

Professional Liaison Group for the review of the standards of education and training, 19 January 2016

Theme: Practice placements

Executive summary and recommendations

Introduction

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

This paper focuses on the theme of practice placements, and specifically the standards and supporting guidance in SET 5. A number of areas are addressed, based on discussions with stakeholders and the findings of commissioned research, including the following:

- the changing nature of practice placements and resulting challenges;
- collaboration between education providers and practice placement providers;
- training for practice placement educators;
- support for students while on placement;
- quality assurance of placements;
- ethics and professionalism in the context of practice placements;
- clarity of language and terminology in SET 5; and
- the structure and format of specific standards.

Decision

The PLG is invited to discuss this paper and to consider the Executive's recommendations in sections 7. A summary of these recommendations is provided below:

- We recommend against combining SETs 4 and 5 (a suggestion previously discussed by the PLG). The integration of theory and practice is set out in existing standards, and we continue to believe that the current structure provides for necessary clarity.
- We recommend that SETs 5.4 and 5.10, which focus on the oversight and management of practice placements, should be moved from SET 5 to SET 3 (on programme management and resources). We believe this would have the effect of clarifying the responsibilities of education providers and the

importance of practice placement providers being integral partners in the design and review of the programme.

- We recommend that SET 5.8 and the supporting guidance should be amended to clarify that training for practice placement educators must include an understanding of the specific teaching, learning and assessment needs relevant to a particular programme and, where relevant, to students at different levels of progression within a programme.
- We recommend merging SETs 5.7 and 5.9, which both deal with the professional background and skills of practice placement educators. The proposal is for the new merged standard to mirror the format of SET 3.4 (which relates to the professional background and skills of the named person with overall professional responsibility for the programme).
- We recommend that the format of SET 5.11 should be brought more in line with the rest of the SETs by removing the bulleted list and placing that information in the supporting guidance underneath. The new standard would then more closely resemble SET 2.1 (which requires that the education provider and the applicant have all of the information they need to make an informed decision during the admissions process).

Further questions for consideration by the PLG have been set out in section 8. These relate to the following:

- the terminology used in SET 5 (specifically ‘practice placement’, ‘practice placement educator’ and ‘practice placement provider’);
- availability, capacity and sustainability of practice placements; and
- potential amendments aimed at highlighting the SCPE and expectations of professional conduct in relation to practice placements.

Background information

See paper.

Resource implications

None

Financial implications

None

Appendices

Appendix 1: Current SET 5 and supporting guidance

Appendix 2: Practice placements – Other regulatory standards

Date of paper

5 January 2016

Theme: Practice placements

1. Introduction

- 1.1 This paper explores a number of topics in relation to practice placements and the standards and supporting guidance in SET 5. Based on the prevalence of comments relating to practice placements during stakeholder engagement activities in the first phase of the review, we consider that this area warrants a specific discussion among PLG members.
- 1.2 The paper provides some background information; a summary of stakeholder feedback and discussion at previous PLG meetings; and information on other regulatory standards. The final sections set out recommendations from the Executive and some further questions for the PLG to consider.

2. Background

- 2.1 Prior to the start of the review of the SETs, the Executive anticipated that practice placements would be an area requiring specific examination during the process, and we proactively sought feedback from stakeholders on this area. This section provides a summary of the policy and operational context to the review, in relation to this topic.
- 2.2 The standards on practice placements (SET 5) have historically been those with the most conditions set against them during the approval process for education and training programmes (although the 2013-2014 academic year represented a slight departure from the norm).¹ The accepted analysis is that this is because practice placements are the area where education providers must work with a larger number of stakeholders and invest additional time and resources. Unlike other systems of quality assurance, the HCPC holds education providers responsible for the whole package of provision, including practice placements.
- 2.3 In response to the Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry (published in February 2013), we committed to using this review to consider amendments to the SETs and supporting guidance that would better set out expectations for education providers in ensuring the safety of service users in the practice learning environment.²

¹ These data are available in the Education annual reports published on the HCPC website: <http://www.hcpc-uk.org/publications/reports/>

² The HCPC's response to the Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry (May 2013) can be found here: <http://www.hcpc-uk.org/assets/documents/10003FDCenc05-MidStaffordshireNHSFoundationTrustPublicInquiryactionplan.pdf>

- 2.4 Additionally, two independent reviews of social work education by Martin Narey and David Croisdale-Appleby³, published in February 2014, expressed concerns about the quality and availability of appropriate practice placements in social work and about the HCPC's approach in placing responsibility with education providers for the quality assurance of practice placements. While these concerns were specific to social work, the Executive viewed this as an area relevant across the regulated professions.

3. Current approach

- 3.1 The requirements relating to practice placements are set out as 13 individual standards. The full text of SET 5, including supporting guidance, is provided at Appendix 1.
- 3.2 The individual standards in SET 5 fall into a number of distinct categories: standards about the structure and design of practice placements; those about the governance and quality assurance of practice placements; those about the characteristics of practice placement educators and other staff at practice placements; and those relating to learning and teaching methods and outcomes.
- 3.3 We define 'practice placement' as 'a period of clinical or practical experience that forms part of an approved programme'. Practice placements are a mandatory component of approved programmes, as set out in SET 5.1: 'Practice placements must be integral to the programme'.
- 3.4 There is a large degree of variety in the structure and design of practice placements across approved programmes. We do not prescribe the number, duration or range of the practice placements which form part of an approved programme, only that these must be 'appropriate' to the programme.
- 3.5 Education providers must have overall responsibility for practice placements, including for their safety, suitability and quality, regardless of where they take place. In many programmes, practice placements take place in organisations separate from the education provider; while in others students receive practical training in the same setting as the rest of the programme. The HCPC does not normally visit individual practice placements (although we would usually meet with practice placement educators as part of an approval visit to a programme).
- 3.6 It is also the responsibility of the education provider to ensure that practice placement educators (defined in the SETs guidance as 'a person who is responsible for a student's education during their period of clinical or practical experience') have the relevant professional background, skills and training. Again, there is a large degree of variety in the roles carried out by practice placement educators. Some act as direct supervisors or mentors for students

³ The Narey and Croisdale-Appleby reports were considered by the Council in March 2014: <http://www.hcpc-uk.org/assets/documents/1000452AEnc01-ReviewsofsocialworkeducationinEngland.pdf>

on practice placements, while others meet with students only at certain intervals and learning takes place independently or with other staff.

- 3.7 SET 5 also requires that students and practice placement educators and providers must be fully prepared for the placement; that the practice placement encourages safe and effective practice, independent learning and professional conduct; and that the rights of service users and colleagues at the practice placement are respected.

4. Summary of stakeholder feedback

- 4.1 A high volume of comments relating to practice placements and the standards and guidance in SET 5 were received from stakeholders during engagement activities in the first part of the review. A summary of these comments are set out below. We have grouped related comments underneath a number of subheadings. Where the topics have been discussed previously by the PLG, this is also mentioned.
- 4.2 A small proportion of stakeholders thought that the standards around practice placements were suitable as they are; however many believed there was a need for amendment. Much of this was focused on how to strengthen standards, which were viewed as not robust enough and lacking clarity in some areas.
- 4.3 For example, attendees at the first HCPC Education Stakeholder Event commented that the standards in SET 5 were too vague and lacked prescription. There were concerns that the evidence required from education providers in this area needed to be reconsidered. Some suggested that the standards could be supplemented with an audit tool for education providers to use for all practice placements.
- 4.4 On the other hand, some stakeholders cautioned that any changes to SET 5 should not be pushed through too quickly, or there would be a risk that practice placement providers would be alienated and good quality placements potentially lost.
- 4.5 Professional bodies represented at the AHP Education Leads (AHP-EL) made the following comments on specific standards:
- SET 5.2 was felt to be too weak; the standards should state that the provision of practice placements needs to reflect contemporary practice and expose students to the range of service users, delivery models, sectors and settings with and in which they are likely to practise once registered.
 - SET 5.4 should include the requirement that programme providers keep the development of their practice education provision (in terms of its quality, sufficiency and relevance to current/future practice) under review; alternatively, this could go under programme management and resources (SET 3).

- SET 5.8 should be strengthened to reflect that practice educators need to be supported in engaging in on-going learning and development relevant to this part of their professional practice.
- SET 5.12 was felt to be too weak; a suggested change was to remove the word 'encourage' and change it to 'enable students to achieve and demonstrate' safe and effective practice, independent learning and professional conduct.

Changing nature of placements

- 4.6 Much of the discussion with stakeholders around SET 5 focused on the changing nature of practice placements in recent years. Attendees at the Council of Deans summit noted that, along with the 'integration agenda', the landscape of placements is changing, and for health professions they are more and more often taking place in the third sector rather than in the NHS. This will necessitate re-examination of the standards and consideration about doing these differently as the model continues to change.
- 4.7 A few of the service users and carers attending workshops during the review noted that there was tension between the requirements in the SETs and the climate in the NHS, where placements are disappearing.
- 4.8 Likewise, attendees at the April 2014 Education Stakeholder Event stated that the standards in SET 5 seemed to be written particularly for NHS placements and did not reflect the complexity of placements nowadays. They noted a growing inconsistency among practice placements, due to the fact that many 'traditional' placement providers were no longer available, because of changes to the NHS. There were concerns that newer practice placement providers sometimes have limited understanding of what is needed to educate students. These stakeholders also thought that the guidance needed to recognise differences in placements across the professions and the UK countries.
- 4.9 Along with the changing nature of the sector and practice placements, many stakeholders noted resulting challenges for education providers in securing good quality practice placements. Attendees at the Higher Education Academy workshop on practice placements made a number of comments:
- There is a lack of quality practice placement educators because many are too stretched with the pressures of service to devote sufficient time and effort to educating students; this impacts on the student experience.
 - In addition, recent changes in service delivery in Wales – such as a reduction in physical space and a movement toward community and 'at home' services – have reduced placement capacity in many areas.
 - Professionals are not incentivised to become practice educators, and there is no requirement or expectation from professional regulators for them to participate.
 - There is inadequate workforce planning with a focus on 'short termism' and cycles of 'boom and bust'. Placement opportunities are increasingly

reactive and student and practice placement educator numbers are misaligned.

Regular and effective collaboration

- 4.10 One of the most important requirements in the standards identified by stakeholders was for 'regular and effective collaboration' between the education provider and the practice placement provider (SET 5.10). Those attending the Council of Deans summit felt that this concept should be embedded throughout SET 5. They pointed out that education providers might not have any formal power to influence practice placement providers, so were dependent on forming strong relationships at the individual level.
- 4.11 There was a suggestion from the AHPEL that there should be a requirement for service level agreements (SLAs) between education providers and practice placement providers.
- 4.12 HCPC visitors supported further guidance about the relationship between the education provider and the practice placement educator, what documents are needed, how they link up and how they should be monitored.
- 4.13 One visitor commented that SET 5 needed to be linked more closely to SET 3, and that this could be achieved by asking for evidence of managing relationships with practice placements, and contracts and service level agreements. Other visitors suggested that the SETs should require a named person responsible for the collaboration between the education provider and practice placement provider.

Training for practice placement educators

- 4.14 Another frequent topic of discussion was requirements for practice placement educators to undertake appropriate training (addressed in SET 5.8). The majority of service users and carers involved in workshops during the review were strongly in support of appropriate training for practice placement educators and in making sure that the 'right kind' of supervisors were involved in educating students on placement.
- 4.15 Some attendees at the first Education Stakeholder Event felt that there should be more robust requirements for practice placement educators who play a key role in student evaluation and assessing fitness for practice. Other attendees said there was a lack of clarity about who is ultimately responsible for practice educators' training – education providers, employers or the individuals themselves.
- 4.16 There were divided opinions among professional body members of the AHPEL group. Some thought that the HCPC should require all practice placement educators to have completed training and/or gained certification before taking on this role. Others, however, recognised that such a step could cause existing practice placement providers to decline to participate, and

therefore such a requirement should only be implemented alongside actions to manage the implications.

4.17 HCPC visitors at refresher training had a number of comments on this topic:

- The SETs should require that practice placement educators have some minimum level of knowledge about education.
- There is a difficulty for the education provider in ensuring that practice placement educators actually attend training.
- The guidance under SET 5.8 should specify that training should be ongoing, or annual.
- The guidance should be strengthened by clarifying that the appropriateness of training should be demonstrated in relation to the ability of the practice placement educator to support the programme's learning outcomes.

4.18 Meanwhile, attendees at the HEA event saw a need for more rigorous expectations on practice educators, including regular and mandatory updates, and further guidance on the role and expectations of supervision.

4.19 Furthermore, commissioned research on preparation for practice among newly qualified professionals raised concerns about the variability of training among practice placement educators (see the separate paper on findings from this research).

Support for students

4.20 In addition to training for practice placement educators, stakeholders saw a need to ensure that students were properly supported. Service users and carers involved in the review were particularly concerned that practice placement educators should have a role in ensuring that a student is not too overwhelmed and is able to cope with the demands of the placement, and in developing their competence and confidence.

4.21 NES AHP Advisory Group members also highlighted the importance of preparing students adequately prior to going on placement. They thought there was a need for further guidance to accompany the SETs on this, including on insurance, immunisations, information governance and general wellbeing of students.

4.22 Attendees at the HEA workshop agreed that students often struggle to maintain a work-life balance while attending placements full-time and also completing academic modules or assessments. Support for students is particularly important because their learning can be affected if they feel unwelcome and unvalued by practice placement educators and wider staff.

Quality assurance of practice placements

- 4.23 Some stakeholders expressed concern about the effectiveness of quality assurance of practice placements as carried out by education providers. Members of the NES AHP Advisory Group suggested that there needs to be greater partnership working between education providers and practice placement providers regarding quality assurance; and that quality should be addressed before, during and after placements.
- 4.24 Similarly, some service users and carers suggested that the education provider should be required to visit placements in advance to ensure they are safe and appropriate environments.
- 4.25 One HCPC visitor at refresher training proposed that the SETs should prescribe how often education providers must monitor practice placements, for example requiring them to undertake an annual review.

Ethics and professionalism

- 4.26 In discussions about the practice placement standards, a significant number of stakeholders mentioned the importance of ensuring that there were requirements for students to conduct themselves ethically and professionally while on placement, and in line with the HCPC standards of conduct, performance and ethics (SCPE). For instance, members of the NES AHP Advisory Group thought that professionalism could be highlighted in SET 5, regarding personal conflict, attitudes, behaviour and use of social media while on placement.
- 4.27 In September and November 2015, the PLG considered two papers summarising stakeholder feedback on the link between the SETs and SCPE and proposing changes to SET 4.5 to strengthen this link. In discussions, members of the PLG collectively expressed the view that the SCPE should be referred to throughout the standards and in particular highlighted in SET 5.

Clarity of language

- 4.28 The topic of language in the SETs has already been explored in a previous paper considered by the PLG at its meeting in September 2015. However, given the frequency of comments in relation to the language in SET 5 in particular, we have addressed these again below.
- 4.29 Attendees at the HCPC Education Department commented that the language and terminology used in SET 5 was not always appropriate for all professions, pointing specifically to hearing aid dispenser programmes.
- 4.30 HCPC visitors commented that SET 5 contains vague language such as 'adequate', 'appropriate', 'effective', 'relevant', and 'regular', which needed clarification or a more prescriptive threshold. Visitors thought that this subjective language prevented consistency across programmes and

professions; while a few suggested this could be solved by the introduction of profession-specific standards in some areas.

- 4.31 In particular, visitors highlighted the use of 'appropriate' in SET 5.2 ('The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes'). They maintained that there should be a requirement for education providers to demonstrate how a placement is appropriate for a particular learning need and why, to prevent placements being used just because they are available.
- 4.32 Members of the NHS Education for Scotland (NES) AHP Advisory Group also sought further clarity on a few specific standards:
- In SET 5.6, clarification is needed on what 'adequate number' means.
 - In SET 5.9, further clarification is needed on what 'appropriately registered' means.
- 4.33 A few HCPC visitors raised the use of the term 'practice placement educator', commenting that the definition currently in the SETs is quite brief and needed clarification. Similarly, a few attendees at the Council of Deans summit pointed out that there were regional differences in terminology used for people who work with students on placement.

Structure and format

- 4.34 As noted in a previous paper for the PLG, there were some comments relating to the structure of the standards in SET 5. Specifically, Education Department employees identified some duplication 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 other staff at practice placements.
- 4.35 Another observation was that SET 5.11 (which sets out the information that must be supplied to students, practice placement providers and practice placement educators to prepare them for a placement) is different in structure and format from the other standards. The vast majority of individual standards are short, single-sentence statements, whereas SET 5.11 includes a five-point bulleted list.
- 4.36 At its meeting in September 2015, the PLG discussed the possibility of merging SETs 5.6, 5.7, 5.8 and 5.9 into one or two standards, and it was agreed that this would be examined further. Members also discussed whether the format of SET 5.11 should be made more in line with the other individual standards; or alternatively whether the bullet-point format could be applied where convenient to some of the other standards.

5. Combining SETs 4 and 5

- 5.1 The PLG has previously discussed whether SET 4 (on curriculum) and SET 5 should be merged into a single section, in order to lend increased importance

to clinical and practical learning as an integral part of programmes. Some members expressed the view that use of the word 'curriculum' created an artificial separation between the theory and practice part of the programme.

- 5.2 The Executive has considered this proposal and our related recommendations are included below in section 7.

6. Other regulatory standards

- 6.1 Other health and social care professional regulators in the UK take a variety of different approaches to setting standards around practice-based learning. Some brief observations are outlined below, while the table at Appendix 2 provides further detail on the approach taken by each regulator.
- 6.2 All of the regulatory standards examined include statements relating to practice-based learning, although a number of different terms are used, such as 'clinical learning environment', 'practice learning opportunities', 'supervised clinical experience' and 'practical experience'. Some regulators have a separate set of requirements relating to practice-based learning, while others incorporate these requirements with the rest of their education standards.
- 6.3 For the most part, other regulatory standards cover similar ground to SET 5 – that is, the planning, monitoring, quality assurance and assessment of practice-based learning, as well as the training and qualification of practice educators and appropriate support for students.
- 6.4 The regulators of social workers in Scotland, Wales and Northern Ireland have much more detailed requirements in place in respect of practice learning in comparison with most of the other regulators. These include not only the number of practice learning periods and minimum number of hours, but also detail about what must be covered during the periods and how and by whom the practice assessments must be carried out.

7. Executive recommendations

- 7.1 Our initial recommendations in response to the issues raised by stakeholders during the review are set out below.

Combining SETs 4 and 5

- 7.2 After consideration, the Executive has decided to recommend against combining SETs 4 and 5. We agree with PLG members and other stakeholders that clinical and practical learning is a vital component of education and training programmes. This principle is set out in existing standards:

SET 4.3: 'Integration of theory and practice must be central to the curriculum.'

SET 5.1: 'Practice placements must be integral to the programme.'

- 7.3 But we believe that the separation of the standards on curriculum (SET 4) from those on practice placements (SET 5) is appropriate, given the differing subject matters of these sections. General feedback during the review has been that the structure of the SETs, including the separation into six broad areas, is clear and helpful for education providers in organising their evidence. We believe that combining SETs 4 and 5 would risk creating unnecessary confusion.
- 7.4 However, we would suggest that there is potential for moving some of the individual standards currently in SET 5 to a different section, in order to emphasise the integration of theory and practice further. Our recommendations in this regard are set out below.
- 7.5 Additionally, in making future drafting amendments to the standards and guidance we will consider how to make clear that the requirements on curriculum in SET 4 apply to the whole of the programme, rather than just the 'theory' components.

Management of practice placements

- 7.6 We recommend that the following standards should be moved from SET 5 to SET 3 (on programme management and resources):
- SET 5.4: 'The education provider must maintain a thorough and effective system for approving and monitoring all practice placements.'
- SET 5.10: 'There must be regular and effective collaboration between the education provider and the practice placement provider.'
- 7.7 Stakeholders have stressed the importance of ongoing collaboration between the education provider and practice placement provider and of the responsibility of the education provider for ensuring the quality, safety and appropriateness of practice placements.
- 7.8 We believe that moving these standards from SET 5 to SET 3 would have the effect of clarifying the responsibilities of education providers for the oversight and management of practice placements as part of the overall management of the programme. It would also make clear the importance of practice placement providers being integral partners in the design and review of the programme as a whole.

Training for practice placement educators

- 7.9 We recommend that SET 5.8 and the supporting guidance are amended to clarify that training for practice placement educators must include an understanding of the specific teaching, learning and assessment needs relevant to a particular programme and, where relevant, to students at different levels of progression within a programme.
- 7.10 The findings from commissioned research have raised concerns about the variability of practice placement educator training. Comments during the

review also indicated that stakeholders felt there should be more robust requirements for practice placement educator training. In particular, some stressed that the appropriateness of training should be demonstrated in relation to the ability of practice placement educator to support a specific programme's learning outcomes.

- 7.11 We propose that a revised standard would read as follows (subject to any changes in terminology; see section 8 below):

‘Practice placement educators must undertake regular training appropriate to their role and specific to the learning outcomes of the programme.’

We will consider amendments to the guidance under SET 5.8 as part of the full proposed draft.

Other recommendations

- 7.12 As stated in a previous paper, we agree with stakeholders that SETs 5.6, 5.7, 5.8 and 5.9 as written do appear to include some duplication. We do not recommend merging all of them into a single standard, as they address separate requirements. However, we do recommend merging SETs 5.7 and 5.9, which both deal with the professional background and skills of practice placement educators. A sensible approach would be to mirror the format of SET 3.4, which relates to the professional background and skills of the named person with overall professional responsibility for the programme (programme leader).

- 7.13 The new merged standard would then read as follows (subject to any changes in terminology):

‘Practice placement educators must have relevant knowledge, skills and experience and, unless other arrangements are agreed, must be appropriately registered.’

Revised guidance underneath this standard will be proposed as part of the full draft.

- 7.14 In addition, we noted in a previous paper that SET 5.11 is significantly different in format and structure to the rest of the standards, in that it includes a bulleted list. We recommend that in order to bring this standard more in line with the rest of the SETs, the bulleted list should be removed from the wording of the standard itself and that information placed in the guidance. It would then more closely resemble SET 2.1, which requires that both the education provider and the applicant have all of the information they need to make an informed decision during the admissions process.

- 7.15 The new standard would then read as follows (subject to any changes in terminology):

‘Students and practice placement educators must have the information they require in a timely manner in order to be fully prepared for practice placements.’

Again, revised guidance underneath this standard will be proposed as part of the full draft.

8. PLG considerations

- 8.1 The PLG is invited to consider the Executive's recommendations in section 7 above. We would also like to seek the views of PLG members on some other issues relating to this theme.

Terminology

- 8.2 As stated above and in previous papers, some stakeholders were concerned that the language in SET 5 needed to be re-examined in light of new professions coming into regulation by the HCPC and other changes in education and training. There is also a large degree of variety in the structure and nature of what we refer to as practice placements which should be accounted for. For example, in some programmes practice learning is undertaken within a third-party organisation (e.g. a hospital, clinic or local authority); while in other cases students gain practical experience by working within the same organisation that provides the whole programme.
- 8.3 We think there may be a case for replacing the terms 'practice placement' and 'practice placement provider' in order to increase applicability across all professions and types of programmes, and also to clarify that practice-based learning does not necessarily take place in a different setting from the academic or theory-based parts of the programme. As can be seen in Appendix 2, other regulators use a variety of different terms to describe practice-based learning.
- 8.4 We also understand from stakeholders that the term 'practice placement educator' is not widely used by education providers. Many use the terms 'supervisor' or 'mentor'; however there is no requirement in the SETs for practice placement educators to directly supervise or mentor students on a day-to-day basis. Our expectation is that this individual has oversight of a student's learning in the practice placement, but other staff may be involved in teaching and assessing the student where appropriate. In addition, some practice placements could see students working on their own for periods of time, only meeting with the practice placement educator at certain intervals.
- 8.5 Therefore the PLG is invited to consider the following questions:
- Is there a more suitable term for 'practice placement' which reflects the variety in current practice in education programmes and is more widely used across professions?
 - Is there a more suitable term for 'practice placement educator' which would reflect the variety of types of roles and activities this individual might undertake?
 - Is there a more suitable term for 'practice placement provider' which reflects the fact that not all practice learning takes place in a different setting from the rest of the programme?

Availability and capacity of practice placements

- 8.6 We acknowledge the difficulties faced by some education providers in securing practice placements of sufficient capacity and quality for approved programmes, due to declining resources and changes in the structure of health and care services. The ability to secure practice placements with capacity for the whole student group is a key aspect of the sustainability of the programme.
- 8.7 The SETs are requirements for education providers, rather than practice placement providers (where they are separate organisations); however we recognise that as regulatory standards, the SETs do carry weight with these and other stakeholders. Some education providers have commented during the review that they would like the SETs to provide more of a 'lever' which they can use to influence third-party practice placement providers.
- 8.8 There is no standard in the SETs which sets out expectations around the availability and sustainability of practice placements. This is perhaps because the SETs were last reviewed when practice placement models were fairly consistent across approved programmes, i.e. when the HCPC regulated healthcare professions exclusively and most practice placements took place in 'traditional' settings like in the NHS.
- 8.9 Currently SET 5.6 does touch on capacity and requires an 'adequate number of appropriately qualified and experienced staff at the practice placement setting'. The guidance clarifies that this means appropriate according to the total size of the student group and according to the level of support a particular student needs.
- 8.10 We invite the PLG to consider the following questions:
- Is there a need for an additional standard (in SET 5 or elsewhere) on practice placement availability, capacity and/or sustainability?
 - If not, can SET 5.6 or another existing standard be amended to strengthen expectations of practice placement availability, capacity and sustainability?

Link to the SCPE

- 8.11 In discussions during the September and November 2015 members, the PLG collectively expressed the view that the SCPE and expectations of professional conduct should be further highlighted in the standards and/or guidance in SET 5.
- 8.12 We therefore invite the PLG to consider the following:
- Have PLG members identified any specific amendments to be made to SET 5 standards or guidance in order to highlight the SCPE and expectations of professional conduct in relation to practice placements?

Further considerations

- 8.13 In addition to the issues above, we would be grateful for any further thoughts or reflections from the PLG on the theme of practice placements, and in particular the issues discussed in this paper where they might have implications for the SETs and/or supporting guidance.
- 8.14 These questions 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.

Detailed guidance

5 Practice placements

5.1 Practice placements must be integral to the programme.

Guidance

The structure of your programme must show that practice placements are an important part of the programme. You could show this by referring to:

- your ongoing partnership arrangements with your practice placement educators;
- how you support and encourage practice placement staff to take part in developing programmes;
- how the practice placement learning outcomes and progression are in line with the rest of the programme; and
- your reasons for your placement structure.

It is good practice to have a formal arrangement with practice placement providers, wherever possible.

Please see SETs 3.1 and 4.3 for more guidance on this issue.

5 Practice placements

5.2 The number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.

Guidance

We will want to be sure that there are clear reasons for the number, length and range of placements you have chosen. We do not set the number, length or range of placements that you must include in your programme to meet our SETs. However, you must show that the number, length and range of practice placements must be appropriate to the design of the curriculum as well as the number of students.

We will want to see that all students gain access to a wide range of learning experiences in a variety of practice environments which reflect the nature of modern practice, and the range of practice settings of the profession they are preparing to enter. You may want to show how you support students to record how their practice placement environment relates to the main areas of practice of that profession.

We will also want to know how you expect students to progress in terms of their practical skills during the placements, and how the learning outcomes for the first placement are different from those of the final one. Evidence you could provide might include a 'map' of the programme and details of assessment.

5 Practice placements

5.3 The practice placement settings must provide a safe and supportive environment.

Guidance

A 'safe and supportive environment' means one where staff and students have carried out relevant assessments of risk within the area of practice. It is also an environment where safety policies and procedures are in place, and where policies and procedures are in place to support students' learning.

In showing how you meet this SET, you may include evidence of how you consider issues such as:

- physical risk from equipment;
- manual handling;
- risk from substances that are dangerous to health;
- radiation risk;
- fire safety;
- infection control;
- aggression from service users, staff or students;
- emotional stress; and
- working alone.

Placement induction processes should explain how you tell students about risks and safety issues.

You should also provide information about how you check the quality of your placement providers. It is good practice for practice placement providers to give you information about their health and safety policies. Information that you have provided for SET 3 about student support may also be relevant here, and you may want to cross-reference it.

You could also show how you help students to assess risk in practical situations, and to make professional decisions. The evidence supplied here may also be relevant to SETs 4.6 and 4.7.

Please see SET 5.12 for more guidance on this issue.

Other sources of guidance

A full, up-to-date list of documents, including those published by other organisations can be found on our website at www.hcpc-uk.org/education/downloads

5 Practice placements

5.4 The education provider must maintain a thorough and effective system for approving and monitoring all placements.

Guidance

You will need to give us information about how you approve placements before you use them, how you then monitor them regularly, and how they have links to the management of the programme. We will also want to see that you have policies in place to respond appropriately when any difficulties arise.

We do not normally visit placement settings, and we give open-ended approval to programmes. We monitor programmes to show they still meet the standards, and we can remove open-ended approval if they do not. If the placement is with another organisation, you will need to show that you assess this effectively. We will want to see evidence that you are working together with placement providers.

The evidence to support this could include:

- policies and processes for approving placements;
- examples of how these policies and processes are put into practice;
- details of systems for ongoing monitoring and assessing placement providers;
- an explanation of how you collect, analyse and act on feedback from students;
- details of how you gain feedback from practice placement educators and co-ordinators, and make sure that there are clear and easy methods for you and them to communicate with each other;
- details of how you use feedback to inform processes; and
- copies of policies or details of processes for dealing with placement providers where difficulties arise.

Please see SETs 3.13 and 5.5 for more guidance on this issue.

5 Practice placements

5.5 The placement providers must have equality and diversity policies in relation to students, together with an indication of how these will be implemented and monitored.

Guidance

You should give us information about how you make sure that equality and diversity policies are in place and that they cover all of the placement providers' activities. You will need to show that students on placements know how they can gain access to these policies and what they should do if they feel that they have been discriminated against. We would normally expect you to have an auditing or monitoring process for your placement providers and this will be part of that process.

Please see SET 5.4 for more guidance on this issue.

Other sources of guidance

A full, up-to-date list of documents, including those published by other organisations can be found on our website at www.hcpc-uk.org/education/downloads

5 Practice placements

5.6 There must be an adequate number of appropriately qualified and experienced staff at the practice placement setting.

Guidance

We will want to make sure that there are enough members of staff to support the students in their learning in a safe environment. We realise that there are different models of practice-based learning and the level of supervision at the placement can vary between the professions we regulate. As a result, we do not say how many staff must be present at each placement, or that those staff must be registered with us.

We will look for evidence in documents – and, in the case of an approval visit, at meetings with the programme team and practice placement educators – that you have clearly justified what you consider to be enough staff. This will include whether the number of staff is appropriate for the size of the student group. This may vary according to the level of support the student needs. For example, a one-to-one relationship may be ideal for many professions, while there may be four or five students to one practice placement educator in others.

If any of your practice placement educators are not registered with us, you may want to provide information about their professional qualifications (and their registration with other regulators or organisations, if appropriate). You should also show how their qualifications are appropriate to the practice placement, and to the learning outcomes of the programme as a whole. We may want to see job descriptions of practice placement educators and the recruitment policies of the placement providers so that we can see how the practice placement educators are qualified to teach or supervise students.

Some professional bodies play an active role in providing advice on staff-to-student ratios. Please contact the individual professional bodies if you want further guidance in this area.

5 Practice placements

5.7 Practice placement educators must have relevant knowledge, skills and experience.

Guidance

We will want to be sure that your practice placement educators have the knowledge, skills and experience to support students and that they provide a safe environment for effective learning. We do not set specific requirements about the qualifications and experience that they must have, but we will want to see how you make sure they have the relevant knowledge, skills and experience.

Please see SETs 5.6 and 5.13 for more guidance on this issue.

5 Practice placements

5.8 Practice placement educators must undertake appropriate practice placement educator training.

Guidance

We expect that you will train all new practice placement educators, and follow this up with regular refresher training. We will want to see evidence of the content, broad learning outcomes and any assessments or qualifications from all the training you provide for practice placement educators. Where practice placement educators are involved in assessment, we will want to see how they are prepared to deliver both formative and summative assessment, and how you make sure this is consistent across all placements.

We do not set specific requirements for the length or content of this training, as we feel that this level of detail is best decided by individual education providers. You may choose to follow the example of other education providers, or follow best-practice advice published by other organisations. Your training may take a variety of forms, which may include:

- attending your site;
- training in the workplace;
- online support;
- written support; and
- peer support through workshops and meetings.

Professional bodies may offer accreditation schemes for practice placement educators, so you may want to put these in place. If you take part in one of these schemes, you could give us information about how it works and how it is put into practice.

5 Practice placements

5.9 Practice placement educators must be appropriately registered, unless other arrangements are agreed.

Guidance

Normally, your practice placement educators will be registered with us in the relevant profession. However, there are other appropriate practice placement educators whose backgrounds do not match the specific profession that the student is studying. For example, occupational therapists may supervise physiotherapy students in areas such as hand therapy, and nurses may supervise radiographers in aseptic techniques. If you choose to use practice placement educators who are not registered with us, you will need to give us information about their experience, qualifications and training relevant to the practice placement.

5 Practice placements

5.10 There must be regular and effective collaboration between the education provider and the practice placement provider

Guidance

We will need to be sure that you regularly work together with your practice placement providers and educators, and that the joint work and communication happens in both directions. This might take the form of regular meetings or other methods of communication with your practice placement providers and educators. You may also use a system where providers comment on their experience of supervising students on placement, or develop ways for practice placement providers and educators to influence the structure of the practice placements or provide feedback on the programme's planning and design. Any information you can provide which shows a partnership and ongoing relationship, and not one that only happens around the time the programme is approved and monitored, will help to show us how you work together effectively with practice placement providers.

5 Practice placements

5.11 Students, practice placement providers and practice placement educators must be fully prepared for placement which will include information about an understanding of:

- the learning outcomes to be achieved;**
- the timings and the duration of any placement experience and associated records to be maintained;**
- expectations of professional conduct;**
- the assessment procedures including the implications of, and any action to be taken in the case of, failure to progress; and**
- communication and lines of responsibility.**

Guidance

You will need to show not only that you provide information to students, practice placement providers and practice placement educators, but also that this information is easily available for them, in an appropriate format. You should also show that you provide information when necessary – to allow enough time for you to answer any questions before practice placements begin.

You might want to show how you provide the information, and how you make sure that everyone involved has understood the information. This might be through follow-up training, teaching, or opportunities for discussion. Information could be in your student handbook, practice placement handbook, or similar material. We may look for evidence to show that the students and practice placement educators feel well informed about what is expected of them, and their responsibilities, during a placement, as well as evidence that you have given placement providers the names and details of the visiting students. It is good practice to have in place a formal arrangement with placement providers, wherever possible.

Examples of practical information to provide to students could include:

- dates, times and venues (including details of the venue, such as maps); and
- placement induction materials.

Please see SET 5.10 for more guidance on this issue.

Other sources of guidance

A full, up-to-date list of documents, including those published by other organisations can be found on our website at www.hcpc-uk.org/education/downloads

5 Practice placements

5.12 Learning, teaching and supervision must encourage safe and effective practice, independent learning and professional conduct.

Guidance

We will want to be sure that your placements prepare your students for entry into their profession. You should provide evidence of how your programme prepares your students for independent learning on their placement, and show how they are given the resources and skills to work more independently. We will want to see information about how students learn about the behaviour expected of them on their placement. You could relate this to any teaching about our standards.

The evidence you could refer to might include:

- reflective logs or diaries;
- professional development portfolios;
- tutorial records; and
- placement reports.

The evidence supplied here may also be relevant to SETs 4.6, 4.7 and 5.11.

Other sources of guidance

- Health and Care Professions Council, Standards of conduct, performance and ethics
- Health and Care Professions Council, Standards for continuing professional development

A full, up-to-date list of documents, including those published by other organisations can be found on our website at www.hcpc-uk.org/education/downloads

5 Practice placements

5.13 A range of learning and teaching methods that respect the rights and needs of service users and colleagues must be in place throughout practice placements.

Guidance

Students may learn on placement in different ways, and different practice placement educators may structure the learning and teaching according to their own preferences and experience, or the individual needs of the students. It is important that the educators' methods respect the needs of service users and colleagues.

We will want to see evidence that you have a system in place which makes sure that:

- wherever possible, service users are aware that students are involved; and
- you have the appropriate consent.

Appendix 2 – Practice placements: Other regulatory standards

Regulator	Current approach
General Medical Council (GMC)	<p>The GMC recently published ‘Promoting excellence: standards for medical education and training’, which is effective from January 2016. This document refers to the ‘clinical learning environment’ but does not set separate standards for this part of education and training. Some of the requirements which correspond with individual SETs are as follows:</p> <ul style="list-style-type: none"> • R1.7: Organisations must make sure there are enough staff members who are suitably qualified, so that learners have appropriate clinical supervision, working patterns and workload, for patients to receive care that is safe and of a good standard, while creating the required learning opportunities. • R2.11: Organisations must have systems and processes to make sure learners have appropriate supervision. Educational and clinical governance must be integrated so that learners do not pose a safety risk, and education and training takes place in a safe environment and culture. • R5.3: Medical school curricula must give medical students learning opportunities that integrate basic and clinical science, enabling them to link theory and practice. • R5.4: Medical school programmes must give medical students experiential learning in clinical settings, both real and simulated, that increases in complexity in line with the curriculum. <p>Full text of the standards available at: http://www.gmc-uk.org/Promoting_excellence_standards_for_medical_education_and_training_0715.pdf 61939165.pdf</p>
Nursing and Midwifery Council (NMC)	<p>The NMC’s Standards for pre-registration nursing education contain requirements which refer to practice learning and practice teachers throughout, as well as a separate section on practice learning. Standard 6 states: ‘Practice learning opportunities must be safe, effective, integral to the programme and appropriate to programme outcomes.’ The key requirements underneath are as follows:</p> <ul style="list-style-type: none"> • R6.1 AEs must provide students and those supporting practice learning with information that includes dates,

outcomes to be achieved, and assessment documents for each period of practice learning.

- R6.2 Programme providers must ensure that mentors and practice teachers meet the relevant requirements within the Standards to support learning and assessment in practice (NMC 2008).
- R6.3 Programme providers must ensure that local registers of mentors and practice teachers are maintained according to Standards to support learning and assessment in practice (NMC 2008), including sign-off status of mentors, record of updates and date for triennial review.
- R6.4 Programme providers must use objective criteria and processes for approving new practice learning environments, and audit them at least every two years.
- R6.5 Programme providers must ensure that students have access to a range of practice learning opportunities sufficient to meet programme outcomes.

Some of the other requirements which correspond with individual SETs state that programme providers must ensure students are allocated an identified mentor, practice teacher or supervisor during practice learning; and that those who supervise students in practice are properly prepared and supported in that role.

Full document: <http://www.nmc.org.uk/standards/additional-standards/standards-for-pre-registration-nursing-education/>

The NMC produces separate Standards for pre-registration midwifery education. Standard 12 relates to the 'balance between clinical practice and theory' and requires that each programme must be no less than 50 percent practice and no less than 40 per cent theory. Standard 13 relates to the scope of practice experience and Standard 15 to the assessment strategy for clinical practice. This document also requires the appointment of a lead midwife for education, who has responsibility for collaboration with maternity services and service users in all matters that affect midwifery education.

Full text: <http://www.nmc.org.uk/standards/additional-standards/standards-for-pre-registration-midwifery-education/>

The NMC's standards to support learning and assessment in practice for mentors, practice teachers and teachers can be found here: <http://www.nmc.org.uk/standards/additional-standards/standards-to-support-learning-and-assessment-in-practice/>

<p>General Dental Council (GDC)</p>	<p>The GDC has produced Standards for education. The requirements under Standard 1 aim to ensure that patients are protected when students perform treatments as part of clinical training. Some relevant requirements are as follows:</p> <ul style="list-style-type: none"> • 2. Providers must have systems in place to inform patients that they may be treated by students and the possible implications of this. The patient’s agreement to treatment by a student must be obtained and recorded prior to treatment commencing. • 4. When providing patient care and services, providers must ensure that students are supervised appropriately according to the activity and the student’s stage of development. • 5. Supervisors must be appropriately qualified and trained. This should include training in equality and diversity legislation relevant for the role. Clinical supervisors must have appropriate general or specialist registration with a UK regulatory body. <p>Requirement 12 under Standard 2 requires the provider to have ‘effective systems in place to quality assure placements where students deliver treatment to ensure that patient care and student assessment across all locations meets these Standards’.</p> <p>The full text is available here: http://www.gdc-uk.org/Aboutus/education/Documents/Standards%20for%20Education%20(v2%20revised%202015).pdf</p>
<p>General Osteopathic Council (GOsC)</p>	<p>The Quality Assurance Agency (QAA) has developed a subject benchmark statement for osteopathy training in conjunction with the GOsC and the osteopathy training providers, which states that supervised clinical experience is essential to osteopathic practice. The expectation is that students will undertake substantial supervised clinical practice within a dedicated teaching clinic where they can observe senior students and qualified practitioners in the early stages of their training, progressing to take on increasing responsibility for their own patient lists as their experience and knowledge develop. There should be a minimum of 1,000 hours of clinical practice learning in the clinical environment during a pre-qualification course, and each student would normally be expected to see and take responsibility for a minimum of 50 new patients.</p> <p>The arrangements for osteopathic clinical education should ensure that there are:</p>

	<ul style="list-style-type: none"> • adequate numbers for each student of new, returning and continuing patient encounters and exposure to an appropriate range of presenting conditions • appropriate staff/student ratios within the clinical setting to allow for close supervision of patient encounters by tutors, and opportunities for clinical tutorials • appropriate clinical administrative infrastructures to support student learning and patient care • arrangements for ongoing assessment and feedback from a variety of clinical tutors • policies and procedures in place in respect to GOsC regulations for patient safety. <p>Further detail in the benchmark states that there should be a dedicated clinic facility with appropriate provision for the discussion of patient cases, such as private 'breakout' rooms.</p> <p>Full text available at: http://www.qaa.ac.uk/en/Publications/Documents/SBS-consultation-osteopathy.pdf</p>
<p>General Chiropractic Council (GCC)</p>	<p>The GCC Degree Recognition Criteria require a chiropractic degree programme to include a 'substantial' period of clinical practice for students to bring together all their knowledge and skills in the management of patients (criterion 16). The length of this period is not prescribed, but the school must have policies and procedures to ensure the effective governance of the clinic period and the effective supervision of students.</p> <p>Criteria 17, 18 and 19 provide further detail on the requirements for the final period of working in clinical practice during a programme. Before beginning this final period, students must have demonstrated that they achieved the full range of programme outcomes related to the basis of chiropractic practice, and the learning outcomes related to the assessment and care of patients as set out for that stage of the degree programme. In addition, in their final clinic period, students must be responsible for the full spectrum of patient management for a sufficient number of different patients in order for there to be confidence in their ability to function as independent practitioners.</p> <p>The full text is available here: http://www.gcc-uk.org/UserFiles/Docs/DegreeRecCriteriaUPDATED2012.pdf</p>
<p>General Optical Council (GOC)</p>	<p>The GOC produces a series of handbooks with guidelines for the approval of training establishments and criteria to be demonstrated. The optometry handbook includes the requirement that the provider 'must have effective supervision procedures in place to ensure that when students</p>

	<p>are undertaking practical experience, the safety of patients and their care is of an appropriate and adequate standard that complies with GOC requirements.’ Any practice-based learning must be carried out under the supervision of a GOC registered and approved supervisor that meets certain requirements including their qualification and experience. In addition, the provider must ensure that both students and supervisors receive guidance and training in relation to practice-based learning so they fully understand their responsibilities and obligations.</p> <p>During an approval visit, the panel considers elements of practice-based learning including:</p> <ul style="list-style-type: none"> • The effectiveness of supervisor arrangements, and the processes in place to assess the supervisor’s suitability, expertise and experience • The practice environment and resources available to students: facilities, equipment, access to patients/ patient base • The appropriateness of learning opportunities provided in the period of practice based learning • Student progression and achievement statistic • The effectiveness of student support systems <p>The dispensing optician handbook includes similar statements and also requires students to complete a period of supervised pre-qualification experience amounting to no less than 1,600 hours, evidenced by a reflective portfolio.</p> <p>See: https://www.optical.org/en/Education/core-competencies--core-curricula/index.cfm</p>
<p>General Pharmaceutical Council (GPhC)</p>	<p>The document ‘Future Pharmacists’ sets out requirements against which the GPhC approves education and training for student pharmacists. In addition to the master’s degree programme, there is a requirement for students to complete a 6-month traineeship in a pharmacy.</p> <ul style="list-style-type: none"> • Standard 1 states that there must be systems in place to ensure that students do not jeopardise patient safety and only do tasks for which they are competent, sometimes under supervision. • Standard 5 on curriculum delivery requires a ‘balance of theory and practice’. The accompanying guidance states that practical experience should increase year on year, but off-site placement visits are not the only way of achieving this.

	<ul style="list-style-type: none"> • Standard 6 calls for a range of mechanisms to be in place to support students, including when they are working away from the normal training premises. <p>The full text can be found here: http://www.pharmacyregulation.org/sites/default/files/GPhC_Future_Pharmacists.pdf</p> <p>The 'Standards for the initial education and training of pharmacy technicians' contain similar statements. However there is no requirement for a formal traineeship.</p> <p>These can be found at: http://www.pharmacyregulation.org/sites/default/files/Standards%20for%20the%20initial%20education%20and%20training%20of%20pharmacy%20technicians.pdf</p>
Pharmaceutical Society of Northern Ireland (PSNI)	<p>The PSNI has adopted the GPhC's 'Future Pharmacists' (see above) as the standards used to accredit education and training courses.</p> <p>See: http://www.psni.org.uk/education-2/</p>
Care Council for Wales (CCW)	<p>The CCW has published 'The Framework for the Degree in Social Work in Wales', which includes criteria for approval and quality assurance of social work programmes. This requires at least 200 days of practice learning during the degree, including 20 days to be completed by the end of the first level of the degree, followed by a further 180 days over at least 2 practice learning periods of 80 days or more. One of the longer practice learning periods must be in a local social services authority and incorporate experience of statutory functions including safeguarding.</p> <p>Through the practice learning periods, the students must demonstrate that they have:</p> <ul style="list-style-type: none"> • the interpersonal skills and values required in order for him or her to be suitable and safe to work with service users and carers; • acquired an understanding, directly from service users and carers, of the impact of social work practice upon them; • an understanding of the professional role in relation to safeguarding children and adults; and • skills to contribute appropriately to safeguarding interventions. <p>The framework contains very detailed requirements about how and by whom practice learning periods are to be assessed, and the CCW has also produced separate Practice Assessment Guidance.</p>

	See the full text at: http://www.ccwales.org.uk/regulation-of-training/
Northern Ireland Social Care Council (NISCC)	<p>The NISCC produces 'Practice Learning Requirements for the Degree in Social Work', separately from the rules and framework specification (competencies). A student's practice learning needs and achievements are recorded in an individual learning plan, and course providers must structure the course in ways that facilitate an incremental approach to practice development. Students will normally undertake 225 days of practice learning, of which 25 days must be spent in preparation for direct work; 185 days must be in direct supervised practice; and 15 days to be used for individual practice development. Supervised direct practice must include experience of statutory tasks and work in a variety of settings with other professions.</p> <p>The NISCC also produces 'Standards for Practice Learning for the Degree in Social Work', which includes standards for course providers as well as for practice learning providers. This document covers areas similar to SET 5 including the strategic planning of practice learning; collaboration; policies; quality assurance; and assessment arrangements.</p> <p>See: http://www.niscc.info/index.php/education-for-our-training-providers/regulating-training-standards-education</p>
Scottish Social Care Council (SSSC)	<p>The SSSC's Framework for Social Work education in Scotland includes the Scottish Requirements for Social Work Training. These mandate at least 200 days in practice learning, of which at least 160 must be spent in supervised direct practice in service delivery settings. Students are required to undergo assessed preparation for direct practice to make sure they are safe to carry out this practice learning in a service delivery setting. Assessed practice learning is structured to allow students to gain experience of:</p> <ul style="list-style-type: none"> • carrying out statutory social work tasks, involving legal interventions; • working in at least two contrasting service delivery settings (for students entering through work-based routes, at least one of these should be outwith their employing agency other than in exceptional circumstances); • providing services to at least two user groups; and • providing services in a way that takes account of and values diversity. <p>Full text here: http://www.gov.scot/Publications/2003/01/16202/17018</p>