Minor/Major Change
guidance notes

Section 1: Introduction

About us (the HPC)

We are the Health Professions Council. We are a health regulator, and we were set up to protect the public. To do this, we keep a Register of health professionals who meet our standards for their training, professional skills, behaviour and health.

We currently regulate thirteen health professions:
- Arts therapists;
- Biomedical scientists;
- Chiropodists and podiatrists;
- Clinical scientists;
- Dietitians;
- Occupational therapists;
- Operating department practitioners;
- Orthoptists;
- Paramedics;
- Physiotherapists;
- Prosthetists and orthotists;
- Radiographers; and
- Speech and language therapists.

We may regulate other professions in the future. For an up-to-date list of the professions we regulate, please see our website: www.hpc-uk.org

Our Register is available on our website for anyone to search, so that they can check the registration of their health professional.

Our key functions

In order to protect the public, we:
- set standards for the education and training, professional skills, conduct, performance, ethics, and health of registrants;
- keep a Register of health professionals who meet those standards;
- approve programmes which health professionals must complete in order to register with us; and

- take action when health professionals on our Register do not meet our standards.

The Health Professions Order says that we must set our standards to protect the public, and that we must set standards which are necessary for safe and effective practice. This is why our standards are set at a 'threshold' level.

About this document

Since its inception, the Education Department of the Health Professions Council has been undertaking approvals visits to educational institutions throughout the UK. As part of an approval visit, the HPC assesses the programme against our Standards of Education and Training (SETs) to ensure that upon graduation, all students meet our Standards of Proficiency (SoPs).

Following the approval of an educational programme by the HPC, the programme obtains what we refer to as "open-ended approval" and is then subject to annual monitoring. Annual monitoring is a documentary process by which we determine whether or not a programme continues to meet all the HPC standards against which it was originally assessed.

Operating in conjunction with the annual monitoring process, is the process of recognising changes of circumstances, especially those which may impact on the provision of a programme and on the Standards of Education and Training or Standards of Proficiency. Education Providers are required to notify us of any changes to HPC approved programmes which may impact on these standards. Following notification of changes, we will determine, in accordance with our processes and policies (which are detailed in sections 2, 3 and 4 of this document), whether the changes are minor or major, as well as the action to be taken in each case.

Notifying us of all changes also assists us when there have been a number of changes over a period of time. It is possible that a number of minor changes may cumulatively result in a major change that requires an approval visit. It is for this reason that the process is closely linked to Annual Monitoring.

The information contained in this document is designed to clarify the minor/major change process and to assist Education Providers in submitting information about changes to the HPC. The process for notifying the HPC of proposed changes is usually an e-mail or correspondence based exercise and is clearly outlined in the flowchart and process description that follow.

Throughout the document, 'we' refers to the Health Professions Council, and 'you' refers to staff working on an approved programme, or a programme that is seeking approval. Where the abbreviation 'SET' followed by a number is used, this refers to a specific Standard of Education and Training.

Section 2: Flowchart of the process

The flowchart below has been designed to ensure that the tracking of cumulative minor amendments and changes, as well as notification of major change, are complimentary with the approvals and annual monitoring processes of the HPC. This process builds upon, and provides more detail on, that contained in the 'Key Decisions from our consultation on the Standards of Education and Training and the Approvals Process'.

Fig 1. Minor/major change process flowchart

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                    ┌──────────────────────────────┐
                    │  Application form request and │
                    │        documentation          │
                    └──────────────────────────────┘
                                   │
                                   ▼
    ┌──────────────────────────────┐        ┌──────────────────────────────┐
    │ HPC Executive reviews paperwork│◄──────►│  AMR tracking of cumulative  │
    │                               │        │            change            │
    └──────────────────────────────┘        └──────────────────────────────┘
                                   │
                                   ▼
                    ┌──────────────────────────────┐
                    │    Partner Visitors to review │
                    │        documentation          │
                    └──────────────────────────────┘
                                   │
                                   ▼
                    ┌──────────────────────────────┐
                    │ Changes recommended to Approvals│
                    └──────────────────────────────┘
              │                │                   │
              ▼                ▼                   ▼
   ┌────────────────┐  ┌────────────────┐  ┌────────────────┐
   │ Recommends     │  │  Minor Change  │  │  Major Change  │
   │ change/s to    │  │                │  │                │
   │ Approvals      │  └────────────────┘  └────────────────┘
   │ Committee      │           │                   │
   └────────────────┘           ▼                   ▼
          │           ┌────────────────┐  ┌────────────────┐
          ▼           │ Advise Education│  │ Advise Education│
   ┌────────────────┐ │    Provider    │  │    Provider    │
   │ Advise Education│ └────────────────┘  └────────────────┘
   │    Provider    │                              │
   └────────────────┘                              ▼
                                         ┌────────────────┐
                                         │ Approvals Process│
                                         └────────────────┘
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Section 3: The process explained

The following points are provided as elaboration of the steps outlined in the above flowchart.

When you have submitted your application form and supporting information, the executive staff of the Education Department, will undertake an initial assessment of the paperwork and make a determination about whether the change is significant enough to be sent for further assessment.

If the change is not thought to have any impact at all on the SETs or SoPs, we will make the appropriate recommendation to the Approvals Committee and advise you of the outcome accordingly.

If the change is considered to have an impact on our standards, the documentation will be sent to two visitor/assessors, from the same part of the register as the programme under consideration, who will be required to assess changes. Any information regarding previously submitted changes will also be sent to the visitors in order that they are able to assess the effect of any cumulative changes on the programme. Where possible, if the programme has been approved by us, we will endeavour to use the services of those partners involved in the original (or subsequent) visit to that institution.

If the visitor/assessors determine that the changes are minor (based on the criteria in section 4 of this document), the changes will be recommended to the Approvals Committee for approval at the next meeting.

If however, the visitor/assessors feel that the change is major (based on the criteria in section 4 of this document), the assessors will make a recommendation to the Committee who will then make a decision based on the information provided. If the Committee agrees that the change is major, the programme will be moved into the approvals process and an approval visit organised. When this decision has been reached, we will notify you immediately and will set in place the approvals process. Where possible, if the change is major and falls into the approvals process, we will endeavour to use the services of the visitors involved in the assessment of the change.

All assessments of Minor/Major change will involve the Conflict of Interest procedures. If either of our visitors makes a declaration which the executive considers may constitute a conflict of interest, you will be granted access to the forms in order that they be able to determine the suitability of the assessor.

Section 4: Minor and Major changes - definitions

In 2002, we undertook a consultation on our Standards of Education and Training and the Approvals Process and what they should look like. When making our decisions in response to the feedback we received, we set the following parameters for our Minor/Major change process. This information is a general guide to what the HPC considers would constitute both a minor and a major change. Further details can be found in the document titled "Key decisions from our consultation on Standards of Education and Training and the Approvals Process".

What constitutes a minor change?

- A one-off change of cumulative changes affecting less than 25% of the programme
- A change to a module title, credit value, level or relationship with other modules
- The addition or replacement of a module within the existing provision
- A non-material change to student numbers
- An insignificant reduction in resources
- An insignificant change in the admissions requirement
- Any changes to the overall aims, objectives or learning outcomes for a module
- Any change to the teaching and learning strategy that does not have a resource implication
- An insignificant change to the assessment strategy for the provision or a change to the assessment strategy for a module, including assessment criteria, modes and weighting

As mentioned in sections 2 and 3 of this document, if there are a number of minor changes that are made to a programme which we believe would cumulatively result in a major change, we will be required to move the programme into the approvals process. This would involve an Approval Visit for the programme, in line with the processes outlined previously.

What constitutes a major change?

- A one-off change or cumulative changes affecting more than 25% of the programme
- A change to the programme title
- The addition of a new route or partway within the existing provision
- A change to the delivery mode, eg: distance learning
- A change to the length of the programme
- A relocation of the site of delivery
- A material change to student numbers
- A significant reduction in resources
- A significant change in the admissions requirement
- Any changes to the overall aims, objectives or learning outcomes for the provision
- A significant change to the assessment strategy
- Multiple minor changes that have a significant impact on the Standards of Education and Training
- Multiple minor changes that have a significant impact of the Standards of Proficiency for the profession in question

We expect that we will conduct prospective visits of programmes which are about to undergo major change wherever possible, to ensure that the quality of the programme is maintained. We recognise that there may be circumstances in which only a retrospective visit is possible, but we will consider a timely Visit to be essential. This is a consideration we will apply to both the Education Provider and the HPC.

Section 5: Documentation required from the education provider

As with a HPC approval visit, we require documentary evidence of any changes that may impact on our standards. Below are further details about the information we require and what possible documentation may be used to evidence this. Please note that the information provided here is a guide only and you may wish to include information from other sources.

We expects that the Minor/Major change process will be an electronic process where possible. This is intended to reduce the amount of paperwork involved and will facilitate the timely assessment of the change proposal. Further, if you wish to use website references, this will be encouraged where appropriate. If for some reason, we find that we require paper copies of documentation, we contact the person nominated on the submission form directly.

1. Submission form for Minor/Major change proposals

This form will provide the basis of the documentation submitted to us for minor/major changes. The form must be completed by the Education Provider and should be submitted, along with supporting documentation, prior to the implementation of the changes where possible.

2. Mapping documents:

As we assess all programmes against the Standards of Education and Training and Standards of Proficiency, if the changes are substantial, you may find it useful to map the proposed changes against our Standards. This mapping can then be used to indicate which of the standards are impacted by the change. Copies of our mapping documents are available on our website at: www.hpc-uk.org

3. Supporting institutional documents:

We require that Education Providers submit any documentation that will evidence the ways in which the change impacts on the provision of the programme from the perspective of the students, staff, resources and placements.

Example 1
If the change involves an increase in student numbers we would require details of the numbers involved, the impact on the staff:student ratio, any additional resources required to support the change and how these will be used/distributed. We would also require evidence of the potential impact on placements in terms of timetabling and staffing and how this will be accommodated and monitored. Documentation may include a revised timetable for placements, information about how the Placement Providers will accommodate the increase in numbers, details of any impact the increased numbers may have on tutorial or lecture times, and details of any staff arrangements made in response to the changes.

Example 2
If the change involves a reduction in tutorial facilities, for example if a tutorial space once utilised by students in the programme is no longer available to them, we would expect to see details of how this will impact on students and how the Provider will ensure the ongoing quality of the student experience. Documentation in this situation might include details of any new tutorial arrangements, the possible impact on, or change to staff:student ratio for tutorials, how these impacts will be managed, and copies of any communication sent to students regarding the change.

Example 3
If your programme over recruited an insignificant number of students in a particular cohort, and we were notified of the change at the time, and provided with sufficient supporting documentation, we may have made a decision that such a change was minor. However, if such over-recruitment was then followed by a decrease in the number of teaching staff, we may consider that the <u>cumulative</u> effect of the two changes constitutes a major change.

In this case, we would require you to submit appropriate documentation for the decrease in staffing levels. This would include information about the staff who remain to deliver the programme and how this impacts on the ability of the team to maintain the quality of the programme, information about the impact on the staff:student ratio, any additional resources required to support the change and how these will be used/distributed. We would also require evidence of the impact on classes, lectures and tutorials, how this is to be managed and details of any other staff arrangements made in response to the changes. Mapping against the Standards of Education and Training would be a useful exercise.

As there have been two changes to the programme since it was last approved by the HPC, as part of the documentation submitted, we would also expect you to declare the earlier changes to student numbers in the space provided on the application form.

Example 4
If your programme is offered on a site that is remote form the Education Provider who validates your programme, and the validating body changes to a new validator or changes name, we would need to be notified of this change. In this case, we would need to be assured that there had been no change at all to the programme itself or to the delivery site. It is also necessary to advise us of this change, even if there is no impact to ensure that when your students graduate, they are able to register with the HPC quickly. Of course if we are not aware of a change of name for an Education Provider the certificates held by the students will not match the information we hold on our website, making it difficult for us to register them.

Section 6: HPC reference documents

Document	*Date of Publication*
SETs guidance	December 2005
Key decisions from our consultation on Standards of Education and Training and the Approvals Process	September 2004
Standards of Education and Training	November 2004
Standards of Proficiency for Paramedics, Dietitians, Orthoptists, Chiropodists and Podiatrists, Radiographers, Clinical Scientists, Biomedical Scientists, Occupational Therapists, Physiotherapists, Prosthetists and Orthotists, Speech and Language Therapists	July 2003
Standards of Proficiency for Operating Department Practitioners	August 2004
Annual Monitoring application form and guidance	December 2005

All of these documents will be published on our website: www.hpc-uk.org

Section 7: Contact Details

If you have any questions regarding the process for submission of minor changes to the HPC, please contact the Education department directly:

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Kennington
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