitable.

The visitors were satisfied that no conditions were required. The visitors' findings, including an explanation of why no conditions were required, are presented below.

Overall findings on how standards are met

This section provides information summarising the visitors' findings against the programme-level standards. The section also includes a summary of risks, further areas to be followed up, and areas of good practice.

Findings of the assessment panel:

SET 1: Level of qualification for entry to the Register

The visitors considered that the programme was at an appropriate level of qualification.

On this basis, the visitors considered that the education provider's approach to meeting this standard was appropriate to meet the standards.

SET 2: Programme admissions

The evidence supplied to the visitors included a document outlining the admissions procedures. Applicants were expected to have an A-level points score similar to other comparable programmes in the profession, at other providers, and to progress through a similar application process involving interviews. The monitoring of equality and diversity through this admissions process followed the university policy, which involved centralised collection of data fed back to individual programmes, with necessary actions taken subsequently.

With the information supplied, and with the knowledge that these procedures and approaches were currently in use in non-HCPC programmes at the provider, the visitors considered that they were appropriate when applied to the new programme, and so that the new programme met the standards.

On this basis, there were no conditions set in relation to this area of the standards.

SET 3: Programme governance, management and leadership

A programme description and handbook for the programme was included. The visitors considered that the management structures, the rationale and senior support for the programme, and the organisation of the programme set out in this evidence was appropriate. Curriculum vitae were provided for staff and these individuals and their time commitments were considered to be appropriate for the delivery of the programme.

Therefore, we were satisfied that standards are met in this area. On this basis, there were no conditions set in relation to this area of the standards.

SET 4: Programme design and delivery

From their review, the visitors considered that the structure and approaches of the programme were appropriate, and that the learning outcomes were appropriately aligned with the standards of proficiency and the standards of conduct, performance and ethics. They were satisfied that the curriculum content and the inter-professional education would prepare learners appropriately for practice.

Therefore, we were satisfied that standards are met in this area, and there were no conditions set in relation to this area of the standards.

SET 5: Practice-based learning

As part of the stage 2 standards of education and training mapping, the education provider cited the programme handbook, correspondence with practice partners and staff CVs. This was as evidence to show that they were able to provide a good structure, duration and range of practice-based learning, and that the practice educators in place were appropriate and sufficient in number. They also noted that

the practice-based learning for this programme would be integrated into existing frameworks.

On this basis, there were no conditions set in relation to this area of the standards.

SET 6: Assessment

Stage 2 documentation gave the visitors a clear understanding of how assessment would work on the programme, and indicated that it would be modelled on the existing approved approaches. The visitors had a clear understanding from the programme leaders' handbook of how assessment would enable learners to meet the standards of proficiency and the standards of conduct, performance and ethics, and to progress through the programme. They were satisfied that the assessment would be effective, based on the diverse range and spacing of the assessments.

In a quality activity, via email, the visitors queried how the education provider ensured that the learners had all the necessary access to materials that would support them in completing their assessment. The education provider sent a narrative explaining how all learners were supported in this area, which the visitors considered met their concerns.

Risks identified which may impact on performance: None.

Areas of good and best practice identified through this review:

- The education provider had a particularly good understanding of the importance of a strong team of staff with appropriate expertise to deliver the standards.

Section 5: Referrals

This section summarises any areas which require further follow-up through a separate quality assurance process (the approval, focused review, or performance review process).

There were no outstanding issues to be referred to another process.

Section 6: Decision on approval process outcomes

Assessment panel recommendation

Based on the findings detailed in section 4, the visitors recommend to the Education and Training Committee that the programme should be approved subject to the conditions being met.

Based on the findings detailed in section 4, the visitors recommend to the Education and Training Committee that:

- All standards are met, and therefore the programme should be approved