Education and Training Committee, 7 September 2017

Annual monitoring: broadening the evidence base

Executive summary and recommendations

Introduction

This paper sets out proposed changes to the evidence required for submission by education providers engaging with the annual monitoring audit process. Whilst the process continues to operate as expected, developments within the health, care and education sectors mean we should consider what further enhancements could be made to ensure the process remains effective.

We are proposing that education providers be required to submit further evidence regarding their programmes in the following areas:

- Practice placement monitoring for the last two academic years
- Service user and carer involvement monitoring for the last two academic years

The paper also considers gathering evidence around student involvement in the ongoing development of a programme. We are not proposing to make changes to incorporate this area in the annual monitoring audit process now, but instead recommend further consideration be given to this in future years (following the assessment of programmes against the revised standards of education and training which will conclude at the end of the 2019-20 academic year).

Section one of the paper discusses the current operation of annual monitoring, outcomes for programmes and how the process fits into our overall approach to quality assuring programmes. Section two discusses the landscape of changes impacting the programmes we approve. Sections three discusses in more detail the areas where further evidence could be gathered through annual monitoring and how this might be beneficial to the process and our overall quality assurance approach.

Decision

The Committee is invited to consider the following discussion points raised in the paper.

Decision

The Committee is asked to make a decision in relation to the following:

1. Should we expand the evidence base relied upon for the assessment of programmes through annual monitoring?

2. What additional sources of evidence should we require an education provider to include in an annual monitoring audit submission?

   o Practice placement monitoring for the last two academic years
   o Service user and carer involvement monitoring for the last two academic years

3. In which academic year(s) should we implement any changes to the sources of evidence required for an annual monitoring audit submission?

Background information

None

Resource implications

The resource implications of this paper include the following.

- Further changes to processes, communications work with education providers and training for visitors.

Financial implications

The financial implications of this paper include the following.

- There may be additional costs associated with any communications and stakeholder engagement activities over and above that which is already budgeted for on an annual basis.

- There may be an impact to the overall annual monitoring budget if the changes result in longer scrutiny time per audit submission. This consideration will be factored into future budget planning cycles.

Date of paper

23 August 2017

Annual monitoring: broadening the evidence base

1   Background to the annual monitoring process

1.1   The annual monitoring process runs on a yearly basis for all approved programmes. Following approval for the first time, education providers are placed for annual monitoring purposes into group 'A' or 'B'. Groupings determine what type of submission an education provider needs to make each year through the process. The submission type alternates each year between an audit and a declaration.

1.2   An audit submission requires an education provider to map changes made to how their programme meets relevant HCPC standards across the preceding two academic years. Education providers are also required to submit evidence to support any changes made, alongside a suite of additional evidence:

- internal programme quality reports for the past two academic years;
- external examiners reports for the past two academic years;
- responses to external examiners reports for the past two academic years; and
- any other additional evidence HCPC may require at the time (e.g. evidence to support meeting newly introduced standards such as the service user and carer standard over recent academic years).

1.3   HCPC visitors review each audit submission to determine if any further action is required based on the information submitted by the education provider. This could mean requesting additional documentation, and could lead on to commencing an approval visit process, should the visitors identify areas where the programme may no longer meet relevant HCPC standards.

1.4   The Education and Training Committee considers the visitor recommendations made during the annual monitoring audit process, and makes final decisions regarding the ongoing approval of programmes, and any further actions necessary on a case by case basis.

1.5   A declaration is considerably 'lighter' in regulatory intervention, requiring the programme leader to confirm the programme continues to meet relevant HCPC standards, based on activity and changes made over the preceding academic year. The Education and Training Committee are notified of the declarations received.

1.6   The approach taken for annual monitoring, using an alternative submission method over a two-year period ensures that all education providers engage at least annually with the HCPC, following approval of their programme(s). It also ensures visitors are involved at least once every two years in the ongoing assessment of a programme against the relevant HCPC standards. Furthermore, this approach also ensures the Education and Training Committee remains engaged and updated around the monitoring of programmes on at least an annual basis.

1.7   Annual monitoring operates alongside our major change and concerns processes. Combined, these processes support our overall quality assurance approach that grants open-ended (rather than cyclic) approval to programmes. Together, they work on the principle of applying proportionate and risk-based quality assurance to the programmes we approve; meaning the regulatory intervention we apply through any one process should be in proportion to the evidence gathered and the issues identified.

1.8   Our annual report data has consistently highlighted that the majority of approved programmes continue to satisfy the requirements of our annual monitoring process. Table 1 illustrates that only a small percentage of programmes each year require further assessment through our approval process. This shows the annual monitoring process is working as it was intended to, ensuring we are able to focus our regulatory activities and level of intervention on programmes that risk not meeting our standards or where they have struggled to engage with us following approval.

Table 1 – Annual monitoring audit outcomes over the last five academic years

AM Audit outcomes	Percentage of programmes				
	2011-12	2012-13	2013-14	2014-15	2015-16
SETs met	100%	99%	99%	99%	100%
Visit required	0%	1%	1%	1%	0%

2   Sector developments in health, social care and education

2.1   Our model of annual monitoring has been in place without change for the last decade, including the standard evidence base we use to underpin the process (as set out in paragraph 1.2). The only adaption made during this time has been where we have used the process to assess programmes against revised HCPC standards (e.g. revised standards of proficiency (SOPs) for each

profession), or newly introduced standards (e.g. service users and carer involvement).

2.2 During this same period, the education sector itself has changed significantly through various structural changes. Of note and relevance to this paper are the following changes listed below.

- Changes to funding arrangements for allied health profession programmes in England
- The availability of practice placements
- An increase in alternate and collaborative models of provision
- HCPC's response to the Mid-Staffordshire NHS Trust public inquiry
- Changes to higher education quality assurance arrangement in England

2.3 We discuss these changes and their implications in the remainder of section two and we will consider what this all means for the annual monitoring process in section three.

Changes to funding arrangements for allied health profession programmes in England

2.4 Programme in nine of our 16 professions[1] that were previously commissioned to run, are now subject to new HEFCE funding arrangements in England. These changes were made in conjunction with a cap on the amount of placement funding available to support placement for allied health profession programmes. These changes will have significant impact on how students are admitted to programmes, the numbers of students per cohort and how resources are used to support effective student learning in academic and placement environments.

2.5 Another consequence of moving to a HEFCE funded model is that new education providers are entering into allied health profession education, particularly where they have been on the fringes of our regulated professions (e.g. delivering courses of training in sports rehabilitation and looking to move into the area of physiotherapy). Broadly, we can expect this trend to continue which should lead to an increase in the diversity of providers within the education sector for most allied health professions. We can also expect some education providers to expand their provision, and others to contract in an increasingly market-led allied health education sector.

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[1] NHS England bursary reform - https://www.gov.uk/government/publications/nhs-bursary-reform/nhs-bursary-reform

<u>The availability of practice placements</u>

2.6 In recent years, we have also noted a higher proportion of our approval work out of the major change process has related to issues around the placement capacity of approved programmes. For the paramedic profession in particular, this has been driven by the health service's need to increase the supply of paramedics into the workforce. This has resulted in significant changes to approved programmes to accommodate increases in student numbers (in the main) and a particular focus for us around how this affects placement capacity at a programme level and within a given region.

2.7 More broadly, we know placement capacity will continue to be an issue across a number of other professions we regulate. Changes to the funding model for allied health professions in England and constraints around the overall amount of placement funding available means programmes will continue to compete within their region for a limited supply of placements. This also means education providers will continue to look to secure placements in a broader range of settings, working with partners in private and community based settings to place students.

<u>An increase in alternate and collaborative models of provision</u>

2.8 Our annual report data over the past five years continues to highlight our increasing engagement with new models of education provision, and the delivery of education by organisations that do not align themselves to a traditional higher education model[2]. These models of training routinely attract a higher level of scrutiny through our approval process, with a proportion each year unable to complete the process. For those that do, significant numbers of conditions are normally placed on approval, in particular around the areas of effective governance arrangements, collaboration between partners and the effective quality management of placements.

<u>HCPC response to Mid Staffordshire NHS Foundation Trust Public Inquiry report</u>

2.9 In response to the recommendations set out in the Mid-Staffordshire report, the Council agreed a series of commitments across a number of areas, including

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[2] Education Annual Report 2016 (submitted to note at June 17 ETC meeting) - http://www.hcpc-uk.org/aboutus/committees/educationandtraining/index.asp?id=782

our education function[3]. This included further consideration around how we might routinely identify trends in practice learning environments. This commitment was made in the context of considering the role that education providers and other education related sector bodies (including ourselves) have in ensuring environments are safe for both service users and students.

2.10   Whist the SETs have been strengthened in part to address our commitment in this area, this paper is the first to specifically discuss how we might use our processes to identify issues around the quality of placement settings.

Changes in quality assurance arrangements within the education sector

2.11   Following the passing of the Higher Education and Research Act in April 2017, the Office for Students (OfS) will take on most of the functions of the Higher Education Funding Council in England (HEFCE) and Office for Fair Access (OFFA), alongside a new focus and responsibility for overseeing the regulatory landscape for higher education[4]. This significant structural change in quality assurance for the education sector will introduce a more risk-based approach to how institutions will interact with the OfS around annual data returns, site inspections and concerns handling. This is a fundamental change to the regulatory system in England, previously led by the Quality Assurance Agency, which operated a system of cyclic institutional review. It is unclear at this stage the impact these changes will have for the future regulation of higher education in the other three home countries.

2.12   The change in the funding model within England also affects how quality assurance is now applied for allied health programmes. Whilst Health Education England will continue to monitor quality through their role and link to the funding of placements environments, it remains unclear how this will extend into the overall quality assurance of teaching and learning on offer through an education provider.

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[3] HCPC Council Paper – 'HCPC response to the Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry – Second update on commitments' - http://www.hcpc-uk.org/assets/documents/10004C44Enc05-HCPCresponsetotheReportoftheMidStaffordshireNHSFoundationTrustPublicInquiry2ndupdateoncommitments.pdf

[4] HEFCE – Roles and responsibilities - http://www.hefce.ac.uk/reg/of/organisations/

<u>Implications for our quality assurance approach</u>

2.13 Cumulatively, all of these changes indicate that the nature of provision across our approved programmes is changing, with notable impacts on the resources available to deliver education and training to the quality we require in both academic and placement environments. Furthermore, the quality checks traditionally relied upon within the wider education system are also subject to change and it is unclear at this stage if the new arrangements will provide the same level of sector wide assurance.

2.14 Under our current arrangements, we quality assure any impacts to the SETs resulting from the changes discussed in a number of ways. For new education providers and new programmes, we complete a full assessment through our approval process, which ensures all the SETs are met before a programme starts. For approved programmes, we rely upon and expect education providers to notify us through our major change and annual monitoring processes of any significant impacts so that we can assess how the SETs continue to be met. We also use our concerns process to identify any issues, however this is dependent on individuals bringing issues to our attention in a timely manner.

2.15 Importantly, based on our current approach we have no further mechanisms in place to identify the impacts these changes will have should an education provider (or any other individual or organisation) not bring them to our attention. Issues may be identified through annual monitoring, however the evidence we require education providers to submit limits this currently.

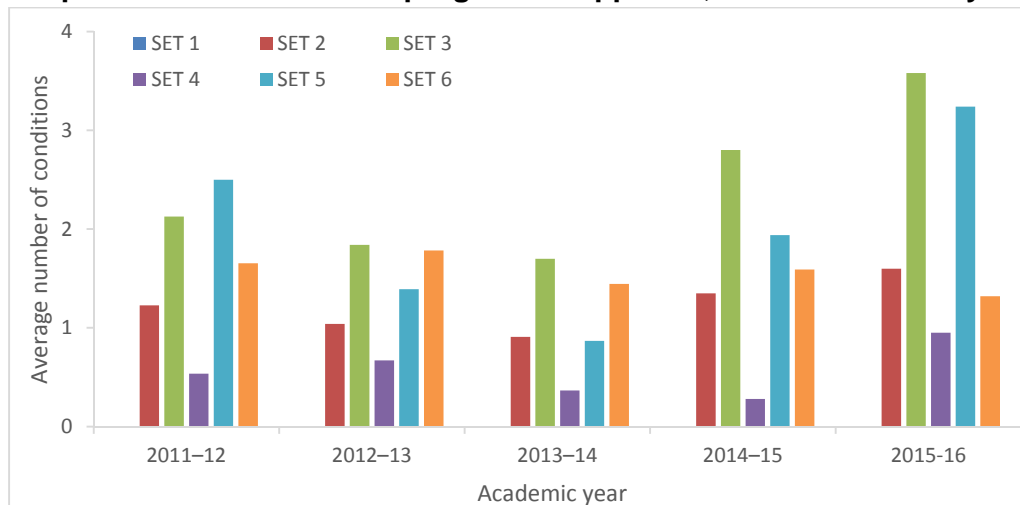**3   Options to expand the annual monitoring evidence base**

3.1 We suggest that amendments should be made now to position our processes appropriately to manage the quality assurance of approved programmes. The nature of the changes discussed in section two indicate there are areas where we could ask for more information from education providers on a routine basis to inform our risk-based quality assurance approach. These include information regarding:

- the quality and availability of practice placements;
- the involvement of service users and carers; and,
- the involvement of learners (students).

3.2 Given its design, using annual monitoring to gather information in these areas is most appropriate, as it is the only process we initiate with education providers on an annual basis. It is important to note that, in focusing on making changes to this process, we would still expect education providers to engage proactively with our other processes as normal. In this regard, the annual monitoring process will continue to be used as a final measure of quality assurance, rather than replacing or duplicating the intent and function of the approvals, major or concerns processes.

3.3 We also view it appropriate to make these changes alongside the broader review of our quality assurance approach that is currently underway. This work relates to the Committee's decision at its last meeting to commission research into our quality assurance approach around education provider experiences and perspectives[5]. The outcomes of this work may certainly lead to further changes for our processes in the future, however the extent and detail of these changes will not be known for some time to come.

Gathering more information about practice placements

3.4 Graph 1 illustrates how the management of placements (SET 5) consistently accounts for a high proportion of the overall number of conditions we place on the approval of programmes. This reflects the complexities involved in ensuring education providers are well placed to maintain overall responsibility for the placement environment, whilst working practically with one or more placement partners to deliver them as part of the programme.

Graph 1: Conditions set on programme approval, over the last five years

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[5] Education research – June 2017 ETC - http://www.hpc-uk.org/assets/documents/10005419Enc03-Educationresearchapproachtoeducationqualityassurance.pdf

3.5 In this context, the analysis in section two, highlighting structural changes to commissioning and funding of programmes (in England), the increase in collaborative arrangements and new models of delivery, and placement availability pressures across most of our professions, all suggests the effective management of placements will continue to be an area of risk in the foreseeable future.

3.6 As previously discussed, whilst the approval process ensures programmes can meet our placement requirements, we have no further mechanisms to ensure adherence on an ongoing basis. The annual monitoring process does not currently require any evidence to support how a programme has managed placements following approval. This means that the inclusion of information within an audit, which specifically addresses practice placements varies significantly between submissions. If information is received, it is usually a consequence of an education provider evidencing specific changes relating to placement standards, or information around the provision of practice placements is included within regular programme monitoring reports.

3.7 This approach means that it is difficult for us to predict and rely upon the level of evidence submitted to us about an education provider's effective management of their placement sites and partnerships with their placement providers. We are also unable to understand consistently across submissions how placement capacity and quality is being managed following approval, and if there are any ongoing issues affecting the SETs.

3.8 Currently, as part of meeting the placement standards in SET 5, education providers must ensure the following.

- 5.1 Practice placements must be integral to the programme.

- 5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

- 5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.

3.9 In maintaining adherence to these standards, education providers should be well placed to provide further evidence around their ongoing management of placements, based on information they would already routinely gather and consider for their own internal purposes. Appendix 1 sets out broadly what we

would expect education providers to disclose through such a submission of evidence, namely:

- Information around placement capacity to the programme;
- summary outcomes from placement monitoring activities; and,
- summary of placement feedback, areas identified for development and action plans

3.10 The impact on education providers, also set out in Appendix 1, would also be minimal. This is because the information submitted to us through the annual monitoring process around practice placements should be already produced by an education provider for their own internal purposes on a regular basis. In this regard, we do not believe requiring additional information of the type outlined above would increase the overall burden to the education provider in engaging with the annual monitoring process.

3.11 Appendix 1 also highlights that, from a visitors perspective, the inclusion of information around the management of placements would broaden the scope around the scrutiny of programmes. This scope would still remain specific to how programmes meet the SETs in this area, but would allow for more risk indicators for visitors to rely upon in assessing how approved programmes continue to manage their placements effectively.

3.12 On this basis, we view that broadening the evidence base to include more information regarding the management of placements would be beneficial to the annual monitoring audit process. We also think it could be introduced in the next academic year (2018-19), which would provide sufficient time for us to communicate these changes and support education providers appropriately in preparing through targeted communications and engagement work.

Gathering more information about service user and carer involvement

3.13 Following the completion of annual monitoring in August this year, all approved programmes now meet the new service user and carer standard, first introduced in 2014. Given this area of our SETs is new, we expect education providers to continue to develop their approaches to involve service users and carers. This would be in much the same way as our expectations around how the standards of conduct, performance and ethics are taught on a programme has changed over time, with the revised SETs now requiring education providers to embed these standards throughout the curriculum and assessment methods of a programme.

3.14 More broadly, our analysis in section two indicates the importance of the service user and carer perspective has in education and training programmes. This includes a service user and carer's role in developing a programme of training and, in learning from Mid-Staffordshire (see paragraph 2.9-2.10), the importance of ensuring students understand their role in meeting the needs of service users in practice.

3.15 Similarly to practice placements, our standard requirements around annual monitoring do not require an education provider to disclose any specific information around the effectiveness of their service user and carer involvement. However, it is possible that some education providers will submit this information to us as part of their annual programme monitoring reports. The existence and level of evidence provided would of course vary between education providers with this current approach. Without any mechanism to monitor progress, we would only see how a small percentage of programmes have developed in this area where further approval processes have been triggered.

3.16 In the area of service user and carer involvement, our SETs currently require the following.

- 3.17 Service users and carers must be involved in the programme.

- 3.3 The programme must have regular monitoring and evaluation systems in place.

- 3.8 The resources to support student learning in all settings must be effectively used.

3.17 In maintaining adherence to these standards, education providers should already be routinely reviewing their service user and carer involvement to ensure it is effective, and to allow for its development over time. As this is the case, education providers should be well placed to demonstrate how their involvement of service users and carers continues to remain effective through the annual monitoring audit process. Appendix 1 sets out broadly what we would expect education providers to disclose through such a submission of evidence, namely:

- where involvement has taken place;
- feedback from stakeholders regarding their involvement, and
- ongoing evaluation of its effectiveness, further development and action plans.

3.18   Similarly to practice placements, the impact around broadening the evidence base to include further information about service user and carer involvement would be relatively minor (see Appendix 1). Information submitted through an audit should be the same as the information being produced by an education provider for their own internal monitoring processes.

3.19   Equally, the benefit to a visitor scrutinising programmes in this area would be significant, enabling the opportunity to gain assurance around the effectiveness of any current service and carer approaches, and how programmes continue to develop in this area. Furthermore, the provision of this information allows for the opportunity to conduct more thematic analysis across approved programmes in the future. This could inform broader discussions around the effectiveness of the standard and any further changes around our requirements.

3.20   On this basis, we also view that broadening the evidence base to include more information regarding the involvement of service users and carers would be beneficial. We also think this requirement could be introduced in the next academic year (2018-19), which would allow sufficient time for us to communicate these changes and support education providers appropriately in preparing through targeted communications and engagement work.

Gathering more information about learner involvement

3.21   As with service user and carer involvement, learner involvement within the education sector is commonly accepted as essential to developing and delivering an effective programme. This moves beyond gathering student feedback and acting on it, to involving students in further aspects of the programme where it is appropriate to do so. Within England, the principle around student involvement has driven government policy in recent years leading to significant structural changes around higher education regulation, as outlined previously in section two with the establishment of the Office for Students (OfS). Furthermore, the changes discussed in section two also suggest that, in changing funding arrangements for some approved programmes to a student loans model, students will play an even greater role in influencing the quality of a programme.

3.22   Through annual monitoring, we normally receive information around the development of the programme through annual programme evaluations and external examiner reports. This does sometimes include how issues raised by students have been identified and addressed. However, the level of information in this area is inconsistent between education providers and it

certainly does not include how student involvement itself is embedded within other aspects of a programme.

3.23 This means visitors cannot routinely rely on student feedback or their broader involvement and engagement to inform an overall understanding around the management of a programme they are assessing through an annual monitoring audit.

3.24 In this area our SETs currently require:

- 3.3 The programme must have regular monitoring and evaluation systems in place.

3.25 This standard includes reference to an education provider gathering feedback and acting on it accordingly, however no explicit requirement is set for this in relation to students.

3.26 However, our revised SETs, which were published in July 2017, will require all educations providers to evidence how they meet this new requirement:

- 3.6 Learners must be involved in the programme.

3.27 For the purposes of the revised SETs, the term 'learner' is a broader term used to encompass a range of terms commonly used, including 'student' and 'trainee'. This standard will specifically require learner involvement in some or all of the areas of programme design, delivery and review. We will use the annual monitoring process in 2018-19 and 2019-2020 to assess this new standard (alongside all other new areas of the SETs).

3.28 As all approved programmes currently meet SET 3.3, education providers should be well placed to provide further information around how they manage feedback and act on this through an annual monitoring audit submission, although this may not be solely specific to students. However, the evidence base specific to learner involvement will be more accessible following the introduction of SET 3.6.

3.29 Broadening the evidence base around learner involvement now would affect education providers significantly. Appendix 1 indicates that some education providers may not be able to evidence how learners are specifically involved (in the context of the revised SETs requirements), but all could probably evidence how student feedback has been gathered and acted upon. Given our strengthening of requirements in this area through the new SETs, we think

requiring additional evidence around student feedback in the interim would be unnecessary and potentially confusing for education providers.

3.30 On this basis, we do not think it is feasible to broaden the evidence base for annual monitoring now in this area, but this option should be reconsidered in the future, once all approved programmes have met our new requirement for SET 3.6.

4 **Proposals for change**

4.1 We consider that expanding the evidence base that the annual monitoring process relies upon would enable a broader scope around the scrutiny of programmes, providing more risk indicators for visitors to rely upon in assessing how approved programmes continue to meet our standards. This would position our annual monitoring process and overall quality assurance approach appropriately, given the broader education sector within which we operate.

4.2 Based on the discussions in section two and three, we view the areas where the evidence base could reasonably and feasibly be expanded include receipt of the following information sources:

- Practice placement monitoring for the last two academic years
- Service user and carer involvement monitoring for the last two academic years

4.3 We do not believe requiring additional information of the type outlined above would increase the overall burden to the education provider in engaging with the annual monitoring process.

4.4 We also suggest that any changes in these areas are introduced in time for the 2018-19 academic year.

4.5 The Committee may wish to consider whether gathering more evidence in these specific areas is a permanent change or perhaps more thematic, at least to start with. A thematic approach could include a review of outcomes at an appropriate point in the future, to consider whether the changes have had the anticipated impact around the scrutiny of programmes through annual monitoring. Such a review could also consider the broader education context and whether or not any further changes to our approach are needed.

5 **Decision**

The Committee is asked to make a decision in relation to the following:

4. Should we expand the evidence base relied upon for the assessment of programmes through annual monitoring?

5. What additional sources of evidence should we require an education provider to include in an annual monitoring audit submission?

   o Practice placement monitoring for the last two academic years
   o Service user and carer involvement monitoring for the last two academic years

6. In which academic year(s) should we implement any changes to the sources of evidence required for an annual monitoring audit submission?

Appendix 1 – impacts and benefits of gathering further evidence through annual monitoring

Additional AM audit evidence	Areas expected to be covered	Benefits for visitors	Source of evidence
Practice placement monitoring	- Placement capacity - Summary outcomes from placement monitoring activities - Summary of placement feedback, areas identified for development and action plans	- Clearer understanding around placement capacity - Evidence of effectiveness of monitoring systems - Evidence of how systems are being used to manage and improve placement provision and quality.	Should exist in existing programme documentation generated through internal QA processes.
Service user and carer involvement monitoring	- Where involvement has taken place - Feedback from stakeholders regarding involvement - Evaluation of effectiveness, further development and action plans	- Insight into how education providers are managing involvement - Understanding of how programme continues to develop involvement - Thematic analysis could inform overall approach and development in this area across professions in the future.	Should exist through internal QA documentation. Some education providers may include this as part of programme monitoring templates or may produce this separately.
Learner involvement monitoring	- Summary of student feedback and areas for development - Summary of student involvement activities	- Consistent disclosure within annual monitoring around student feedback - Understanding how student feedback is being	Evidence of student feedback should exist in existing programme documentation generated through

		used to develop programme • Understanding of how programme chooses to involve students across different programme areas • Thematic analysis could inform overall approach and development in this area across professions in the future.	internal QA processes. Broader involvement of learners may not yet exist given HCPC requirements in this area have only just been introduced.