

HCPC approval process report

Education provider	Bangor University
Name of programme(s)	PGDip Physiotherapy, Full time
Approval visit date	18-19 July 2019
Case reference	CAS-14503-S3F5D5

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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:

Janet Lawrence	Physiotherapist
Joanna Jackson	Physiotherapist
Manoj Mistry	Lay
Patrick Armsby	HCPC executive

Other groups involved in the approval visit

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

Myfanwy Davies	Independent Chair (supplied by the education provider)	Bangor University – Head of the Quality Assurance & Validation Unit
Wendy Williams	Internal Panel Member	Bangor University – Quality Assurance & Validation Unit
Karen Chidley	Internal Panel Member	Bangor University – Quality Assurance & Validation Unit

Gavin Lawrence	Internal Panel Member	Bangor University – Senior Lecturer, School of Sport, Health & Exercise Science
Errol Grant	Internal Panel Member	Bangor University– Student Reviewer, Business School
Nina Paterson	Chartered Society of Physiotherapy (CSP) Panel Member	CSP – Head of Learning and Development
Alexandra Hough	Chartered Society of Physiotherapy (CSP) Panel Member	CSP – Professional Advisor
Graham Copnell	Chartered Society of Physiotherapy (CSP) Panel Member	CSP – Education Representative

Section 2: Programme details

Programme name	PGDip Physiotherapy
Mode of study	FT (Full time)
Profession	Physiotherapist
First intake	01 October 2019
Maximum learner cohort	Up to 15
Intakes per year	1
Assessment reference	APP02090

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

The first intake date in the table above is based on the visit request form. However, there was conflicting information about the start date within the documentation. Therefore, it may be subject to change.

Section 3: Requirements to commence assessment

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

Type of evidence	Submitted
Completed education standards mapping document	Yes
Information about the programme, including relevant policies and procedures, and contractual agreements	Yes
Descriptions of how the programme delivers and assesses learning	Yes

Proficiency standards mapping	Yes
Information provided to applicants and learners	Yes
Information for those involved with practice-based learning	Yes
Information that shows how staff resources are sufficient for the delivery of the programme	Yes

We also usually ask to meet the following groups at approval visits, although there may be some circumstances where meeting certain groups is not needed. In the table below, we have noted which groups we met, along with reasons for not meeting certain groups (where applicable):

Group	Met	Comments
Learners	Yes	As this is a new programme, the panel met with a learner from PGDip Adult Nursing and three learners from Advanced Clinical Practice.
Service users and carers (and / or their representatives)	Yes	
Facilities and resources	Yes	
Senior staff	Yes	
Practice educators	Yes	
Programme team	Yes	

Section 4: Outcome from first review

Recommendation of the visitors

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

Conditions

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

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 26 September 2019.

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 show that the information provided for this programme, allows applicants to make an informed choice about whether to take up a place on the programme.

Reason: Prior to the visit, the education provider guided the visitors to the Physiotherapy PGDip webpage to highlight the admissions information available for potential applicants. The visitors noted that the webpage was not complete and some information had been omitted such as an outline of the programme, information about funding and additional costs. The visitors were told in the programme team meeting, more information would be uploaded for potential applicants such as information about additional costs and the differing funding routes within the programme. Specifically, the details regarding commissioned and privately funded places. As the visitors were not able to view the content for this further information, they could not judge whether applicants will have the appropriate information to make an informed choice, about whether to take up an offer on the programme. Therefore the education provider must provide evidence to show that applicants will be provided with all appropriate details before they make the decision to take up a place on the programme.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must show the programme is sustainable and fit for purpose.

Reason: To evidence this standard, the education provider provided a link to the internal quality audit page on the Bangor University website. The visitors were able to see that the university has processes in place to ensure the ongoing quality of the programme, but could not see that how audits that take place every 6 years ensure that the programme is sustainable or fit for purpose. At the visit, the visitors queried how the education provider was going to ensure there is sufficient resources, staffing and commitment from partners to make the programme sustainable. The education provider told the visitors that they were in the preliminary stages of hiring new members of teaching staff. The visitors noted that at the time of the visit there were insufficient staff numbers and a lack of physical resources for the programme. They also provided a list of equipment that had been requested for the programme. The visitors could not confirm that this equipment would be provided or if the request had been successful. Without appropriate resources in place, the visitors noted that insufficient support will be available for the programme. Therefore, the visitors were not certain that the programme is currently sustainable. This standard is about making sure that there is a future for the programme that is currently secure and is supported by all stakeholders involved. The education provider must show that the programme will be appropriately resourced in order for it to be delivered effectively.

The visitors also raised questions about the programme being fit for purpose. The visitors found the standard of proficiency (SOPs) mapping to be generic and were not able to determine whether the module content would ensure that the SOPs were being appropriately covered. This is covered in further detail in the condition for standard 4.1. As they were not clear about the modular content covering the SOPs, they could not confirm that the programme is currently fit for purpose.

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

Condition: The education provider must demonstrate how there will be regular and effective collaboration between the education provider and practice education providers.

Reason: Prior to the visit, the education provider stated in the SETs mapping document that there were regular meetings between the “education provider and practice education providers”. The name or details of the practice education providers were not disclosed, in the evidence provided. The education provider also provided minutes from the Practice Education Quality Assurance Group Minutes for visitors, before the visit. However, these minutes made no mention of physiotherapy or the start of the PGDip programme. From this information, the visitors could not confirm that there was regular and effective collaboration between the education provider and practice educators.

At the visit, the visitors asked about the nature of the collaboration between the relevant partners and the education provider. The senior team, programme team and practice educators confirmed there had been contact between the practice educators and education provider but they did not confirm the frequency or how regularly the meetings took place between the two parties. Due to this the visitors could not determine if this practice reflected there was effective collaboration between the two groups. By ‘regular’ collaboration we mean that the arrangements for working with others must reflect a partnership and ongoing relationship, not joint work and co-operation that only happens around the time the programme is approved or being monitored, or when specific issues arise with practice-based learning. For the visitors to consider this standard to be met they would need to see how the education provider and practice education providers will work in partnership to ensure ongoing quality and effectiveness.

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

Reason: To evidence this standard the education provider stated in the SETs mapping document that Bangor university has a “high level understanding” with the local health board. At the visit, the nature of this collaboration was discussed. The visitors were told there had been meetings with potential partners to discuss placement capacity. It was also disclosed to the visitors that the meetings with partners were irregular and there was not a specific plan for the regularity of conducting these meetings. Furthermore, the visitors were not able to view any formalisation of practice-based learning capacity so were unable to confirm that the current process is effective at ensuring that all learners will have access to practice-based learning that meets their learning needs.

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

Condition: The education provider must show there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

Reason: To evidence this standard the education provider made a statement in the SETs mapping document that the “university [wide] staff/student ratio” would ensure there were sufficient staff to deliver the programme. The visitors were not provided with the university staff/student ratio and noted from staff curriculum vitae’s (CVs), that there was currently only one physiotherapy specific member of the teaching staff. At the visit the visitors raised questions about recruitment strategies and the progress for recruiting new members of staff. The senior team confirmed they were at the interview stage for the recruitment of a programme leader, and they had plans to advertise for two

additional members of staff for the teaching team. The senior team and programme team also told the visitors that the new members of the teaching staff would have a cardio-vascular and respiratory systems speciality and the other would have neuromuscular speciality to compliment the current member of staff, who has a musculoskeletal background. The visitors noted that this plan would provide sufficient numbers of profession specific staff for the programme. However, the process for employing these new members of staff is in the very early stages and the visitors were not provided with specific detail of required qualifications and experience for this recruitment process. Therefore, the visitors were not able to judge that the new members of staff will be appropriately qualified and experienced nor were they able to confirm there would be an adequate number of staff in place to deliver the programme effectively.

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

Condition: The education provider must demonstrate that subject areas will be delivered by educators with relevant specialist knowledge and expertise.

Reason: To evidence this standard, the education provider stated in the SETs mapping document that the programme teaching team will be made of a range of “clinical specialisms such as Musculoskeletal (MSK), Neurological and Cardiorespiratory”. Upon a review of the staff CVs, the visitors noted that the teaching staff only contained one qualified physiotherapist. At the visit, the visitors raised questions about recruitment strategies and the progress for new members of staff. The senior team confirmed they were at the interview stage for the recruitment of a programme leader and they had plans to advertise for two additional members of staff for the teaching team. The senior team and programme team also told the visitors that the new members of the teaching staff would have a cardio-vascular and respiratory systems speciality and the other would have neuromuscular speciality to compliment the current member of staff who has a musculoskeletal background. However, the process for employing these new members of staff is in the very early stages and the visitors were not provided with details of their qualifications or experience. From the documentation provided and discussions held at the visit, the visitors could not judge the knowledge and expertise of all the educators in the process of being recruited. The education provider was not able to confirm which parts of the programme would be delivered by these members of staff. Therefore, the visitors cannot confirm how the staff will be deployed in the programme to ensure that educators have the necessary knowledge and expertise to deliver their parts of the programme effectively. The education provider must provide evidence demonstrating the education and qualifications of the staff to be recruited, and how their expertise will be relevant to this programme so the visitors could judge if this standard has been met.

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

Condition: The education provider must ensure there are appropriate physical resources and contemporary reading lists available for learners to ensure effective delivery of the programme.

Additionally, the education provider must also ensure that all relevant programme documentation is updated with correct and accurate information. Including information that is reflective of the language associated with statutory regulation and the HCPC.

Reason: To evidence this standard prior to the visit, the education provider provided a link to the student services webpage on the Bangor University website. The visitors were able to see a range of support services available to learners but could not see the teaching resources specific to the programme that are available. This standard is about how the education provider ensures that programme resources are readily available to learners and educators and are used effectively to support the required learning and teaching activities of the programme. On the facilities and resources tour during the visit, the visitors were shown some equipment that would be used in the rehabilitation part of the programme. The visitors then requested to see an equipment list to assess the resources available for learners. The list provided to the visitors was a request for equipment to be provided for this programme. As there was no confirmation on whether the request for the list of equipment will be granted and when any equipment purchased will be made available, the visitors could not confirm that the current resources are readily available for the effective and appropriate delivery of the programme. Upon review of the module descriptors, the visitors noted that they did not include a reading list. The visitors queried this with the senior team and were then provided with more up to date module descriptors with the same module content, but with reading lists added. The visitors noted that a lot of the reading materials were out of date and queried the programme team about why they had not sourced the contemporary editions of the books for learners. The programme team then stated that the more up to date version of the reading list would be provided for learners on the virtual learning environment (Blackboard). The visitors were unable to access Blackboard so could not determine that the reading list ensured learners were exposed to contemporary physiotherapy practice that would ensure they meet the demands of current physiotherapy practice. The visitors noted that providing books that might be out of date would not be effective or appropriate in terms of delivering the programme. The education provider must ensure that all teaching materials available to learners are up to date to allow for meeting the SOPs and meeting the demands of contemporary practice.

The visitors also noted some inaccuracies in the documentation provided for learners. Firstly, in the practice learning handbook on page 42, the education provider has stated that “the very nature of this physiotherapy programme is such that successful completion allows mandatory HCPC registration and a license to practice”. The visitors noted that this statement is incorrect and should read that completion of an approved programme leads to eligibility to apply for registration with the HCPC. Furthermore, the reading lists provided to the visitors made reference to the Health Professions Council (2008) standards of Performance, Conduct and Ethics, rather than the up to date Standards of Conduct Performance and Ethics (SCPEs) from the HCPC. Finally, along with the examples of changes given above, the education provider indicated on the visit there would be changes made to the practice learning handbook, module descriptors and student handbook. These changes will be linked to but not limited to; interprofessional learning, information for applicants, assessment and module content. The visitors must therefore judge that the changes made provide correct information to support learning in all settings and are effective and appropriate for the delivery of the programme.

3.16 There must be thorough and effective processes in place for ensuring the ongoing suitability of learners' conduct, character and health.

Condition: The education provider must show a thorough and effective process in place for ensuring the ongoing suitability of learners' conduct, character and health, specifically for this proposed programme.

Reason: To evidence this standard in the documentary submission, the education provider highlighted section 1.25 in the student handbook and the institutional student charter. Additionally, the education provider had stated that a document called the student agreement would be tabled at the approval event. Section 1.25 in the student handbook outlines that learners must adhere to institutional regulations and highlights the areas that could cause a breach of conduct. The visitors noted that this did not give an overview of the process for ensuring the ongoing conduct for learners. The education provider also provided a web link to the University student charter. This gave an overview of expectations for all learners across Bangor University. From the information provided prior to the visit, the visitors could determine that learners would be subject to adhering to the institution standards of conduct, but could not see how it was monitored or how the education provider ensured the ongoing suitability of learners' conduct, character and health. The student agreement document was not tabled at the event so visitors were unable to make a judgment if there was a thorough and effective process for ensuring the ongoing suitability of learners' conduct, character and health.

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

Condition: The education provider must show that the learning outcomes and module content ensure that learners are able to meet the standards of proficiency (SOPs) for physiotherapists.

Reason: To evidence this standard the education provider directed the visitors to review section 9 in the programme specification and the SOPs mapping document. The SOPs mapping document guided visitors to review the module descriptors provided. Firstly, when the visitors reviewed the module descriptors the education provider had stated that "the module may include" before detailing module content. At the visit, the visitors were told that programmes must prefix all module content with "may" to meet internal procedures. As there was further discussion around the module content, the visitors understood there would be changes to the content. Therefore, visitors would need to see finalised rather than provisional learning outcomes and module content in order to judge that learners are meeting the SOPs.

The visitors also had queries about the learning outcomes and module content, and how they effectively ensured that learners met the SOPs. The visitors found the SOPs mapping to be quite broad and not explicit in mapping the SOPs to module content and learning outcomes. In the programme team meeting the visitors raised an example to understand how the module content had been created. The visitors enquired about the teaching of ergonomics (SOP 13.7) and where in the programme this would be delivered. The visitors were then told it would be in all modules and would run throughout the programme. However, upon a review of all module content there is no mention of ergonomics in any of the modules. The visitors do not expect all individual SOPs to be mapped to individual learning outcomes and noted that module NHS 4448

includes a learning outcome related to human movement which could include ergonomics. However, as this was not clear to the visitors, they could not make a judgement regarding the content of the programme having any relevance to ergonomics.

More broadly to the above example, the visitors need to see explicitly that all the SOPs will be appropriately covered in the module content. As stated the above is an example brought up to the programme team to highlight how the visitors could not see specific SOPs mapped to relevant module content. The education provider must therefore evidence that all SOPs are being covered in learning outcomes or module content.

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

Condition: The education provider must demonstrate that the programme reflects the philosophy, core values, skills and knowledge base as articulated in any relevant curriculum guidance.

Reason: To evidence this standard prior to the visit, the education provider highlighted the programme philosophy section in the programme specification. While this section gave an overview of the philosophy and core values of the profession, the visitors could not discern how the programme was reflecting the skills and knowledge base of physiotherapy. Upon review of the other documents provided as part of the submission, the visitors found the SOPs mapping to be quite broad and not explicit in mapping the SOPs to module content and learning outcomes. The SOPs set out the requirements for safe and effective practice for physiotherapists, without them being clearly mapped the visitors cannot confirm that the programme is reflective of the skills and knowledge base required for safe and effective practice as a physiotherapist.

This was raised by the visitors in the programme team meeting, specifically citing the area of neurology, also referred to as neuromuscular systems. The visitors were unable to see a mention of this area of practice within the module content and queried what the approach would be for this programme. The programme team responded by explaining the philosophy of the teaching and how they would ensure evidence based practice. However, the programme team were unable to confirm in what module(s) this teaching would occur. The visitors were therefore noted that there was the potential for this area of study to be omitted and thus a key area of knowledge would be missing for learners. The visitors must be certain that learners are being taught all relevant subject areas within physiotherapy. The education provider must show evidence demonstrating the programme is reflecting the philosophy core values, skills and knowledge base to ensure safe and effective practice.

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must show how they will ensure the programme remains relevant to current practice in the future.

Reason: To evidence this standard the education provider highlighted the programme specification to show the “current regulations and standards that guide current practice in physiotherapy”. Upon reviewing the programme specification the visitors could see that the programme had been mapped against the Quality Assurance Agency for Higher Education (QAA) Code for Higher Education (2018), QAA Benchmark Statement for

Physiotherapy (2017) and the HCPC SOPs. While the visitors could see how the programme had drawn on contemporary standards for physiotherapy this standard is about how the programme takes account of and reflects current practice on an ongoing basis, so that it remains relevant and effective in preparing learners for practice. At the visit, the visitors questioned the education provider how they intended to review the programme and ensure it was relevant. The programme team responded by stating there would be an annual review of the programme in which the team would review the curriculum. However, the programme team did not confirm how they would ensure the programme would stay relevant to current practice. The visitors were therefore unable to confirm that the curriculum would consistently be relevant to current practice.

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

Condition: The education provider must ensure that theory and practice are effectively integrated to ensure learners are prepared and competent for practice

Reason: To evidence this standard prior to the visit the education provider guided the visitors to view their “spiral curriculum model” as a way of showing how they will integrate the theoretical and practical parts of the programme. While the visitors understood the theoretical concept of the spiral model, the information provided did not provide specifics about how the education provider will ensure that learners are able to apply their knowledge in the practice environment. Upon further assessment of the documentation, the visitors noted in the SOPs mapping document that the education provider has mapped many of the SOPs to the practice learning handbook and indicated in the meeting that much of the learning would be reinforced on placement. However, the visitors were not told what the education provider meant by ‘reinforcement’ or how they would ensure that this would take place. When the visitors queried the mechanism to ensure this, the education provider indicated they are in the process of auditing placement sites. However, the visitors could not see the audits and so could not determine if they would ensure the integration of theory and practice. The education provider must demonstrate they are effectively managing what is covered by learners in the practice-based learning setting to ensure that theory and practice are integrated effectively.

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

Condition: The education provider must show that the teaching methods used are appropriate to the effective delivery of the learning outcomes.

Reason: To evidence this standard the education provider highlighted the spiral curriculum diagram and explanation to show that this standard is met. The visitors were unsure of the learning and teaching methods from this, but were able to review the module descriptors that provided an outline for the teaching methods being used. At the visit, the visitors were provided with different descriptors of the modules after inquiring about the reading lists. Within these they noted that the teaching methods were different to the module descriptors originally provided. As the visitors were provided with conflicting information and the education provider indicated there would be changes to the learning outcomes, the visitors could not judge that the teaching methods are appropriate to the effective delivery of the learning outcomes.

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

Condition: The education provider must articulate what interprofessional learning there will be on the programme, and how they will ensure that learners will learn with, and from professionals in other relevant professions.

Reason: To evidence this standard prior to the visit the education provider highlighted two modules, NHS 4380 and NHS 4250, which would include interprofessional education. Upon reviewing the module guides the visitors could not see activities that could be considered interprofessional learning. The module content made reference to understanding other professional's view and understanding interdisciplinary teams but did not confirm that learners are able to learn with, and from, professionals and learners in other relevant professions. The education provider also stated that there would be "ample opportunity" for learners to learn with a range of health and social care professionals during practice-based learning. While there may be the opportunity, the visitors could not confirm that the programme was ensuring that learners were all exposed to these opportunities and so could not confirm the standard is met. At the visit the visitors were told that the programme would aim to involve guest lecturers and learners from the nursing and radiography programmes at Bangor University. The visitors enquired where in the programme this would be included and they were told it would happen in the module titled Leadership in context NHS 4380. The visitors had conflicting information about the content of this module and they could not be certain that the programme was ensuring that learners are able to learn with, and from, professionals and learners in other relevant professions.

4.10 The programme must include effective processes for obtaining appropriate consent from service users and learners.

Condition: The education provider must show there is an effective process for obtaining appropriate consent from service users and learners.

Reason: To evidence this standard in the documentary submission the education provider directed visitors to a module specification for module NHS 4447. The education provider added that this teaching on consent would be consolidated during practice placement. However, this standard is related to the practicalities rather than the theory of consent. Upon viewing the module descriptors the visitors noted there was not a specific inclusion of consent in the module. Furthermore, there was no clear mechanism to show how it was being consolidated during practice placement. During the programme team meeting the visitors were told again that consent would be introduced in the early stages of the teaching and carried through the programme. The visitors could not see any processes for obtaining consent from learners or service users and so were unable to confirm that this standard has been met. The education must show its process for obtaining appropriate consent from service users and learners.

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

Condition: The education provider must ensure that the range of practice-based learning supports the achievement of the learning outcome and the standards of proficiency (SOPs) for physiotherapists for all learners.

Reason: To evidence this standard prior to the visit the education provider stated in the SETs mapping document that the programme “utilizes a range of clinical areas” and guided visitors to review the practice placement handbook as evidence of this. Upon a review of the practice placement handbook the visitors were able to see a draft structure of the programme that highlighted four practice-based learning blocks. Upon further assessment of the practice placement handbook the visitors could not determine that the education provider was ensuring that learners would be guaranteed the appropriate range of placements. The education provider provided information about the areas of focus that learners could cover on placements but did not confirm how they would ensure learners would cover these areas. At the visit, the question was raised about the mechanisms in place from the education provider to ensure the range of placements would be available for all learners. While the education provider outlined many potential areas of placement, the education provider did not outline an effective process to ensure that all learners are covering the appropriate areas of physiotherapy to meet all the SOPs. The education provider must ensure that learners have access to appropriate range of practice-based learning experiences which reflect the nature of modern practice and the range of practice setting of the profession they are preparing to enter.

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

Condition: The education provider must show there are an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

Reason: To evidence this standard prior to the visit the education provider stated in the SETs mapping document that a member of the physiotherapy team, called the physiotherapy liaison lecturer, has been nominated to ensure that all placement educators are appropriately qualified and prepared. The practice placement handbook described the physiotherapy liaison lecturer’s role as being the main point of contact between the placement and the physiotherapy programme. The description did not state that the physiotherapy liaison lecturer had responsibilities that related to ensuring appropriately qualified and experienced staff are involved in practice-based learning. Furthermore, the visitors were not able to determine if there was a member of staff in this role currently.

The visitors were also not provided with details of the placement sites or the number of practice educators that would be involved in relation to the number of learners at each site. Therefore the visitors were unable to determine there would be an adequate number of appropriately qualified and experienced staff involved in practice-based learning from the documentation. At the visit, the programme team confirmed that all practice placements would be audited to ensure they would be appropriate and safe for learners. The visitors understood that this would involve ensuring an adequate number of appropriately qualified and experienced staff involved in practice-based learning. However, it was not discussed in the meetings what the exact number, in relation to learners, of practice educators the education provider was intending. Without specific information about the practice-based learning sites, the visitors were unable to judge that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning.

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 show how practice educators will undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

Reason: To evidence this standard in the SETs mapping document, the education provider stated that the physiotherapy liaison lecturer will be responsible for "training and preparation of all placement educators". The statement did not highlight the nature of this training or its frequency and so the visitors were unable to judge that it was appropriate for learner's needs and the delivery of the learning outcomes. Upon further review of the documents the visitors noted in the practice learning handbook that all practice educators would be "validated" by Bangor University. The visitors were not clear what this validation entailed so could not judge it would ensure that practice educators are appropriately prepared to support learners. At the visit, the programme team confirmed that practice educators would be trained. However, the visitors were not given explicit details about the nature or frequency of the training for practice educators so they were unable to judge that this standard was met. Therefore, the education provider must show how practice educators will undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

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 demonstrate how the assessments of learning outcomes ensure that those who successfully complete the programme meet the standards of proficiency (SOPs) for physiotherapists.

Reason: To evidence this standard the education provider highlighted the programme specification and a document titled Post Graduate Diploma Physiotherapy Appendix 1 to evidence this standard. Upon reviewing these documents the visitors were able to view a list of assessments and the module title they corresponded to, from this information the visitors were unable to determine this standard had been met. Upon reviewing the module descriptors the visitors had queries about the learning outcomes and module content and how they effectively ensured that learners met the standards of proficiency, as detailed for SET 4.1. The visitors found the SOPs mapping to be quite broad and not explicit in mapping the SOPs to module content and learning outcomes. The visitors raised an example to understand the rationale for the assessment strategy around the assessment of manual handling. The visitors first queried where this would be covered in the programme. The education provider responded by stating that it would be covered in the module entitled 'Applied functional anatomy' (NHS 4448). The visitors then queried the examination strategy for this module as it included a 3 hour examination and a 15 minute presentation on a learners chosen subject. The visitors raised to the education provider that they could not understand how a written exam would include assessment of these handling skills that are commonly assessed practically. The education provider then indicated there could be changes to the assessment strategy alongside changes to module content. The visitors would need to review these changes to ensure that any new content or learning outcomes are

appropriately assessed to ensure learners are meeting the SOPs. Therefore, the education provider must submit further information that shows how assessments will ensure that learners are able to meet the SOPs to determine whether this standard is met.

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

Condition: The education provider must show they ensure that assessments provide an objective, fair and reliable measure of learners' ability to meet the SOPs and be considered fit to practice upon successful completion of the programme.

Reason: Prior to the visit the education provider highlighted the assessment methods throughout the modules and appendix 1 to evidence this standard. However at the visit the education provider has indicated there will likely be changes made to the content for the programme and consequentially the assessment strategy. The standard is about making sure that assessments are effective at deciding whether a learner is fit to practice by the end of the programme. The visitors will need to reassess any changes to ensure that the assessments provide an objective, fair and reliable measure of learners' progression and achievement.

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

Condition: The education provider must demonstrate how assessment methods used are appropriate to, and effective at, measuring the learning outcomes.

Reason: Prior to the visit the education provider highlighted the assessments throughout the modules are mapped to the learning outcomes for the programme. The visitors were able to see that the learning outcomes were being assessed but, as detailed in standard 4.1, were not clear how these learning outcomes are mapped to the SOPs. Therefore the visitors could not confirm that standard 6.5 had been met. At the visit the visitors raised an example to understand the rationale for the assessment strategy around the assessment of manual handling. The visitors first queried where this would be covered in the programme. The education provider responded by stating that it would be covered in the module entitled Applied Functional Anatomy (NHS 4448). The visitors then queried the examination strategy for this module as it included a 3 hour examination and a 15 minute presentation on a learners chosen subject. The visitors raised to the education provider that they could not understand how practice manual handling skills could be effectively assessed without observation of practice. The education provider then indicated there could be changes to the assessment strategy alongside changes to module content. The visitors would need to review these changes to ensure that any new content or learning outcomes are matched with an assessment strategy that is appropriate at measuring the learning outcomes. Therefore, the education provider must submit further evidence demonstrating that assessment methods will measure the learning outcomes appropriately and effectively.

Section 5: Outcome from second review

Second response to conditions required

The education provider responded to the conditions set out in section 4. Following their consideration of this response, the visitors were satisfied that the conditions for several of the standards were met. However, they were not satisfied that the following conditions were met, for the reasons detailed below. Therefore, in order for the visitors to be satisfied that the following conditions are met, they require further evidence.

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

Condition: The education provider must demonstrate how there will be regular and effective collaboration between the education provider and practice education providers.

Reason condition not met at this time: From the education provider's response, the visitors noted that the tripartite meetings with Betsi Cadwaladr University Health Board (BCUHB) now include references to the physiotherapy provision. However, they noted that the membership of this group has not been updated to include any physiotherapy input. This is both in terms of practice staff and staff from the education provider. In order for collaboration to be effective in relation to the physiotherapy programme, the visitors would expect to see the membership of this group to be expanded to include physiotherapy representatives from the education provider and from practice. Therefore, the visitors are not satisfied that this condition is met at this time.

Suggested documentation: Information which demonstrates that the membership of the tripartite meetings with Betsi Cadwaladr University Health Board (BCUHB) is expanded to include physiotherapy representatives from the education provider and from practice.

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

Reason condition not met at this time: In their response, the education provider provided several strands of evidence, which are explored below.

The education provider has noted that a Local Level Agreement is due to be signed by the education provider and practice partners. This agreement includes information about capacity planning, specifically paragraph 6.2, which states "The number, nature and location of Practice Based Placement opportunities will be determined on an annual basis in discussions between the Placement Provider and the HEI, reflecting at least the number of students commissioned on the programmes by the Education Commissioner in response to Health Board and Trust workforce plans." This suggests that if this agreement is signed, the placement provider would place learners from the programme (who are all on commissioned places). The education provider has noted that this agreement will be signed "once the programme has been validated". However, at this time, the agreement has not been signed, and there is no evidence provided which explicitly suggests this is the intention of the practice provider identified (Betsi Cadwaladr University Health Board (BCUHB)).

On arranging practice based learning for the learners due to commence the programme in January 2020 (should the programme be approved), the visitors noted that the education provider:

- Was undertaking “Meetings with regards to the establishment of placements are ongoing and will continue on a monthly basis until the programme is established.”
- Provided an email confirming that BCUHB will be able to place 12 learners from the programme.

From this information, the visitors note:

- That BCUHB have confirmed that there is practice-based learning available for 12 of the 15 learners who are due to enter the programme in January 2020 (should the programme be approved) for the duration of their studies.
- This means there is a gap of three learners when considering the number of learners noted by the education provider as the maximum cohort size (15).
- There is currently no agreed process in place to ensure the availability and capacity of practice-based learning for all learners on an ongoing basis (ie for learners who commence the programme from January 2021 onwards).

Therefore, the visitors are not satisfied that this condition is met at this time, and require further evidence.

Suggested documentation: Evidence that shows how the education provider will ensure sufficient capacity of practice based learning to support the delivery of the programme, which might include:

- How the education provider will ensure ongoing capacity for practice based learning for learners who commence the programme from January 2021 onwards, for example, signed agreements with partner institution(s).
- A breakdown of the placement providers that will be involved, including the number of placements they will provide, and in which areas of practice.
- How the remaining three learners due to start the programme in January 2020 will be placed.

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

Condition: The education provider must ensure there are appropriate physical resources and contemporary reading lists available for learners to ensure effective delivery of the programme.

Additionally, the education provider must also ensure that all relevant programme documentation is updated with correct and accurate information. Including information that is reflective of the language associated with statutory regulation and the HCPC.

Reason condition not met at this time: In their response, the education provider noted that the reading lists have been updated, and would be available on the virtual learning environment. However, updated versions of the reading lists were not provided through the submission, and therefore the visitors were not able to review and confirm that they were appropriate and up to date. In relation to equipment, the education provider provided a list of equipment, but it seemed that this list was what the provider

would like (suggested by statements such as “Ideally would need x 4 of these”) rather than what had been agreed for purchase. The visitors did not see commitment from the evidence provided that equipment would be purchased, should the programme be approved. The visitors also note that the reading lists and equipment “will be finalised post validation”. They were unclear whether this meant that there may be further changes to these lists.

The visitors also noted one instance in the documentation where requirements were incorrectly attributed to the HCPC. Specifically page 10 of the practice learning handbook notes “In accordance with the requirements of the Chartered Society of Physiotherapy and the Health and Care Professions Council, you are required to complete a minimum of 1000 hours of supervised clinical practice placement education.”

The visitors also noted two inconsistencies with the information provided about practice-based learning in the placement handbook:

- Page 11 states that there are “four practice placements with two six-week placements located in the first year and two seven-week placement located in the second year.” However, in the table on page 12, the second placement from the first year is noted as 7 weeks.
- Page 24 states that learners “will complete a minimum of 37.5 hours per week which includes 2 hours for developing the student placement learning portfolio.” The visitors note that in the second year, the number of hours required across two 7 week placements is 560 hours, meaning that learners will need to work 40 hour weeks. The visitors note that the 37.5 hours is referenced as a ‘minimum’, but also note that it would not be possible to complete placement hours if learners work to that minimum.

Therefore, the visitors were not satisfied that this condition is met, and require further evidence.

Suggested documentation: The updated reading lists, or a way of accessing them. Formal commitment to purchase required equipment and books, or information that shows this investment has been made. Updates to documentation to correct the issues noted.

3.16 There must be thorough and effective processes in place for ensuring the ongoing suitability of learners’ conduct, character and health.

Condition: The education provider must show a thorough and effective process in place for ensuring the ongoing suitability of learners’ conduct, character and health, specifically for this proposed programme.

Reason condition not met at this time: In their response, the education provider supplied the Personal Development Review (PDR) system, which they note will “will ensure ongoing monitoring of professional behaviours and attitudes such as learners conduct, character and health.” However, from reviewing the PDR, it seems that this system is focused on educational attainment and pastoral support, rather than capturing potential issues in the ongoing suitability of learners’ conduct, character and health. Nowhere in the document is there an obvious place to capture these issues, nor is there information about what action should be taken if any issues are identified. The education provider also supplied:

- An escalation of concerns policy (appendix 10), which provides a clear overview of what would happen if a referral is made, but not information about how any issues might be identified in the first place.
- A student agreement (appendix 12), but it appeared that this would only be interacted with (signed) by learners at the start of the programme.

Therefore, the visitors were not clear how the information supplied would ensure ongoing suitability of learners' conduct, character and health. Particularly, they noted that there did not seem to be a regular mechanism for identifying and capturing issues (or potential issues) in place.

Suggested documentation: Information which shows how the education provider identifies potential issues with the ongoing suitability of learners' conduct, character and health, on an ongoing basis through the programme.

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 26 November 2019 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).