

28 January 2005

To: All Education Providers offering programmes leading to eligibility to register with the Health Professions Council

Dear Colleagues

Health Professions Council: New Approvals Process/Annual Monitoring

I am writing in my capacity as the new Director of Education & Training at the Health Professions Council (HPC) by way of introduction and to send you information regarding our new Approvals and Monitoring processes. The following areas are covered below in further detail:

- The new Approvals process for education providers and their programmes leading to registration for those professions regulated by the HPC.
- A brief outline of our expected process for ongoing Annual Monitoring.
- An official copy of the new Standards of Education & Training, which should be read in conjunction with the information on the new Approvals Process.
- A request to provide us with your details to confirm the data held by us for your organisation and programmes to allow a full data cleansing exercise to be undertaken. We are also asking for information regarding the timetable for your own internal annual monitoring processes.

1. Introduction

An introductory leaflet to the Health Professions Council is enclosed with this letter. Should you wish further copies to distribute to students and/or placement/clinical educators then please contact our Communications Department on info@hpc-uk.org.

The main aim of the new Approvals Process is to allow an independent review of programmes for regulatory purposes and ensure rigour surrounding the outcomes of the Approvals event. HPC Visitors need to be satisfied that the provider and its programmes meet our Standards of Education & Training to ensure that graduates meet our Standards of Proficiency to allow eligibility to apply for registration with the HPC. The main areas where the new Approvals process differs from the previous system are:

- 1.1. That, as far as possible, the new procedures will align with and build upon existing approval and quality assurance processes already used by education providers.
- 1.2. Programmes will be approved on an open-ended basis subject to satisfactory annual monitoring returns (although the HPC reserves the right to visit a

- programme, if necessary, where problems have become apparent through the process of assessing annual monitoring reports).
- 1.3. The introduction of a unified approach to allow multiple-professional approvals to be incorporated into a single approvals event.
 - 1.4. Where required formal approval of new education providers will now be achieved at the same time as programme approval.
 - 1.5. Annual monitoring will adopt a lighter touch by reporting by exception and according to an education providers own annual monitoring timetable, using their own documentation where available (pro-forma provided if needed).
 - 1.6. Following feedback from our consultation process Annual Monitoring Review will be extended to include Cyclical Review, which will take place according to the education providers own internal programme review timetable. No Annual Monitoring Report will be required in a year where Cyclical Review occurs. It should be stressed that this is *not* re-approval but rather an extension to ongoing annual monitoring.
 - 1.7. The HPC will no longer visit clinical/practice placements. Quality assurance of such placements will be the responsibility of the education provider, to be evidenced by the inclusion into an education provider's own quality assurance mechanisms of QA systems which ensure that the HPC Standards of Education & Training and Standards of Proficiency are being met within clinical/practice placements. It should be noted, however, that should the evidence highlight problem areas the HPC reserves the right to visit clinical/practice placements.
 - 1.8. The HPC will no longer approve the appointment of external examiners instead our Visitors will look for evidence that at least one external examiner is from the relevant part of the Register.

2. The New Approvals Process

Approval events can be triggered in a number of ways:

- 2.1. a request by an educational provider for HPC to visit a newly developed programme
- 2.2. a request by an education provider for HPC to visit a programme which has undergone substantive (major) change
- 2.3. programmes which have not previously been approved by HPC against QAA Benchmark Statements
- 2.4. programmes which have never been approved by the HPC
- 2.5. programmes relevant to new professions coming onto the Register eg Operating Department Practitioner programmes
- 2.6. programmes which have open-ended approval but where a number of problems have been identified through annual monitoring and where a HPC Visitor recommends a visit.

A flow chart showing the various steps in the new Approvals process is attached to this letter and can be found on our website at www.hpc-uk.org/education. We are currently drafting an *Approvals Handbook*, which will give more details regarding the new Approvals process and which will be posted on our website with a hard copy distributed to all education providers as soon as it has been finalised.

We are in the process of drawing up a programme of forward Approvals visits for the year April 2005 to March 2006. The Education and Training Committee has taken a policy decision that those programmes which have already been approved against the QAA Benchmark Statements will move automatically to open-ended approval and be subject to ongoing annual monitoring. For those programmes which have been approved but for which Benchmark Statements were not available at the time of the event then a further Approvals visit under the new Approvals Process will be required. Subsequent to a positive outcome these programmes would then move to open-ended approval.

Priority for Approvals visits for the next year will be given to new programmes although the Council is committed to undertaking as many outstanding visits as possible during this time. There are in the region of 200 visits required at present and a finite resource available within our Education & Policy Department. Your forbearance is appreciated as we try to deal with the backlog. As part of the new process we will endeavour to undertake Approvals visits in conjunction with an education provider's own internal academic validation process. If you are about to start, or are in the throes of, developing a new programme then please let us know as soon as possible to allow us to plan and timetable the approval event with you well in advance.

3. Approvals Events

One of the main differences between the new Approvals process under the HPC and the system operated by the previous regulator, CPSM, is that the previous Joint Boards and the Pre-Registration Education & Training Working Groups (PRETWGs) have disappeared and been replaced by a new Partner Visitor system. To ensure the independent role of the Regulator any Visitor who attends an Approvals event on behalf of the HPC cannot represent any other body at the same event. Programme approval leading to eligibility to apply for registration with the HPC as the regulatory body, allowing graduates to practice using a protected title, lies *solely* with the Health Professions Council. Whilst the Council fully recognises that the Professional Bodies are the holders of the professional knowledge and values their involvement in programme development and post registration training and delivery, as stated above Joint Boards and PRETWGs no longer exist and programme approval for regulation purposes will be undertaken independently of the Professional Bodies. However, the Professional Bodies have been involved in our consultations and in drafting the Standards of Proficiency and we look forward to working with them once again when developing our Curriculum Guidance (a Professional Liaison Group is in the process of being set up to draft such guidance).

As part of the new Approvals process the HPC wishes to undertake regulatory approval at the same time as an educational provider's own internal academic validation event in an attempt to contain the volume of quality assurance events in which providers have to participate. It is the decision of education providers which other bodies they might wish to invite to an approvals event and the HPC are pleased to be part of a joint panel involving other bodies, and indeed have done so

successfully at a number of Approvals events which have already taken place under our new process.

It should be noted that the HPC Visitors' deliberations for regulatory purposes, using our Standards of Education and Training and Standards of Proficiency, will solely involve the HPC Visitors and that no other member of a Joint Panel may participate in the discussions regarding the final outcome for regulation. This protects the regulatory independence mentioned above and allows our Visitors time to assess a programme against the very specific criteria contained in our Standards, against which our Visitors will prepare their report. Allowance for such private deliberation should be factored into proposed agendas (a suggested agenda is available) for approvals events. The final outcome of the HPC Visitors' deliberations may be used by the Joint Panel if desired and should be fed back to Programme Teams at the end of the event by the HPC Visitors at the same time as the Joint Panel feedback. *Chairs of approvals events should be made aware of these requirements.*

Some further points of information regarding the new Approvals process are contained in *Paper 1* enclosed.

For those education providers offering programmes in the biomedical sciences area a separate letter will be sent shortly detailing how the HPC will be dealing with programmes in this area.

4. Partner Visitors

The HPC has already trained approximately 130 Partner Visitors (with another 140 to be trained over the coming year), who will undertake Approvals visits on behalf of our Education & Training Committee. We will be sending education providers a copy of our *Visitors' Guidance* documentation to allow transparency around the areas which the Visitors will be assessing. The *Visitors' Guidance* gives more details of the Standards of Education & Training, each of which has to be met for a programme to be approved as leading to eligibility for graduates to apply for registration with the Health Professions Council. For each visit there will be two Visitors appointed from the relevant part of the Register, at least one of whom will be an educator. The Visitors will prepare a report for each programme considered at an Approvals event and once the full process has been completed these reports will be posted to the web.

5. Annual Monitoring

As outlined above, Annual Monitoring will be by exception reporting using an educational provider's own internal timetable and paperwork (a pro-forma will be provided where required). As a result of feedback from our consultation exercise the Council has decided to extend Annual Monitoring to include Cyclical Review ie where the HPC will send a Visitor to attend an education provider's own internal programme review (generally understood to be a quinquennial event), which will constitute the Annual Monitoring for that year. There will be no requirement for an Annual Monitoring report in the year of a Cyclical Review as the Visitor will prepare a short report of the internal event. It should be noted that this is *not* programme re-

approval as programmes have open-ended approval. We are in the process of drafting the operational details and guidance for Annual Monitoring and will be writing out regarding these details in time for the Annual Monitoring process to start in the new academic year (September/October 2005).

6. What We Need From You

(data cleansing and annual monitoring/cyclical review information)

6.1 With regard to our aim to ensure that we hold the most current information on our education providers and their programmes the final enclosure with this letter is a Data Cleansing Sheet which requests that you complete certain details for your organisation and its HPC-relevant programmes. We are taking this opportunity, at the start of implementing the new procedures, to undertake some data cleansing and I would be grateful if each organisation would complete the attached form (*one per organisation*) to allow us to update our data. There are two parts to the form – one which asks for details at institutional level and another which requests details at Faculty/School level. We appreciate your assistance in this matter.

6.2 In addition, with regard to Annual Monitoring and Cyclical Review, and to assist us in setting up our operational procedures for these areas, we would be obliged if you would let us know on your data return sheet the following information *per programme*:

- at what time of year you would generally expect your internal annual monitoring reports to be signed off *at institutional level*; and
- the approximate time of your next expected internal programme review event for each HPC-approved programme being run at your institution.

The above information will allow us to schedule in due dates for the two parts of the Annual Monitoring process (ie annual reporting and cyclical review) and assist in drafting our procedures. It will also enable us to alert our Visitor Evaluators in advance of the expected workload around Annual Monitoring Report evaluations and Cyclical Review events.

It is our intention to run a number of roadshows around the UK to explain the new Approvals Process to education providers. Details of these will be distributed in the next few weeks. The roadshows will provide an opportunity for either yourself and/or key staff from your organisation to come along and hear about the new process and ask any questions on the role of the education provider within the process or about the process itself.

If, having read the attached documents, you have queries regarding the new process and do not wish to wait until one of the roadshows, please email education@hpc-uk.org with your question. We will endeavour to reply to you within five working days. Alternatively, information has already been posted on our website. The Education & Policy web address is www.hpc-uk.org/education. As further publications are available these will also be able to be viewed here.

If you wish to contact us regarding a request for an Approvals visit or with information regarding major/minor changes then please contact the education mailbox detailed above (education@hpc-uk.org).

The HPC looks forward to building upon its relationships with our education stakeholders. I have already met a number of you through our Partners' Conference and at Approvals events which have taken place. I look forward to meeting more of you during our roadshows and at future scheduled events. I apologise for the length of this correspondence but it was important to give you as much information as possible at this time.

Yours sincerely

Ms Fiona Nixon
Director of Education and Policy

Enc: HPC Introductory Leaflet
Approvals Flowchart
Standards of Education & Training booklet
Points of Information Sheet
Data Cleansing Sheet

Health Professions Council

APPROVALS PROCESS

Points of Information

The following are some general points about our new Approvals process which may be of interest – these are listed alphabetically:

1. **Accelerated Masters Programmes:** a number of these programmes have been through the new Approvals process and from our experiences of such visits it is suggested that any educational provider developing an accelerated Masters leading to registration should make very clear in the learning outcomes and assessment methodology the distinction between those elements which are undergraduate and evidence the Standards of Proficiency and those at Masters level.
2. **Agendas for Approvals Visits:** the agenda must include time for private HPC deliberation both during and at the end of the day (a suggested agenda is available and will be sent out as part of the event organisation).
3. **Biomedical Science Programmes:** following discussions with the Institute for Biomedical Science (IBMS) HPC is encouraging educational providers to move towards integrated degrees where practice placements occur throughout the duration of the academic educational programme as opposed to a training period following graduation. This would mean that there would be no requirement for graduates of these programmes to obtain the Certificate of Competence issued by the IBMS for regulatory purposes as both the programme and practice elements of the award would be considered under the HPC's new Approvals process. We will shortly be writing to providers of such programmes with regard to this matter.
4. **Chairs of Joint Events:** Joint Panel Chairpersons should be made aware of HPC's requirements for regulatory purposes and ensure that the Visitors are allowed to explore queries against the SETs and SoPs and to give feedback at the end of the day to Programme Teams.
5. **Clinical/Practice Placements:** the HPC Visitors will not visit clinical/practice placements unless evidence from the Approvals event leads Visitors to request such. Quality assurance of clinical/practice placements rests with the education provider who should ensure that such QA procedures are fully integrated with their own quality assurance mechanisms. Such mechanisms will be explored by the HPC Visitors at the Approvals event.
6. **Curriculum Guidance:** the HPC will be publishing curriculum guidance to support programme approval. A Professional Liaison Group is being set up to undertake this task. It is our intention to continue to use the curriculum guidance of the relevant professional bodies until the HPC Curriculum Guidance has been published (scheduled for the end of 2005). The

Professional Liaison Group is looking forward to working with the professional bodies to develop the regulatory Curriculum Guidance.

7. **Documents required prior to visit:** the following documents will be required prior to the visit (a letter requesting these will be sent as part of the event organisation):
 - a. Programme specifications
 - b. Module Descriptors
 - c. Clinical Handbook
 - d. Overview report mapping the evidence to our Standards of Education & Training (*all SETs must be met for approval to take place*)
 - e. Overview report mapping the evidence to our Standards of Proficiency (*all SoPs must be met for approval to take place*)
 - f. Any other documentation/evidence which you think would be relevant to the event.
8. **Judgements**
 - a. **Judgements of Visitors:** Visitors can: i) approve a programme without Conditions, ii) approve a programme with Conditions, or iii) not approve a programme. Visitors can also give Recommendations and/or Commendations.
 - b. **Formal Approval:**
 - i. if a programme is '*approved without Conditions*' a recommendation to approve goes immediately to the Education and Training Committee (ETC) for formal approval;
 - ii. if a programme is '*approved with Conditions*' the education provider agrees a date by which it will meet the Conditions. Once revised documentation is received it is sent to the Visitors for sign-off. A programme is cannot be considered by the ETC until *all* Conditions have been met. At that point a recommendation for programme approval by the HPC Visitors can be formally considered and agreed by the ETC. *A programme cannot be advertised as leading to eligibility to apply for registration with the HPC until formally approved by the Education & Training Committee and a letter sent to the education provider.*
 - iii. Should the findings of the Visitors be '*not approved*' the education provider will be informed in writing and given a period of time in which to comment on the Visitors' Report. Should the education provider wish the programme to be reconsidered at a later date another visit will require to be organised.
 - c. **Recommendations:** theses do not have to be met prior to formal approval. The implementation of recommendations are at the discretion of the education provider after due consideration.
 - d. **Commendations:** where Visitors find evidence of good practice or innovation a commendation will be recorded on the Visitors' Report.
9. **Overseas Franchise Programmes:** the HPC will only approve programmes offered through franchise arrangements between UK and overseas institutions provided all HPC expenses were covered by the UK institution. Provided all

10. Standards of Education & Training and Standards of Proficiency were met approval would be granted to the UK institution for its programme offered through the franchise arrangements. Once an overseas franchised programme has been approved graduates would be eligible to apply to come onto the HPC Register via the UK-approved programme route.
11. **Paramedic Training Programmes:** all training centres and educational providers offering programmes leading to registration with the HPC will require to be visited and will be contacted in the next few months regarding dates for such visits.
12. **Retrospective Approval:** the Council is moving away from retrospective approval of new programmes therefore as much notice as possible should be given to allow approvals visits to be scheduled well in advance of the programme start date.
13. **Supplementary Prescribing, Local Anaesthesia, and Prescription-only Medicines:** The Department of Health (DH) is amending the Prescription Only Medicine Order 1997, and NHS regulations ('National Health Service (General Medical Services Contracts) Regulations 2004 - SI 2004/2694' and the 'National Health Service (Personal Medical Services Agreements) Regulations 2004 – SI 2004/267') in order to allow radiographers, physiotherapists and chiropodists/podiatrists to become supplementary prescribers. HPC have responsibility under this new legislation to flag registrants who have successfully completed an approved course for Supplementary Prescribing, Local Anaesthesia, and Prescription-Only Medicines. Such stand-alone courses will be approved under the new Approvals process. The length of time required at the Approvals event for such courses is likely to be less than that for a full degree programme.