

## Approval process report

Roehampton University, Physiotherapy / Occupational Therapy, 2024-25

## **Executive Summary**

This is a report of the process to approve programmes at Roehampton University. This report captures the process we have undertaken to assess the institution and programme(s) against our standards, to ensure those who complete the proposed programme(s) are fit to practice.

#### We have:

- Reviewed the institution against our institution-level standards and found our standards are met in this area.
- Reviewed the programme(s) against our programme level standards and found that our standards are met in this area following exploration of key themes through quality activities.
- Recommended that all standards are met, and that the programme(s) should be approved

Through this assessment, we have noted:

- The areas we explored focused on:
  - We have explored one area as a quality activity. This looked at the levels of staffing on the proposed programmes. This was to ensure that sufficient staff are available for the successful running of the proposed programmes.
- The following areas should be referred to another HCPC process for assessment:
  - We are referring the ongoing recruitment of new staff on the Occupational Therapy programme to the Focused Review process. This is to ensure that sufficient levels of staff are available for the programme.
- The programme(s) meet all the relevant HCPC education standards and therefore should be approved.

# Previous consideration

N/A – not referred from another process

#### Decision

The Education and Training Committee (Panel) is asked to decide:

- whether the programme(s) are approved.
- whether issues identified for referral through this review should be reviewed, and if so how.

#### Next steps

Outline next steps / future case work with the provider:

- The provider's next performance review will be in the 2028-29 academic year (include deadline and current case status if there is an active case)
- Subject to the Panel's decision, we will undertake further investigations as per section 5 of this report.


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#### Section 1: About this assessment

#### About us

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.

This is a report on the approval process undertaken by the HCPC to ensure that the programme(s) detailed in this report meet our education standards. The report details the process itself, evidence considered, outcomes and recommendations made regarding the programme(s) approval.

#### **Our standards**

We approve education providers and programmes that meet our education standards. Individuals who complete approved programmes will meet proficiency standards, which 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 programmes meet the relevant proficiency standards.

## Our regulatory approach

We are flexible, intelligent and data-led in our quality assurance of programme clusters and programmes. Through our processes, we:

- enable bespoke, proportionate and effective regulatory engagement with education providers;
- use data and intelligence to enable effective risk-based decision making; and
- engage at the organisation, profession and programmes levels to enhance our ability to assess the impact of risks and issues on HCPC standards.

Providers and programmes are <u>approved on an open-ended basis</u>, subject to ongoing monitoring. Programmes we have approved are listed on our website.

## The approval process

Institutions and programmes must be approved by us before they can run. The approval process is formed of two stages:

- Stage 1 we take assurance that institution level standards are met by the institution delivering the proposed programme(s)
- Stage 2 we assess to be assured that programme level standards are met by each proposed programme

Through the approval process, we take assurance in a bespoke and flexible way, meaning that we will assess whether providers and programmes meet standards based on what we see, rather than by a one size fits all approach. Our standards are

split along institution and programme level lines, and we take assurance at the provider level wherever possible.

This report focuses on the assessment of the self-reflective portfolio and evidence.

#### 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 <u>partner visitors</u> to design quality assurance assessments, and assess evidence and information relevant to the assessment. Visitors make recommendations to the Education and Training Committee (ETC). Education providers have the right of reply to the recommendation. If an education provider wishes to, they can supply 'observations' as part of the process.

The ETC make the 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 takes decisions through different levels depending on the routines and impact of the decision, and where appropriate meets in public. Their decisions are available to view on our website.

## The assessment panel for this review

We appointed the following panel members to support this review:

	Lead visitor, Physiotherapist –
Jo Jackson	Educationalist
	Lead visitor, Occupational Therapist –
Jennifer Caldwell	Educationalist
Alistair Ward-Boughton-Leigh	Education Quality Officer

## Section 2: Institution-level assessment

#### The education provider context

The education provider currently delivers 10 HCPC-approved programmes across 4 professions. It is a Higher Education Institution and has been running HCPC approved programmes since 1993.

The education provider engaged with the approval review process in the model of quality assurance in 2023 for the MSc Occupational Therapy (Pre-registration), FT (Full time) programme. At the meeting in August 2024 the Education and Training Committee agreed that there was sufficient evidence to demonstrate that our standards were met, and the programme was approved.

The education provider engaged with the performance review process in the model of quality assurance in 2023. At the meeting in September 2024 the Education and Training Committee agreed that there was sufficient evidence that the standards continued to be met, and the programmes remain approved. The education

provider's next engagement with the performance review process should be in the 2028-29 academic year.

## Practice areas delivered by the education provider

The provider is approved to deliver training in the following professional areas. A detailed list of approved programme awards can be found in <u>Appendix 2</u> of this report.

	Practice area	Delivery level		Approved since
Pre- registration	Arts therapist	□Undergraduate	⊠Postgraduate	2006
registration	Occupational therapy	□Undergraduate	⊠Postgraduate	2024
	Physiotherapy	□Undergraduate	⊠Postgraduate	2024
	Practitioner psychologist	□Undergraduate	⊠Postgraduate	2007

## Institution performance data

Data is embedded into how we understand performance and risk. We capture data points in relation to provider performance from a range of sources. We compare provider data points to benchmarks, and use this information to inform our risk-based decisions about the approval and ongoing approval of institutions and programmes.

This data is for existing provision at the institution, and does not include the proposed programme(s).

Data Point	Bench- mark	Value	Date	Commentary
Learner number capacity	71	155	2024	The benchmark figure is data we have captured from previous interactions with the education provider, such as through initial programme approval, and / or through previous performance review assessments. Resources available for the benchmark number of learners was assessed and accepted through these processes. The value figure is the benchmark figure, plus the number of learners the provider is proposing through the new provision.

				1
Learner non-continuation	3%	4%	2020-21	This information was presented to the visitors prior to their review and factored into their overall assessment  This data was sourced from a data delivery. This means the data is a bespoke Higher Education Statistics Agency (HESA) data return, filtered bases on HCPC-related subjects. The data point is above the benchmark, which suggests the provider is performing below sector norms When compared to the previous year's data point, the education provider's
				performance has dropped by 3%.
Outcomes for those who complete programmes	92%	90%	2020-21	This data was sourced from a data delivery. This means the data is a bespoke HESA data return, filtered bases on HCPC-related subjects. The data point is below the benchmark, which suggests the provider is performing below sector norms When compared to the previous year's data point, the education provider's performance has dropped by 3%.
Teaching Excellence Framework (TEF) award	N/A	Silver	2023	The definition of a Silver TEF award is "Provision is of high quality, and significantly and consistently exceeds the baseline quality threshold expected of UK Higher Education."
Learner satisfaction	79.0%	81.1%	2024	This data was sourced at the subject level. This means the data for HCPC-related subjects The data point is above the benchmark, which suggests the provider is performing above sector norms When compared to the previous year's data point, the education provider's

			performance has improved by 6%
HCPC performance review cycle length	N/A	5 years	The education provider last engaged with our Performance Review process in 2023-24. At this review, the education provider gained a 5 year ongoing monitoring period. This is the maximum an education provider can gain, meaning their next review is due in 2028-29.

We also considered intelligence from others (e.g. prof bodies, sector bodies that provided support as follows:

• The education provider is located in London. We regularly receive regional updates about the developments and challenges London is facing as a region. This includes updates from NHS England (NHSE). In our recent discussions with NHSE, they have advised us that London is experiencing placement shortages for several professional areas. This includes Physiotherapy and Occupational Therapy. Visitors were advised to consider this information during their assessment of the proposed programmes.

## The route through stage 1

The education provider is an existing provider whose provision includes HCPC-approved programmes. We chose to conduct an executive-led stage one review because the education provider already provides HCPC-approved programmes and has demonstrated alignment with the institution-level standards through this. We have a baseline document on file for the education provider that demonstrates their alignment with these standards and has completed regulatory assessments (via performance reviews and other approval cases) within the last 12 months.

Institutions which run HCPC-approved provision have previously demonstrated that they meet institution-level standards. When an existing institution proposes a new programme, we undertake an internal review of whether we need to undertake a full partner-led review against our institution level standards, or whether we can take assurance that the proposed programme(s) aligns with existing provision.

As part of the request to approve the proposed programme(s), the education provider supplied information to show alignment in the following areas.

#### Admissions

Findings on alignment with existing provision:

• Information for applicants –

- The education provider explained how the provision website programme pages are available for all proposed programmes. Prospective learners can access admissions policies, including entry requirements and instructions on how to apply for the programmes. They run 'applicant communications' with applicants throughout their application process. This includes invitations to interviews, offer letters and enrolment instructions.
- They have discussed how admissions policies and processes are well established and tailored for professional programmes. The Admissions policy has been updated to include all relevant professional programmes, such as those proposed.
- Specific applicant communications will be created from templates for similar professional programmes to ensure applicants are aware of the recruitment processes and subsequent course conditions.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Assessing English language, character, and health –

- The education provider has policies in place for this area, which are detailed on their website concerning programme entry requirements.
- Their admissions policy refers to English language, character, and health requirements for professional programmes and will be updated to include the requirements for the proposed programmes.
- Entry and suitability requirements for other professional programmes are stated on the education provider's website. This gives prospective applicants information on the kind of requirements needed.
- The 'Admissions Referral Board' examines and makes decisions about applications where relevant criminal convictions have been declared and / or found on the Disclosure and Barring Service (DBS). This will be expanded to include applicants for the proposed programmes. The Fitness to Study policy is generic and refers to the Fitness to Practise policy for professional programmes.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Prior learning and experience (AP(E)L) –

- Information on this area is presented in the education provider's admissions policy, academic regulations, and Recognition of Prior Learning (RPL) policy. Existing, generic and programme-specific information is available on their website, and this will be updated to include the proposed programmes.
- The RPL policy already refers to Professional Statutory and Regulatory Body (PSRB) requirements. Individual programme specifications set out the specific RPL requirements for that relevant programme.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

#### Equality, diversity and inclusion –

- The education provider has an existing Equality, Diversity and Inclusion (EDI) that is in place and applies to their existing programmes. The education provider has also referred to multiple policies that incorporate the EDI requirements of their central policy. These include their Admissions policy, the 'Equality and Diversity' policy, the programme specifications, the disability policy, the 'Dignity and Respect' policy, the occupational health processes, and the 'Access and Participation Plan'.
- The education provider has discussed how their strategic governance works with the EDI committee reporting to their University Executive Board. There are also a range of policies which feed into this area, such as the access and participation plan. This highlights new vocational provision such as nursing as increasing access to higher education.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

Non-alignment requiring further assessment: None.

## Management and governance

## Findings on alignment with existing provision:

- Ability to deliver provision to expected threshold level of entry to the Register<sup>1</sup> –
  - The education provider has referred to their 'Articles of Association' in support of this area. These articles confirm degree awarding powers, including for all their programmes and will apply to the new provision.
  - The education provider also holds registration with the Office for Students (OfS) and their existing academic regulations stipulate the undergraduate and postgraduate frameworks and any specific programme variations.
  - They have also stated in their approval request form that the relevant Professional Statutory and Regulatory Body requirements (such as HCPC) are adhered to.
  - We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Sustainability of provision –

The education provider has referred to their established Portfolio Development Committee (PDC) and Curriculum Strategy Committee (CSC), which are responsible for ensuring the sustainability of their provision. They stated that the proposed programmes have been reviewed and approved by both committees via their internal validation process. This helps to demonstrate that institutional strategic support and investment are in place. Full economic costings for all proposed programmes at the education provider are detailed in the associated

<sup>&</sup>lt;sup>1</sup> This is focused on ensuring providers are able to deliver qualifications at or equivalent to the level(s) in SET 1, as required for the profession(s) proposed

- business case and now factored into the School's overall Business plan.
- The education provider has also secured funding to support the proposed provision. This includes £2 million from the OfS to support the support growth of nursing, physiotherapy, occupational therapy and other programmes.
- The education provider has also discussed how they are a part of the London and South-East Area Placement Partnership (LSEAPP) and Tribal Group to ensure sustainable placement provision for healthcare programmes. This demonstrates that the education provider works collaboratively across the region and has mechanisms in place to secure practised-based learning placements.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## • Effective programme delivery –

- The education provider explained how they use their institution-wide Design and Delivery Framework, Academic Regulations and Quality Assurance Procedures to support effective programme delivery.
- The Design and Delivery framework guides the principles of validated programmes to ensure effective learner outcomes. The Academic Regulations stipulate academic structure, assessment, and management, which are monitored and evaluated by quality assurance procedures. The education provider also explained how they have processes to ensure their programmes are able to meet additional PSRB requirements.
- The education provider explained how the proposed programmes and module specifications include updated templates and guidance to ensure clear contemporary and programme-specific requirements (including PSRB).
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

#### • Effective staff management and development –

- The education provider explained how the PDC and CSC contribute to effective staff management and development. These committees' approval and associated business case processes identify appropriate staff resources for new programmes, including meeting staff: learner ratio requirements.
- The staff development plans for programmes identify core and programme-specific staff developmental needs and support. The institution-wide conditions of service for academic staff are derived from the standard terms and conditions and stipulate requirements to participate in the Probationary Scheme and Appraisal and Development Scheme. The education provider has stated how these processes already work effectively across their existing PSRB programmes.
- The education provider's Academic Responsibilities Framework (ARF) is in place and uses both standard and non-standard tariffs to identify

- appropriate staff workloads. This is used by their Nursing provision and has required amendments to reflect specific work such as practical teaching, interviewing and placement support. Their capability procedures detail performance management processes outside of the probation procedure.
- We are satisfied with the education provider's approach to this area, as
  it aligns with how we understand the education provider to operate.
  Their approach here aligns with other approval cases and the
  information we hold in their baseline document.

## • Partnerships, which are managed at the institution level –

- The education provider explained how their partnership development and approvals are managed by their Partnerships Office using their established processes. They have no plans to deliver the proposed programmes through a partnership with another institution. The education provider has discussed how they're engaging with an extensive range of existing partners to deliver the proposed programmes. They have also said they will be developing new practice partnerships, as needed, to support introducing the new programmes.
- We note that partnerships will be needed for placements, but this can be managed at the programme level. We shall highlight this matter for the visitors to consider as part of the stage 2 assessment.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

**Non-alignment requiring further assessment:** A further assessment regarding partnerships is required and will be looked at through stage two of this process.

Quality, monitoring, and evaluation

## Findings on alignment with existing provision:

- Academic quality
  - The education provider has several policies and mechanisms in place to manage and monitor academic quality. These include their academic regulations, which set out the standards they require for the programmes and are the basis of their quality assurance procedures.
  - O PSRB programmes vary to ensure specific requirements are clearly identified. The academic office is responsible for administering Quality Assurance (QA) procedures. The education provider detailed how a collection of processes and templates were required during programme development, approval, delivery, and monitoring. Standard Programme and Module Specification Templates and Guidance will be used for the proposed Occupational Therapy programme.
  - Programme monitoring occurs through the 'Student Education and Improvement Plan' (SEIP). These are presented at the Programme Board meeting, which reviews other quality measures, such as external examiner feedback. The education provider have processes in place to ensure appropriate external examiners are appointed for each proposed programme. These processes also set out the training and support which will be provided to them to perform their roles.

 We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Practice quality, including the establishment of safe and supporting practice learning environments –

- The education provider has institutional level process to implement placement agreements which will be used to establish partnerships for the proposed programmes. This specifies the quality level expected for practise-based learning placement providers. Their educational audit process to review placement providers is well-established and are be updated for new programmes.
- They explained how the Placement Team and allocation processes will be expanded to cover placement management for the proposed programmes. Under academic guidance, the team monitors Care Quality Commission (CQC) reports, processes learner evaluations and undertakes data returns for NHS England (NHSE).
- The education provider have an Raising Concerns Process which applies to all programmes and will be updated to include the proposed programmes. Their Fitness to Practise (FTP) policy will be updated and implemented when a learner is identified as not fit for practice learning. They have established training resources and processes for developing and supporting supervisors will be adapted for the proposed programmes.
- The education provider discussed how an occupational therapy stakeholder group, similar to their existing nursing and physiotherapy groups, will be established for the proposed programmes. This group will maintain the oversight of placement quality.
- Additionally, they have joined LSEAPP for physiotherapy who
  maintains the oversight of placement issues at a local sector level. This
  will be extended for the remaining proposed programmes.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

#### Learner involvement –

- The education provider stated they have several mechanisms already in place to support learner involvement in their provision. This includes Module Evaluation Surveys (MES), Student Experience and Outcomes Panels (SEOPS), Programme Boards, Course Representatives, the Students Union and Senate. They deploy nationwide surveys such as the Postgraduate Taught Experience Survey (PTES) and National Student Survey (NSS) as well as their own Pulse surveys.
- The education provider has stated that learner involvement is central to their QA processes. They have discussed how their PSRB programmes use an enhanced process, such as external examiner meetings with learners, in developing these programmes. Results / feedback from these mechanisms, as well as outcomes and action plans, are also analysed and developed through the SEIP which is presented for discussion at the Programme Board. Course

- Representatives are identified and supported through the Student Union.
- The education provider explained how the 'Student Senate' provides a forum where learners can raise concerns with members of the senior administration and be consulted on key institutional matters. Postgraduate Occupational Therapy learners will be encouraged to complete the national PTES which is analysed through the QA process described above and used to inform action plans for improving learner experience. The education provider currently utilises the National Student Survey (NSS) in the same way for undergraduate learners and will also use Pulse surveys to provide regular feedback.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

#### Service user and carer involvement –

- The education provider has in place a Service User and Carer (SUC) Group and Strategy, a Stakeholder Group, an SUC Coordinator and an SUC Academic Lead / Champion that facilitate SUC involvement. They have an-established SUC Group and Strategy, which was strengthened and developed for nursing and physiotherapy programmes and will be expanded to include all proposed programmes.
- Service Users and Carers are involved with curriculum design and development, programme approval, programme evaluation, PSRB student recruitment, teaching, assessment and staff recruitment. SUC's, with experience of occupational therapy practice, will be sought through their existing networks. The SUC Group is chaired by the Pro-Vice-Chancellor (for education) and led by programme-level lead academics. The group is supported by a coordinator who ensures meetings are administered and SUCs are supported with induction, training, onboarding, payment, etc.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

Non-alignment requiring further assessment: None.

#### Learners

## Findings on alignment with existing provision:

#### Support –

The education provider referred to the existing learning support in place. This will be made available and tailored for the new learners. The library will be updated with relevant materials for the new programmes, and learners will have access to resources for other relevant health-related programmes. The education provider clarified how they have relevant texts in place for Nursing, Physiotherapy, Psychology and Education and will purchase further occupational therapy and dietetics-specific texts over this year.

- The Academic Achievement Team (AAT) is familiar with supporting learners on PSRB programmes and works closely with programme teams.
- The Programme Convener role is responsible for overseeing and coordinating learner support. Module Conveners provide specific support at a modular level. The AGT (Academic Guidance Tutor) is embedded within PSRB programmes and is the main source of 1-2-1 academic and pastoral support.
- The education provider has discussed the NEST system which is a centralised learner support connection that all learners can access remotely or on campus to resolve issues. NEST can also direct learners to services such as finance, accommodation, careers, chaplaincy etc.
- The Student Union provides learners with support for processes such as academic appeals. The Student Charter details what learners can expect from the education provider.
- The education provider's supervisors support learners in practice for PSRB programmes. The education provider works with clinical partners to identify, train and support supervisors.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Ongoing suitability –

- The education provider has discussed how enrolled learners are subject to the Student Contract, which identifies their general responsibilities and those specific to their programmes, including PSRB requirements.
- Ongoing suitability is managed through Fitness to Study and Fitness to Practice (FTS and FTP) policies. For PSRB programmes, FTP is most commonly followed when ongoing suitability is in question.
- The Disciplinary Policy is also used when non-programme-related issues arise, such as disruptive behaviour in University accommodation. In such cases, the Secretariat will inform relevant Programme Leaders to ensure FTP is considered, where necessary.
- The Standard Placement Agreement specifies responsibility for monitoring and responding to issues about ongoing suitability.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Learning with and from other learners and professionals (IPL/E) –

- The education provider's Interprofessional Learning Policy (IPL) policy was created for their nursing programme and will be expanded to include occupational therapy. The NHSE Standard Placement Agreement specifies the need for learner's access to multi-professional resources.
- The occupational therapy stakeholder group will monitor the access to IPL locally and work with LSEAPP to monitor this at a local sector level.
   Oversight for IPL is maintained by the Learning Teaching Quality

- Committee / Group (LTQC / LTQG), and learners will have access to research seminars from a range of other professional groups.
- They have also discussed how all three proposed programmes are being developed alongside each other. They have a focus on IPL, and this development will help facilitate IPL throughout the three programmes.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Equality, diversity and inclusion –

- The education provider has referred to their strong strategic governance with the groups / teams like their EDI committee, reporting to their University Executive Board. This includes the monitoring conducted as part of their quality assurance processes. These processes monitor EDI data such as awarding gaps through their 'Student Education Plan', 'Student Experience Outcome Panels' (SEOPS), Programme Boards and 'Learning Teaching Quality Committees / Groups (LTQC / LTQG).
- There is also a range of institution-wide policies that feed into this area. This includes their Disability Policy, Occupational health policy, access and participation plan and their wellbeing policy. Their access and participation plan highlights new vocational provisions such as Nursing as increasing access to higher education.
- EDI is also explicitly addressed within their programme specification template concerning the Institution's EDI policy. Disability policy and processes are embedded in all programmes, but principles of reasonable adjustments applied to professional PSRB programmes will be replicated for Occupational Therapy.
- There are a variety of EDI Network Groups and Champions which monitor and develop access and equality for learners and staff. Their 'Student Engagement Team' also leads innovations for supporting EDI, such as inclusive practice working groups which include learners to analyse and develop curricula, etc.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

Non-alignment requiring further assessment: None.

#### Assessment

## Findings on alignment with existing provision:

## Objectivity –

- All proposed programmes will follow Academic Regulations regarding assessment structure and procedures with any additional relevant variations (e.g. nursing / physiotherapy specifies two attempts at practice assessment).
- The new Supporting Achievement, Innovation and Learning framework (SAIL) will be implemented in all new programmes from 2025 onwards.

The education provider explained how this ensures appropriate assessments that equip learners with confidence, knowledge and adaptability to be successful in their graduate careers. The framework will be used to guide assessment style, volume, weighting, criteria etc. These categorical assessment criteria have been successfully applied to other PSRB programmes. The Programme and Module Specifications detail assessment maps, weighting, criteria, mapping to learning outcomes etc.

- An occupational therapy External Examiner (EE) will be appointed to scrutinise assessment processes and sit on the board of examiners.
   Enhanced EE roles have been adopted for other PSRB programmes.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Progression and achievement –

- The proposed programme will follow the existing Academic Regulations regarding progression and achievement with any required variations. These will be detailed in the Programmes' and Module Specifications. If required, the programmes will have a bespoke examination board process to confer progression and achievement (as for nursing).
- Progression and achievement will be monitored through the SEIP, Programme Board, Student Evaluation Committee (SEC), and SEOPS. This will include externally collected data such as OfS continuation, transfer data and 'Destination of Leavers from Higher Education' data (DLHE).
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

## Appeals –

- The education provider stated that the proposed programmes will follow the existing academic regulations and appeals processes within the 'student complaints policy and procedure'.
- Additionally, the student's union is responsible for supporting learners through this process. This process is already in place and in use for their existing provision and will apply to the proposed programmes.
- We are satisfied with the education provider's approach to this area, as it aligns with how we understand the education provider to operate. Their approach here aligns with other approval cases and the information we hold in their baseline document.

#### Non-alignment requiring further assessment: None.

#### **Outcomes from stage 1**

We decided to progress to stage 2 of the process without further review through stage 1, due to the clear alignment of the new provision within existing institutional structures, as noted through the previous section.

We used their approval request form and also the baseline document we hold for the education provider to make this decision. The policies discussed are largely already in place, used by the existing programmes and will apply to the new provision as detailed above.

## Risks identified which may impact on performance: None

**Outstanding issues for follow up:** There is one area we are referring to stage 2 of this assessment. This concerns the partnerships managed at the institutional level. The education provider has indicated that no partnerships will be managed at the institutional level and no partner institution / college / HEI will be delivering the programmes. They have stated that the programmes will be run internally. However, we recognise that partnerships will be required that are managed at the programme level (e.g. Practice-based learning placements). Therefore, we shall highlight this for the visitors to assess in stage 2 of this approval case.

Education and training delivered by this institution is underpinned by the provision of the following key facilities:

- The education provider has discussed a range of physical resources that are in place. This includes their investment in specialist teaching resources for healthcare education, including Occupational Therapy, Physiotherapy, and Nursing. Their Mary Seacole Health Innovation Centre has a specialist teaching space, including five large clinical teaching rooms equipped with medical and audio-visual equipment. It includes physiotherapy plinths, anatomical models, mobility aids, and exercise equipment. They have discussed how a £110,000 capital investment has been approved for further enhancements throughout the 2024-25 academic year. The centre also houses a simulated apartment for practical training.
- The education provider has also discussed the use of their Grove House Clinical Simulation Centre. Here, there is a six-bedded simulated ward with emergency and handling equipment, plus flexible community rooms that can be adapted into general practitioner clinics or domestic settings. The facilities here include changing rooms and are managed by three full-time technical staff. The education provider's Whitelands College features food science laboratories with sensory analysis tools, microscopy, and dietary analysis software. They have also stated that there are high-spec computer suites and expert technicians support at all practical facilities across their campuses.
- They have discussed how these physical resources are in place, and they
  plan to review the physical resources on a yearly basis. They are also
  intending to grow their staffing resource by up to 2.0 full-time equivalent staff
  members.

## Section 3: Programme-level assessment

#### Programmes considered through this assessment

Programme name	Mode of	Profession	Proposed	Proposed
	study	(including	learner	start date
			number,	

		modality) / entitlement	and frequency	
BSc (Hons) Occupational Therapy (pre-registration)	FT (Full time)	Occupational therapist	34 learners, 1 cohort	22/09/2025
BSc (Hons) Physiotherapy (Pre-registration)	FT (Full time)	Physiotherapist	50 learners, 1 cohort	22/09/2025

## Stage 2 assessment – provider submission

The education provider was asked to demonstrate how they meet programme level standards for each programme. They supplied information about how each standard was met, including a rationale and links to supporting information via a mapping document

## Data / intelligence considered

We also considered data and intelligence from regional groups such as the London NHS England Team and intelligence from professional bodies, including the Royal College of Occupational Therapy (RCOT).

RCOT have advised us that they are not accrediting the programme at this time due to concerns around staffing. They informed us that they are concern that insufficient numbers of experienced staff are available to run the programme. This comes after a lead member of staff has gone on maternity leave. They also informed us that many members of staff are not wholly focused on proposed programme as they also teach on other programmes. We used this intelligence in our assessment and the visitors have factored this into their recommendation.

#### Quality themes identified for further exploration

We reviewed the information provided, and worked with the education provider on our understanding of their submission. Based on our understanding, we defined and undertook the following quality assurance activities linked to the quality themes referenced below. This allowed us to consider whether the education provider met our standards.

We have reported on how the provider meets standards, including the areas below, through the <u>Findings section</u>.

Quality theme 1 – Ensuring there are appropriate levels of staffing on the proposed programmes to ensure sustainability.

**Area for further exploration**: The visitors noted the education providers' current levels of staffing and the range of experience and knowledge this provides to the proposed programmes. But found this to be less comprehensive than they expected for the proposed programmes, particularly the occupational therapy programme. The visitors determined that the education providers' current staff have the knowledge and experience to run the programme at the start, but had concerns about how the

programme would be effectively staffed going forward, particularly into years two and three of the programme. We also gained intelligence from the RCOT as discussed above. This highlighted their concern about the education providers' levels of available staff. It is important that we ensure that there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme in accordance with SET 3.9.

**Quality activities agreed to explore theme further**: We chose to explore this further and requested the education provider respond with a narrative response on how they plan to deliver the programmes. We also asked for supporting documentation to be submitted to explain their overall staffing plan and approach to recruitment going forward. We found this to be the best way to explore this as it allows us to see their overall resourcing and have this confirmed through the supporting documentation. But this also allows the education provider to respond to us in their own words and detail for us how they will staff the programmes.

**Outcomes of exploration:** The education provider submitted a staffing and recruitment plan that is aimed at and planned to cover their staffing over the next five years. This also details the planned learner number growth over the same period. It shows how the new intakes per year will gradually and methodically increase to a maximum of 40 new learners. This balances this with gradual increases in staffing, with at least a new member (1.0 FTE) of staff planned to be recruited per year (occasionally at 1.0 or 1.5 FTE), but starting with a 2.0 FTE increase.

The visitors assessed the additional documentation and information made available and found this to contain a clear plan for expanding the staffing resource as programme numbers increase. The visitors noted that for both programmes the staff-to-learner ratio (SSR) is around 20:1, which is above the sector norm in England; however, it appears to be the norm for the provider. It was agreed that the progress the education provider in terms of their planned staff recruitment should be monitored. This is to ensure the sustainability and effectively delivery of the programmes.

## Section 4: Findings

This section details the visitors' findings from their review through stage 2, including any requirements set, and a summary of their overall findings.

#### **Conditions**

Conditions are requirements that must be met before providers or programmes can be approved. We set conditions when there is an issue with the education provider's approach to meeting a standard. This may mean that we have evidence that standards are not met at this time, or the education provider's planned approach is not suitable.

The visitors were satisfied that no conditions were required to satisfy them that all standards are met. The visitors' findings, including why no conditions were required, are presented below.

The visitors recommend that the following conditions are met before the programme(s) can be approved

## Overall findings on how standards are met

This section provides information summarising the visitors' findings against the programme-level standards. The section also includes a summary of risks, further areas to be followed up, and areas of good practice.

## Findings of the assessment panel:

- SET 1: Level of qualification for entry to the Register this standard is covered through institution-level assessment
- SET 2: Programme admissions -
  - The education provider has stated how they have utilised existing generic entry requirements for entry onto the proposed programme.
     With additional programme-specific requirements where necessary.
  - These include five GCSEs at grade C or above, including mathematics, English language or literature and a science subject or equivalent. English language requirements for non-native speakers of a minimum International English Language Testing System (IELTS) score of 6.5 in writing alongside a minimum of 7.0 in reading, listening and speaking, with a minimum overall score of 7.0 or equivalent qualification. They also accept a Test of English as a Foreign Language (TOEFL) score of 100 out of 200 for TOEFL tests taken outside of the UK.
  - The programme-specific entry requirements include a UCAS tariff score of Advanced-Level grades (A-Level) BBB or 120 UCAS points overall, Business and Technology Education Council (BTEC) qualification or equivalent for Occupational Therapy. For the Physiotherapy programme, the specific requirements are a UCAS tariff score of Advanced-Level grades (A-Level) BBB or 120 UCAS points overall. This should include a Science or Life Science subject such as psychology, physical education, biology, etc.
  - Information is provided on the education provider's website reflecting expected academic and professional requirements. The visitors found there to be clear evidence on the website and in the submitted documents. They noted that good policy documents and processes, through interviews, were clear and easy to interpret. The visitors found the education provider to have demonstrated an effective processin place to admit learners onto the programmes.
  - o The visitors therefore found the SETs related to this area to be met.
- SET 3: Programme governance, management and leadership
  - The education provider has stated that they have built strong relationships with a number of practice education providers to support the introduction of the proposed programmes. They have detailed how they have achieved this through consultation and ongoing stakeholder engagement alongside other activities such as the NHSE's working groups and placement provision. They have discussed how they are a member of the London and South East Area Placement Partnership group (LSEAPP), the 'Fair Share' group, and have a contract with the Placement Management Partnership (PMP) for Physiotherapy and Occupational Therapy in London.

- The education provider has also discussed how they maintain the relationships with their practice-education providers. The stated that:
  - link lecturers visit new placement settings at the mid-way point of each placement to build relationships and provide opportunities for informal feedback. they explained how this ensures ongoing support and engagement between educators and placement providers.
  - for existing placement settings, the mid-way review is conducted by the same link lecturer to maintain continuity and positive relationships. These meetings are typically held via virtually or by telephone for convenience.
  - They also provide online and in-person joint training for Physiotherapy and Occupational Therapy practice educators approximately every two months. Feedback is gathered from these sessions, and placement providers are encouraged to suggest additional continuing professional development (CPD) topics to enhance training.
  - They have also discussed how, in collaboration with Southwest London (SWL) allied health professionals, they have developed and shared a survey to assess practitioners' confidence in practice educator training. This will also help identify future training needs. Current training reflects these findings, focusing on assessment paperwork and supporting struggling learners.
- The education provider has also discussed how the LSEAPP and PMP help to ensure the availability and capacity of practice-based learning for all learners on the proposed programmes. The education provider has reflected on their ability to source placements for all their existing programmes currently and adopting a flexible and creative approach to placement provision. This includes sourcing new placement sites such as in hospitals and looking at research placements.
- The education provider also discussed their approach to staffing, including utilising existing staff and shared delivery of the provision. This also supports their approach to interprofessional learning (IPL / IPE) with learners from different programmes at times learning alongside one another. For Physiotherapy, they have at this time a total of 4.0 full-time equivalent (FTE) staff. For occupational therapy, this number is lower at 1.0 but is in the process of recruiting an additional member of staff and utilising existing staff to account for an additional 1.0 FTE.
- The visitors noted the education providers' current levels of staffing and the range of experience and knowledge this provides to the proposed programmes. They found the information for this to be limited for the proposed programmes, particularly the occupational therapy programme. It is important we ensure that sufficient levels of appropriately qualified and experienced staff are available to run the programme in alignment with the SETs. SET 3.9 states that must be an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme. We therefore chose to explore this further via quality activity one.
- Following the response to the quality activity, the visitors found the SETS related to this area met at the threshold. The visitors also wanted to ensure that at the onset of the programme, sufficient staff are in

place and that the planned recruitment goes ahead as planned. We therefore shall be referring this matter for review via a subsequent focused review case.

## • SET 4: Programme design and delivery –

- The education provider has explained how the proposed programmes' learning outcomes (PLOs) have been created to reflect the HCPC Standards of Education and Training Guidance and meet the Standards of Proficiency (SOPS) for Physiotherapists and the Standards of Proficiency (SOPS) for Occupational Therapy for relevant programmes. The education provider has completed the HCPC SOPS mapping documents to demonstrate where and how learners meet the SOPS. They have stated that every module is mapped to the PLOs, each module includes module learning outcomes (MLOs) that are mapped to assessments and all modules in the programmes are mandatory.
- The education provider has explained how professionalism is important to them as a higher education institution and the proposed programmes. They explained how they have embedded this throughout the proposed programmes. The module Professional Skills for Success will introduce professional values, codes of conduct and legal and ethical principles surrounding practice with a strong focus on personal and professional development. Scope of practice, confidentiality and risk management will also be covered in the module and applied in practice-based learning.
- Programmes learning and development outcomes have also been designed and mapped to the curriculum of their relevant professional bodies. This includes the Chartered Society of Physiotherapy's (CSP) Physiotherapy Framework (2020) and the Royal College of Occupational Therapy's (RCOT) career development framework (2021). These are aimed to demonstrate how learners develop the knowledge, skills, behaviour and values articulated within their relevant framework.
- The visitors found the modules to be appropriately mapped to the required SETs and relevant SOPs for their professions. The visitors found the professional body mapping and supporting documentation a useful reference point for their investigation. The visitors found the proposed programmes to reflect contemporary practice and include a module in each programme that is specifically designed to focus on emerging areas of practice. They found evidence of engagement with a range of stakeholders that also helps the programme teams to develop and deliver a programme that is reflective of contemporary practice.
- o The visitors have found the SET related to this area to be met.

#### SET 5: Practice-based learning –

The education provider has described how Practice-based learning are embedded into the programmes across all three years of the proposed programmes. The education provider has stated that the proposed programmes integrate placements in a variety of health and social care settings with the education provider-led modules, such that the experience provided by placements allows learners to apply learned behaviours, knowledge and skills and learn new knowledge and skills to reflect the nature of modern practice.

- The education provider has also detailed how two simulated placements will be integrated into the programmes. With one taking place in the first year of the programmes and another in its second year. This will lead to a total of five external placements being integrated into the programmes across all years of study.
- The education provider has described how the simulated placements will be led by expert academic and clinical staff. Learners will spend time in the education provider's Clinical Simulation Centres and will learn in simulated community areas. These include general practice rooms, home environments and a fully functioning simulated ward. The first placement will be a 1-week simulation where the focus will be on building confidence and competence in professional behaviours, skills, and knowledge and also human factors. Learners will practice skills on, and with each other, with service users and carers. These sessions will be recorded so that learners can observe and re-watch sessions they have been involved in. The second simulated placement in the second year of the programmes will focus on areas that are important for learning but may not be experienced on physical placements. This includes communicating sensitively and effectively with service users and carers who have mental health issues, learning disabilities or dementia and difficult conversations in the workplace.
- Through clarification, the education provider detailed how they have documents called placement profiles. This evidence shows how learners will be exposed to a range of experiences across a range of settings within placements. These show how there are sufficient, appropriately qualified, and experienced staff involved in practicebased learning.
- The visitors found the information presented and expanded upon to clearly show that practice-based learning and placements are embedded into the proposed programmes. They found a range of placement opportunities to be available including simulated placements in years one and two of the programmes. They noted how service users and carers contribute to the simulation experiences and that both full and part-time placements are offered.
- The visitors have found the SET related to this area to be met.

#### • SET 6: Assessment -

- The education provider has stated that the proposed programmes contain diverse and authentic assessments. These assess both theory and practice to acknowledge different learning journeys and motivate learners towards success. Assessments will take several forms and will include practical assessments, case-study based assessments, oral presentations, posters, self-reflections, peer assessment and in-class tests.
- The education provider detailed how all theory modules are mandatory and must be passed at a minimum grade of 40%. These modules allow for a first submission and a resit if needed within the year of study. If assessments are not passed by the end of the year, the Programme Examinations Board may exercise discretion and grant an exceptional second resit opportunity. This will be considered in the context of the learners overall academic progress, or under the provisions of their Mitigating Circumstances Policy. Failing is not permitted in any module.

- All assessments must be passed, and learners are required to pass all modules in each year to progress to the following year.
- The education provider explained how learners are required to write reflections that focus on personal and professional development at different points throughout the programmes. These reflections must demonstrate self-awareness, evaluation of their communication, teamworking, practical reasoning and a comprehensive understanding of professional values, codes of conduct and legal and ethical principles of practice. Learners will have the chance to receive and reflect on feedback from peers and educators and use this learning to enhance their understanding of these topics and identify areas where they need to develop their understanding further. Self-assessment will also be used in different modules through formative and summative assessments to help build understanding and support self-reflection.
- The education provider explained how module assessments have been designed to limit opportunities for academic misconduct through improper use of artificial intelligence and other sources of plagiarism. Processes are in place to manage any issues around academic misconduct or fitness to practice. Their Student Code of Conduct provides general definitions of misconduct, allegations of which will be investigated, considered and determined under the Student Disciplinary Regulations. These regulations set out the procedures through which the education provider will normally respond to an allegation of misconduct as defined in the code of conduct. Attendance is also monitored and addressed as necessary.
- The visitors have found the rules of assessment to be clear and set out the expectations for learners. The procedures in place ensure SOPs are met upon successful completion of the programmes. The visitors found the assessment to be as authentic as possible, allowing learners to demonstrate achievement of the programme's learning outcomes.
- o The visitors have found the SET related to this area to be met.

**Risks identified which may impact on performance:** We are referring one area to another process which is captured below.

#### Section 5: Referrals

This section summarises any areas which require further follow-up through a separate quality assurance process (the approval, focused review, or performance review process).

## Referrals to the focused review process

Ensuring sufficient levels of staff are available for the programmes

**Summary of issue:** As part of this approval review, we reviewed the education providers' number of appropriate, qualified, and experienced staff available to run these programmes. The visitors considered the information available and presented by the education provider as well as intelligence received by the RCOT. We have noted the current levels of staff should not prevent the timely start of both proposed programmes being considered as part of this approval case review.

However, for the occupational therapy programme, we noted that the levels of staffing are low and will not be suitable or sustainable for the programme going forward. We have also learnt that a key member of staff is due to go on maternity leave and that their replacement is being recruited but is not yet currently in place. The education provider has also informed us of their plans to recruit additional staff to support the programme over the next few months

We therefore find it appropriate to refer this matter to a focused review case. This will allow us to monitor the recruitment and management of the programme without delaying its start. We shall therefore open a focused review case following the conclusion and closure of this case. This shall run for the next few months to review and monitor the recruitment process and ensure that all standards are maintained.

## Section 6: Decision on approval process outcomes

#### Assessment panel recommendation

Based on the findings detailed in section 4, the visitors recommend to the Education and Training Committee that:

- All standards are met, and therefore the programmes should be approved
- The issues identified for referral through this review should be carried out in accordance with the details contained in section 5 of this report.

## **Education and Training Committee decision**

Education and Training Committee considered the assessment panel's recommendations and the findings which support these. The education provider was also provided with the opportunity to submit any observation they had on the conclusions reached.

Based on all information presented to them, the Committee decided that:

- The programmes are approved
- The issues identified for referral through this review should be carried out through the focused review process

**Reason for this decision:** The Panel accepted the visitor's recommendation that the programmes should receive approval and be referred to the focused review process, for the reasons noted in the process report.

## Appendix 1 – summary report

If the education provider does not provide observations, only this summary report (rather than the whole report) will be provided to the Education and Training Committee (Panel) to enable their decision on approval. The lead visitors confirm this is an accurate summary of their recommendation, and the nature, quality and facilities of the provision.

Education provider	Case reference	Lead visitors	Quality of provision	Facilities provided
Roehampton University	CAS-01704- W5Z2L4	<ol> <li>Jo Jackson.         Lead visitor,         Physiotherapist         – Educationalist</li> <li>Jennifer         Caldwell. Lead visitor,         Occupational         Therapist –         Educationalist</li> </ol>	Through this assessment, we have noted:  The areas we explored focused on:  We have explored one area as a quality activity. This looked at the Levels of staffing on the proposed programmes. This was to ensure that sufficient staff are available for the successful running of the proposed programmes.  The following areas should be referred to another HCPC process for assessment:  We are referring the ongoing recruitment of new staff on the Occupational Therapy programme to the Focused Review process. This is to ensure that sufficient levels of staff are available for the programme.  The programme(s) meet all the relevant HCPC education	Education and training delivered by this institution is underpinned by the provision of the following key facilities:  • The education provider has discussed a range of physical resources that are in place. This includes their investment in specialist teaching resources for healthcare education, including Occupational Therapy, Physiotherapy, and Nursing. Their Mary Seacole Health Innovation Centre has a specialist teaching space, including five large clinical teaching rooms equipped with medical and audio-visual equipment. It includes physiotherapy plinths, anatomical models, mobility aids, and exercise equipment. They have

standards and therefore should be approved.	discussed how a £110,000 capital investment has been approved for further enhancements throughout the 2024-25 academic year.
	The centre also houses a simulated apartment for practical training.
	The education provider has also discussed the use of their Grove House Clinical Simulation Centre. Here, there is a six-bedded simulated ward with emergency and handling equipment, plus flexible community rooms that can be adapted into general practitioner clinics or
	domestic settings. The facilities here include changing rooms and are managed by three full-time technical staff. The
	education provider's Whitelands College features food science laboratories with sensory analysis tools, microscopy, and dietary analysis software. They
	have also stated that there are high-spec computer suites and expert

				technicians support at all practical facilities across their campuses.  • They have discussed how these physical resources are in place, and they plan to review the physical resources on a yearly basis. They are also intending to grow their staffing resource by up to 2.0 full-time equivalent staff members.
Programmes				
Programme name			Mode of study	Nature of provision
BSc (Hons) Occupational Therapy (pre-registration)			FT (Full time)	Taught (HEI)
BSc (Hons) Physiotherapy (Pre-registration)			FT (Full time)	Taught (HEI)

# Appendix 2 – list of open programmes at this institution

Name	Mode of study	Profession	Modality	Annotation	First intake date
MA Art Psychotherapy	FT (Full time)	Arts therapist	Art therapy		01/09/2009
MA Art Psychotherapy	PT (Part time)	Arts therapist	Art therapy		01/09/2009
MA Dramatherapy	PT (Part time)	Arts therapist	Drama therapy		01/09/2006
MA Dramatherapy	FT (Full time)	Arts therapist	Drama therapy		01/10/2012
MA Music Therapy	FT (Full time)	Arts therapist	Music therapy		01/09/2006
MA Music Therapy	PT (Part time)	Arts therapist	Music therapy		01/09/2006
MSc Occupational Therapy (Pre-registration)	FT (Full time)	Occupational therapist			16/09/2024
MSc Physiotherapy	FT (Full time)	Physiotherapist			15/01/2024
PsychD in Counselling Psychology	FT (Full time)	Practitioner psychologist	Counselling psychologist		01/01/2007
PsychD in Counselling Psychology	PT (Part time)	Practitioner psychologist	Counselling psychologist		01/09/2017