Professional Liaison Group for the review of the standards of education and training, 11 September 2015

Theme: Format, language and structure in the standards and supporting guidance

Executive summary and recommendations

Introduction

The first phase of the standards of education and training (SETs) review has comprised a range of research and engagement activities to gather the views of stakeholders on the existing standards and accompanying guidance. This feedback has been synthesised into a number of key themes.

This paper focuses on the format, language and structure of the standards and guidance, which has been identified as a theme for consideration by the PLG. It summarises the feedback received on this topic and includes suggested amendments and further questions for the group.

Decision

The PLG is invited to discuss this paper and consider the recommendations and further questions set out in section 6 and 7.

Background information

See paper.

The current versions of the SETs and supporting guidance have been supplied separately as documents to note.

Resource implications

None

Financial implications

None

Appendices

None

Date of paper

1 September 2015

Theme: Format, language and structure in the standards and supporting guidance

1. Introduction

1.1   This paper explores the theme of format, language and structure in the standards of education and supporting guidance, drawing on feedback from stakeholders. Based on the prevalence of this topic in the first phase of the review, we consider that it warrants a specific discussion among PLG members.

1.2   We have included as part of this theme considerations about the number of standards, their relation to each other and style of presentation; as well as the format of the guidance document. We have also addressed the clarity of language used in the standards; however this paper does not cover specific terminology which is discussed as part of other themes.

1.3   This paper provides background information and a summary of stakeholder feedback on this theme. The final sections set out recommendations from the Executive and some key points for the Group to consider.

2. Background

2.1   We actively sought comments from stakeholders during the first part of the review about the format of the current standards and supporting guidance and the changes that could be made to improve their readability and accessibility.

3. Current approach

3.1   The SETs are currently divided into six numbered sections:

   1: Level of qualification for entry to the Register
   2: Programme admissions
   3: Programme management and resources
   4: Curriculum
   5: Practice placements
   6: Assessment

3.2   Each of these sections contains between one and 17 individual standards. In total there are 57 individual standards which education providers must evidence in order to obtain approval and meet on an ongoing basis. The individual standards are also numbered in a way that indicates which of the six main sections they belong to (e.g. the first individual standard of the second section is numbered 2.1).

3.3   The vast majority of individual standards (with the notable exception of SET 1.1 which sets out the normal level of qualification for entry to the Register in each profession) are composed as brief, one-sentence statements.

3.4   The SETs supporting guidance document is divided into six sections (following the structure of the standards). At the start of each of the six sections is a summary, with overall guidance on the areas covered, example questions and in some cases examples of evidence which may be shown by education providers in relation to the standards in that section. The length and level of detail of the information in this summary varies among the six sections.

3.5   Detailed guidance is then given for each of the individual standards, generally in the following format: the section title (e.g. '2. Programme admissions'); a statement of the individual standard itself; guidance; and other sources of guidance. Again, there is wide variation among individual standards with regard to the length of the information under 'Guidance'; some provide definitions and details of how an education provider might evidence the standard, while others are much briefer.

3.6   The text of the guidance is written using first and second-person pronouns, i.e. 'we' meaning the HCPC and 'you' meaning education providers.

3.7   The language used in the existing SETs and supporting guidance is a result of the approach we have taken in developing and applying them to HCPC education operational processes. As with all of our standards, the SETs are intended to be outcome-focused. This means that we want to see how education providers have put policies and processes in place which ensure effective education and training and enable students to meet HCPC standards when they qualify – rather than prescribing the way in which they should do so. In addition, the SETs are generic standards, meaning that they apply to all pre-registration education and training programmes across all 16 HCPC-regulated professions.

3.8   Therefore, provided they meet the standards, it is left open to the education provider to decide what is sufficient and appropriate, taking into account organisational and professional considerations. Consequently the language of the standards is intended to maintain this flexibility.

4. Summary of stakeholder feedback

4.1   Discussions with stakeholders during the first phase of the SETs review covered a number of issues related to structure and language of the standards as well as the format of the guidance document. This feedback is further detailed below. In order to assist the PLG in considering the various aspects of this theme, comments on similar issues have been grouped under subheadings.

Number of standards

4.2   Attendees at the Education Stakeholder Event warned against increasing the number of standards – already at a relatively high 57 – as part of the review. They worried that adding more standards for education providers to engage with would increase complexity and could have a 'knock-on effect' on the effectiveness of the SETs and the HCPC's education assurance processes. These stakeholders recommended that the review should include consideration of how to consolidate some standards, particularly in SET 2 (programme admissions) and SET 3 (programme management and resources), where there are multiple standards covering the same or closely related issues.

4.3   The potential for merging and reducing the number of standards was a common topic of discussion at the workshop held with HCPC Education Department employees.

- In particular, Education Officers and Managers advocated merging SETs 3.8, 3.9 and 3.10 (all relating to the resources to support student learning) which were considered very similar and usually demonstrated by education providers using the same evidence.

- Duplication was also identified among SETs 5.6, 5.7, 5.8 and 5.9 (which all address the knowledge, skills, qualification and experience of practice placement educators), and Education employees thought there might be potential to merge these.

- Additionally some Education Department employees questioned whether SET 4.2 (requiring the programme to reflect relevant curriculum guidance) should be merged with SET 4.4 (requiring the programme to remain relevant to current practice).

Structure of the standards

4.4   Some education provider representatives at the Council of Deans Summit expressed concern that the way the SETs are currently structured and divided up contributes to a 'reductionist' approach in meeting them. This, they noted, runs contrary to what is actually good practice, i.e. a more holistic approach to ensuring effective education and training.

4.5   On the other hand, other stakeholders thought that the current structure worked well. For example, at the Education Stakeholder Event, one attendee from the biomedical science profession commented that the current structure complemented the Institute of Biomedical Science (IBMS) standards which made it easier to facilitate joint working at approval visits.

4.6   A small number of stakeholders, including some visitors and professional bodies, advocated the addition of profession-specific standards in the SETs.

4.7   SET 5.11 (which sets out the information that must be supplied to students, practice placement providers and educators to prepare them for a placement)

was highlighted at the Education Department workshop as being different in structure and format from the other standards. The vast majority of individual standards are short, single-sentence statements, where further detail is provided in the accompanying guidance. However SET 5.11 is unique in that it includes a five-point bulleted list. Education employees questioned whether the format should be made uniform across all standards; or alternatively whether the bullet point format could be applied where convenient to some of the other standards.

4.8   SETs 2.1 and 3.8 were also highlighted by Education Officers and Managers at the workshop, as being atypical in the way they are used by visitors. SET 2.1 (relating to the information which is provided to applicants and the education provider during the admissions process) is often a convenient point to discuss errors in documentation relating to programme admissions, which would sometimes fit better under one of the other standards in SET 2. Similarly, SET 3.8 ('The resources to support student learning in all settings must be effectively used') plays a similar role for the standards in SET 3 relating to learning resources. Education employees suggested that a simple reordering to place SETs 2.1 and 3.8 after the other standards covering similar ground could be the solution.

Language

4.9   The language used in the SETs was the subject of some discussion during the first phase of the review. In particular, service users and carers thought the review should be an opportunity to ensure that the SETs use easy-to-understand language and avoid abbreviations, acronyms and unnecessary jargon.

4.10 HCPC visitors commented on the subjective nature of some of the language used throughout the standards. Examples include the words 'adequate', 'appropriate', 'relevant', 'regular' and 'effective' used as qualifiers to a number of requirements. Some visitors thought that the lack of a more descriptive threshold in such statements made judgements difficult and prevented consistency across programmes and professions. On the other hand, one visitor stated that the nature of this language enabled education providers to meet the standards in different ways.

4.11 Professional representatives at the NHS Education for Scotland (NES) AHP Advisory Group also observed that some of the language used in the SETs required clarification. Examples included the phrase 'adequate number' in SET 5.9.

4.12 HCPC Education Department employees noted that a lack of clarity around some of the language used in the standards can impact on approval visits because of the time needed in some cases to provide additional explanation.

Format of the guidance document

4.13 We received a high number of comments from stakeholders about the format of the SETs supporting guidance document and the type and amount of information included. Some attendees at the Education Stakeholder Event thought that the current model of guidance worked well and was accessible. However, most stakeholder groups were in favour of some amendment in order to increase the clarity and usability of the guidance.

4.14 Some discussions focused on the format in relation to purpose of the guidance and how it has been used. Education Officers and Managers maintained that the guidance should explain what is meant in the standards and assist education providers in meeting them. However, they also cautioned that the guidance should not be used as a way of adding to the standards themselves (e.g. further requirements), which need to be understandable and clear on their own.

4.15 A few attendees at the Education Stakeholder Event considered that the guidance was in some areas disconnected with the spirit or intention of the standard it was meant to support. Others said that if interpreted very rigidly, the guidance is occasionally used by some to inhibit change within programmes. The format and types of information provided therefore should acknowledge and encourage innovation and variation.

4.16 HCPC Education Officers and Managers called attention to the fact that the guidance is inconsistent in the types and amount of information provided under different standards. For instance, other sources of guidance are provided for some standards and not for others. The length of guidance and detail included varies widely among standards; some (such as SET 4.4) include lists of example evidence which could be used by the education provider, while others do not (see SET 4.3). Most agreed that the guidance should not delve too deeply into the detail of HCPC operational processes.

4.17 Education employees advocated a consistent outline format for guidance across all standards. Specific proposals varied slightly, but all attendees at the workshop thought that the guidance under each standard should include the intent or rationale of the standard, before any further detail about our expectations or how to evidence compliance with them.

4.18 Additionally, some Education employees suggested that the examples of evidence could be moved to a separate document – perhaps on the HCPC website – which could be updated more frequently. It was suggested that this could also help education providers to focus on the meaning and intention behind the standards, rather than using the example evidence more superficially as a checklist.

4.19 Some stakeholders, including Academic Registrars Council attendees, found the example questions at the start of each section in the guidance to be helpful for education providers in preparation for an approval visit. One attendee in particular suggested that more questions could be provided or

existing ones revised to increase their relevance to social worker programmes. A few HCPC Education employees also proposed that example questions could be added underneath specific standards where useful.

4.20   Internal HCPC stakeholders and a number of external stakeholder groups alike have highlighted the importance and usefulness of sign-posting within the guidance to further guidance or information from other organisations, such as professional bodies.

5.   Other regulatory standards

5.1   Other health and social care regulators in the UK take a variety of different approaches to setting standards or criteria for education and training programmes. A brief description of the relevant documents, including format, is provided in the table below. It has not been possible to make a thorough comparison of the language used by other regulators in their standards or criteria with that in the SETs; however the full documents can be accessed at the links provided.

Regulator	Current approach
General Medical Council (GMC)	'Tomorrow's Doctors' contains both learning outcomes for students completing medical degrees and the standards for teaching, learning and assessment. The standards are grouped under nine domains: patient safety; quality assurance, review and evaluation; equality, diversity and opportunity; student selection; design and delivery of the curriculum, including assessment; support and development of students, teachers and the local faculty; management of teaching, learning and assessment; educational resources and capacity; and outcomes. For each domain there are one or more broad 'standards', similar to the broad areas the SETs are grouped by. Under these are the more technical 'criteria' by which medical schools are judged on whether they meet the standards. Statements and paragraphs are numbered in a continuous fashion for the whole document. See: http://www.gmc-uk.org/education/undergraduate/tomorrows_doctors.asp The GMC recently published 'Promoting excellence: standards for medical education and training' which will replace the education standards in 'Tomorrow's Doctors' from January 2016. There are five themes: Learning environment and culture; educational governance and leadership; supporting learners; supporting educators; and developing and implementing curricula and assessments. Within these are 10 key standards, and

	underneath those, a number of specific requirements (76 in all). See: http://www.gmc-uk.org/Promoting_excellence_standards_for_medical_education_and_training_0715.pdf_61939165.pdf
Nursing and Midwifery Council (NMC)	The NMC's Standards for pre-registration nursing education are split into standards for competence and standards for education. The latter are arranged into ten broad areas: safeguarding the public; equality and diversity; selection, admission, progression and completion; support of students and educators; structure, design and delivery of programmes; practice learning opportunities; outcomes; assessment; resources; and quality assurance. Each area has a main standard and subordinate requirements. Some of these have another level of subordinate requirements underneath. Individual requirements are laid out in a table format and numbered with reference to the levels or areas above. See: http://www.nmc.org.uk/standards/additional-standards/standards-for-pre-registration-nursing-education/ The Standards for pre-registration midwifery education are structured in a different way, with 17 broad standards divided across three categories: standards for the lead midwife for education; standards for admission to, and continued participation in, pre-registration midwifery programmes; and standards for the structure and nature of pre-registration midwifery programmes. These standards are written in longer, paragraph form. See: http://www.nmc.org.uk/standards/additional-standards/standards-for-pre-registration-midwifery-education/
General Dental Council (GDC)	The GDC has recently updated its Standards for education (May 2015). There are three broad standard areas: protecting patients; quality evaluation and review of the programme; and student assessment. Each of these has between four and nine requirements set out as one or two sentence statements. Examples of evidence are provided alongside these. See: http://www.gdc-uk.org/Aboutus/education/Documents/Standards%20for%20Education%20(v2%20revised%202015).pdf
General Osteopathic Council (GOsC)	The Quality Assurance Agency (QAA) has developed a subject benchmark statement for osteopathy training in conjunction with the GOsC and the osteopathy training

	providers. A revised version was published for consultation in September 2014. The document is set out in paragraph form and covers knowledge, understanding and skills; teaching, learning and assessment; and benchmark standards. See: http://www.qaa.ac.uk/en/Publications/Documents/SBS-consultation-osteopathy.pdf
General Chiropractic Council (GCC)	The GCC Degree Recognition Criteria are structured into three sections. Section 2 covers programme outcomes (corresponding to the GCC's Code of Practice and Standard of Proficiency), while Section 3 gives the other criteria that chiropractic programmes, and programme providers, must meet for the programme to be recognised by the GCC. These include: the length and level of the programme; the teaching, learning and assessment methods and approaches; the overall organisation and resources of the institution that delivers the degree programme; and the institution's contribution to research, the development of the evidence base and the development of the profession. The numbered outcomes and criteria are set out in tables, with accompanying guidance in a second column. See: http://www.gcc-uk.org/UserFiles/Docs/DegreeRecCriteriaUPDATED2012.pdf
General Optical Council (GOC)	The GOC sets the necessary competencies which education and training must enable students to meet, but does not produce a set of standards for education and training providers specifically. Instead there are visit guidelines for the approval of training establishments which cover content including programme construction; teaching, learning and assessment; student progression and achievement; monitoring and evaluation; staffing; and resources and facilities. See: https://www.optical.org/en/Education/Approving_courses/index.cfm
General Pharmaceutical Council (GPhC)	The document 'Future Pharmacists' sets out requirements against which the GPhC approve education and training for student pharmacists and pre-registration trainee pharmacists. There are nine broad standards, supplemented by criteria for the systems which must be in place to meet each standard, the evidence required and further guidance. The tenth standard sets out the detailed learning outcomes to be achieved as well as

	guidance on teaching, learning and assessment methods.
	See: http://www.pharmacyregulation.org/sites/default/files/GPhC_Future_Pharmacists.pdf
	The standards for the initial education and training of pharmacy technicians covers similar topics but in a different format; there are 14 broad standards accompanied by criteria. Statements are more concise. Learning outcomes and guidance on the syllabus are provided in appendices.
	See: http://www.pharmacyregulation.org/sites/default/files/Standards%20for%20the%20initial%20education%20and%20training%20of%20pharmacy%20technicians.pdf
Pharmaceutical Society of Northern Ireland (PSNI)	The PSNI has adopted the GPhC's 'Future Pharmacists' (see above) as the standards used to accredit education and training courses.
	See: http://www.psni.org.uk/education-2/
Care Council for Wales (CCW)	The CCW has published 'The Framework for the Degree in Social Work in Wales', which combines a number of things including the Welsh Government's requirements for award of a social work degree; the processes for approval and visiting of degree courses; and criteria for approval and quality assurance of social work programmes. The latter is most closely analogous with the SETs and covers seven broad areas such as resource provision, selection of students, learning and assessment criteria in detailed, outline form. There are separate standards documents for involving service users and carers and practice education.
	See: http://www.ccwales.org.uk/regulation-of-training/
Northern Ireland Social Care Council (NISCC)	The NISCC 'Rules for the Approval of the Degree in Social Work' sets out requirements in terms of collaborative arrangements; management and organisation; resources and staffing; selection; teaching; practice learning; assessment; and governance and continuous improvement (among other areas). Individual requirements are displayed as brief, numbered statements. There are separate standards for practice learning during the social work degree.
	See: http://www.niscc.info/index.php/education-for-our-training-providers/regulating-training-standards-education
	The SSSC's 'Rules for Social Work Training' set out high-level criteria for approval of courses and refer to other

Scottish Social Care Council (SSSC)	documents, including in the Framework for Social Work education in Scotland. Included in this framework are the Scottish Requirements for Social Work Training, which are organised into two sections: entry requirements, and teaching, learning and assessment requirements. Statements are short. A separate document, the Standards in Social Work Education (SiSWE) sets out learning requirements and proficiencies in long, narrative form. There are separate standards for practice learning, which are not mandatory.
	See: http://www.gov.scot/Publications/2003/01/16202/17018

6. Executive recommendations

6.1 The Executive does not recommend any wholescale restructuring of the SETs. The majority of stakeholders contacted during the first part of the review were generally happy with the structure of the SETs, i.e. the six broad areas and individual standards within each. Despite some concern from a small number of stakeholders that this structure was 'reductionist', no alternative or preferred structure has been suggested. We think that the current structure continues to be a logical way of organising the standards.

6.2 We recommend merging SETs 3.8, 3.9 and 3.10. These currently read as follows:

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

3.9 The resources to support student learning in all settings must effectively support the required learning and teaching activities of the programme.

3.10 The learning resources, including IT facilities, just be appropriate to the curriculum and must be readily available to students and staff.'

All three relate to learning resources and the requirement for them to effectively support student learning needs specific to the programme. The same or very similar evidence is used by education providers in demonstrating all three. Combining these standards would help to eliminate unnecessary duplication.

6.3 With regard to SETs 5.6, 5.7, 5.8 and 5.9, we accept that there is some potential to reduce repetition among these standards and to clarify our expectations of the knowledge, skills, qualification and experience of practice placement educators. Possible amendments to SET 5 will be explored in more detail in a subsequent paper.

6.4 The Executive agrees with stakeholders that the use of flexible language including the words 'appropriate', 'relevant' and 'sufficient' to qualify requirements in the SETs has the potential to be unclear. However, given the

role and cross-professional nature of the SETs, it is necessary to retain this flexibility using such language. We would propose that where there is need for clarification, this should be added to the supporting guidance or otherwise managed on an individual basis by HCPC Education Officers and visitors.

Format of the guidance document

6.5   We also agree with the feedback received that the guidance document as currently written is inconsistent in terms of format, types and amount of information provided under different standards. Our recommendation for a standardised outline format is as follows:

  i.   A statement of the individual standard itself

  ii.   A short description of the intention or reasoning behind the standard, in some cases to include any specific risks being addressed

  iii. Definition of terms and/or concepts which may be unfamiliar to some audiences

  iv.   Further clarification of the expectations set out in the standard, if needed

  v.   Links to guidance underneath other individual standards (where appropriate)

  vi.   Example questions which visitors may ask in relation to the standard

  vii. Other sources of guidance

6.6   Other sources of guidance may not be available for every individual standard. Similarly, not every standard will have links to guidance elsewhere in the document.

6.7   As per the outline above, we recommend that specific examples of evidence should not be included in the guidance. We agree with stakeholders that the guidance should remain flexible enough to allow for variation and innovation in the way that different education providers meet and evidence the SETs. A list of example evidence may be viewed as a rigid list of requirements, rather than suggestions.

7. PLG considerations

7.1   Issues raised by stakeholders about the format, language and structure of the SETs and supporting guidance should be considered in light of the key principles behind development and use of the standards. In particular, the SETs should:

  • be set at the **threshold** level, to ensure that education and training programmes provide students with skills and understanding to practise safely and effectively and to meet the standards of proficiency for their profession;

  • be **flexible**, in that we aim to minimise prescription and to enable education providers to meet the standards in the way they consider most

effective and appropriate (given institutional and professional considerations);

- be **meaningful**, clear and useful to education providers and other stakeholders; and

- reflect **existing provision** within education and training programmes, or be realistic or reasonable as requirements.

7.2 The PLG is invited to consider the Executive's recommendations in section 6 above. In addition, the PLG may wish to consider the following questions as part of their discussion on this topic:

- Are there other standards which should be merged to reduce duplication?

- Are there any standards which are too complex and should be split into multiple standards?

- Does the PLG have any other comments, reflections or suggested amendments in relation to the format or structure of the SETs?

- Does the PLG have any other comments, reflections or suggested amendments in relation to the language used in the SETs?

- Does the PLG have any other comments, reflections or suggested amendments in relation to the format, type and amount of information provided in the SETs supporting guidance?