

HCPC approval process report

Education provider	London Metropolitan University
Name of programme(s)	Professional Doctorate in Health Psychology, Full time Professional Doctorate in Health Psychology, Part time
Approval visit date	27 February 2018
Case reference	CAS-12168-G3G3M2

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Executive Summary

We are the Health and Care Professions Council (HCPC), a regulator set up to protect the public. We set standards for education and training, professional knowledge and skills, conduct, performance and ethics; keep a register of professionals who meet those standards; approve programmes which professionals must complete before they can register with us; and take action when professionals on our Register do not meet our standards.

The following is a report on the approval process undertaken by the HCPC to ensure that programme(s) detailed in this report meet our standards of education and training (referred to through this report as 'our standards'). The report details the process itself, the evidence considered, and recommendations made regarding programme approval.

Section 1: Our regulatory approach

Our standards

We approve programmes that meet our education standards, which ensure individuals that complete the programmes meet proficiency standards. The proficiency standards set out what a registrant should know, understand and be able to do when they complete their education and training. The education standards are outcome focused, enabling education providers to deliver programmes in different ways, as long as individuals who complete the programme meet the relevant proficiency standards.

Programmes are normally [approved on an open-ended basis](#), subject to satisfactory engagement with our monitoring processes. Programmes we have approved are listed [on our website](#).

How we make our decisions

We make independent evidence based decisions about programme approval. For all assessments, we ensure that we have profession specific input in our decision making. In order to do this, we appoint [partner visitors](#) to undertake assessment of evidence presented through our processes. The visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation of the visitors, inclusive of conditions and recommendations. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make decisions about the approval and ongoing approval of programmes. In order to do this, they consider recommendations detailed in process reports, and any observations from education providers (if submitted). The Committee meets in public on a regular basis and their decisions are available to view [on our website](#).

HCPC panel

We always appoint at least one partner visitor from the profession (inclusive of modality and / or entitlement, where applicable) with which the assessment is concerned. We also ensure that visitors are supported in their assessment by a member of the HCPC executive team. Details of the HCPC panel for this assessment are as follows:

Gareth Roderique-Davies	Practitioner psychologist - Health psychologist
Sandra Wolfson	Practitioner psychologist - Sport and exercise psychologist
Nicholas Drey	Lay
Amal Hussein	HCPC executive
Anna Lubasinska	HCPC executive (observer)

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.

Richard Skues	Independent chair (supplied by the education provider)	London Metropolitan University
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Gene Huie-Manneh	Secretary (supplied by the education provider)	London Metropolitan University
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Section 2: Programme details

Programme name	Professional Doctorate in Health Psychology
Mode of study	FT (Full time)
Profession	Practitioner psychologist
Modality	Health psychologist
First intake	01 January 2011
Maximum learner cohort	Up to 4
Intakes per year	1
Assessment reference	APP01785

Programme name	Professional Doctorate in Health Psychology
Mode of study	PT (Part time)
Profession	Practitioner psychologist
Modality	Health psychologist
First intake	01 January 2011
Maximum learner cohort	Up to 4
Intakes per year	1
Assessment reference	APP01786

We undertook this assessment via the approval process, which involves consideration of documentary evidence and an onsite approval visit, to consider whether the programme continues to meet our standards. We decided to assess the programme via the approval process due to the outcome of a previous assessment. We are visiting this programme because significant changes were identified through the annual monitoring process. We visited the programme to ensure that standards of education and training continue to be met, and are considering whether the programme(s) can have approval reconfirmed.

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
Learners	Yes
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 28 May 2018.

2.4 The admissions process must assess the suitability of applicants, including criminal conviction checks.

Condition: The programme team must provide further information about the admissions procedures and how they ensure that successful applicants meet the education provider's requirements regarding Disclosure and Barring Service checks.

Reason: From the information provided in the documentation the visitors were unable to determine the process in place for assessing the suitability of applicants, including Disclosure and Barring Service (DBS) check. The visitors noted in Appendix 3 page 8 the following statement, "If you have a criminal conviction you may not be able to fulfil the standards of proficiency as set by the Health and Care Professions Council or fulfil the competencies required by the British Psychological Society due to an inability to access appropriate placements". In discussions at the visit, the visitors were told that all

learners must undergo a Disclosure and Barring Service (DBS) check as part of the admissions process to the programme. From this information, the visitors were unable to determine how the DBS check is applied and how policies are structured to deal with any issues that would arise as a result of the check. The visitors were also unable to determine who makes the final decision about accepting a learner onto the programme if any issue does arise. Therefore, the visitors require further information about the DBS checks that are applied at the point of admission. In particular the visitors require further evidence of the education provider's process and clarification of who makes the final decision about accepting an applicant onto the programme if an issue arises from the DBS check.

2.5 The admissions process must ensure that applicants are aware of and comply with any health requirements.

Condition: The programme team must provide further information about the admissions procedures and how they ensure that successful applicants meet the education provider's health requirements.

Reason: From the initial documentation, the visitors noted that a health declaration is completed by applicants. However, they could not determine how the admissions procedures deal with the information provided through health declarations nor how any issues that may arise would be dealt with. In particular, the visitors could not determine who makes the final decision about accepting a learner if adjustments would be required. In discussions at the visit, the visitors heard that applicants applying for the programme complete a health declaration as part of the admissions process to the programme. However, from the documentation and in discussions at the visit, the visitors were unable to determine the education provider's process for determining what adjustments could or could not reasonably be made if health conditions were disclosed. As such, the visitors did not see evidence of the process in place for managing health declarations. Therefore, the visitors require further information about the process for dealing with the health declarations that are applied at the point of admission, determining what adjustments can and cannot be made and information about who makes the final decision about accepting an applicant onto the programme if adjustments are required.

2.6 There must be an appropriate and effective process for assessing applicants' prior learning and experience.

Condition: The education provider must demonstrate how their admissions process appropriately and effectively assesses applicants' prior learning.

Reason: From their review of the documentation, the visitors were not clear what the process for recognition of prior learning will be for this programme. From discussions at the visit, the visitors understood there is a process in place for assessing applicants' prior learning; however, there is conflicting information in the documentation about how this process works. For example, Appendix 1 page 23 states "180 are achieved via AP(E)L", however, page 28 of the same document states "1800 credited via APL". During the visit, the visitors heard that the recognition of prior learning process would be applied at the point of application and would be assessed through a series of documents, which would be completed as part of the application process. However, the visitors were not clear about the criteria that would be used to make judgements about prior learning, how any policy would be applied to applicants to the programme, or how

this policy would be made available to applicants and the staff who would apply it. As such, the education provider will need to provide evidence of a clearly defined process for assessing applicants' prior learning, and how this will be reflected in relevant programme documentation, in order for the visitors to make a judgement about whether this standard is met.

2.7 The education provider must ensure that there are equality and diversity policies in relation to applicants and that they are implemented and monitored.

Condition: The education provider must provide evidence of equality and diversity policies in relation to applicants and how they are implemented and monitored.

Reason: Prior to the visit, the visitors were provided with policies on welfare as opposed to equality and diversity policies in relation to applicants. At the visit, the visitors raised this and subsequently were provided with an equality and diversity policy. Whilst the visitors were satisfied that the content of the policy, if implemented and monitored appropriately, was appropriate to ensure equality and diversity in relation to applicants, there was no clear evidence to show how the policy is implemented and monitored. The visitors noted that without seeing information about how the policy will be implemented and monitored in relation to this programme at the admission stage, they were unable to see how that the process will continue to be applied consistently throughout the admission process. The visitors therefore require further evidence to show how the policy will be implemented and monitored in relation to applicants on to this programme.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must provide evidence that the programme is sustainable and fit for purpose.

Reason: Prior to the visit, the visitors were provided with a link to the University's 2015–2020 strategic plan 'Transforming lives through excellent education'. However, from the information provided the visitors noted that there was no reference made to this programme or the school in which this programme sits, within the strategic plan. In discussions with the senior team, the visitors heard that there is a future for this programme and the education provider is committed to supporting the programme. However, the visitors were not provided with any evidence of the strategy in place to determine that the education provider is committed to providing enough resources to deliver the programme. As such, the education provider must provide evidence that the programme is sustainable and fit for purpose.

3.2 The programme must be effectively managed.

Condition: The education provider must provide further evidence of the structure for the day-to-day management of the programme and the lines of responsibility of the teaching team.

Reason: Prior to the visit, the visitors were provided with brief biographies for all the staff responsible for the programme. However, from the information provided, it was not clear which members of the programme team would be responsible for which aspects of programme management, or who would be delivering specific areas of the programme.

At the visit, the visitors heard that a number of staff have either left or been made redundant. From this information, the visitors were unable to determine whether these individuals were contributing to the programme in a significant way. The visitors were reassured at the visit that the programme continues to be effectively managed and that an additional part time staff member has been brought in to support the programme leader. However, the visitors were still unclear how the programme continues to be effectively managed even with the additional part time staff. As such, the visitors require further information regarding the structure for the day-to-day management of the programme and the lines of responsibility of the teaching team, including teaching and pastoral responsibilities. In this way, the visitors can determine how the management of the programme will work in practice, and how learners will be supported through the programme by members of the programme team.

3.4 The programme must have regular and effective monitoring and evaluation systems in place.

Condition: The education provider must provide further evidence of the regular monitoring and evaluation systems in place for this programme.

Reason: From the documentation provided prior to the visit, the visitors could not determine what regular monitoring and evaluation systems are in place for this programme. During the visit, the visitors discussed the monitoring and evaluation of several aspects of the programme with the programme team. However, from the evidence provided in the documentation and in the discussions the visitors were unclear about several aspects of the feedback systems. In particular, the visitors could not determine how learner and practice educator feedback will be considered by the programme team, how any changes will be implemented as a result of this feedback, and how any changes to the programme following feedback will be communicated to learners and practice educators. As such, the visitors did not have any documentary evidence of the regular monitoring and evaluations systems in place to quality assure this programme. The visitors therefore require further evidence which clearly articulates the regular monitoring and evaluation systems in place for this programme, how these systems will be implemented and how they will be used to quality assure the delivery of this programme to ensure that this standard is met.

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

Condition: The education provider must demonstrate that there is regular and effective collaboration with practice education providers.

Reason: In their mapping document, the education provider referred to a 'Placement learning agreement' which gives more of a narrative of responsibilities of the education provider and practice education providers relating to collaboration for this programme, but the visitors considered that this did not provide evidence of regular and effective collaboration itself. At the visit, the visitors were able to discuss the existing arrangements for collaboration between the education provider and practice education providers. They were given verbal reassurances by the programme team that collaboration takes place for this programme, but they were not able to see from the evidence provided the nature or extent of this collaboration. In discussion with practice education providers, the visitors were informed that some practice educators considered that collaboration with the education provider was not regular. The visitors

understood that such collaboration tended to be driven by existing relationships between individuals rather than by a formal process, and that it tended to be reactive. It was not clear to the visitors whether formal records were kept of meetings and communications between the education provider and practice education providers. They were also unable to determine from the evidence provided and from discussions, the level of input that practice education providers had had into the development of the new programme. They therefore require the education provider to demonstrate how they will ensure that there is regular and effective collaboration with practice education providers.

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 there is an effective process in place to ensure access to practice-based learning for all learners.

Reason: From a review of the documentation, the visitors noted that in the SETs mapping document under (SET 3.6) submitted by the education provider, it stated there was a 'placement learning agreement'. However, this standard is concerned with the processes in place that ensure that all learners on the programme have access to practice-based learning which meets their learning needs. In discussions with the programme team, the visitor heard learners could either undergo a placement provided by the education provider or source their own placement for this programme. The visitors heard that acquiring practice-based learning opportunities was ultimately the responsibility of the learner. From these discussions, the visitors were unsure of the process the education provider has in place to ensure availability and capacity of practice-based learning for all learners including future learners. From the evidence provided, the visitors were unable to identify whether there is an effective process in place for ensuring that there is sufficient availability and capacity of practice-based learning for all learners. The visitors therefore require the education provider to demonstrate how they will ensure that all learners are enabled to secure practice-based learning and that there is an effective process in place to ensure access to practice-based learning for all learners.

3.8 Learners must be involved in the programme.

Condition: The education provider must provide evidence of how learners are involved in the programme.

Reason: From the documentation provided prior to the visit, the visitors could not determine how learners are involved in the programme. During the visit, the visitors discussed how learners are currently involved in the programme for example as 'course reps'. However, from the evidence provided in the documentation and in the discussions the visitors were unclear how the education provider involves learners in the programme. In particular, the visitors were unable to determine the process in place to ask for, allow and encourage learners to be involved. As such, the visitors were unable to determine how involving learners in the programme has contributed to the quality, effectiveness and continuous improvement of the programme. The visitors therefore require further evidence to clearly articulate the process in place for managing learners' contribution and involvement in the programme.

3.14 The programme must implement and monitor equality and diversity policies in relation to learners.

Condition: The education provider must provide evidence of how equality and diversity policies in relation to learners are implemented and monitored

Reason: Prior to the visit, the visitors were directed to a university wide equality and diversity policy to evidence this standard. Whilst the visitors were satisfied that the content of the policy, if implemented and monitored appropriately, was appropriate to ensure equality and diversity in relation to learners, there was no clear evidence to show how the policy is implemented and monitored. The visitors noted that without seeing information about how the policy will be implemented and monitored in relation to this programme, they are unable to have confidence that the process will continue to be applied consistently throughout the lifetime of the programme. The visitors therefore require further evidence to show how the policy will be implemented and monitored in relation to this programme.

3.16 There must be thorough and effective processes in place for ensuring the ongoing suitability of learners' conduct, character and health.

Condition: The education provider must provide further information about the formal procedure in place for ensuring the ongoing suitability of learners' conduct, character and health.

Reason: In discussions at the visit and from the documentation, the visitors were made aware that there are processes in place which deal with concerns about learners' conduct, character and health. For example, practice educators are given training on learners' conduct and learners' conduct is monitored at practice-based learning by practice educators. However, the visitors were unable to determine a clear, definitive, formal procedure for dealing with issues around learners' conduct, character and health to ensure that issues of this kind are dealt with clearly and consistently. They were also unclear how this process links into the established fitness to practice procedure in place at the education provider. As a result, the visitors could not determine what criteria are used to determine when an issue related to learners' conduct is referred to the fitness to practice procedure and how this is communicated to learners, staff and practice educators to ensure consistency. Therefore, the visitors require clear evidence of the formal procedure in place to deal with issues around learners' profession-related conduct and how this procedure connects to the fitness to practice processes in determining if learners can continue on the programme. This evidence should also highlight explicit information for learners and practice educators around this process so that visitors can determine how this standard is being met.

3.17 There must be an effective process in place to support and enable learners to raise concerns about the safety and wellbeing of service users.

Condition: The education provider must provide further information about the formal process in place to support and enable learners to raise concerns about safety and wellbeing of service users.

Reason: From the documentation provided prior to the visit, the visitors were unable to determine the formal process in place to support and enable learners to raise concerns about safety and wellbeing of service users. At the visit, the visitors heard that there is a

safeguarding policy and whistle blowing policy. The visitors were unsure how these policies ensure that learners are able to recognise situations where service users may be at risk, support them in raising any concerns and ensure action is taken in response to those concerns. As such, the visitors were unable to determine a clear, definitive, formal process. Therefore, the visitors require further evidence that there is an effective process in place to support and enable learners to raise concerns about safety and wellbeing of service users.

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 the learning outcomes ensure that those who successfully complete the programme meet the standards of proficiency (SOPs) for practitioner psychologists.

Reason: The documentation provided prior to the visit included module descriptors, together with a mapping document which provided some information about how learners who successfully complete the programme will meet the SOPs. However, the SOPs mapping made broad references to workshops, rather than specific references to the learning outcomes. Therefore, the visitors were unclear how each of the module learning outcomes linked to each of the SOPs, to ensure that learners completing the programme can meet the SOPs for practitioner psychologists. From discussions with the programme team the visitors heard that the necessary learning outcomes were in place throughout the programme; however, the visitors were unable see this information in the documentation. The visitors therefore require the education provider to submit further evidence, such as revised documentation, to clearly define the link between the learning outcomes associated with all aspects of this programme and how these outcomes will ensure that learners completing the programme can meet all of the relevant SOPs for Practitioner psychologists.

4.2 The learning outcomes must ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Condition: The education provider must provide further evidence of how the learning outcomes ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Reason: The documentation provided prior to the visit included module descriptors, together with a mapping document which provided some information about how learners who successfully complete the programme will meet the SOPs. However, from the documentation the visitors were unable to determine how the learning outcomes ensure that throughout the programme, learners are able to learn about professional conduct and to demonstrate an understanding of which types of behaviour are appropriate for a professional and which are not. In discussions with the learners at the visit, the visitors were unable to determine how learners are made aware of their obligations to meet the standards of conduct, performance and ethics when they qualify and apply for registration, as well as throughout their future professional practice. The visitors therefore require the education provider to submit further evidence of how the learning outcomes ensure that learners understand and are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

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 the programme reflects the philosophy, core values, skills and knowledge bases as articulated in the curriculum guidance from the British Psychological Society (BPS).

Reason: In documentation provided prior to the visit, the visitors reviewed the rationale for the programme and noted that the education provider has stated that they have reflected curriculum guidance from the BPS. However, the visitors were unable to determine where in the curriculum the BPS philosophy, core values, skills and knowledge bases as articulated in the curriculum guidance is reflected. At the visit, the visitors heard that the programme team have undergone a mapping exercise whereby they have mapped the curriculum against the HCPC standards of proficiency and the BPS curriculum guidance. The visitors however, were not presented with this mapping document, and as such they were unable to determine from the documentation how the education provider meets this standard. The visitors therefore require the education provider to demonstrate how the programme reflects the philosophy, core values, skills and knowledge bases as articulated in the curriculum guidance from the BPS.

4.4 The curriculum must remain relevant to current practice.

Condition: The programme team must provide further evidence of the mechanisms that will be in place to ensure that the curriculum will remain current.

Reason: From a review of the initial documentation, the visitors were unable to determine how the programme team ensures that the curriculum remains relevant to current practice. In the SETs mapping document, the visitors were referred to the course specification. However, the visitors were unable to determine from the evidence provided what process is in place for ensuring that the programme takes account of and reflects current practice, so that it remains relevant and effective in preparing learners for practice. In discussion with the programme team, the visitors heard that the education provider has a number of mechanisms in place such as feedback from practice educators, the course committee, internal feedback and ongoing research that all feedback into ensuring that the curriculum remains current. However, the visitors were not presented with any evidence to support this and therefore were unable to determine how the programme team ensure that the curriculum remains relevant to current practice. As such, the visitors require further evidence of the mechanisms that the programme team have in place to keep the curriculum up-to date with the current practice for the profession.

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

Condition: The education provider must demonstrate how integration of theory and practice will be central to the curriculum.

Reason: From the documentation prior to the visit, the visitors noted that there are 11 workshops throughout the programme. At the visit, the visitors heard that the workshops are designed to ensure that learners are able to apply knowledge to practise. However, the visitors noted that learners undergo a range of practice-based learning as such workshops are not compulsory and learners are able to choose which workshops they

attend. Given the optional nature of these workshops, the visitors were unable to determine how this structure would allow learners to be able to practise what they have learnt in the theoretical element of the programme, or how practice-based learning would feed back into the theoretical aspect of the programme. As such, the visitors require further evidence to demonstrate that the integration of theory and practice will be central to the curriculum.

4.6 The learning and teaching methods used must be appropriate to the effective delivery of the learning outcomes.

Condition: The education provider must provide further evidence that the range of teaching approaches used are appropriate to the effective delivery of the curriculum.

Reason: Prior to the visit, the visitors noted that the education provider intends to utilise supervision and workshops to deliver the two-year full time programme. At the visit, the visitors understood that the workshops are optional and learners can select which workshop they attend. From the documentation and in discussions at the visit, the visitors were unable to determine how utilising only workshops and supervision is relevant to and effective at achieving the learning outcomes needed, both in terms of theoretical knowledge and the practical skills needed in professional practice. Although we do not prescribe specific requirement for the types, number or range of learning and teaching methods, the visitors were unable to determine how the current range of learning and teaching methods are appropriate to the effective delivery of the learning outcome. As such, the visitors require further evidence that the range of teaching approaches used are appropriate to the effective delivery of the curriculum.

4.9 The programme must ensure that learners are able to learn with, and from, professionals and learners in other relevant professions.

Condition: The education provider must demonstrate how learners will be able to learn with, and from, professionals and learners in other relevant professions.

Reason: In a review of the documentation, the visitors found limited information related to this standard. At the visit, the visitors heard that there is a counselling workshop held for learners to learn with and from other practitioner psychologists specifically counselling psychologists. The visitors noted that the optional nature of these workshops would not ensure that learners are able to learn with, and from, professionals and learners in other relevant professions. At the visit, the programme team noted that there would be many other opportunities for shared teaching and shared learning, but that no further formal plans have been put in place for ensuring learners could learn with and from other professionals and learners from relevant professions. Therefore, in order for the visitors to make a judgment about whether this standard is met, the education provider must demonstrate how they will ensure learners are able to learn with, and from, professionals and learners in other relevant professions on this programme.

4.10 The programme must include effective processes for obtaining appropriate consent from service users and learners.

Condition: The education provider must provide evidence of the formal process in place for obtaining appropriate consent from learners and service users.

Reason: From a review of the documentation, the visitors noted that the SETs mapping document stated that the process for obtaining appropriate consent from learners and service users was contained in assessment sheets (Appendix 1). In a review of the evidence, the visitors were unable to determine how the assessment forms constitute consent forms. The visitors did not see evidence of any formal protocols to obtain consent from learners and service users in activities such as role play and practising clinical techniques. In addition, the visitors were unclear how the education provider manages situations where learners decline from participating as service users in practical sessions. To ensure this standard is met, the visitors require evidence of the formal protocols for obtaining consent from learners and service users. They also require evidence that demonstrates how learners and service users are informed about the requirement for them to participate in activities such as role-play and practising clinical techniques, and how records are maintained to indicate consent has been obtained. In particular, the visitors require evidence to show what alternative learning arrangements will be put in place where learners do not consent to participating as a service user.

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 define where attendance is mandatory and demonstrate that associated monitoring processes are in place, along with how these requirements are communicated to learners on the programme.

Reason: From review of the documentation, the visitors were unclear on the parts of the programme where attendance is mandatory, or what the consequences would be for learners that do not attend these parts of the programme. In the documentation, there is an eighty percent attendance requirement; however, it is not clear exactly how this applies across the programme (for example, practice-based learning) or how attendance is monitored by the education provider. In discussions with the programme team, the visitors could not establish how the team would apply this requirement, or which parts of the programme could not be missed. Therefore, the education provider must define what the requirements are, how attendance is monitored, and how this is communicated to learners.

5.1 Practice-based learning must be integral to the programme.

Condition: The education provider must confirm whether overseas practice-based opportunities are available for learners on this programme.

Reason: The documentation provided prior to the visit made no reference to overseas practice-based learning opportunities. In discussions with the education provider, the visitors heard that a learner is currently undertaking an overseas practice-based learning placement with attached learning outcomes. However, from the documentation and in discussions with the education provider the visitors were not aware that overseas practice-based learning opportunities were part of the programme. As such, the visitors were unable to determine the following:

- how practice-based learning outcomes and progression are in line with learning outcomes for the programme as a whole;
- the ongoing partnership arrangements with overseas practice education providers; and

- the education provider rationale for the design of practice-based learning on the programme.

At the visit, the visitors heard that the arrangement of the overseas practice-based learning opportunity was carried out by the previous programme team. As such, once this learner completes their overseas practice-based learning learners will only undertake practice-based learning within the United Kingdom. The visitors consider practice-based learning as a key part of the programme, to prepare learners for future practice. As such, the education provider must confirm whether overseas practice-based opportunities are available for learning on this programme and ensure that the documentation is clear for both staff and learners.

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 all learners have access to practice-based learning opportunities of appropriate structure, duration and range to support the achievement of the learning outcomes.

Reason: From a review of the documentation, the visitors were unclear how learners have access to practice-based learning of appropriate structure, duration and range to support the achievement of the learning outcomes. In discussions with the programme team, the visitors heard that the education provider intends to make use of a wide variety of practice-based learning settings, and that this could be considered appropriate for health psychologist trainees. However, it was not clear to the visitors how the education provider ensures that the structure, duration and range of practice-based learning will support the achievement of the learning outcomes and standards of proficiency for each learner. Additionally, the placement handbook gave a narrative briefly explaining some of the details of practice-based learning on the programme. However, it did not give any detailed information about the expected structure, duration or range of practice-based learning. In discussions with the programme team, the visitors were informed that practice-based learning for each trainee will be different. The visitors were unable to determine how, without a process in place, the achievement of learning outcomes and standards of proficiency would be ensured for each learner on the programme. Therefore, visitors were not able to determine whether the education provider's approach to ensuring an appropriate structure, duration and range of practice-based learning was sufficient, as they could not see information about what this approach was. They therefore require the education provider to submit further evidence demonstrating how they will ensure an appropriate structure, duration and range of practice-based learning for all learners to determine whether this standard it met.

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 that there is an effective system in place for approving and ensuring the quality of practice-based learning.

Reason: The visitors noted a number of different documents submitted by the education provider to demonstrate how the programme meets this standard. However, in considering the programme documentation and discussions held at the visit, the visitors were not provided with sufficient evidence of any overarching policies, systems and procedures in place regarding the approval and monitoring of practice-based

learning. When this was discussed with the programme team, the visitors remained unclear how the education provider effectively approves and ensures the quality of practice-based learning for this programme. Additionally, the visitors could not determine the criteria used by the programme team to assess a practice-based learning opportunity. They could not determine what the overall process would be to approve such an opportunity, as well as what activities and information would feed into any quality monitoring of practice-based learning. The visitors therefore require further evidence of the overarching policies, systems and procedures in place regarding the approval and monitoring of practice-based learning, and how they are put into practice, to ensure this standard is met. In particular, the visitors require further evidence in the following:

- the criteria used to approve practice-based learning and settings;
- the overall process for the approval and ongoing monitoring of practice-based learning; and
- how information gathered from practice-based learning at approval, or during a practice-based learning experience, is considered and acted upon.

This condition links to the conditions for SET 5.4, 5.5, 5.6 and 5.7.

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 all practice-based learning will provide a safe and supportive environment for learners and service users.

Reason: From the documentation, the visitors understood that learners are expected to source their own placement. As the education provider has not demonstrated there is an effective process in place for approving and monitoring practice-based learning, the visitors cannot make a judgement about whether the education provider can ensure that all practice-based learning will provide a safe and supportive environment for learners and service users. Specifically, the education provider has not demonstrated there is a process in place for identifying suitable practice-based learning staff, including the criteria that they will use to make this judgement. The visitors cannot make a judgement about whether the education provider has a system for ensuring that the practice-based learning settings provide a safe and supportive environment for learners and service users. As such, the education provider will need to demonstrate what systems they have in place to ensure the practice-based learning setting provides a safe and supportive environment for learners and service users.

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

Reason: From the documentation, the visitors understood that learners are expected to source their own placement. As the visitors were unable to determine whether there is an effective process in place for approving and monitoring practice-based learning, the visitors cannot make a judgement at this stage that the education provider will have an adequate number of appropriately qualified and experienced staff involved in practice-based learning. Specifically, the visitors were unable to see whether there is a process in place for identifying suitable practice-based learning staff, including the criteria that are used to make this judgement. In order for the visitors to determine whether this

standard is met, the education provider must demonstrate there is a process in place for identifying an adequate number of appropriately qualified and experienced staff involved 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 the system for approving all practice-based learning on this programme will ensure that practice educators have relevant knowledge, skills and experience.

Reason: From the documentation, the visitors understood that learners are expected to source their own placement. The visitors were unable to determine whether there is an effective process in place for approving and monitoring practice-based learning. Therefore the visitors cannot make a judgement at this stage that the education provider has a suitable process for ensuring that practice educators will have relevant knowledge, skills and experience. Specifically, the visitors could not see that there is a process in place for identifying suitable practice-based learning staff, including the criteria used to ensure that these individuals have relevant knowledge, skills and experience. In order for the visitors to make a judgement about whether this standard is met, the education provider must demonstrate there is a process in place for ensuring practice educators have the 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 ensure that practice educators undertake regular training, which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme

Reason: Prior to the visit, the visitors were unclear on what training practice educators must undertake to work with learners on this programme, or when and how the training would be provided. At the visit, during the programme team meeting the visitors learned that the education provider would have links with the practice education providers once a learner applies for the programme. The programme team noted that at this point they would ascertain what training the practice educator may need to support the trainee. However, it is not clear what criteria the education provider will use to determine what training individuals will need, or an indication of the content of that training. The visitors were also unclear what training is required of placement staff, for example, when initial training would need to be completed and how frequently refresher training would need to be completed. Therefore, the visitors require evidence to demonstrate how the education provider ensures that all practice educators undertake regular training which is appropriate to their role, the 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 provide further information as to how the education provider ensures learners and practice educators are fully prepared for practice-based learning.

Reason: The visitors could not determine from the evidence provided how the education provider ensures that learners and practice educators are fully prepared for practice-based learning. In particular, they could not identify how they were made aware of the learners' ability and expected scope of practice while on placement and what the expectations of both the learners and practice educators should be at each individual placement to ensure that learners gain the experience they require. In the meeting with the practice educators, it was clear that discussions regarding information needed for practice-based learning was conducted on an informal basis. As such, the visitors were unable to determine the process in place for ensuring learners and practice educators have the information they need in a timely manner in order to be prepared for practice-based learning. The visitors therefore require information about the mechanisms in place, which demonstrate how the education provider ensures learners are fully prepared for practice-based learning. In particular, this should demonstrate how practice educators are made aware of students' experience and expected scope of practice for each placement and how the expectation of both the learners and practice educators at practice-based learning are managed to ensure that learners get the experience they require to meet the relevant learning outcomes. Therefore, the visitors require further evidence to demonstrate how learners and practice educators will be fully prepared for practice-based learning and in a timely manner.

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 the assessments of learning outcomes ensure that those who successfully complete the programme meet the standards of proficiency (SOPs) for Practitioner psychologists.

Reason: The documentation provided prior to the visit included module descriptors, together with a mapping document giving information about how the assessment procedures for the programme will ensure that students who successfully complete the programme meet the SOPs. However, the SOPs mapping made broad references to the modules rather than specific references to learning outcomes. Therefore, the visitors were unclear how the assessment of each module and the associated learning outcomes were linked to each of the SOPs, to ensure that a student completing the programme has demonstrated that they meet the SOPs for practitioner psychologists. From discussions with the programme team, the visitors heard that the necessary learning outcomes and associated assessments were in place throughout the programme. However, the visitors were unable to see this information in the documentation. The visitors therefore require the education provider to submit further evidence, such as revised documentation, to clearly define the link between the assessment of learners associated with all aspects of this programme and how these assessments will ensure that learners completing the programme have demonstrated that they have met all of the relevant SOPs for Practitioner psychologists.

6.2 Assessment throughout the programme must ensure that learners demonstrate they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Condition: The education provider must submit further evidence that the assessment throughout the programme ensures that learners demonstrate they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

Reason: The documentation provided prior to the visit included module descriptors, together with a mapping document which provided some information about how learners who successfully complete the programme will meet the SOPs. However, from the documentation the visitors were unable to determine how the assessment throughout the programme ensures learners demonstrate they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics. In discussions at the visit, the visitors were unable to determine how the assessment ensures that learners are able to demonstrate that they understand the expectations associated with being a regulated professional by the time they complete the programme. The visitors therefore require the education provider to submit further evidence that the assessment throughout the programme ensures that learners demonstrate they are able to meet the expectations of professional behaviour, including the standards of conduct, performance and ethics.

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

Condition: The education provider must demonstrate how the assessments provide an objective, fair and reliable measure of learners' progression and achievement.

Reason: For this standard, the visitors were directed to various documents including the course handbook. Following a review of the documentation, the visitors were unclear on how some of the assessment methods adopted will provide an objective, fair and reliable measure of learners' progression and achievement. In particular, the visitors were unable to determine the following:

- how progression is assessed; and,
- how performance of the necessary competencies influences progression.

In discussion with practice educators, the visitors heard that they are authorised to sign off competencies. However, the visitors were unsure of the assessment criteria that the education provider and practice educators will use to ensure that practice educators are consistently applying the same criteria. The visitors were not provided with the assessment criteria or the process in place to make sure that the assessments in the programme are objective, fair and reliable. The education provider therefore, must provide evidence to demonstrate how the assessments provide an objective, fair and reliable measure of learners' progression and achievement.

6.4 Assessment policies must clearly specify requirements for progression and achievement within the programme.

Condition: The education provider must provide further evidence of the requirements for progression and achievement within the programme.

Reason: For this standard, the visitors were directed to information about a summary of deadlines, assessment board appeals and the research student progress group. From a review of the documentation, the visitors understood requirements for progression and

achievement within the programme. However, at the visit the visitors heard learners' competencies are signed off by an external examiner before undergoing their viva voce (oral examination) for their research as part of the doctorate, which is then signed off by a different external examiner. It is therefore, possible that competencies that were signed off at the earlier stage by an external examiner might be overturned at the viva voce. As such, the visitors were unclear on the requirements for progression and achievement within the programme. In particular, the visitors were unable to determine the following:

- how progression is achieved given that there are two external examiners who could potentially conflict with each other;
- which external examiner has the final decision on whether a learner has met all the competencies and standards of proficiency for practitioner psychologist and;
- how requirement for progression and achievement is communicated to learners.

In discussions with the learners, the visitors noted that there was a lack of clarity in their understanding around the expectations for progression and achievement within the programme. Therefore, the visitors require further evidence to demonstrate the requirements for progression and achievement within the programme and how this will be communicated to learners. In this way, the visitors can make determinations about whether the programme meets this standard.

6.5 The assessment methods used must be appropriate to, and effective at, measuring the learning outcomes.

Condition: The education provider must further evidence that the assessment methods employed are appropriate to, and effective at, measuring the learning outcomes.

Reason: The visitors reviewed the programme assessment learning outcomes prior to the visit. They noted that the portfolio which is submitted at the end of the two-year programme, was the only formal assessment method employed by the education provider. The visitors were unsure how utilising one assessment method will enable the education provider to decide whether the learning outcomes of the programme have been met by the learners. Although we do not specify the methods of assessment that should be included in the programme, the visitors were unable to see how the chosen method is in line with the learning outcomes of the programme. In addition, the visitors were unsure how the education provider ensures that assessments are carried out at appropriate stages during the course of the programme to match a learner's expected progression, when the portfolio is submitted at the end of two years. As such, the education provider must further evidence that the assessment methods employed are appropriate to, and effective at, measuring the learning outcomes to ensure that learners who complete the programme can practise safely and effectively.

6.6 There must be an effective process in place for learners to make academic appeals.

Condition: The education provider must provide further evidence of which assessment regulation regarding academic appeals applies to this programme and how this is communicated to learners.

Reason: From the evidence provided, both prior to the visit and in discussion with the programme team, the visitors were clear that the education provider has an appeal process for learners. In further discussions at the visit, the visitors were made aware

that although this programme is a taught doctoral programme, the assessment regulations of research doctorates will apply to aspects of the programme. From the documentation and the discussions, it was not clear to the visitors whether learners on this programme would make an academic appeal using the taught or research assessment regulations. The visitors were also unsure as to how learners are made aware of which regulation applies to them or whether both academic appeal policies work in tandem. As such, the education provider must provide further evidence of which assessment regulation regarding academic appeals applies to this programme and how this is communicated to learners.



FAO: Amal Hussein and
The Health and Care Professions
Council, Park House,
184 Kennington Park Road, London
SE11 4BU

Accreditation Visit

Dear Amal,

Re: HCPC approval process report

One minor observation we had in relation to the report was with regards to SET 3.6.

The report states that 'The learners could undergo placement provided by the education provider or source their own placement for this programme.' We think it should say 'students source their own placement for this programme and identifying a suitable placement is a condition to being accepted on the course. The education provider assesses the suitability of the placement during the admissions process'. We do support students if they have difficulties with their placements, but we do not take responsibility to finding placements and so do not have issues with capacity as such.

Kind regards,

Dr Lorna Rixon