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## Education and Training Committee – 24 March 2020

### Non-approval recommendation – The University College of Osteopathy – BSc (Hons) Integrated Nutrition and Dietetics, FT (Full time)

#### Executive summary and recommendations

The report in appendix 1 set out the visitors' recommendation to not approve the above programme.

This programme was first visited on 25-26 June 2019. It was visited because it was a new programme, seeking to meet our standards for the first time. Conditions were placed on the approval of the programmes, which are documented in section 4 of the visitors' report. The visitors' report, including the conditions, were taken to the Committee on 24 September 2019. At this meeting, the Committee agreed that conditions must be met in order for the programme to be approved. The decision notice from this meeting can be found as appendix 2.

If required, education providers are provided with two attempts to meet conditions placed on the approval of programmes. Following the education provider's first conditions response, the visitors required a second response, reasons for which are detailed in section 5 of the report.

After reviewing the additional evidence provided by the education provider through both conditions responses, the visitors consider that 2 conditions are not met by the programme. At this stage of the process, the visitors are only able to recommend that the programme is approved or not approved. As they are not satisfied that a number of conditions are met, they have chosen the second of these two options.

The conditions that visitors consider are not met, along with reasoning as to why these conditions are not met, are noted through section 6 of the report provided as appendix 1.

The education provider has provided observations on the report, including the visitors' recommendations, which are included as appendix 3.

If the Committee is minded to not approve the programme, the education provider will have a 28 day period to provide observations on this decision, which will then be taken to a future Committee meeting alongside the visitors' report. At that future meeting, the Committee will be asked to make a decision about whether to not approve the programme.

#### **Decision**

The Committee is asked to determine whether proceedings for the consideration of non-approval of the programme should be commenced in accordance with Article 18(4) of the Health and Social Work Professions Order 2001.

The Committee may decide to:

- approve the programmes;
- commence non-approval proceedings; or
- direct the executive to undertake any other course of action it deems necessary to inform its decision regarding the approval of the programmes.

In reaching this decision, the Executive asks that the Committee:

- provides reasons for their decision; and
- provides the Executive with any necessary instructions to give effect to the decision.

### **Background information**

- None

### **Resource implications**

- None

### **Financial implications**

- None

### **Appendices**

- Appendix 1 – visitors' report for the process
- Appendix 2 – ETC decision notice (24 September 2019)
- Appendix 3 – observations from the education provider

### **Date of paper**

16 March 2020

## HCPC approval process report

Education provider	The University College of Osteopathy
Name of programme(s)	BSc (Hons) Integrated Nutrition and Dietetics, Full time
Approval visit date	25 June 2019
Case reference	CAS-14456-Y3D9X8

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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:

Helen Catherine White	Dietitian
Prisha Shah	Lay
Jennifer Caldwell	Occupational therapist
Niall Gooch	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.

John Deane	Independent chair (supplied by the education provider)	University College of Osteopathy
Emanuela Russo	Secretary (supplied by the education provider)	University College of Osteopathy
Chris Wilkes	Internal panel member	University College of Osteopathy

Miguel Toribo-Mateas	Internal panel member	University College of Osteopathy
Felicity Hamilton-Cox	Learner member of internal panel	University College of Osteopathy
Sharon Potter	Internal panel member	University College of Osteopathy

## Section 2: Programme details

Programme name	BSc (Hons) Integrated Nutrition and Dietetics
Mode of study	FT (Full time)
Profession	Dietitian
Proposed first intake	01 October 2019
Maximum learner cohort	Up to 20
Intakes per year	1
Assessment reference	APP02083

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.

## 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	Comments
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	The visitors requested, and received, further information around this area after a review of the documentation prior to the visit
Internal quality monitoring documentation	Not Required	This is a new programme.

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
Learners	Yes
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 21 August 2019.

### **3.3 The education provider must ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.**

**Condition:** The education provider must demonstrate what arrangements are in place to support the programme leader, who is not an HCPC-registered dietitian.

**Reason:** The visitors were aware from programme documentation and from discussions with the programme team that the programme leader was not an HCPC-

registered dietitian. While the HCPC normally expect a programme leader to be registered in the relevant profession, this is not an absolute requirement as long as an education provider can show that their arrangements are appropriate to their programme. However, the visitors were not shown evidence relating to how the programme leader will be supported appropriately so that the programme can be effectively delivered. They did not, for example, see evidence of arrangements for the leader to have input from registered dietitians. They were therefore unable to determine whether this standard was met, and require further evidence showing that the programme leader will be appropriately supported.

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

**Condition:** The education provider must demonstrate that there are ongoing relationships with practice education partners, and that these relationships can enable ongoing quality and effectiveness.

**Reason:** The visitors understood from the documentation and from discussions at the visit that, in the first year, practice-based learning would take place solely with the University College of Osteopathy's own clinic. They were satisfied that the collaboration with this clinic was regular and effective, and that appropriate arrangements were in place to manage the relationship. In years two and three of the programme, practice-based learning would take place in other locations, external to the education provider.

However, with regard to the practice-based learning in years two and three, they did not see specific evidence regarding ongoing relationships with all external stakeholders. They did see evidence concerning the roles and responsibilities of practice educators, and documents such as risk assessments and learning agreements that would underpin operational working, but not evidence about the regular and effective collaboration at an institutional level.

In discussions at the visit, the programme team gave verbal assurances that there was ongoing co-operation with such stakeholders, but the visitors were not able to view evidence of these relationships, and so were unable to determine that the standard was met. They therefore require further evidence demonstrating that there is regular and effective collaboration with external providers of practice-based learning.

### **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 that they can ensure appropriate availability and capacity in external practice-based learning placements.

**Reason:** As noted in the condition under SET 3.5 above, the visitors were aware that during the first year of the programme all practice-based learning would take place in the University College of Osteopathy clinic. In subsequent years, learners would go into external placements. The visitors were satisfied that the education provider could effectively ensure sufficient availability and capacity in the first year. However, they were not able to determine whether effective processes were in place to ensure availability and capacity in years two and three. In the visit documentation the visitors had been provided with records of correspondence between the education provider and possible external providers of practice-based education. Before the visit, in response to

a request by the HCPC, the education provider also submitted further evidence about their process for securing capacity, noting that they had reached agreement with several providers. At the visit the programme team gave additional verbal assurances that this process was proceeding well. However, the visitors noted that, at the time of the visit, it appeared that the education provider had not yet formally secured external practice-based learning for all learners in years two and three of the programme, and they were not clear how the education provider would secure all the remaining practice-based learning. They were therefore not able to determine that the standard was met, and require further evidence demonstrating how the education provider would secure the necessary practice-based learning.

### **3.7 Service users and carers must be involved in the programme.**

**Condition:** The education provider must demonstrate how service users and carers will be involved in the programme.

**Reason:** In their evidence for this standard the education provider referred to the parts of the curriculum that would likely require learners to interact with, or learn about, service user and carer needs. They also provided a guide to the admissions process, aimed at learners, that made reference to service user and carer involvement. The visitors were also able to speak with service users and carers who were involved with the Masters in Osteopathy (M. Ost.) programme, who were able to give them an idea of how the education provider approached service user and carer involvement. They also discussed service user and carer involvement with the programme team. The programme team gave verbal assurances that they were planning to involve service users and carers but the visitors' understanding from these discussions was that these plans were at an early stage. From the evidence and from these discussions, the visitors understood that the education provider was intending to involve service users and carers in the programme. However, it was not clear what form this involvement would take. The visitors were not able to see evidence relating to what exactly the service users and carers would be doing, or the rationale for the approach. Similarly they were not clear how the service users and carers would be prepared and trained for their involvement in the programme. They were therefore unable to determine that the standard was met. The visitors require the education provider to submit further evidence clarifying how service users will be involved in the programme, and how this involvement will be justified, planned and evaluated.

### **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 demonstrate that they have an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

**Reason:** The visitors reviewed the evidence submitted by the education provider, including documents related to staff recruitment, management, deployment and planning. They were aware from a recruitment plan in the evidence that the education provider was planning to fill key staff roles – module leaders and a practice education co-ordinator – for the first year of the programme by July 2019. At the time of the visit these roles had not yet been filled. The senior team and programme team confirmed in discussions that the recruitment process was at an advanced stage but had not yet been completed. The visitors understood that this recruitment was an essential part of



the programme running successfully as designed and planned. As a result they considered that, with the roles unfilled, this standard was not yet met. They therefore require further evidence demonstrating that there will be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

#### **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 demonstrate that the learning outcomes of the modules clearly deliver the standards of proficiency (SOPs) for dietitians, as follows:

- 14.1 be able to accurately assess nutritional needs of individuals, groups and populations, in a sensitive and detailed way using appropriate techniques and resources
- 14.6 be able to analyse and critically evaluate the information collected in order to identify nutritional needs and develop a diagnosis
- 14.7 be able to analyse and critically evaluate assessment information to develop intervention plans including the setting of timescales, goals and outcomes
- 14.10 be able to critically evaluate the information gained in monitoring to review and revise the intervention

**Reason:** The visitors reviewed the learning outcomes of the programme as laid out in the documentation, and discussed them with the programme team. They considered that while the learning outcomes were broadly appropriate, in the practice-based learning modules they needed to have a stronger thread linking the learning outcomes in the different modules, especially in light of the programme's use of a spiral curriculum model. The following two issues were identified by the visitors:

- Nutritional assessment is not referred to the learning outcomes of the Clinical Dietetics module until level 6, even though that topic needs to be covered at levels 5 and 6 under the spiral model. This may impact learners' ability to meet SOP 14.1 in the standards of proficiency for dietitians.
- In the learning outcomes for the level 6 clinical practice module, there needs to be a clearer focus on the critical evaluation component. This may impact learners' ability to meet a number of the standards in section 14 of the standards of proficiency for dietitians. Several of these require learners to be able to critically evaluate information: 14.6, 14.7 and 14.10.

The visitors therefore require further evidence relating to how the learning outcomes will ensure learners meet the listed SOPs.

#### **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 demonstrate that learners on the programme will be able to learn with, and from, professionals and learners in other relevant professions.

**Reason:** From the visitors' review of the evidence submitted for this standard, including the practice handbook and module descriptors for the clinical practice modules, it was not clear what opportunities would be available for learners to take part in interprofessional education on the programme. In discussions with the programme team, the visitors were given verbal assurances that there would be opportunities for learners to take part in interprofessional education. However there was no detail

provided about what form this would take, and how the education provider would ensure equity in access for all learners so as to ensure that all would have similar opportunities to benefit. The existing plans appeared to be heavily dependent on learners meeting other professionals in their practice-based learning. The visitors were therefore unable to determine whether the standard was met, and require further evidence to demonstrate that learners will be able to learn with, and from, professionals and learners in other relevant professions.

## **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 demonstrate that learners on the programme will have access to an appropriate structure, duration and range of practice-based learning in years two and three of the programme.

**Reason:** From their review of programme documentation and from discussions with the programme team, the visitors were aware that the external practice-based learning placements, which learners would be entering in years two and three of the programme, had not yet been finalised. As noted in the condition set under SETs 3.5 and 3.6, they had seen evidence of discussions and contacts between the education provider and possible practice education partners. They had also viewed evidence showing the proposed structure and duration of practice-based learning in years two and three. The programme team gave verbal assurances that a diverse range of practice-based learning would be available. However, the visitors have not seen specific evidence relating to what practice-based learning would be available to learners after year one of the programme, for example a strategy for placement development, or some timescales and plans for securing appropriate settings. They were therefore unable to determine that this practice-based learning would cover an appropriate range, which would support learners to meet the standards of proficiency for dietitians. They require further evidence showing that the education provider can secure an appropriate range of practice-based learning for these years of the programme.

## **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 demonstrate how they are going to ensure that practice educators are appropriately trained, and that such training is updated as necessary.

**Reason:** The visitors reviewed the evidence submitted for SET 5, relating to how the education provider intended to monitor practice-based learning. They were satisfied that the education provider had appropriate procedures and policies in place, and that even though not all practice-based learning for years two and three had been secured or finalised, these policies and procedures could be applied as necessary when such settings were determined. However, on the specific question of how practice educators would be appropriately trained, the visitors were not clear about how the education provider planned to ensure this. In discussions with the programme team the visitors were given verbal assurances of how this would be done, but they were not able to view evidence relating to these procedures. They were unclear about such issues as when training would happen, how it was kept up to date, and how practice educators'

understanding of the programme would be developed, including how to assess the learning outcomes. They therefore require further evidence demonstrating how the education provider will achieve this.

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

**Condition:** The education provider must demonstrate how they will ensure that assessment in practice-based learning is consistent and fair.

**Reason:** The visitors reviewed the evidence submitted for this standard, including an academic framework document, the terms of reference for the scrutiny board, and a special circumstances procedure. They also discussed assessment with the programme team. The visitors did not have issues with the assessment on the academic components of the programme, as the evidence made it clear that this would be objective, fair and reliable. However, in the case of practice-based learning it was not clear to the visitors what arrangements were in place to ensure that practice educators were able to assess all learners equitably and objectively. The main reason for this was that not all practice-based learning settings had been secured, and the education provider could not identify who all their practice educators would be, or clarify the nature of the relationship with them. This meant that the education provider were not in a position to explain how they would ensure that all practice educators were prepared to assess appropriately. The visitors were therefore unable to determine whether the standard was met, and require further evidence showing that the education provider could monitor and oversee practice educators' assessment to ensure fairness.

### **6.7 The education provider must ensure that at least one external examiner for the programme is appropriately qualified and experienced and, unless other arrangements are appropriate, on the relevant part of the Register.**

**Condition:** The education provider must clarify whether the external examiner for the programme will be an HCPC-registered dietitian, and if not, show why this arrangement would be appropriate.

**Reason:** The visitors noted that an external examiner had not yet been appointed to the programme. They had seen the policies and procedures for the appointment, but these did not state whether the external examiner would need to be an HCPC-registered dietitian, and if not, the rationale for this decision. They were unable to determine how the education provider would ensure that at least one external examiner for the programme was a registered dietitian, or if not, how the education provider would ensure that the arrangements were appropriate. They therefore require further evidence clarifying the arrangements for the appointment.

## **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.

### **3.6 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 that they can ensure appropriate availability and capacity in external practice-based learning placements.

**Reason condition not met at this time:** For this standard, the education provider submitted a narrative describing their plans to meet with potential providers of practice-based learning partners, and to develop relationships with them in order to secure appropriate availability and capacity of practice-based learning. This narrative was supported by various documents, including a newly-developed practice educator's handbook. The visitors were aware from this information that the education provider had made progress in reaching out to partners who would be involved with the provision of practice-based learning, in order to secure placements for years two and three of the programme. However, it was not clear from this information what the actual process would be for ensuring that all learners had access to the practice-based learning that they required. For example, the plans to join the London Dietetic Education Stakeholder Group had not been confirmed. There is no indication of specific numbers of practice-based learning placements being offered. The employee who would co-ordinate access to practice-based learning was not yet in place, and the education provider had only committed to their being in place for the start of Year 2. The visitors therefore considered that the condition was not met at this time.

#### **Suggested documentation:**

- Formal agreements relating to placement numbers which demonstrate that the education provider will be able to place all learners
- Evidence that shows the education provider will be in regular communication with practice-based learning partners, with a specific focus on ensuring availability and capacity
- Evidence showing that the planned employee responsible for placement co-ordination will be in position to facilitate practice-based learning from the start of year two.

### **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 demonstrate that they have an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

**Reason condition not met at this time:** For this standard, the education provider noted that they have carried out significant recruitment of HCPC-registered dietitians. The visitors considered that these staff members were appropriately qualified and experienced. However, it was not clear to the visitors which staff members would have which responsibilities for which parts of the programme, and how this would be integrated with other staff, including visiting lecturers. This standard requires that staff on a programme are used in a way which is appropriate to their qualifications and experience, and that their workload is manageable such that they can deliver the programme effectively. Without clearer evidence relating to how the staff would deliver an effective programme, the visitors could not be sure that the condition was met. The visitors were also not clear that, in the first year of the programme, there would be

sufficient teaching and education expertise and experience available from HCPC-registered dietitians. They therefore require further evidence demonstrating that there will be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

**Suggested documentation:** Evidence to show

- which parts of the programme would be taught by which staff members;
- how the responsibilities would be shared between these staff and non-permanent staff; and
- how the education provider would ensure that the programme had appropriate educational and teaching expertise available for the first year.

#### **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 demonstrate that the learning outcomes of the modules clearly deliver the standards of proficiency (SOPs) for dietitians, as follows:

- 14.1 be able to accurately assess nutritional needs of individuals, groups and populations, in a sensitive and detailed way using appropriate techniques and resources
- 14.6 be able to analyse and critically evaluate the information collected in order to identify nutritional needs and develop a diagnosis
- 14.7 be able to analyse and critically evaluate assessment information to develop intervention plans including the setting of timescales, goals and outcomes
- 14.10 be able to critically evaluate the information gained in monitoring to review and revise the intervention

**Reason condition not met at this time:** In their response to this condition, the education provider noted that the learning outcomes in certain modules had been amended to reflect the above-mentioned standards of proficiency more effectively. The education provider also introduced nutritional assessment at Level 5. The visitors considered that while this helped to align the learning outcomes with the SOPs, it was not clear to them from the evidence submitted how the education provider was ensuring that module content was aligned with the learning outcomes. In particular, they could not see how the learning outcomes would enable learners to deepen and develop their understanding of nutritional assessment in line with the SOPs as they progressed through the programme, which is what the education provider's spiral curriculum model was intended to achieve. They were unable to determine whether the learning outcomes would align with module content in such a way that this progression in their understanding would enable the learners to meet the SOPs listed in the condition. The visitors noted that:

- Meeting SOP 14.1 requires learners to develop their understanding of techniques and resources used to assess nutritional needs of individuals, groups and populations; and
- Meeting SOPs 14.6, 14.7 and 14.10 require learners to attain a sophisticated understanding of how to analyse and use data for service user interventions.

Without understanding how the learning outcomes were aligned to the module content, the visitors could not be satisfied that learners would be able to develop their understanding through the programme, in relation the SOPs mentioned in the condition. Therefore the visitors considered that the condition was not met at this stage.

**Suggested documentation:** Evidence to show how the education provider will align learning outcomes and module content to ensure that learners' understanding and expertise develops appropriately through the programme in line with the spiral curriculum.

#### **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 demonstrate that learners on the programme will be able to learn with, and from, professionals and learners in other relevant professions.

**Reason condition not met at this time:** For this standard, the education provider submitted evidence showing that learners on the programme would have access to inter-professional education with osteopathy learners, during the normal course of their learning and teaching activities, and in practice-based learning. However, they did not submit evidence showing that learners would have opportunities to learn with, and from, professionals in other relevant professions, or provide a rationale for the decisions they had made about which professions would be most relevant or appropriate. It was also not clear to the visitors that the education provider had a clear strategy for ensuring that inter-professional education was integrated formally into the structure of the programme, rather than being expected to happen on an ad hoc basis. They were therefore not satisfied that the standard was met at this time.

**Suggested documentation:** Evidence to show:

- how and why decisions about which other professions to involve in practice-based learning have been made;
- how professionals from other relevant professions will be involved in practice-based learning; and
- how interprofessional education will be formally integrated into the programme to ensure that all learners have appropriate access.

#### **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 demonstrate that learners on the programme will have access to an appropriate structure, duration and range of practice-based learning in years two and three of the programme.

**Reason condition not met at this time:** The education provider submitted documentation indicating that a range of practice-based learning settings would be available. However, the visitors were not clear from this information what use the education provider intended to make of the range of settings that had been secured. It was not clear from the evidence how the overall practice-based learning strategy would work. The visitors were not sure of the rationale for some of the ways that practice-based learning had been structured. For example, it was not clear why the education provider had chosen to employ the various different placement lengths that they had used, or how they would ensure that all learners received an appropriate practice-based learning experience and had equitable access to placement. It was not clear to the visitors from the evidence submitted that the education provider had liaised

appropriately with its practice-based learning partners to ensure that across the whole programme there was an appropriate structure, duration and range. The visitors were therefore unable to be satisfied that the condition is met.

**Suggested documentation:** Evidence to show that the education provider has obtained firm commitments from its practice-based learning partners that they can provide an appropriate structure, duration and range of placements throughout the programme.

### **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 demonstrate how they are going to ensure that practice educators are appropriately trained, and that such training is updated as necessary.

**Reason condition not met at this time:** The education provider submitted a number of documents showing that they are in the process of developing virtual platforms which will contribute to the training of practice educators.

The visitors considered that this platform would be an appropriate way for the education provider to co-ordinate training of practice educators. However, they could not see from the evidence provided how the education provider would maintain their oversight of training – in particular how they would ensure that practice educators' initial training status was recorded, that their support needs were recorded, and that their ongoing training status was monitored. It was not clear that practice educators would have opportunities to discuss with the programme team the expectations and requirements of their role. The visitors could not be sure, therefore, that training would be appropriate to practice educators' roles. They were therefore not satisfied that the condition was met.

**Suggested documentation:** Evidence to show how the education provider will maintain oversight of practice educators' training status and requirements.

## **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 not satisfied that the conditions are met for the reason(s) noted below, and recommend that the programme(s) are not approved.

This report, including the recommendation of the visitors, will be considered at the 25 March 2020 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).

### **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 that they can ensure appropriate availability and capacity in external practice-based learning placements.

**Reason condition not met:** The documentation submitted before the visit included correspondence between the education provider and prospective practice partners. From discussions at the visit, the visitors understood that the education provider's strategy for practice-based learning was to use their own in-house osteopathy clinics in the first year of the programme, and to secure external placements in the second and third years. We set a condition requiring the education provider to submit evidence showing that they would have a process in place to ensure the availability of practice-based learning for the second and third years of the programme, as the visitors had not seen evidence of this.

In the first conditions response, the education provider gave a detailed outline of their plans for securing practice-based learning capacity for years two and three, and supplied new documents such as a practice educator's handbook. However, the visitors were still not clear that the education provider could ensure sufficient practice-based learning for all learners in years two and three of the programme. Agreements were not in place with practice partners, and noted that the education provider had not yet joined the London Dietetic Education Stakeholder Group (LDESG). This group is formed of dietitian education providers in London and is intended to allow collaboration and discussions, and to enable agreements to be made relating to the delivery of programmes. This includes how practice-based learning is allocated between approved programmes. The visitors also noted that planned recruitment to a practice co-ordinator role had not yet been undertaken. This role was intended to manage the practicalities and arrangements of practice-based learning for the programme. As a result, the visitors requested further evidence for this standard, specifically formal agreements, information about how regular communication with practice partners would be achieved, and details about how they would recruit to the planned new placement co-ordinator role.

In their second conditions response, the education provider provided documents giving a detailed breakdown of the stage that they had reached in discussions with each prospective practice partner. They also provided evidence of their upcoming engagement with the LDESG, and stated that an existing employee had taken on the responsibilities of the placement co-ordinator, having delayed additional recruitment as they were pushing back the start date of the programme.

Following their review of this evidence, the visitors considered that there was an outstanding issue with the process to ensure sufficient availability and capacity of practice-based learning in years two and three of the programme. Although some progress has been made by the education provider towards meeting the standard, the visitors noted that only 36 placement weeks out of a required 240 weeks had so far been formally and specifically secured. They noted that there was a considerable amount of correspondence with other practice partners, and that the education provider had been meticulous in accurately recording and communicating the state of their relationships with prospective practice partners. The visitors recognise that securing placements years in advance can be challenging. However, at this stage of the process, they would expect that the education provider would be able to show evidence which indicates a commitment by partners to support the programme, along with indicative learner numbers (although specific numbers might be subject to further negotiation). This standard requires that the education provider can ensure the availability of practice-based learning for all learners on the programme. Without commitment from practice partners, the visitors note that the education provider cannot recruit to the programme while guaranteeing that practice learning will be available for all learners.



With this lack of evidence, especially in light of the considerable competition for dietetic practice-based learning placements in the London area, the visitors note that there is no indication that placements for years two and three of the programme are likely to be secured. This has led the visitors to conclude that the education provider is not able to ensure the availability and capacity of practice-based learning for all learners.

The visitors' conclusion, therefore, is that the standard is not met and that the programme should not be approved.

## **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 demonstrate that learners on the programme will have access to an appropriate structure, duration and range of practice-based learning in years two and three of the programme.

**Reason condition not met:** From the initial documentary submission and from discussions at the visit, the visitors were aware that the education provider intended to rely on in-house practice-based learning placements for the first year and then move learners into external placements in the following two years. The education provider made clear in the initial documentation and in discussions at the visit that they had not yet finalised the external placements. As a result, the visitors were unable to determine whether the structure, duration and range of these placements would support the achievement of the learning outcomes and the standards of proficiency. They set a condition requiring the education provider to provide more detail about the structure, duration and range of the placements, so that they could make a judgement about whether the standard was met.

In the conditions response the education provider clarified some of the practice-based learning that had been secured, providing agreements with practice partners and information about the structure and design of practice-based learning. However, because the education provider had yet to finalise many of the planned placement settings, as noted in the reasoning under SET 3.6 above, the visitors were not able to determine whether the standard had been met. They had outstanding concerns about the duration and range of placement opportunities that would be available to learners.

In the second conditions response, the education provider submitted a mapping exercise for the competencies to be achieved in each of the placements, a spreadsheet showing progress in securing placements, and evidence relating to the process that would be followed prior to a learner entering practice-based learning. Following their review of this information, the visitors noted that progress had been made towards meeting the condition, particularly regarding how the education provider would ensure that learners received as much benefit as possible from their placements.

However, the visitors were not satisfied that the condition is met, for the reasons detailed below:

### A suitable range of practice-based learning is not secured

The visitors noted that, linked to the reasoning found under SET 3.6 above, specific and formal arrangements had not been made with practice partners to secure the required number of placements.

More fundamental to SET 5.2, the visitors noted that the education provider had not shown that the range of practice-based learning required to support the achievement of the learning outcomes for all learners had been secured for years two and three of the programme. In particular, the visitors found that placements in both community health and NHS settings had not been secured. Although a meeting was planned with London practice-based learning providers in January 2020 to discuss further placements, the outcome of this meeting was still uncertain.

The visitors noted that these settings are essential for learners to understand dietetic practice, and considered that without experience in these settings, learners would not be able to effectively demonstrate that they are fit to practise (ie met the standards of proficiency (SOPs) for dietitians) when completing their training. Some SOPs would need to be addressed, at least in part, in the community health and NHS settings. This would ensure familiarity with these settings and the ability to contextualise the expectations of the SOP. Examples are as follows:

- 9.1 be able to work, where appropriate, in partnership with service users, other professionals, support staff, communities and others
- 9.3 understand the need to empower and engage individuals, groups, and communities in planning and evaluating interventions to meet their needs and goals
- 9.4 be able to contribute effectively to work undertaken as part of a multi-disciplinary team
- 9.5 be able to empower individuals, groups and communities to make informed choices including diet, physical activity and other lifestyle adjustments
- 12.5 be able to evaluate intervention plans using recognised outcome measures and revise the plans as necessary in partnership with individuals, groups and communities
- 13.5 understand the structure and function of health and social care services in the UK
- 15.2 be aware of applicable health and safety legislation, and any relevant safety policies and procedures in force at the workplace, such as incident reporting, and be able to act in accordance with these

Linking to the above, the visitors note that the condition for SET 4.1 is met, as the programme and module learning outcomes are now effectively mapped to the SOPs. Although there is overlap between SET 4.1 and this issue, there is no contradiction in the visitors considering that the condition for 4.1 is met, and that this condition is not. The condition for SET 5.2 focuses on whether practice experience supports the delivery of the learning outcomes.

#### The identified practice-based learning settings are not suitable to support the achievement of the learning outcomes

The visitors concluded that the specific external practice-based learning that has been identified was not appropriate to support the achievement of the learning outcomes and the standards of proficiency.

For example, the Day Centre placement at the Royal Free Hospital is intended as a C placement, which is the most advanced kind of placement. In this placement, learners are expected to demonstrate a substantial range and depth of knowledge and skills, spending “a total of 6 weeks in specialist, acute and clinical care settings working

autonomously and as part of multi-disciplinary teams...". The Day Centre provides specialist dietetics services to service users with HIV and AIDS, and the specifics of what would be included in the six week placement had yet to be finalised. Therefore, the visitors noted that the education provider could not guarantee that breadth of required clinical situations would arise in this placement, in the time allocated, and so learners would not be set up to be able to achieve the learning outcomes. To illustrate this point, the visitors have picked out the following two learning outcomes which need to be demonstrated in this placement. For these learning outcomes, the education provider has not evidenced how there would be the breadth of required clinical situations, or the time to meet the requirements:

- Learning outcome: Recognise the need for and make appropriate referrals. Competence activity: Identify when a service user whose care you are responsible for should be referred to another professional and action this accordingly.
- Learning outcome: Effectively recognise and respond to critical incidents in a timely and effective manner. Associated workbook task: 2 x critical incident reports, 3 x feedback forms completed by colleagues regarding how you dealt with critical incidents.

The visitors also considered that the plan for learners to be supervised by Day Centre staff was not suitable. They considered that learners would not be able to be guided appropriately to contextualise their placement experience as future registered dietitians. The reason for this was that, although the placement would be "part overseen" by a UCO staff member who was covering the clinic at the Day Centre, there was no detail about what other on-site specialist supervision would be available for learners. According to the evidence supplied, Royal Free staff themselves would not be offering dietetic supervision.

All of the above means that broadly, the education provider had not show that, over the time available, the range of learning experiences available at each identified placement would enable the fulfilment of the particular learning outcomes that they intended to be met by the placement.

In light of the above, the visitors have concluded that this standard is not met and that the programme should not be approved.

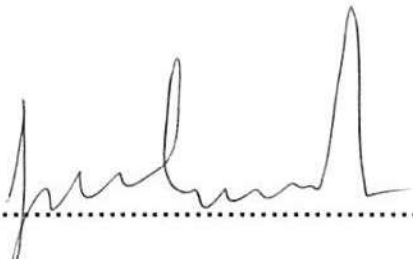
**Education and Training Committee Panel**

**Programmes in respect of which approval is recommended subject to conditions**

<b>Programme name</b>	BSc (Hons) Integrated Nutrition and Dietetics
<b>Education provider</b>	The University College of Osteopathy
<b>Mode of delivery</b>	FT (Full time)
<b>Assessment ref</b>	APP02083
<b>Date of decision</b>	24 September 2019

**Panel:** Stephen Wordsworth (Chair) Penny Joyce  
Luke Jenkinson Sonya Lam

<b>Decision</b>
That the Visitors' report (including the conditions and recommendations in the report) should be accepted.
<b>Reasons</b>
The Panel is satisfied that the conditions in the Visitors' report must be met before the programme can be approved or before the ongoing approval of the programme can be confirmed.

Signed:  ..... Panel Chair

## UCO Observations HCPC Visit June

The UCO were disappointed with the proposed outcome to its recent HCPC review of the proposed dietetics course. The core challenge continues to be around the provision of enough variety of clinical placements at programme start in the Autumn of 2020 for the whole of the programme's three-year duration.

Notwithstanding that for Year 1 of the programme, students would be placed within our own dietetics' public outpatients and community clinics for their first year. The Visitors required evidence of formal agreements with partners with whom we are currently negotiating placements in years 2 and 3. Furthermore as demonstrated by the documentation we have already provided; we are in advanced discussions with these partners. In addition to NHS placements, consistent with BDA guidance we are also negotiating with a diversity of other partners. Placement providers quite rightly and logically are unable to commit to formal agreements with us for specific student number allocations in 2022 and 2023 so far in advance. This places a block on new niche entrants, contrary to Government policy and the best interests of the dietetic profession to increase pre-registration capacity in the face of limited clinical supply. This situation stands in stark contrast to existing HEIs where they have existing pre-registration clinical programmes, which it is argued have a competitive advantage as those providers will be seen as already deeply embedded within their local NHS healthcare environments.

We believe that the nature and scale (> 40,000 consults annually) of our own clinics across several communities and our main site should provide considerable assurance to the HCPC. We have operated clinical training since pre-war and have been and remain the largest statutorily regulated provider of osteopathy since the General Osteopathic Council started regulating the profession in 2000. Reference to the GOsC could inform the HCPC of the UCO's leading quality across all areas from governance, teaching & learning to practice education. Furthermore, this would have been apparent, if the Visitors had observed our placement education in action, where much similarity in practice education will be noted.

Turning to the Team's core arguments for recommending denying UCO accreditation, namely placement education. We fully acknowledge the need for sufficient variety and capacity within NHS, voluntary, commercial and statutory placement education. However, for us this approach does not reflect best regulatory practice as seen elsewhere. The Plymouth Marjon University resolved to establish a regulated pre-registration osteopathy programme from scratch. It had no staff and no clinic. The GOsC's Recognised Qualification (programme accreditation) arrangements allow for new entrants to provide a commitment and endure enhanced monitoring in order to develop this clinical capacity when required. In this case when the visiting team undertook the visit it was not able to evaluate the then placement capacity as none existed. Notwithstanding, it undertook a visit similar to the HCPC visit, in this case the Team relied upon the quality of programme documentation and looked for supporting evidence across the provider's other programmes including governance arrangements to satisfy itself on key areas. This especially concerned the critical issue of practice education, it looked for

evidence concerning the quality of and robustness of action plans to build up clinical capacity – physical and staffing infrastructure and service user capacity, against phased student number growth. Approval was granted with practice-education conditions, consistent with the provider's smart action plan. Close GOsC monitoring ensued. This enabled the new entrant to start with an initial small student cohort, that protected the integrity of the profession, while building pre-registration capacity generally, meeting the strategic needs of the profession. This provider is now well established. What was demonstrated, was flexibility in regulatory approach, through specific conditions in dealing with what appeared to be a difficult conundrum.

Clearly HCPC needs to assure itself of the quality of UCO's provision and that its graduates meet the required standards of proficiency. However, it can protect the integrity of the dietetic profession by granting approval with specific and smart practice education conditions. This will enable UCO to continue to build placement capacity for the later programme stages so providing the hard evidence HCPC requires concerning placement diversity and capacity, consistent with its phased low student numbers during programme establishment. Furthermore, it will help facilitate UCO's negotiations with some areas who need evidence that its programme is accredited. UCO respectfully seeks approval with conditions to unblock this negative cycle.