

HCPC approval process report

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| Education provider | Queen Margaret University |
| Name of programme(s) | Master of SLT (MSLT), Full time BSc (Hons) Speech and Language Therapy, Full time |
| Approval visit date | 02 June 2020 |
| Case reference | CAS-15913-R6Y0K7 |

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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:

| | |
|---------------------|-------------------------------|
| Catherine Mackenzie | Speech and language therapist |
| Clare Attrill | Speech and language therapist |
| Temilolu Odunaike | 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.

| | | |
|-----------------|--|---|
| Michael Stewart | Independent chair (supplied by the education provider) | Queen Margaret University |
| Jill Kelly | Secretary (supplied by the education provider) | Queen Margaret University |
| Kate Shobbrook | Professional body representative | The Royal College of Speech and Language Therapists (RCSLT) |

Section 2: Programme details

| | |
|------------------------|-------------------------------|
| Programme name | Master of SLT (MSLT) |
| Mode of study | FT (Full time) |
| Profession | Speech and language therapist |
| Proposed First intake | 07 September 2020 |
| Maximum learner cohort | Up to 20 |
| Intakes per year | 1 |
| Assessment reference | APP02214 |

| | |
|------------------------|--|
| Programme name | BSc (Hons) Speech and Language Therapy |
| Mode of study | FT (Full time) |
| Profession | Speech and language therapist |
| Proposed First intake | 31 August 2020 |
| Maximum learner cohort | Up to 20 |
| Intakes per year | 1 |
| Assessment reference | APP02259 |

We undertook this assessment of new programmes proposed by the education provider via the approval process. This involved consideration of documentary evidence and a virtual approval visit, to consider whether the programmes 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 | The programmes are new and have not run. |

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 | Comments |
|---|-----|--|
| Learners | No | As this was a virtual visit and, because the visitors did not have areas to address with this group, we decided that it was unnecessary to meet with them. |
| Service users and carers (and / or their representatives) | No | As this was a virtual visit and, given the current situation around the Covid-19 pandemic, we decided that it was unnecessary to meet with this group |
| Facilities and resources | No | |
| 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 28 July 2020.

2.1 The admissions process must give both the applicant and the education provider the information they require to make an informed choice about whether to take up or make an offer of a place on a programme.

Condition: The education provider must ensure that appropriate information about the

programmes is provided to potential applicants, to allow them to make an informed decision about taking up a place on the programmes.

Reason: From the documentation provided, the visitors could not determine how the education provider ensures pertinent admissions information relating to the programmes will be communicated to potential applicants in order for them to make an informed choice about whether to take up a place on the programmes. The visitors noted that the evidence provided for this standard referred to entry criteria onto the Master of SLT programme. However, information such as placement travel and accommodation costs were not provided within the documentation. The visitors also noted that there was no explicit information within the documentation to explain that even though the programme is a Masters degree, learners would have the opportunity to opt out at BSc level; and that this also gives eligibility to apply to the HCPC Register.

At the visit, the visitors heard that prospective learners would be provided with information about the programme at an open day and visit day. The programme team explained that the open day would give applicants the opportunity to know about the topics they will learn and the visit day would be for those who have been offered a place to learn more about the programmes. The visitors considered that information such as the costs and exit award should be made available to potential applicants before they apply to the programme or before they attend the open day. Therefore, the visitors require the education provider to provide additional documentation, in particular the literature that would be made available to potential applicants to allow them to informatively decide on taking up a place on the programme. This should include:

- information about associated costs as identified above; and
- clarification around the BSc exit award that is available on the Masters programme.

This way the visitors will be able to determine whether this standard is met.

3.1 The programme must be sustainable and fit for purpose.

Condition: The education provider must demonstrate that there are plans in place to ensure the ongoing sustainability for the programmes.

Reason: From their documentation review, the visitors noted that the education provider had initially indicated that there will be 50 learners on the programme. The visitors could not see that there was commitment either from partner organisations or the education provider to provide sufficient resources to deliver the programme to all learners, as this was not provided in the documentation. In their pre-visit responses to the visitors' questions about learner numbers, the education provider explained that graduate numbers for the BSc programme in 2018 and 2019 were 12 and 13 respectively. The visitors therefore understood that there would be at least 12 additional learners. At the visit, the senior team clarified that there would be 25 learners on the Integrated Masters with the other 25 on the existing postgraduate diploma which was not considered at this visit. Based on this, the visitors understood that there would be additional learners across the speech and language therapy provision at this education provider. The visitors also understood that the existing BSc provision would be closing but they are uncertain when this will be.

In the practice educators' meeting, the visitors heard that the majority of the practice education providers do not have capacity for additional learners in practice-based learning. The visitors were also unclear how the education provider would ensure there

are sufficient teaching staff to support all learners, particularly in their dissertation supervision as this was not made clear within the documentation. As such, the visitors require the education provider to demonstrate that there would be sufficient teaching and practice based learning resources in place to ensure the programme is sustainable and can effectively support all learners.

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

Condition: The education provider must demonstrate how they will ensure that sufficient practice-based learning is available for all learners.

Reason: Through the documentary review and from discussions at the visit, the visitors were made aware that there is a Practice Placement Agreement (PPA) coordinated by NHS Education Scotland (NES) which ensures education providers in Scotland have sufficient practice-based learning capacity. The visitors noted that there was no breakdown provided of practice-based learning to assure them that there is currently sufficient practice-based learning capacity for these programmes. The visitors also did not see evidence of any shared practice-based learning database being maintained by NES (if this was the case) as it relates to these programmes. Given the education provider is responsible for ensuring availability and capacity of practice-based learning for all learners on their programmes, the visitors could not determine how the education provider uses the information provided by NES to ensure this.

The visitors also understood from their discussions with the practice educators that the majority of the practice education providers are already at full practice-based learning capacity and may struggle to take on additional learners. As such the visitors were unable to determine that there is an effective process in place for ensuring availability and capacity of practice-based learning. Therefore, they request that the education provider provide evidence showing how they will ensure the availability of sufficient practice-based learning for all learners.

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 provide further evidence to demonstrate that there is an adequate number of appropriately qualified and experienced staff in place to deliver an effective programme.

Reason: The visitors reviewed the staff section of the validation document as well as the staff curriculum vitae (CVs) as evidence for this standard. The visitors also noted that the SETs mapping document stated that there are 14 staff members on the programmes, 9 of whom are qualified speech and language therapists. The visitors noted that these were the same staff members that were delivering the existing programmes and there was no information about how they would manage the increased number of learners on the programmes. The visitors also noted that the external examiner picked up challenges in staffing on the outgoing BSc programme. However, the education provider had not demonstrated how they intend to overcome these challenges.

In their pre-visit responses to the visitors' questions about learner numbers, the education provider explained that graduate numbers for the BSc programme in 2018

and 2019 were 12 and 13 respectively. The visitors therefore understood that there would be at least 12 additional learners. At the visit, the senior team explained that there would be 25 learners on the Integrated Masters with another 25 on the existing postgraduate diploma (which was not considered at this visit). The visitors therefore understood that there will be additional learners across the speech and language therapy provision at this education provider. The visitors also understood that the existing BSc provision would be closing but they were unsure when this will be. As such, the visitors could not be certain that there would be adequate number of appropriately qualified and experienced staff in place to support all learners, particularly in their dissertation supervision. This is because the education provider did not provide the visitors with clear information on how the existing staff would be involved in delivering the different aspects of the programmes. Therefore, the education provider must provide additional information that demonstrates they have adequate staff in place to effectively deliver the new programmes and to manage and support all learners on the programmes.

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

Condition: The education provider must demonstrate they have a process in place for obtaining appropriate consent from learners when they take part as service users in practical and clinical teaching.

Reason: From reviewing the programme documentation, the visitors saw that the education provider has a process for obtaining consent from learners in practical and clinical teaching. However, the visitors noted that this was a broad consent which will be obtained at the start the programme and may not be applicable when learners take part in specific activities such as role plays. At the visit, the programme team explained that they make it clear to learners that some activities are optional and that they would support them if they wish to opt out of certain activities such as food tasting or role plays. The visitors noted that this information was not provided within the documentation so they were unable to determine how learners would be informed of this. As such, they could not determine that the education provider's process for obtaining consent was effective. They therefore request that the education provider submit further evidence that demonstrates their process for obtaining appropriate consent from learners when they take part as service users and carers in practical and clinical teaching.

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

Condition: The education provider must demonstrate that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning for the number of learners on the programme.

Reason: The visitors were referred to the practice-based learning section of the validation document as evidence for this standard. The visitors noted that the information provided did not demonstrate how the education provider would ensure an adequate number of appropriately qualified and experienced staff in practice-based learning. In discussions with the practice educators, the visitors heard from two of the three that were present that they were full to capacity regarding staff available to support learners in practice-based learning. The third practice educator explained that

although they have staff in place, they were having challenges taking on learners due to their geographical location. As such, the visitors were unable to determine how the education provider will ensure that there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning. Therefore, the visitors require the education provider to provide evidence that clearly outlines the process by which they will ensure there is an adequate number of appropriately qualified and experienced staff involved in practice-based learning to support all learners on these programmes.

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.

3.7 Service users and carers must be involved in the programme.

Recommendation: The education provider should consider reviewing their strategy for service user and carer recruitment, with a view to diversifying the carer group.

Reason: The visitors were satisfied that this standard was met at threshold, as there were service users and carers involved in the programme development as well as its ongoing development and delivery. The visitors noted that limited information was provided about the involvement of parents or carers of children using or, that have used, speech and language therapy services, to demonstrate that this group are also involved in the programme. Given the adult and paediatric nature of the profession, the visitors considered that the education provider should consider broadening their carer recruitment to include this group as they could also contribute to the ongoing development and effective delivery of the programme.

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

Recommendation: The education provider should consider providing further guidance to practice educators on how to support learners in understanding and meeting the expectations of professional behaviour, including the standards of conduct, performance and ethics (SCPEs).

Reason: The visitors were satisfied that this standard was met at threshold level as they received evidence that demonstrated that learners would be given in-depth teaching on professional behaviour and the SCPEs by the teaching staff. However, the visitors noted that the practice educators only discuss the SCPEs at the beginning of practice-based learning experience. The visitors considered that it was important that learners, continue to learn throughout the programme and in all settings, which types of behaviour are appropriate for them as professionals and which are not. As such, the visitors recommend that the education provider considers providing the practice educators with more guidance on how to ensure that the SCPEs play a more prominent and structured role throughout practice-based learning.

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

Recommendation: The education provider should consider reviewing the learning outcomes to ensure there is sufficient differentiation where the same module is taken in the BSc and Masters programme (level 10 and 11 respectively).

Reason: From the documentation provided and discussions with the programme team, it was clear that the teaching and learning methods used to deliver the programme were met at threshold. However, the visitors noted from their review of the module descriptors that there would be some modules that are delivered in both the BSc and Masters programmes but with different learning outcomes. The visitors considered that the programme documentation should demonstrate sufficient differentiation between the learning outcomes where the same module is taken by both sets of learners. They therefore recommend that the education provider review the learning outcomes where the same modules are delivered at levels 10 and 11 and make these explicitly clear so learners fully understand the differences.

5.7 Practice educators must undertake regular training which is appropriate to their role, learners' needs and the delivery of the learning outcomes of the programme.

Recommendation: The education provider should consider different ways of delivering regular training to practice educators to support them in their role, in meeting learners' needs and for the delivery of the learning outcomes of the programme.

Reason: From the information provided prior to the visit and through discussions at the visit, the visitors were satisfied that practice educators have access to the training they need to be able to support learning and assess learners effectively and as such, they considered that the standard was met at threshold level. The visitors understood that there is a clear framework of training for practice educators in Scotland and the training is delivered four times a year. The practice educators also informed the visitors that there are regular trainings organised by the education provider for practice educators and that there are resources accessible to them to support them in their role. The visitors noted however, that some of the practice educators struggle to attend the training delivered by the education provider as these are usually delivered on the education provider's site. The practice educators told the visitors that they would be able to attend the training more regularly if it was delivered to them at their NHS Trusts rather than they having to undertake the training at the education provider's site. As such, the education provider should consider how they deliver training to practice educators so they can be sure that the practice educators continue to undertake regular training appropriate to their role, learners' needs and the delivery of the learning outcomes.

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

Recommendation: The education provider should consider reviewing the usefulness of the indicative mark used by practice educators to assess learners, to ensure they are objective, fair and reliable in assessing learners throughout the programme.

Reason: The visitors considered that this standard was met as the education provider's assessment strategy was laid out and comprehensible for learners. However the visitors noted that there is an additional indicative mark that practice educators are allowed to

give in practice-based learning assessments. The education provider explained that the indicative mark is important to learners as it provides them with an opportunity to know how well they are doing in practice, particularly for those that struggle with academic work but do very well in practice. The visitors understood the importance of the indicative mark to learners, however, they were unsure how practice educators would know how to grade this mark. The programme team explained that new practice educators would be supported by their more experienced peers and that there is guidance available to them. The team also explained that they have done a lot of work to support practice educators in understanding the learning objectives for each year. The visitors considered that the education provider should consider reviewing the usefulness of the indicative mark used by practice educators, in terms of its objectivity, fairness and reliability to ensure assessments are clear, realistic and consistent throughout the programme.

Section 5: Visitors' recommendation

Considering the education provider's response to the conditions set out in section 4, and the request for further evidence set out in section 5, 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 20 August 2020 meeting of the ETC. Following this meeting, this report should be read alongside the ETC's decision notice, which are available [on our website](#).