



Council of Deans of Health Response to the Health and Care Professions Council's (HCPC) Consultation on Revised Standards of Education and Training and Supporting Guidance

9 December 2016

Council of Deans of Health

The Council of Deans of Health (CoDH) is the representative voice of the UK's university health faculties engaged in education and research for nursing, midwifery and the allied health professions. Further information about us can be read at:

<http://www.councilofdeans.org.uk/>.

We welcome the opportunity to respond to this consultation.

Consultation questions

Q1. Do you think the draft revised SETs are at the threshold level necessary to ensure that all learners are able to practise their profession safely and effectively by completion of a HCPC-approved programme?

Yes, we particularly welcome new standards on learner involvement in the design, delivery and review of programmes (SET 3.8) and support for learners to raise concerns about the safety and wellbeing of service users (SET 3.17). Several reports, such as the Francis report¹, have highlighted the valuable contribution learners make to the standards of care provided to patients. While many of our members already involve learners in their programmes and support them in raising concerns about poor practice, the new standards help to reinforce the importance of student involvement. HEIs often have their own approaches to supporting and developing students on healthcare programmes, our members

¹ Francis R. (2013) *Report of the Mid Staffordshire NHS Foundation Trust Public Inquiry*. London: The Stationary Office.

Francis, R. (2015) *Freedom to speak up: an independent review into creating an open and honest reporting culture in the NHS*.



have said they would welcome guidance from the HCPC on whether they have any particular requirements of student involvement in programmes.

Q2. Do you think the draft revised SETs and supporting guidance are applicable across all HCPC approved pre-registration programmes?

Partially. We recognise that the SETs should strive to reflect the changing face of clinical practice and the wider policy context to ensure the SETs remain relevant and are future proofed as far as possible. Apprenticeships are a key government priority and the HCPC will need to ensure that the revised SETs and guidance are reflected in any AHP Apprenticeship Standards.

Degree level apprenticeships can be expected to create a new type of relationship between HEIs and employers as employers will have the ability to choose apprenticeship providers. Whilst HEIs are the most obvious providers of degree apprenticeships for allied health professionals in the immediate term, over time it is possible new providers may want to enter the market. Should this happen the SETs will need to be understood by a variety of providers.

We would also want to ensure that apprenticeships routes in to the allied health professions result in equivalent outcomes and standards to the traditional education routes and believe this should be emphasised within the SETs and guidance.

We would encourage the HCPC to consider these points and make any necessary changes within the SETs and supporting guidance where appropriate.

Q3. Do you think there are any additional standards or guidance needed?

As above in question 2.

Where the route to registration may be non-traditional for example via an apprenticeship, employers and education providers that are new to working with the HCPC should be encouraged through the SETs to ensure their employees experience a range of practice settings that enable their employee/apprentice to have opportunity to be eligible to meet HCPC SETs and SOPs.

Q4. Do you think there are any standards or guidance which should be amended or removed?

SET 4.11 (page 6)

We suggest this would fit better under the section 'Programme governance, management and leadership'.



Q5. Do you have any comments about the language used in the SETs or supporting guidance?

The language used in the SETs and guidance is generally clear and easy to understand. The revised SETs and guidance has been reduced in size and are structured in a clear way, which should help ensure that the Standards are understood by stakeholders and the public.

Q6. Do you have any other comments on the SETs or supporting guidance?

Major trends in health and social care are changing how care is delivered and it is vital that learning and teaching are effective in preparing all allied health professionals to meet the needs of practice both now and in the future. Within this context, the Council recognises that the role and expectations of the paramedic profession, in particular, are changing. Paramedics are increasingly required to deliver high levels of care to patients, often with complex needs, across a range of care settings. This requires a different set of skills, knowledge and competencies for expanded practice. Whilst the current minimum educational threshold for entry onto the HCPC register is currently a Certificate of Higher Education, the Council supports the aspiration outlined in the PEEP² report on the on the future of paramedic education and training, to progress paramedic science to an all-graduate profession. This would enable the profession to practice at a higher level and would bring it more closely in line with the threshold entry routes to other allied health professions regulated by the HCPC. We therefore urge the HCPC to review the current education threshold for entry onto the register for paramedics.

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² Allied Health Solution (2013) [Paramedic Evidence Based Education Project \(PEEP\) End of Study Report](#)