

## Education in Shifting the Balance

<b>Purpose of paper</b>	This paper sets out a proposed consultation on the education initiatives within the 'upstream' section of Shifting the Balance and asks for approval from Council to consult on these proposals in mid-February 2018.
<b>Status</b>	Public session
<b>Action</b>	For comment and approval to publish
<b>Corporate Strategy 2016-19</b>	Professionals Objective 2: To help ensure that dental professionals are properly trained in the skills necessary to practise dentistry safely from the outset.
<b>Business Plan 2018</b>	12.1. StB: Education and QA – Risk-based QA 12.2. StB: Education and QA – Evolving Learning Outcomes
<b>Decision Trail</b>	Shifting the Balance agenda launched in January 2017 Annual Review of Education approved by Council in March 2017 PRB presented with 'direction of travel' paper in April 2017 and more detailed plans in November 2017 EMT presented with the draft consultation in November 2017 and an update, including resource implications in January 2018
<b>Next stage</b>	Following Council and EMT feedback, the education team and the Shifting the Balance working group will consult on a risk and theme based approach to the quality assurance of education and a regular process for reviewing the learning outcomes.  The consultation will be opened in mid-February 2018 for a period of 12 weeks.
<b>Recommendations</b>	Council is asked to: <ul style="list-style-type: none"> <li>• Discuss the proposed risk-based approach, the introduction of thematic QA and a process for regular review of the learning outcomes</li> <li>• Approve the consultation, subject to any changes prior to publication in mid-February 2018</li> </ul>

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<b>Appendices</b>	Appendix A: Consultation proposals

## 1. Executive summary

- 1.1. The purpose of this paper is to seek Council's comment on the enclosed consultation proposals and gain approval to consult, subject to any required changes, on the:
  - Introduction of risks and themes into the GDC's quality assurance processes for education and training programmes;
  - Introduction of a process for regular review of the learning outcomes for registration, across all registrant categories.
- 1.2. The GDC Education team has undertaken research and discussion with a range of internal and external stakeholders and further developed the education proposals that were outlined in *Shifting the Balance*. This has included meetings with other regulators, a survey of education providers, a survey of QA inspectors, a project board with representatives from across the GDC executive, a reference group comprising education stakeholders, as well as discussion at EMT and PRB meetings. The meetings and discussions have helped shape these proposals and led to the development of the draft consultation document, which is attached at Appendix A.
- 1.3. There are several close links within this work to other workstreams within *Shifting the Balance*, particularly with those related to improving engagement and the data and intelligence strategy.
- 1.4. Council is asked to provide feedback on the plans outlined in the draft consultation document. With Council approval and following the incorporation of amendments required, the consultation proposals will be published in mid-February for a period of 12 weeks, closing in May 2018.
- 1.5. Consultation responses will be evaluated and proposals for implementation of new/revised processes will be presented to PRB, EMT and Council in late Quarter 2, or early Quarter 3, 2018.
- 1.6. This paper is based on papers previously considered by PRB and EMT in November 2017.

## 2. Introduction and background

- 2.1. Within the 'Upstream' strand of *Shifting the Balance*, three distinct areas of focus relating to education were identified:
  - Risk-based quality assurance
  - The process for reviewing the learning outcomes
  - Supporting new registrants from outside the UK
- 2.2. Following discussion with the *Shifting the Balance* working group, it was agreed that the work to support overseas registrants was primarily a communication initiative with internal and external stakeholders feeding into its development. This will sit within the communications work stream of *Shifting the Balance* and will be reported through this.

- 2.3. An internal project board, comprising staff from the education, policy, registration, compliance, risk and project management teams has been established. This group will continue to meet as the consultation feedback is analysed and the changes are implemented. Others may be invited to join the group as the work develops.
- 2.4. Early views of PRB members were sought in a paper which was presented to PRB in April 2017 and again when more developed proposals were presented in November. Feedback was received from EMT in November 2017 and agreement to consult on these proposals was gained in January 2018.
- 2.5. GDC staff have met with a range of healthcare and other regulators to seek information about how they approach the quality assurance of education and training, including what they believe they do well and what is a challenge for them or provides limited value. In addition, a reference group of external stakeholders has been established and has met on four occasions to provide feedback on the proposals.
- 2.6. There are several links within this work to other workstreams within Shifting the Balance, particularly the data and intelligence strategy and improving engagement workstreams. An outcome of these proposals will be that the GDC will be 'more present' in the education and training sector than we are now. This is because we will be undertaking more frequent, shorter inspections based on either a risk-assessment or an identified theme. There will also be the opportunity to undertake further engagement through workshops with providers and student engagement events.

### **3. Research and development**

- 3.1. The responses to the education proposals outlined in Shifting the Balance were reviewed upon receipt. The proposals in the consultation will address many of the issues that were raised.
- 3.2. The team has reflected on the outcomes of the work undertaken by the Dental Nurse Working Group (DNWG) in 2016 and 2017, which looked to implement a risk and sampling based approach for the quality assurance of individual dental nursing training providers. The findings of the DNWG have been valuable in shaping the consultation proposals.
- 3.3. The GDC education team have spoken to the following groups when developing the proposals:
  - 3.3.1. Quality Assurance Officers. Views of the strengths and weaknesses of the current process were sought from those who operate this. Quality assurance team members have also had opportunity to provide feedback on the draft consultation proposals.
  - 3.3.2. Fellow regulators: We have met with the following organisations either face-to-face or by teleconference:
    - Architects Registration Board
    - General Medical Council
    - General Optical Council
    - General Osteopathic Council
    - General Pharmaceutical Council
    - Health and Care Professions Council
    - Nursing and Midwifery Council
    - Ofsted
    - Professional Standards Authority
    - Quality Assurance Agency
    - Royal College of Veterinary Surgeons
    - Solicitors Regulatory Authority

The information shared by these regulators has been discussed with the staff project board and some of the practice we have seen has been incorporated into these proposals.

- 3.3.3. Quality Assurance Inspectors: A survey of inspectors' views of the current GDC QA process took place in September 2017.
- 3.3.4. Education and Training Providers: A survey of providers' views of the current processes and how they could be improved took place in October 2017. Much of the feedback received related to areas not directly covered by this consultation, however, these proposals will enable us to address a number of areas for development identified in the survey. These areas included, consistency between inspection panels, panel expertise and the time taken for reports to be produced. A further survey relating to the plans for regular review of the Learning Outcomes has also been undertaken and a wide-range of views was received regarding how and how frequently the learning outcomes should change.
- 3.3.5. Dental Schools' Council (DSC): An earlier version of the draft consultation was shared with the DSC and was discussed at their meeting of 16 October. Feedback from DSC was very positive, and support was given to the direction of travel. DSC members agreed that the subject suggested as a possible early thematic review, new graduates' preparedness for practice, was an ambitiously complex subject with which to begin. The proposals were also shared with the Directors' of Dental Hygiene and Therapy Group.
- 3.3.6. Education reference group: The Education team convened a working group of stakeholders to act as a sounding board and provide feedback on draft proposals. The group, which has met on four occasions, comprises six individuals who are QA inspectors or programme leads (including one member of Council/PRB). This group will continue to be used as a reference group to help us with our proposals throughout the consultation period and up to implementation.
- 3.4. The research and engagement we have undertaken has shaped the consultation proposals attached to this paper. Further amendments can be made to these proposals before publication, following feedback from Council.

#### **4. Overview of risk-based and thematic quality assurance**

- 4.1. The attached draft consultation document outlines key proposals, which include:
- 4.1.1. That the frequency, duration, scope and depth of inspections of established programmes is determined by an assessment of risk based on a range of factors.
  - 4.1.2. The process for quality assuring new programmes may vary according to an assessment of risk.
  - 4.1.3. The annual monitoring process becomes a more central element of the GDC's QA of education process and incorporates an enhanced self-assessment to be undertaken by providers. GDC associates (QA inspectors) will be used to analyse the annual monitoring returns, working in pairs to provide a short summary report and recommendation for each programme.
  - 4.1.4. The option to undertake thematic reviews is introduced. These will focus on a particular area, rather than on a specific programme. We may seek agreement from providers and others in the sector to undertake elements of a thematic review as a joint exercise.
  - 4.1.5. The GDC will be 'more present' in the education and training sector than we have been in the past. The education team will be likely to undertake more frequent, shorter inspections based on either a risk-assessment or an identified theme. We will also undertake more engagement through workshops with providers and student engagement events.
  - 4.1.6. Subject to further consultation, the quality assurance of specialty training will follow the same process as the quality assurance of primary qualifications. Council should

note that developments regarding specialty curricula and quality assurance processes will be dependent on work being undertaken with a strategic specialty working group (with representatives from the four nations of the UK, the Royal Colleges and the specialties). This group is looking at a range of broad questions about the regulation of the specialties and how these link with patient interest and, consequently, workforce needs.

4.1.7. As the GDC develops greater capability to gather and analyse data and other information from internal and external sources, the education team will seek to use this capability to inform both the risk analysis and themes for review. Findings will be shared with the sector, where it is appropriate to do so.

4.1.8. An increased range of decisions will need to be made and these may be more complex than at present. Expert input may be necessary to inform EMT, the Registrar and Council when making decisions.

4.2. Council is asked to provide views on the above areas and request further explanation and indicate if they advise that further work should be undertaken prior to the consultation.

## 5. Reviewing the learning outcomes

5.1. The learning outcomes for all courses that lead to registration with the GDC are outlined in the document, [Preparing for Practice](#), and were last reviewed in 2015. However, there is no formal, regular review process in place to ensure that the learning outcomes best reflect the perceived requirements of current and future practice.

5.2. To ensure the learning outcomes remain fit for purpose we proposed, within *Shifting the Balance*, that a regular review of the learning outcomes in consultation with stakeholders is required. This approach is intended to keep the outcomes up to date, ensuring they reflect current practice. It is also intended to be less onerous for education providers in adapting to the changes than the previous infrequent fundamental reviews. The aim is to move towards a process that embraces gradual evolution while also making sure this new process works for all education providers, whether the training is delivered in a university, college or work-based context

5.3. Information gathering work to identify practical considerations that will need to be considered in the learning outcomes review process has been undertaken and has involved:

- internal engagement work, looking at GDC policy and guidance, including for the assessed applications process for overseas applicants and the Overseas Registration Exam (ORE), which will both be affected by changes to learning outcomes
- a survey for training providers asking how their organisational procedures could impact on implementing changes to the learning outcomes, what might be an optimum or a limit to the frequency and magnitude of changes, about training provider engagement considerations – both for implementation and potential sources of evidence for changes to the learning outcomes
- a review of other regulators' approaches to updating their learning outcomes or equivalent, including practical constraints and engagement and approval processes

5.4. This information will be further analysed alongside the consultation responses to assist in the design of a review process. An evidence gathering and stakeholder engagement strategy will be developed following analysis of consultation responses, which will include a medium-term plan of work and a proposal for a reference/advisory group to review evidence for future changes. Further details can be found in Section 7 of Appendix A.

5.5. The consultation proposes that changes to the learning outcomes should take place at most every two years, though there will be flexibility in the process for urgent changes.

## **6. Decision making**

- 6.1. The process for signing-off the programme of activity in a calendar year will be through the budget-setting process (involving the EMT, FPC and Council). The draft consultation document highlights, under Section 8, that the proposed processes may require additional expert and professional input into the decision-making process. Consideration will need to be given to the body or bodies that would be best placed to make or inform recommendations to the GDC regarding, for example, the programme of activity in a particular period and themes for review.
- 6.2. The proposed revisions to the QA process outlined in this consultation will mean that there will be additional decisions and recommendations that need to be made and the GDC may need to seek external advice to inform these decisions. These include the programme of QA activity for a specific time period (academic year), including which programmes we should inspect, the aspects of these programmes to focus on, the themes identified that should be subject to a review and the data and intelligence that will inform any risk assessment.
- 6.3. For the 2018/19 academic year, it will not be feasible to appoint and train a new group to provide the GDC with this advice. The suggested approach for this period is that the QA team will propose options for the activity to be undertaken to PRB for their views. Options would then be taken to EMT and Council for decision as part of the 2019 budget-setting process. This approach would be helpful in exploring the types of decisions that will need to be made and enable PRB, EMT and Council to have a closer relationship with developments and understand the impact of decisions on resources.

## **7. Plans for 2018/19 (2019 budget)**

- 7.1. For the 2018/19 academic year we will undertake some follow up activity (re-inspections) from the 2017/18 inspections and some inspections of new programmes, however, we do not anticipate that this will be extensive.
- 7.2. It is proposed that the remainder of QA activity is focused on BDS (dentistry) programmes. The reasons for this include that we have not inspected many of these programmes since the BDS inspection round between 2012 and 2014 and also that a dentist's scope of practice and the cohort size of programmes would increase the potential impact and the likelihood of risk. Therefore, BDS programmes would probably meet both the current and future criteria for inspection activity. In addition, by focusing the first year of the transition to a new process on one registrant group will help make the transition more manageable.
- 7.3. What would be different when following the proposed process in the 2018/19 academic year is that we would not inspect each BDS programme against each individual requirement of the Standards for Education, but for some programmes we would undertake shorter – more focused – inspections based on annual monitoring self-assessment, previous performance and other factors as outlined in the consultation proposals. It may be that for some programmes there are risks identified around the assessments and it is determined that we need to inspect the final exams, but for other programmes we may undertake only a single day inspection visit where we will meet staff and students.
- 7.4. We will use the 2017 annual monitoring process to assist us in determining the scope and duration of BDS inspections, which will feed into the 2019 budget proposals. We have worked with the finance team to establish average costs for several types of activities on which we will base assumptions within budget proposals.
- 7.5. We propose to undertake at least one thematic review in the 2018/19 academic year. Whilst we had, initially, thought that the preparedness for practice of new dental graduates could be a suitable subject for this, we have received feedback from a range of stakeholders that this will be both a challenging and substantial subject to begin this activity. It may be more sensible and prudent to trial this new approach with a more manageable theme. As it is probable that we will complete a thematic review of new registrants' preparedness for practice

at a later date, we will still collect information about these issues at BDS inspections taking place in 2018/19. The Dental Schools' Council (DSC) have had sight of these proposals and are aware that inspections of BDS programmes are likely to take place from late 2018.

## 8. Risks and considerations

- 8.1. There will be cost considerations related to these proposals, which will greatly depend on the chosen processes, the performance of providers and the number of new programmes commencing, as well as major changes and threats to existing programmes. However, there is likely to be a 15% increase to the average education budget between 2019 to 2023 compared to the five years between 2014 to 2018 if the proposals are adopted as planned. When developed, the proposals will offer the GDC the ability to make decisions based upon a much greater range of options. There will be scope for EMT and the Council to make decisions regarding programmes of activity with consideration of cost versus benefit. It would be determined through the budget setting process whether each of the activities proposed was an appropriate use of resources.
- 8.2. We should be able to achieve some efficiencies by making better use of QA activity that does not necessarily include full inspections of the programme and the examination/assessment elements of programmes. However, there will be additional costs in collecting and analysing the data and intelligence required to administer the process. Undertaking thematic activities would also incur costs that are not present in the current process.
- 8.3. There is an associated risk aligned to the above, that more programmes than expected are determined as high-risk and requiring more frequent GDC scrutiny.
- 8.4. We value the insight/involvement of students and patients in the development of our processes and systems and we wish to actively seek their input at appropriate stages. We believe that, whilst the consultation in early 2018 will be an open consultation, the most appropriate point at which to use GDC resource to actively engage students, new registrants and patients/patient groups will be when we are seeking evidence to make changes to the learning outcomes and when consulting on any proposed changes to the outcomes.
- 8.5.

### Communications

- With Council approval, this consultation is scheduled to be opened in mid-February. There may also be a consultation on fees policy opened at this time and discussions are ongoing around optimum timings.
- The feedback received from stakeholders, such as Dental Schools' Council and those on the education reference group, who have seen an earlier version of the proposals, suggests that there is broad support for the direction of travel. This work follows the commitments made by the GDC in the upstream strand of Shifting the Balance.
- A significant proportion of interest in the proposals is likely to be from within the dental education sector and stakeholders such as the committees of the Royal Colleges and professional bodies. Direct communications will be sent to these bodies.

### Equality and Diversity

- An equality impact assessment (EIA) was carried out in June 2017.
- A further EIA will be undertaken following the consultation response analysis. There will be a particular need for an EIAs to be undertaken when the learning outcomes are reviewed in future.

### Legal

- The quality assurance of qualifications leading to registration with the GDC is a statutory duty under the Dentists Act 1984. The Act does not specify frequency of activity. The

proposals we are consulting on would ensure that the GDC continues to meet its statutory duty to quality assure qualifications leading to registration.

#### **Policy**

- This is a proposal to change GDC policy in relation to the approach to quality assuring education and training programmes.

#### **Resources**

- These proposals will require additional resource, both in terms of financial resource and staff resource.
- Indicative costs have been shared with the EMT and highlight an increase in the education and QA budget of 15%.
- Council and the EMT will have control over the additional resource required through the budget-setting process.

#### **National**

- The proposals apply uniformly across the four nations of the United Kingdom.

#### **Risks on registers**

- EQ1 - Failure or inability to measure effectiveness of performance.
- EQ3 - Perception that the Education system is failing; and the GDC have not taken proactive measures to address this

## **9. Recommendations**

9.1. Council is asked to:

9.1.1. Provide feedback, including any changes that should be made to the consultation proposals in Appendix A

## **10. Internal Consultation**

<b>Department</b>	<b>Date and consultee name</b>
StB Education Project Board	28 February, 2 May, 19 September 2017
PRB	5 April and 8 November 2017
StB Programme Board	15 August and 26 September 2017
EMT	27 November 2017 and 22 January 2018

## **11. External Consultation**

<b>Department</b>	<b>Date and consultee name</b>
Education Reference Group	14 September, 10 October, 28 November 2017 and 15 January 2018
Dental Schools' Council	15 October 2017
Directors' Group (hygiene and therapy)	7 November 2017

## 12. Timescales

### Timescales for development of risk-based and thematic QA process

Review other regulators' approaches	March – July 2017
Develop draft consultation document with StB project team and education reference group	July – November 2017
PRB consider consultation proposals and provided feedback	8 November 2017
EMT consider consultation proposals	27 November 2017, 22 January 2018
Council consider draft consultation	1 February 2018
Consultation	February - May 2018
Amendments to proposals made and shared with PRB, EMT and Council for comment and approval	June - September 2018
First academic year of new process commences, and revised process published. Data and intelligence gathering. Work programme for 2018/19 academic year developed, approval sought and circulated to providers.	Quarter 3 2018
Risk-based and thematic QA activity commences.	Quarter 4 2018
Data and intelligence gathering	Quarter 1-2 2019
Review of 'pilot' year of activity Risk framework further developed, and themes identified for 2019/20 academic year.	Quarter 2-3 2019

### Timescales for the learning outcomes project

Review other regulators' approaches	July – October 2017
Research practical considerations for a new process	July – October 2017
Develop draft process and stakeholder and evidence strategy	October – December 2017
PRB consider draft consultation and provide feedback	8 November 2017
EMT consider draft consultation	27 November 2017, 22 January 2018
Council consider draft consultation	1 February 2018
Consultation on proposals	February - May 2018
Amendments to proposals and approval	May - September 2018
GDC approval and launch preparation	Quarter 3 2018
Process published and implemented	Quarter 4 2018

## 13. Appendices

- Appendix A: Draft consultation