

## HCPC approval process report

|                      |                                   |
|----------------------|-----------------------------------|
| Education provider   | University of Plymouth            |
| Name of programme(s) | MDiet (Hons) Dietetics, Full time |
| Approval visit date  | 26 – 27 May 2021                  |
| Case reference       | CAS-16824-J3Z6H0                  |

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### Executive Summary

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

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

## Section 1: Our regulatory approach

### Our standards

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

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

### How we make our decisions

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

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

### HCPC panel

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

|                  |                |
|------------------|----------------|
| Susan Lennie     | Dietitian      |
| Fiona McCullough | Dietitian      |
| Niall Gooch      | HCPC executive |

### Other groups involved in the virtual approval visit

There were other groups involved with the approval process as follows. Although we engage in collaborative scrutiny of programmes, we come to our decisions independently.

|                      |  |                               |
|----------------------|--|-------------------------------|
| Christopher Groucutt | Independent chair (supplied by the education provider) | University of Plymouth        |
| Natalie Dixon        | Secretary (supplied by the education provider)         | University of Plymouth        |
| Ruth Boocock         | Panel member   | British Dietetics Association |
| Najja Qureshi        | Panel member   | British Dietetics Association |

|               |                       |                               |
|---------------|-----------------------|-------------------------------|
| Laura Stuart  | Panel member          | British Dietetics Association |
| Phil Gee      | Internal panel member | University of Plymouth        |
| Angela Madden | Internal panel member | University of Plymouth        |
| Kahila Smith  | Internal panel member | University of Plymouth        |
| Chris Johns   | Internal panel member | University of Plymouth        |

## Section 2: Programme details

|                        |                        |
|------------------------|------------------------|
| Programme name         | MDiet (Hons) Dietetics |
| Mode of study          | FT (Full time)         |
| Profession             | Dietitian              |
| Proposed first intake  | 01 September 2021      |
| Maximum learner cohort | Up to 20               |
| Intakes per year       | 1                      |
| Assessment reference   | APP02310               |

We undertook this assessment of a new programme proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programme meet our standards for the first time.

## Section 3: Requirements to commence assessment

In order for us to progress with approval and monitoring assessments, we ask for certain evidence and information from education providers. The following is a list of evidence that we asked for through this process, and whether that evidence was provided. Education providers are also given the opportunity to include any further supporting evidence as part of their submission. Without a sufficient level of evidence, we need to consider whether we can proceed with the assessment. In this case, we decided that we were able to undertake our assessment with the evidence provided.

| Type of evidence  | Submitted | Comments |
|---|-----------|----------|
| Completed education standards mapping document  | Yes       |          |
| Information about the programme, including relevant policies and procedures, and contractual agreements | Yes       |          |
| Descriptions of how the programme delivers and assesses learning  | Yes       |          |
| Proficiency standards mapping   | Yes       |          |
| Information provided to applicants and learners   | Yes       |          |
| Information for those involved with practice-based learning   | Yes       |          |

|   |              |                                |
|---|--------------|--------------------------------|
| Information that shows how staff resources are sufficient for the delivery of the programme | Yes          |                                |
| Internal quality monitoring documentation   | Not Required | New programme so not available |

Due to the COVID-19 pandemic, the education provider decided to move this event to a virtual (or remote) approval visit. In the table below, we have noted the meeting held, along with reasons for not meeting certain groups (where applicable):

| Group   | Met |
|---|-----|
| Learners  | Yes |
| Service users and carers (and / or their representatives) | Yes |
| Facilities and resources                                  | Yes |
| Senior staff  | Yes |
| Practice educators  | Yes |
| Programme team  | Yes |

## Section 4: Outcome from first review

### Recommendation of the visitors

In considering the evidence provided by the education provider as part of the initial submission and at the virtual approval visit, the visitors' recommend that there was insufficient evidence to demonstrate that our standards are met at this time, but that the programme(s) should be approved subject to the conditions noted below being met.

### Conditions

Conditions are requirements that must be met before programmes can be approved. We set conditions when there is insufficient evidence that standards are met. The visitors were satisfied that a number of the standards are met at this stage. However, the visitors were not satisfied that there is evidence that demonstrates that the following standards are met, for the reasons detailed below.

We expect education providers to review the issues identified in this report, decide on any changes that they wish to make to programmes, and then provide any further evidence to demonstrate how they meet the conditions. We set a deadline for responding to the conditions of 16 July 2021.

**3.1 The programme must be sustainable and fit for purpose.**

**3.6 There must be an effective process in place to ensure the availability and capacity of practice-based learning for all learners.**

The following condition applies to the above standards. For simplicity, as the issue spans two standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that:

- there is an effective process in place to ensure the availability and capacity of practice-based learning for all learners.

**Reason:** In their mapping document, under these standards, the education provider referred the visitors to sections of the programme handbook and the programme specification. In these documents the visitors were able to see a brief overview of how the practice-based learning would fit into the programme, where it would sit and what its general aims were. However, the visitors were not given more detailed evidence about what practice placements would be available to the learners, and how these would be managed and guaranteed. The visitors were aware that the programme start date was not until September 2022 (sixteen months from the visit date), and it was therefore not reasonable or proportionate to expect the education provider to have all their arrangements for practice-based learning finalised. However, they did consider that there was not yet enough detail regarding what the education provider planned to do over the next year to ensure that they were ready in time for September 2022.

The issue was discussed at the visit. The visitors received reassurances from both the programme team and the practice educators that there were strong relationships between the education provider and placement partners, because of the existing undergraduate programme. However, the visitors considered that interpersonal relationships were not sufficient on their own to ensure a robust process for securing sufficient availability and capacity in practice-based learning. They also considered that if there was not a clear pathway to obtaining formal commitments from practice partners, they could not be clear that the programme would be able to run as intended. In particular, the visitors were not clear about the detail of the “special placements” that the programme team had mentioned at the visit.

The visitors therefore require the education provider to submit further evidence demonstrating that they have a plan for ensuring sufficient commitment from practice partners, and that they have an effective process for securing sufficient capacity of placements.

### **3.9 There must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.**

**Condition:** The education provider must demonstrate that they have an adequate number of staff in place to deliver the programme effectively.

**Reason:** During discussions at the visit, the visitors were informed by the programme team that, in their opinion, more staff recruitment was required for the programme to operate as planned. The visitors had not previously been aware of this need from the documentation. They had considered that the evidence provided around staffing was appropriate. They had not seen any evidence relating to a recruitment plan, or a timetable for the recruitment. They were therefore unable to determine whether this standard was met. They were aware that as the programme was not due to start until September 2022, it was not reasonable to expect that all staff would be in place at this stage. However, they did consider that it would be reasonable to request further evidence about when the recruitment would take place and how the education provider would ensure that the most suitable person was recruited.

### **5.2 The structure, duration and range of practice-based learning must support the achievement of the learning outcomes and the standards of proficiency.**

**Condition:** The education provider must demonstrate that the structure and duration of practice-based learning on the programme will be appropriate to the programme design.

**Reason:** As noted in the condition under SETs 3.1 and 3.6 above, the visitors were aware that the details of the practice-based learning on the programme were not yet finalised. The documentation stated that there would be two weeks in year one, and twelve weeks in each of years two and three. However, the visitors were not given details of where these placements would take place, with which partners, and for how long learners would be at each setting. There was also mention at the visit of “special placements” of various kinds but their nature was not clear to the visitors and the planning for them was still at an early stage. The visitors were not clear about the structure and the duration of placements and so could not be sure that the standard was met. The visitors therefore require further evidence demonstrating that the education provider will provide placements of appropriate duration and structure so that all learners can meet the learning outcomes and the standards of proficiency.

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

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

The following condition applies to the above standards. For simplicity, as the issue spans two standards, the education provider should respond to this condition as one issue.

**Condition:** The education provider must demonstrate that, when it becomes necessary to do so, they will be able to effectively monitor the quality of all practice-based learning, and ensure that there will be an adequate number of appropriate staff.

**Reason:** As noted in the conditions above, the visitors were aware that at this stage the plans for practice-based learning were still at a relatively early stage, because the programme was not due to start for another 16 months. The visitors did not see evidence relating to the systems and processes by which the education provider would monitor the quality of practice-based learning, or by which they would ensure that practice educators were suitable. They did discuss these issues at the visit with both the senior team and the programme team. In these discussions verbal assurances were given regarding relationships with practice partners (see the condition under SETs 3.1 and 3.6 above). The education provider were intending to develop the placements and its related procedures already used on the existing undergraduate programme, which the visitors considered to be a reasonable and appropriate approach. However, they did not see details of how exactly this would be done and how the education provider would ensure that it was done, for example by designating particular responsibilities to particular staff. The visitors therefore require further evidence to demonstrate how the education provider will ensure that they will be able to effectively monitor the quality of placement, and that there are an adequate number of practice educators.

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

**Condition:** The education provider must demonstrate that, when it becomes necessary to do so, they will be able to ensure that practice educators have relevant knowledge, skills and experience.

**Reason:** As noted in the conditions above, the visitors were aware that at this stage the plans for practice-based learning were still at a relatively early stage, because the programme was not due to start for another 16 months. The visitors did not see evidence relating to how the education provider would ensure that practice educators were appropriately qualified, for example with role briefs or person specifications.

The visitors were given verbal assurances about these areas, and were aware that a similar approach to that on the existing undergraduate programme would be taken. However, they did not see details of how exactly the education provider would ensure appropriately qualified staff, and therefore require further evidence to demonstrate how the education provider will ensure relevant knowledge, skills and experience.

### **Recommendations**

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

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

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

**Recommendation:** The education provider should keep under review their mechanisms for ensuring that learners are aware of what they can expect if they need to go through a fitness to practice process or a raising concerns process.

**Reason:** The visitors were satisfied that the standards were met at threshold because appropriate processes were in place, both for learners to raise concerns and for learners to go through in the event of difficulties around their conduct, character and health. From conversation with learners at the visit, the visitors understood that learners knew where to access the relevant policies, and particularly that they had a good grasp of the requirements of professionalism. However, it was not clear that the learners understood what would actually happen during a concerns process or a fitness to practice process. This created a possible risk that in future the standard would not be met, because a process might not be effective if learners did not understand how it worked. The visitors therefore suggest that the education provider reflect on how they can improve learners' understanding of these processes.

## **Section 5: Visitors' recommendation**

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

This report, including the recommendation of the visitors, will be considered at the 25 August 2021 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).