

Education and Training Committee (Panel), 22 August 2019

Cover paper for agenda item 3D – University of Plymouth – BSc (Hons) Diagnostic Radiography – Full time

Executive summary and recommendations

At the Education and Training Committee (Panel) meeting of 30 January 2019, the Committee agreed the visitors' recommendation that the programme should be approved subject to conditions being met. The visitors now consider that the conditions are met at a threshold level, and are therefore recommending that the programme should be approved.

However, the visitors also note that they consider there is a risk that certain standards may not be met in the future if the education provider does not carry out the actions as described in the conditions response (see 1.5 and 1.6 below). The visitors considered that it would be disproportionate to recommend non-approval in this case, but noted that it may be appropriate for the Committee to vary the normal monitoring requirements to ensure a suitable level of scrutiny for the programme when it is next reviewed by visitors.

The education provider has submitted observations on the visitors' recommendation to approve the programme, which can be found in Appendix B.

Decision

Considering sections 2 and 3 of the paper, the Committee is asked to:

- Agree the visitors' recommendation that the programme is approved.
- Decide on a future course of action to consider whether this programme continues to meet the standards, for example:
 - When the programme should next be required to engage with annual monitoring.
 - Any additional requirements of annual monitoring for the programme to undertake in the future.

Resource implications

- Small additional executive resource if the decision is to assess the programme via annual monitoring in the 2019-20 academic year.

Financial implications

- Likely small additional partner costs if the decision is to assess the programme via annual monitoring in the 2019-20 academic year.

Appendices

Appendix A – Approval process report

Appendix B – Observations provided by education provider

Date of paper

13 August 2019

Approval process for University of Plymouth diagnostic radiographer programme

1. Programme history and interactions with the HCPC

- 1.1. This is a programme in a new professional area, proposed by an education provider that runs other HCPC-approved programmes. A visit was requested in February 2018, and took place on 28-29 November 2018.
- 1.2. The visitors recommended approval subject to conditions being met, setting conditions on 22 of the standards of education and training (SETs). The key areas of concern for the HCPC panel at that stage were as follows:
 - The management of the programme, in particular how the programme would be overseen by senior staff at the education provider, and whether sufficient qualified and experienced staff were available to deliver the programme appropriately.
 - The lack of effective co-operation with another university, who are a significant local competitor for practice-based learning capacity, with whom the education provider had indicated that they were planning to liaise.
 - The formality of relationships with providers of practice-based learning, in particular the concerns expressed by practice educators about the education provider's ability to find sufficient capacity for practice-based learning, and that a key liaison post had not been filled.
 - The content of the curriculum. Some module descriptors were not complete, and the visitors were not clear how the programme would reflect relevant curriculum guidance. They also had concerns about the integration of theory and practice and whether the programme reflected current practice. Therefore the visitors were unclear how the standards of proficiency (SOPs) for diagnostic radiographers would be delivered and assessed through the programme.
 - The arrangements for monitoring practice-based learning.
- 1.3. The report was sent to the education provider on 21 December 2018, with a suggested conditions deadline of 8 February 2019. The education provider requested an extension to 25 March 2019. This was granted given the scope and number of the conditions.
- 1.4. Following their review of the conditions response, the visitors determined that four conditions had not yet been met, and requested further evidence. The outstanding issues were as follows:
 - Whether the relationship with the other university had advanced sufficiently to ensure appropriate co-operation between the two institutions.

- Whether roles and responsibilities were clear in the programme management following administrative changes at the education provider.
 - Whether the education provider was able to secure sufficient capacity in practice-based learning, and whether the education provider could appropriately ensure the quality of practice-based learning.
- 1.5. Following their review of the second conditions response the visitors were satisfied regarding the programme management and the monitoring of practice-based learning. They did however seek clarification from the education provider concerning, firstly, the relationship with the other education provider (SET 3.1), and secondly the process to ensure availability and capacity of practice-based learning for all learners (SET 3.6).
- 1.6. Based on this clarification, the visitors understood that a formal written agreement would shortly be in place between the two education providers, and that although the education provider had not yet secured all the practice-based learning that it would require for years two and three of the programme, there was a process in place through which they could do so.
- 1.7. The visitors therefore recommended approval, noting in the report, under Section 7, that they made this recommendation based on the understandings noted above, and that visitors in future review processes should be aware of this.

2. Future requirements of the programme

- 2.1 From the 2018-19 academic year onwards, all programmes are required to provide a broader evidence base through annual monitoring than they have done previously.
- 2.2 In addition to previous requirements of internal quality monitoring reports, external examiner reports, and responses to external examiners, programmes must now provide monitoring of service user and carer involvement, and monitoring of practice-based learning.
- 2.3 Normally, following successful engagement with the approval process (leading to approval or ongoing approval), a programme is exempt from our annual monitoring requirements in the academic year after the approval visit (in this case the upcoming academic year, 2019-20).
- 2.4 Therefore, if this programme were to enter into normal monitoring, it would provide nothing in the 2019-20 academic year, followed by an declaration in 2020-21, and an audit in 2021-22.

3. Decision

- 3.1 The Committee made a decision to approve the programme subject to the conditions being met at its meeting in January 2019.
- 3.2 The visitors have decided that the conditions are now met.

3.3 Therefore, the Committee is asked to agree the visitors' recommendation that ongoing approval of the programme is confirmed.

3.4 The Committee may wish to require something different of this programme in the future, such as:

- Require an audit submission earlier than 2021-22;
- Require specific information and / or reporting (in addition to the normal documentary evidence, outlined in paragraph 2.2) to be provided through a future annual monitoring audit; or
- Another course of action to satisfy the Committee that this programme continues to meet the standards.

HCPC approval process report

Education provider	University of Plymouth
Name of programme(s)	BSc (Hons) Diagnostic Radiography, Full time
Approval visit date	28 November 2018
Case reference	CAS-13238-F5P3G4

Contents

Section 1: Our regulatory approach	2
Section 2: Programme details.....	3
Section 3: Requirements to commence assessment.....	3
Section 4: Outcome from first review.....	4
Section 5: Outcome from second review	15
Section 6: Visitors’ recommendation.....	17
Section 7: Future considerations for the programme(s)	17

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.

Through undertaking this process, we have noted areas that may need to be considered as part of future HCPC assessment processes in section 7 of this report.

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:

Susanne Roff	Lay
Helen Best	Radiographer - Diagnostic radiographer
Shaaron Pratt	Radiographer - Diagnostic radiographer
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.

Tim O'Brien	Independent chair (supplied by the education provider)	Plymouth University
Hannah Wisdom	Secretary (supplied by the education provider)	Plymouth University
Louise Coleman	Professional officer for Education and Accreditation	Society and College of Radiographers (SCoR)

Ruth Strudwick	Assessor, Society and College of Radiographers	Society and College of Radiographers
Kirsty Wood	Assessor, Society and College of Radiographers	Society and College of Radiographers

Section 2: Programme details

Programme name	BSc (Hons) Diagnostic Radiography
Mode of study	FT (Full time)
Profession	Radiographer
Modality	Diagnostic radiographer
Proposed first intake	01 September 2019
Maximum learner cohort	Up to 32
Intakes per year	1
Assessment reference	APP01937

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 require 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.

Required documentation	Submitted
Programme specification	Yes
Module descriptor(s)	Yes
Handbook for learners	Yes
Handbook for practice based learning	Yes
Completed education standards mapping document	Yes
Completed proficiency standards mapping document	Yes
Curriculum vitae for relevant staff	Yes
External examiners' reports for the last two years, if applicable	Yes

We also expect to meet the following groups at approval visits:

Group	Met	Comments
Learners	Yes	As the programme has not yet started we met with learners from the medicine and dentistry programmes, who are in the same faculty as this programme.
Senior staff	Yes	
Practice education providers	Yes	
Service users and carers (and / or their representatives)	Yes	
Programme team	Yes	
Facilities and resources	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 25 March 2019.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that partner organisations are committed to providing enough resources to deliver the programme.

Reason: The visitors reviewed the evidence provided for this standard, including letters of support from programme stakeholders and partners. They were also able to ask the senior team about how they were co-operating with providers of practice-based learning and other stakeholders. From this evidence, and from these discussions, the visitors were aware that there were regular tripartite meetings between the education provider, Exeter University and the local hospital trust, to enable effective co-operation, especially around practice-based learning. However, the visitors were not clear that this relationship was enabling an appropriate level of collaboration, or enabling the education provider's preparation to run the programme. From the meeting with the senior team and the meeting with the representatives of practice-based learning, the visitors were aware that there was no evidence that an agreement had yet been reached with regards to the placement tariff. A placement tariff is a payment to a provider of practice-based learning to cover the costs associated with having a learner

on placement. In the practice educators' meeting several of those present indicated that they had not been consulted about the new programme and were concerned by the education provider's lack of consultation. Additionally they told the visitors that the education provider had not been represented at some of the tripartite meetings. The visitors also noted that the letters of support from partners supplied in the documentation laid out certain expectations that the education provider had not yet met. These included working closely with Exeter University, finalising the placement tariff and co-operating with the tripartite group to reduce the administrative burden of dealing with learners from two institutions. The visitors were therefore unable to determine whether the programme was sustainable and fit for purpose, as it was unclear how they would work with partners whose co-operation was essential for the success of the programme. They require the education provider to submit further evidence demonstrating how they will ensure appropriate support from partner organisations.

3.2 The programme must be effectively managed.

Condition: The education provider must demonstrate that there is appropriate support in place for the programme leaders, and that their roles and responsibilities are clear to them and to colleagues and senior management.

Reason: The visitors reviewed the evidence for this standard, which set out the roles and responsibilities for various individuals on the programme. They also discussed with the senior team how management on the programme would work. The visitors considered that appropriate support for the programme leaders would be particularly important as the programme sits within the medical school and there were no radiographers and no members of allied health professions in the senior management team. The visitors understood that the education provider had chosen to have two co-programme leaders in place. They considered that this arrangement could be appropriate, but it was not clear from the documentation or the discussions how responsibilities would be divided between the two individuals. Both of the individuals were employed on a 0.5 FTE basis, and one of them was only going to be committing half of that time, that is 0.25 FTE, to the programme. In addition, the individual who was 0.5 FTE was an anatomist rather than a radiographer. These arrangements were not in themselves problematic, but the visitors were not clear how the programme leaders will be supported to deliver a radiography programme, as neither of the programme leaders are diagnostic radiographers, or had experience in radiography education. The visitors therefore require further evidence showing how the education provider will ensure that the programme can be effectively managed, including appropriate support for the co-programme leaders and a clear breakdown of roles and responsibilities and where radiographer education expertise will come from.

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 how they ensure that they have an appropriately qualified and experienced person in place to hold overall professional responsibility for the programme.

Reason: The visitors reviewed the evidence for this standard, including the programme specification and a curriculum vitae for the programme co-leads, and asked the senior

team about the relevant arrangements. From this evidence and from the discussions they were not clear that there was an appropriate process in place to identify suitable persons and appoint a replacement. They could not see in the documentation, for example, a job description or person specification which laid out clearly what would be required of a new appointee. They therefore require the education provider to submit further evidence showing that they ensure that the person holding overall professional responsibility for the programme is appropriately qualified and experienced.

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

Condition: The education provider must demonstrate that they have ongoing relationships with practice education providers and that these arrangements will facilitate the programme being effectively delivered.

Reason: The visitors reviewed the evidence submitted for this standard, including descriptions of key roles in the relationships between education provider and practice-based learning providers. They also discussed collaboration with the senior team, the programme team and the practice-based learning providers. From these discussions the visitors were aware that there were a number of areas where collaboration did not appear to have been effective or regular, for example:

- The Clinical Liaison position, which would provide a key contact point between the education provider and practice educators, had not yet been filled.
- There did not seem to have been significant input into programme development from providers of practice-based learning, and a number of practice educators appeared to be concerned about the viability of the programme, especially in regard to practice-based learning capacity.
- With regards to capacity, practice educators stated that they were not sure how the education provider was planning to co-operate with partners to secure sufficient capacity. They did not seem to be aware of any plans by the education provider to develop capacity, and they noted that the diagnostic radiography programme at Exeter, which has 60 learners with scheduled placements, would create pressure on the education provider.

The visitors were unable to determine whether the education provider was working effectively in partnership with providers of practice-based learning, and so require further evidence to demonstrate their ongoing and effective working with their partners. They considered that there was a link between this condition and that set under SET 3.1 above.

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 have an effective process in place for securing sufficient practice-based learning for all learners.

Reason: The visitors reviewed the evidence submitted for this standard, including letters of support from partners and documents relating to how practice-based learning was organised and developed at the education provider. They also discussed it with the senior team and the providers of practice-based learning. The visitors understood that the education provider was working towards having appropriate capacity, but they could

not see evidence that there was an effective process for ensuring this. For example, it was not clear from discussions with the senior team that the education provider had a clear idea of what practice-based learning capacity had currently been secured. The visitors were aware that this was a new programme not due to start until September 2019, meaning that some of the capacity would not need to be in place for some time. However, they considered that the apparent absence of a process for ensuring capacity and availability meant that this standard was not met. The letters of support noted in the mapping document were conditional and were not received from all the potential placement providers proposed, and therefore could not, in the visitors' judgment, be taken as evidence of secured practice-based learning capacity. In addition, the visitors noted that in the meeting of providers of practice-based learning, a number of representatives had expressed doubts about the education provider's ability to secure sufficient capacity. The visitors therefore require the education provider to submit further evidence showing that they have an appropriate process in place to ensure the availability and capacity of practice-based learning for all learners. They consider that there is a link between this condition and those set above under SETs 3.1 and 3.5.

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 staff with educational experience to deliver an effective programme.

Reason: The visitors reviewed the evidence submitted for this standard, including staff curriculum vitae. They also discussed staffing with the senior team. From the documentation and these discussions, it was not clear what the total full time equivalent (FTE) staff were available for this programme. The visitors were unclear how the staff team in place would be able to deliver an effective programme, as they could not see any evidence suggesting how many total staff hours would be required for the programme and how many were available. For many parts of the programme it was not clear who would be teaching and how much time they would have committed to the programme. They therefore require the education provider to demonstrate that they will have an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

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

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

Reason: The visitors reviewed the evidence submitted for this standard, including curriculum vitae belonging to the university staff. They discussed staffing with the senior team, and also reviewed module descriptors in order to assess what kinds of knowledge and expertise would be needed for programme staff. It was not clear from the discussions or from the documentation which staff members were going to be teaching which programme components. For example, the education provider did not appear to have appointed module leads. This is not an HCPC requirement but it does assist visitors in understanding the structure and teaching responsibilities on the programme. The visitors were aware from discussions with the senior team that more recruitment was planned before the scheduled start date in September 2019. However, they were not able to see timescales for this recruitment, or evidence relating to what

kind of knowledge and expertise the education provider was seeking to acquire. This was especially important because the senior management team of the programme was from the Faculty of Medicine and Dentistry, and did not have backgrounds in radiography or in the allied health professions, so the specialist support available to teaching staff might be relatively limited. The visitors therefore require the education provider to submit evidence demonstrating that teaching and learning activities in the academic components of the programme will be carried out by appropriate staff.

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

Condition: The education provider must demonstrate how they will ensure that appropriate resources to support learning will be available and accessible to all learners.

Reason: The visitors reviewed the evidence submitted for this standard, including the programme specification and a draft service-level agreement addressing access to resources in practice-based learning. They were also able to discuss resourcing with the senior team and programme team, and view a presentation from one of the education provider's academic librarians. They were aware that the education provider had plans for resourcing the programme, for example by acquiring appropriate textbooks, appropriate clinical teaching equipment, and diagnostic radiography related simulation equipment. However, they considered that the standard was not met at this time. This was because, although they were able to view a financial plan, they were not able to see timescales and detailed plans for the education provider acquiring the necessary resources or enabling access to them for learners on the programme. They also noted that many of the module reading lists did not have the most up-to-date texts. The senior team did not appear to be certain what equipment would be available for learners on the programme. The visitors were aware that the education provider would not be able to finalise acquisition of resources until the programme had been approved, but they considered that the education provider should provide further evidence of resource planning. They therefore require the education provider to demonstrate that resources appropriate to the programme will be available to learners.

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 how they will ensure that the learning outcomes enable learners to meet the standards of proficiency for diagnostic radiographers.

Reason: The visitors reviewed the evidence for this standard, including the standards of proficiency (SOPs) mapping document and the programme specification. They also discussed curriculum with the programme team. From the documentation and from these discussions the visitors understood that some of the module descriptors were not yet complete, so they were unable to determine whether the learning outcomes in these modules would ensure that learners meet the standards of proficiency for diagnostic radiographers. They therefore require the education provider to demonstrate that the learning outcomes for all modules are finalised and that those learning outcomes will ensure that learners meet the SOPs.

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

Condition: The education provider must demonstrate how they will ensure that the programme reflects the philosophy, core values, skills and knowledge base of radiography as articulated in curriculum guidance from the Society and College of Radiographers.

Reason: The visitors reviewed the evidence for this standard, including the standards of proficiency (SOPs) mapping and a benchmarking document. They also discussed with the programme team how the programme was intended to reflect the expectations and guidance for radiography learners. From these documents and from the discussions the visitors understood that the education provider was seeking to ensure that the programme would reflect the curriculum guidance from the relevant professional body, the Society and College of Radiographers (SCoR). However, they noted that the module descriptors had not yet been completed, so it was unclear how the learning outcomes from particular modules would be aligned to the SCoR guidance, and how the education provider's way of meeting this standard would work. The visitors therefore require the education provider to submit evidence demonstrating that the programme will reflect the curriculum guidance from the SCoR, in line with the programme design.

4.4 The curriculum must remain relevant to current practice.

Condition: The education provider must demonstrate how they will ensure that the curriculum remains relevant to current practice by enabling all learners to meet the standards of proficiency in all settings where a diagnostic radiographer might be required to work.

Reason: The visitors reviewed the evidence for this standard including the programme and operational specification documents. They also discussed with the senior team and programme team how they would ensure that the programme remained in touch with current practice. In the documentation and in the discussions the education provider appeared to be strongly focused on preparing learners for work in the NHS, and the visitors understood that practice-based learning settings were planned for both the NHS and private sector. Diagnostic radiography learners should be prepared to practice in all settings, including private and independent institutions. The visitors noted that due to changes in healthcare organisation and procurement an increasing number of radiographers would be working in private and independent settings. The visitors were therefore unable to determine whether the education provider could ensure that their curriculum remained relevant to all current practice. Additionally the visitors noted that some of the language used in the documentation did not reflect the terminology normally used within the profession. For example, several references were made to "X-rays", a term which is inaccurate when referring to a radiographic image. The visitors were therefore not clear how much input there had been into the curriculum from experienced radiographers and radiography educators. They therefore require the education provider to demonstrate how they will prepare learners for all possible settings for radiography practice, and how they will ensure that the terminology used on the programme reflects current usage and understanding in the profession.

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

Condition: The education provider must demonstrate how they will ensure that integration of theory and practice is central to the programme.

Reason: The visitors reviewed the evidence submitted for this standard, including handbooks and programme and operational specifications, and discussed integration of theory and practice with the programme team and senior team. They understood from this evidence and from the discussions that the programme used a spiral model of learning, where the same subject areas are revisited with increasing depth throughout the programme. However, the visitors were not clear about how this spiral model would work on the programme. A number of the module descriptors were still incomplete, so they were unable to make a judgment about how each module would integrate theory and practice. They were not able to see evidence showing how practice-based learning would be integrated with the theoretical parts of the programme. For example, it was not clear how the education provider would ensure that learners going into practice-based learning had acquired appropriate theoretical knowledge for each area of experience. They therefore require the education provider to submit evidence demonstrating how they will ensure that integration of theory and practice is central to the programme, including how the spiral curriculum works, how learners would acquire appropriate knowledge before practice-based learning, and what clinical competencies will be required in practice-based learning.

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 how they will ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Reason: The visitors reviewed the evidence submitted for this standard, including module records and the programme specification, which laid out “distinctive features” of the programme. They also asked the senior team about their plans for, and approach to, interprofessional education (IPE). In these discussions the senior team stated that they had plans for learners on the programme to take part in teaching and learning activities with learners and professionals from other professions. However, it was not clear to the visitors that these activities would involve learning with and from professionals and learners from other professions, as required by the standard. The visitors were not able to see in the documentation detailed evidence of how the education provider would approach IPE, and how they would ensure that all learners had appropriate access. The education provider did not, for example, appear to be seeking the involvement of other allied health professions, except paramedics. The visitors were not clear about how the education provider had made decisions about which other professions were most relevant to the programme. They therefore require the education provider to submit further evidence demonstrating how they will ensure that learners are able to learn with, and from, learners and professionals from other relevant professions.

4.11 The education provider must identify and communicate to learners the parts of the programme where attendance is mandatory, and must have associated monitoring processes in place.

Condition: The education provider must demonstrate how they will ensure that learners understand which parts of the programme are mandatory and what action learners will need to take if they miss compulsory parts of the programme.

Reason: The visitors reviewed evidence submitted for this standard including placement and learner handbooks and the draft learner – placement contract. They also discussed attendance requirements with the programme team. From the evidence and from the discussions it was not clear to the visitors what the attendance requirements for the programme were, and what learners would be expected to do if they missed compulsory parts of the programme. The draft learner – placement agreement mentioned compulsory sessions but there was no information about what would need to be done if these were missed. Similarly, it was not clear from the information about practice-based learning how learners would be enabled to make up lost time. The programme team were unable to clarify what arrangements would be in place for such situations. The visitors therefore require the education provider to demonstrate how they will ensure that learners know which programme components are mandatory and what they will need to do if they miss compulsory components.

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 how they will ensure that the structure, duration and range of practice-based learning enables learners to meet the learning outcomes and the standards of proficiency.

Reason: The visitors reviewed the evidence for this standard, including letters of support from possible practice-based learning partners and the placement handbook. The visitors heard from some providers of practice-based learning that, in those people's judgment, the programme was still some way from having appropriate practice-based learning in place. This meant that the visitors could not determine what range and duration of practice-based learning would be available for all learners, as it was not clear who the practice-based learning partners would be. Additionally, the visitors understood that the competencies for the practice-based learning modules had not been finalised. Therefore they could not understand how the structure of practice-based learning would ensure that learners could achieve the standards of proficiency (SOPs) for diagnostic radiographers. They require the education provider to demonstrate how they will ensure that the structure, duration and range of practice-based learning enables learners to meet the SOPs.

5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Condition: The education provider must demonstrate how they will maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Reason: The visitors reviewed the evidence for this standard, including the placement handbook and a quality assurance document. They also discussed audit of practice-based learning with the programme team. It was not clear from this documentation, or

from the discussions, that the education provider had in place a clear system for ongoing quality monitoring of practice-based learning. They were given verbal assurances that an audit system would be in place, but they were not clear about the details of this system. They therefore require the education provider to submit further evidence demonstrating that a thorough and effective system will be in place to approve and ensure the quality of practice-based learning.

5.4 Practice-based learning must take place in an environment that is safe and supportive for learners and service users.

Condition: The education provider must demonstrate how they will ensure that practice-based learning will take place in an environment that is safe and supportive for learners and service users.

Reason: The visitors reviewed the evidence for this standard, including the placement handbook. They also discussed audit of practice-based learning with the programme team. As noted in the condition under SET 5.3 above, it was not clear from the documentation, or from the discussions, that the education provider had in place a clear system for auditing practice-based learning. This meant that the visitors could not determine how the education provider would ensure that all practice-based learning settings would be safe and supportive for learners and service users. The visitors received verbal assurances from the senior and programme teams that they had institutional experience of organising appropriate practice-based learning and that they would be able to finalise arrangements as necessary before the programme start date. However, the visitors were not clear about the processes, details or timescales involved in this. They therefore require the education provider to submit further evidence demonstrating how they will ensure that practice-based learning takes place in a safe and supportive environment for service users and learners.

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

Condition: The education provider must demonstrate how they will ensure that an adequate number of appropriately qualified and experienced staff are involved in practice-based learning.

Reason: The visitors reviewed the evidence for this standard, including the draft programme description. They also discussed with the programme team how they intended to ensure adequate numbers of appropriate staff in practice-based learning. As noted in the condition under SET 5.3 above, it was not clear from the documentation, or from the discussions, that the education provider had in place a clear system for audit of practice-based learning. This meant that the visitors could not determine how the education provider intended to ensure adequate numbers of appropriately qualified and experienced staff in practice-based learning. The visitors received verbal assurances from the senior team and programme teams that they had institutional experience of organising appropriate practice-based learning and that they would be able to finalise arrangements as necessary before the programme start date. However, the visitors were not clear about the processes, details or timescales involved in this. They therefore require the education provider to submit further evidence demonstrating how they will ensure adequate numbers of appropriately qualified and experienced staff in practice-based learning.

5.6 Practice educators must have relevant knowledge, skills and experience to support safe and effective learning and, unless other arrangements are appropriate, must be on the relevant part of the Register.

Condition: The education provider must demonstrate how they will ensure that practice educators have relevant knowledge, skills and experience to support safe and effective learning.

Reason: The visitors reviewed the evidence for this standard, including the draft programme description and the placement handbook. They also discussed with the programme team how they intended to ensure that practice educators were appropriately qualified. As noted in the condition under SET 5.3 above, it was not clear from the documentation, or from the discussions, that the education provider had in place a clear system for audit of practice-based learning. This meant that the visitors could not determine how the education provider intended to ensure adequate numbers of appropriately qualified and experienced staff in practice-based learning. The visitors received verbal assurances from the senior team and programme teams that they had institutional experience of organising appropriate practice-based learning and that they would be able to finalise arrangements as necessary before the programme start date. However, the visitors were not clear about the processes, details or timescales involved in this. They therefore require the education provider to submit further evidence demonstrating how they will ensure that practice educators have relevant knowledge, skills and experience to support safe and effective learning.

5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

Condition: The education provider must demonstrate how they will ensure that practice educators undertake regular training appropriate to their role, learners' needs and the delivery of the learning outcomes.

Reason: The visitors reviewed the evidence for this standard, including the draft programme description and the placement handbook. They also discussed with the programme team how they intended to ensure that practice educators were appropriately qualified. As noted in the condition under SET 5.3 above, it was not clear from the documentation, or from the discussions, that the education provider had in place a clear system for audit of practice-based learning. This meant that the visitors could not determine how the education provider intended to ensure adequate numbers of appropriately qualified and experienced staff in practice-based learning. The visitors received verbal assurances from the senior team and programme teams that they had institutional experience of organising appropriate practice-based learning and that they would be able to finalise arrangements as necessary before the programme start date. However, the visitors were not clear about the processes, details or timescales involved in this. Additionally they considered that as the learning outcomes for placement had not yet been finalised, and so it was uncertain what would be happening in practice-based learning, they could not determine whether educators were being appropriately prepared. They therefore require the education provider to submit further evidence demonstrating how they will ensure practice-based learning staff undertake regular training appropriate to their role, learners' needs and the delivery of the learning outcomes.

5.8 Learners and practice educators must have the information they need in a timely manner in order to be prepared for practice-based learning.

Condition: The education provider must demonstrate how they will ensure that learners and practice educators are appropriately prepared for practice-based learning.

Reason: The visitors reviewed the evidence for this standard, including the placement handbook and the programme and operational specifications. They also discussed with the programme team how they intended to ensure that learners and practice educators were appropriately prepared for practice-based learning. From the documentation, and from these discussions, it was not clear to the visitors how practice educators and learners would be prepared for practice-based learning. From discussions with the providers of practice-based learning and practice educators the visitors were aware that the practice educators were not clear about how they would be prepared for practice-based learning. In discussion with learners from the medicine and dentistry programmes, the visitors were told that these learners generally felt well-prepared for their practice-based learning. However, they considered that, due to the differences in practice-based learning settings and arrangements, this was not sufficient to be satisfied that such preparation would be sufficient on the radiography programme. The visitors received verbal assurances from the programme team that they had institutional experience of organising appropriate preparation for practice-based learning and that they would be able to finalise practice-based learning preparation. However, the visitors were not clear about how this would be done. They therefore require the education provider to submit further evidence demonstrating how they will ensure appropriate preparation for learners and practice educators.

6.1 The assessment strategy and design must ensure that those who successfully complete the programme meet the standards of proficiency for the relevant part of the Register.

Condition: The education provider must demonstrate how they will ensure that assessment throughout the programme aligns appropriately with the academic level.

Reason: The visitors reviewed the evidence for this standard, including a standards of proficiency (SOPs) mapping exercise and an assessment strategy document. They also discussed assessment with the programme team. From the evidence, and from the discussions, the visitors were not clear how the assessment strategy and design would ensure that assessment aligned appropriately with the level of the programme. The learning outcomes did not have level descriptors, aligning them to a particular year of the programme, so the visitors could not see how the learning outcomes would ensure that learners demonstrated a level of understanding and skill appropriate to the academic level being undertaken. For example, the SOPs often use concepts like understanding and being able to analyse and reflect, but the learning outcomes for the programme did not reflect this, and only used words like “know” and “describe”. This might mean that learners’ ability to meet the SOPs was not appropriately assessed, which could mean learners leaving the programme unable to practice safely and effectively. The visitors therefore require the education provider to demonstrate how they will ensure that assessment strategy and design enables learners to meet all the standards of proficiency, including those which require higher levels of understanding and ability.

Recommendations

We include recommendations when standards are met at or just above threshold level, and where there is a risk to that standard being met in the future. Recommendations do not need to be met before programmes can be approved, but they should be considered by education providers when developing their programmes.

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

Recommendation: The education provider should consider reviewing how they will ensure that learners submitting coursework have access to formative feedback before their work is submitted for summative assessment.

Reason: The visitors considered that this standard was met, as the education provider's assessment strategy was laid out and comprehensible for learners. However, the visitors did note that learners were required to submit a number of lengthy pieces of coursework during the programme and it was unclear whether learners would have access to any feedback and consultation with programme staff before they were required to submit the work for summative assessment. The programme team stated that learners might have access to informal discussions about work but there was not a formal process for learners to be able to do this. The visitors considered that this lack of access to formative assessment might create a risk that the standard was not met in future, if learners did not have an opportunity to ensure that they were working in the right direction and that their expectations were aligned with the staff who would be assessing their coursework. They therefore suggest that the education provider consider how they might include more formative assessment in coursework.

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.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that partner organisations are committed to providing enough resources to deliver the programme.

Reason condition not met at this time: The visitors reviewed the evidence submitted for this condition. The education provider sought to show that they had developed relationships with practice-based learning partners and other programme stakeholders. For example, they provided evidence of meetings and of agreements around capacity in practice-based learning, and of how they would develop the audit and preparation process for practice-based learning settings. However, from this evidence, the visitors were still not clear about a number of issues:

- Whether the Memorandum of Understanding with the University of Exeter has been finalised. At present the relationship is described as “developing” in the evidence.
- How many practice educators are confirmed to be in place for the programme, and what ratio of practice educators to learners the programme aims to achieve.

Suggested documentation: Evidence to show:

- That the education provider will be able to maintain an effective relationship with the University of Exeter so that the programme will be sustainable and fit for purpose.
- How the education provider will ensure that the number of practice educators on the programme is appropriate to the number of learners.

3.2 The programme must be effectively managed.

Condition: The education provider must demonstrate that there is appropriate support in place for the programme leaders, and that their roles and responsibilities are clear to them and to colleagues and senior management.

Reason condition not met at this time: From the evidence provided the visitors were aware that the education provider was planning a merger of the Faculties of Health and Human Sciences, and Medicine and Dentistry, and that this would take effect from September 2019. The education provider stated they did not anticipate that this would involve any changes to the management of the programme, to teaching and learning activities, or staffing levels. However, as the full details of the staff roles and responsibilities within the new structure were not yet available, the visitors were not able to review evidence showing that the programme would be effectively managed after this merger, and so they could not be sure that the condition was met.

Suggested documentation: Evidence to demonstrate that changes to the Faculty within which the programme sits will not affect the management structures of the programme.

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 have an effective process in place for securing sufficient practice-based learning for all learners.

Reason condition not met at this time: In their evidence for this condition the education provider sought to demonstrate that they were developing their relationships with a range of practice-based learning partners, and that they had developed a mechanism for finding out from all such partners the availability and appropriateness of practice-based learning at those partners’ settings. The visitors considered that their concerns had mostly been addressed. However, as noted under SET 3.1 above, the education provider has not yet finalised its Memorandum of Understanding (MoU) with the University of Exeter (UoE). According to the conditions response, further meetings with the UoE are scheduled to develop the relationship. As the UoE is a significant competitor for practice-based learning capacity with the education provider, until that agreement is finalised the visitors cannot see how the education provider will manage practice-based learning with the UoE. Therefore they cannot be sure at present that the

education provider will be able to ensure the availability and capacity of practice-based learning for all learners.

Suggested documentation: Evidence showing that an agreement around use of practice-based learning capacity has been reached with the University of Exeter.

5.3 The education provider must maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Condition: The education provider must demonstrate how they will maintain a thorough and effective system for approving and ensuring the quality of practice-based learning.

Reason condition not met at this time: The education provider provided evidence relating to how they would carry out audit of practice-based learning and how they would ensure that there was appropriate collaboration with the University of Exeter (UoE) where necessary. The visitors considered that this evidence was broadly appropriate to meet the standard. However, they noted that they had not seen detail of how the education provider would ensure on an ongoing basis:

- that an appropriate number of staff were available in practice-based learning to ensure the quality of that learning for learners from the education provider (as distinct from the UoE), and
- that the education provider could monitor the practice-based learning capacity available to learners from the education provider.

The visitors considered that this was closely linked to the conditions under SET 3.6 above, and noted that it was important for the education provider to be able to look at specific data about the suitability of individual practice-based learning settings, as well as taking into account wider issues around capacity.

Suggested documentation: Agreements with practice-based learning partners or the University of Exeter dealing with management of practice-based learning capacity, and showing that appropriate staffing will be in place.

Section 6: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 5, the visitors are satisfied that the conditions are met and recommend that the programme(s) are approved.

This report, including the recommendation of the visitors, will be considered at the 22 August 2019 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).

Section 7: Future considerations for the programme(s)

We include this section to note areas that may need to be considered as part of future HCPC assessment processes. Education providers do not need to respond to this section at this time, but should consider whether to engage with the HCPC around these areas in the future.

The visitors recommended approval of the programme on the understanding that although not all practice-based learning for years two and three of the programme had yet been secured, the education provider did have clear plans for securing those placements, and that they had means in place for ensuring that there were appropriate educators available. They also understood that the education provider was in the process of finalising its formal relationship with the University of Exeter, such that the sustainability and fitness of the programme will be ensured.

The visitors wished to underline that their recommendation was based on their understanding of the education provider's approach to the above. In line with this, they consider that it would be appropriate for visitors in future HCPC monitoring processes to ensure that:

- Learners on the programme continue to have access to appropriate practice-based learning, with sufficient practice educators; and
- The education provider continues to have a constructive relationship with the University of Exeter which enables access to suitable practice-based learning for all learners, as necessary.

The education provider should ensure that the arrangements on the programme continue to reflect the understanding on which the visitors are recommending approval.



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12th August 2019

Dear Professor Wordsworth

Letter of Observation to HCPC Education and Training Committee

Although we have not yet had sight of the final report, we were delighted to learn that the visitors are recommending approval of our new BSc (Hons) Diagnostic Radiography. However, the journey to this point has not been without difficulty and we would like to highlight some key points to the Committee. Our full responses to the visitors are included as Appendices 1A and 1B.

1. Rationale for a new programme

The programme was developed after consultation with HEE and in direct response to a local need. Currently there are around 10 vacancies for qualified diagnostic radiographers in each Trust within the South West, and there is an ongoing strategic goal to improve healthcare provision in the Peninsula. Many facilities in the South West struggle with recruitment given their more remote geography and this includes those reliant on medical imaging facilities. Imaging is seen as a bottleneck in many patient care pathways, particularly those relating to cancer. Providing 'home grown' students could help mitigate recruitment factors in these areas with the wider healthcare environment seeing the benefit.

The rise in demand for diagnostic imaging is most pronounced in higher complexity cross sectional examinations. This changing landscape of the radiography profession is not, however, necessarily reflected in the curricula of many existing diagnostic radiography programmes, which maintain their focus on plain films. There is clearly a need not only for increased numbers of radiographers but also in the way they are used to deliver diagnostic services.

The Faculty of Medicine and Dentistry (FoMD) has developed a national and international reputation for innovative and high-quality practice. Our programmes align with University and FoMD aspirations for excellence in teaching and learning, world-class research, sustainability and strong social engagement. Our curricula are developed with reference to best educational practice, guidance from the relevant professional bodies and feedback from students, public and patients.

Diagnostic radiography is a very patient focussed and practical career. The Faculty of Medicine has a track record of delivering courses which are constructively aligned with the relevant occupation, both in placement and academic setting. Many existing diagnostic radiography undergraduate degrees are more traditional in their approach to learning which is at odds with the modern radiographic role. The Faculty's experience in constructively aligned curriculum delivery is very much aligned with the needs of radiographic training, and as such this programme is founded in similar pedagogic principles.

At present there is only one, traditionally taught, diagnostic radiography course in the Southwest which limits choice within the region. Offering a programme with a different mode of course delivery allows students to exercise this choice should they wish to study in the South West. Furthermore, it widens the net for recruitment of diagnostic radiographers, to include those who would not enrol in a traditional programme.

2. Local competition

Understandably, the existing and well established provider in the region has not welcomed the introduction of our new programme. Whilst the development of a new programme is in the interests of the profession and local healthcare provision, this does not align with Exeter's own ambitions to expand their student numbers and their recently announced plans to develop an apprenticeship programme. There have been suggestions that there have been attempts to polarise opinion about our programme, locally and nationally, but of course these cannot be substantiated. It is clear however, that obstructive tactics have been employed, including delays over signing the Memorandum of Understanding. As our programme has not yet been approved, the Plymouth team were not invited to the most recent meeting of HEIs and radiography service leads in the south west which could have been used as an opportunity to develop co-operative strategies and improve communication, and this is disappointing. Nonetheless, we have been working hard to develop good and ongoing working relationships with all our placement providers and with Exeter and other HEIs in the region.

As outlined above, the Plymouth BSc Diagnostic Radiography programme offers a different mode of delivery, and recruitment has targeted local students, many of whom would have been unable or unwilling to travel/move to Exeter. Furthermore, placements have been carefully negotiated with the placement providers to ensure students from neither institution are negatively impacted by the expansion of placement numbers. Many of our placements are at sites which do not deliver training to Exeter students. These include a wide variety of placements at local peripheral sites/community hospitals and independent providers of imaging, and unlike Exeter students, Plymouth students will experience the out of hours service at evenings and weekends, which has the additional advantage of exposing them to all aspects of the modern healthcare setting and will provide a broader range of experiences.

These differences have been accepted by the Exeter programme team, which has led to the collaboration described in the full response to the visitors, Appendix 1A. In addition, there are other examples of collaboration between the Schools such as the recent meeting to discuss fitness to practice policies and processes for all the healthcare programmes operated by Plymouth and Exeter, including Diagnostic Radiography. This was attended by Exeter's Professor of Medical Imaging, who holds a key role in the Exeter process.

We would respectfully suggest that putting the burden on a new provider to evidence collaboration with the existing provider has the potential to lead to an inequitable situation. In effect, we have to

gain Exeter's 'approval' of our placements which, given their own plans for expansion, is a difficult balance. If an existing provider is not actively supportive, they can cause delays for the new provider in gaining approval.

3. Placements

We would like to reassure the committee that we are working very closely with all existing placement providers, and in addition we are opening channels of communication with new providers. (see Appendix 1A, pg7). The programme lead has been meeting with at least two or three placement providers every week, to ensure that all sites are fully prepared. Practice placements in diagnostic radiography teams start from Year 2 of the programme, and we are very confident that we have negotiated more than enough high quality placements for all students.

We acknowledge that in the early stages there were difficulties in working with some placement providers where Exeter was the established HEI. These included the local NHS trust, which is now a University Hospital aligned to Plymouth. These issues are now resolved, and we hold current letters of very positive support from our placement providers, together with completed pre-placement questionnaires which provide a detailed audit of the capacity, facilities and staff available at each location. The arrangements and expectations are described in the Service Level Agreements which have been signed with each of the placement sites.

At an early stage in the development of the programme we contracted two diagnostic radiographers, who are working in practice in Derriford and Truro Hospitals, to provide their expert input into programme development and practice placement delivery. We continue to engage regularly and closely with all placement providers to provide detailed information about the programme and to work together to establish a pattern of practice placement delivery that ensures that Exeter and Plymouth students can both be accommodated, and that the individual student experience is not impacted. This includes out of hours and weekend working, the experience of which will be beneficial to our students.

We have developed placements at sites which do not deliver training to Exeter students. These include a wide variety of placements at local peripheral sites/community hospitals and independent providers of imaging, and collaboration with Exeter is of course not required for these sites.

In addition, the students will be spending the majority of their Year 1 placements in non-radiography teams, so that they develop a broad understanding of healthcare systems, the patient journey, routine techniques such as calling patients and basic patient care that are applicable across healthcare environments, and are provided with opportunities to develop their communication skills. The programme lead has also been visiting each of these teams to ensure they are fully conversant with expectations. Year 1 students will also experience a significant period of time in simulated environments each week, culminating with a 5 week simulation block and visit to their Year 2 placement site. This will ensure that they are fully prepared and ready for practice in Year 2, and will reduce the burden on the diagnostic radiographer teams.

4. Quality assurance and other issues

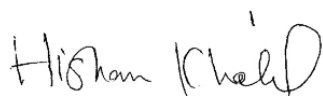
- Expert registrants are required to assess the suitability of a new programme, and HCPC takes steps to ensure that there is no significant conflict of interest with the programme or institution that is being inspected. However, we are very aware that there is a small pool of diagnostic radiography experts available, and so it is not possible to avoid all potential conflicts. We are aware that aspects of our new programme have been discussed at various closed meetings of Radiography programme leads and others, and we would respectfully

suggest that this could have the potential to impact on the ability of our visitors to reach an impartial and unbiased opinion. At least one of our visitors also acts as a Society and College of Radiographers assessor, and we would suggest that the request to submit a Memorandum of Understanding as a condition for HCPC approval may reflect a confusion of roles.

- Changing focus of conditions: The outcome from the second review was that the visitors were not satisfied with 4 conditions. In two of these cases, we feel that new points were raised as listed below. Whilst we were of course very happy to respond to these points to the visitors, and did so fully, we would like to point out that this was in effect our first opportunity to respond to these points:
 - 3.1 How the practice educator will ensure that the number of practice educators on the programme is appropriate to the number of learners. *This was not identified as part of the original condition, and thus not referenced in our first response. However, we were of course very happy to provide further details to the visitors (see Appendix 1A, pg7 and Appendix 1B, pages 15-17).*
 - 3.6 Evidence showing that an agreement around use of practice-based learning capacity has been reached with the University of Exeter. *This was not identified as part of the original condition for 3.6, and thus not referenced in our first response. The original condition referenced our relationship with placement providers rather than with Exeter and we therefore did not refer to Exeter in our response. We have been informed that HCPC do not require the completion of an MoU, although we are required to evidence collaboration with Exeter. Please see our full response to this point in Appendix 1A, pg11 and Appendix 1B, page 15 .*

We would like to thank the Committee for taking the time to consider the points outlined above. We would also like to assure the committee of our continuing dedication to ensuring that we develop and operate a high quality programme, designed to deliver competent and sought after diagnostic radiographers of the future.

Yours Faithfully



Professor Hisham Khalil

Dean