

**EDUCATION AND TRAINING AND EXAMINING BODY COMMITTEE**

**25<sup>th</sup> February 2009**

**Held by phone**

**10.30AM – 12.30PM**

**Item**

Item 8 Proposed new route to registration for aptitude and EU candidates

**Summary**

This paper proposes a new route on the register for aptitude candidates that balances consumer protection, proportionate cost and compatibility with current HPC processes. The same process could be used for EU applicants.

**Action**

To advise on how candidates could be assessed to select which competences should be tested. For example, what information the panel would require and in what format.

To agree the route in principle and instruct the executive to present to Council with legal opinion, timetable and expected costs.

## **A route to the register for aptitude candidates**

### **Background**

In light of the Government's intention to transfer the HAC register to the HPC in March 2009, the Council took the decision to close the historic exam route on to the register in January 2009 following a series of consultations with the industry. The exams were the traditional gateway for aptitude candidates. Since the Council took the decision to close the exams, the Government had delayed the transfer until March 2010. It is in the interest of potential registrants and consumers that the Council find a new route on the register for aptitude candidates in its final year. The Council is also obliged by European legislation to offer candidates from other EU countries a test of those areas where their training and experience is judged to fall short of the standard applied to those trained in the UK.

This paper proposes a new route for aptitude candidates that balances consumer protection, proportionate cost and compatibility with current HPC processes. The same process could be used for EU applicants.

### **Legal basis**

The Council has a clear duty to protect the public. Ensuring a minimum standard of competence to join the register is a vital part of that system of protection. However, the Council could be challenged on human rights grounds if it is unfairly restricting people's ability to work by blocking from the register without good reason. Two of the Standards of Competence (2008) for joining the register are:

*1. (4) (a) acceptance by the Council that the applicant has evidence of education and training gained elsewhere that substantially meets the theoretical and practical requirements of the Council's examination and post-examination training, in which case the applicant will be offered an aptitude test or adaptation period at the discretion of the Council; and*

*(b) in the event that the applicant is offered an aptitude test, a declaration by the Council of success in that test; and*

*(c) in the event that the applicant is offered an adaptation period, the submission to the Council of a certificate signed by the trainee's notified supervisor testifying that the trainee has satisfactorily completed the adaptation period as set out in paragraph 5 of the Standard of Competence as prescribed for that trainee by the Council and that in the opinion of the signatory the applicant is competent to act as a dispenser of hearing aids. or*

*1. (5) in the case of applicants whose evidence of education and training gained elsewhere differs substantially from the theoretical and practical requirements of the Council's examination and post-examination training:-*

*(a) (i) notification to the Registrar that the applicant wishes to commence an adaptation period; (ii) submission to the Council of a certificate signed by the trainee's notified supervisor testifying that the trainee has satisfactorily completed an adaptation period as set out in paragraph 5 of*

*the Standard of Competence as prescribed for that trainee by the Council and that in the opinion of the signatory the applicant is competent to act as a dispenser of hearing aids; (iii) submission to the Council of a logbook as prescribed in the adaptation period for that trainee; and (iv) agreement of the Council that the certificate at (ii) above and the logbook at (iii) above are satisfactory; or*

*(b) declaration by the Council of success in an “aptitude test” as set out in paragraph 5 of the Standard of Competence. The choice of undergoing an adaptation period or taking an aptitude test is the applicant’s provided that, in the opinion of the Council, the evidence of education and training shows preparation for dispensing hearing aids. In all other cases, including those trained elsewhere within the UK, the choice is the Council’s.*

Paragraph 5 sets out the format of the adaptation period and aptitude test:

**5. (1)** *The “adaptation period” will be such period of supervised practice as the Council considers necessary to ensure the applicant has the knowledge and skills required by the Council.*

*The adaptation period will be subject to detailed requirements made by the Council, which set the length of the period, the supervisory requirements, the further education and training required, the knowledge and skills to be assessed, etc. As required by paragraph 23 of the Code of Practice, the applicant’s supervisor will notify the Council that the applicant will be undergoing full time training before the applicant first dispenses under supervision.*

**5. (2)** *The “aptitude test” set by the Council will test the theoretical knowledge, practical skills and knowledge of professional rules required by the Council and not covered by the applicant’s evidence. Prior to declared success in the aptitude test, the applicant may not dispense unless first notified to the Council as a full time trainee and unless under supervision as required by paragraph 26 of the Code of Practice. Applicants for the aptitude test are required to take and pass the aptitude test within eighteen months of being accepted for the test by the Council. Any extension of that period will be at the discretion of the Council and must be applied for in writing together with the reason for such application at least 28 days prior to the expiry of the 18 month period, or whatever additional period was previously authorised.*

*In the case of those with NVQ level III in Audiology or equivalent, the adaptation period or aptitude test will only cover those aspects of the Council’s syllabus relating to its Code of Practice, consumer legislation and knowledge of the selection and fitting of available commercial hearing aids over a full range of different technical characteristics.*

The HAC has twice consulted on closing the examination route on to the register for notified trainees. Following Council’s decision in January 2008, the Council ceased to accept new notified trainees to sit exams following the 2008 exams. The Standards make a clear distinction between the **exams**, aimed at notified trainees with no professional or academic experience, and the **test/adaptation period**, aimed at those who already have demonstrable competence. It is clear from section 5(1) above that aptitude candidates should be prescribed a tailored adaptation period, there is not set syllabus such as that required by section 8 for the examinations. Similarly

in section 5(2) there is reference to an aptitude test set by the Council as distinct from the examination process.

Section 9 of the Standards reinforces the distinction between the aptitude test/adaptation period and the examinations referred to in section 8. It implies that an aptitude candidate's evidence of practical and educational competence should be assessed against the minimum standards required by the Council and a specific test or adaptation period set for each candidate:

*9. The Council, shall specify an adaptation period or set an aptitude test for an applicant within four months of receipt of all the documents needed by the Council to compare that applicant's evidence of knowledge and skills or experience with that required by the Council through its examinations and post-examination training. The documents must include, as appropriate, 4 copies of: the certificate or other evidence of education and training; the syllabus followed; evidence of relevant experience which, in the case of applicants wishing to take an aptitude test, must include a statement signed by a suitable person, that the applicant is competent to dispense without physical and personal supervision; a translation into English of the above documents a Certificate of Good Standing.*

Historically, the Council has tested aptitude candidates through a test which closely mirrored the concurrent exam process for notified trainees. It was not obliged to do so but did so on grounds of efficiency since the notified trainee exams brought several economies of scale. Rooms hire and examiner costs were spread across many candidates, for example. With the closure of the exams, running aptitude tests mirroring traditional OSPE/Theory exam for a handful of candidates would be prohibitively expensive for candidates thereby acting as an effective barrier to the register.

A final consideration is how aptitude candidates will become eligible to join the HPC register once the transfer takes place. Established routes on to the HAC register can remain open once the transfer to HPC takes place. It is sensible then to ensure any new route for aptitude candidates on to the HAC register will be an acceptable route on the HPC's in the future. This was a fundamental reason behind the Council's decision to close its exams and replace them with approved foundation degrees.

### **A proposed new model**

Any new route for aptitude candidates must test candidates are competent enough to practice safely within the Code of Practice, be accessible at reasonable cost and be acceptable to the HPC.

Intuitively, it would be seem more efficient for candidates and the Council if all aptitude candidates were to undergo an adaptation period rather than a test. However this is not viable for two reasons. Firstly, it is clear from the Standards of Competence that aptitude candidates should have the choice to undergo an adaptation period or a test. Secondly, an adaptation period must be signed off by a supervisor who must be a registered dispenser. Many aptitude candidates work in the NHS where no HAC supervisor may be available; again, an effective barrier to the register.

### **What should the adaptation period or test assess?**

Historically the Council has tested aptitudes on their understanding of the Code of Practice via a written exam and their practical ability in 10 areas:

- History Taking and Decision Making
- Medical Aspects
- NOAH and Hearing Aid Fitting
- NOAH and Fine Tuning
- Otoscopy and Otoblock Placement
- Impression Taking and Impressions.
- Pure Tone Audiometry without Masking
- Retubing and Earmoulds
- Hearing Aid Technology and Fault Finding
- Pure Tone Audiometry with Masking.

The new model proposes to test the same areas but using more flexible, cost effective methods.

### **How would candidates be assessed?**

Candidates would apply to be accepted as aptitude candidates. They would send in evidence of educational attainment, clinical experience and professional development. Two clinical references and proof of identity would also be required.

The Registrar would make an initial assessment based on the documentation. The assessment would evaluate the extent to which the applicant could demonstrate competence in each of the areas above. The Registrar would submit the application and an initial recommendation to the Education and Training Committee and Examining Body. The recommendation would propose whether to accept the applicant as aptitude candidate or not and if so in what areas they should be asked to demonstrate competence in the test or adaptation period.

The Education and Training Committee and Examining Body would consider the application and Registrar's recommendation. If the Committee accepted the applicant as aptitude candidate then they would consider the format of a test or adaptation period. Again the objective would be to isolate those areas where there is insufficient evidence of the minimum acceptable level of competence. The Education and Training Committee and Examining Body would proscribe which areas should be tested or, in the case of an adaptation period, which areas should be covered by the period, the level of supervision required, and the number of hours/cases and any external tests necessary to prove competence.

### **Test**

It is proposed that tests would be run by HEIs. The cost per competence to be assessed would be set by the HEI to encourage competition, as would the frequency of test periods. However HEIs would be obliged to offer tests at least twice during 2009-10.

Test centres would need to be approved by the HAC but this need not be an arduous process. The HAC would limit test centre approval to those HEIs already running approved degrees. Approval would be granted by small ad hoc panel (ideally containing the HAC former Chief

Examiner, Moderator and an HAC staff member) based on written submission explaining how each area would be tested. It is envisaged that an oral exam could be used to test understanding of the Code of Practice and clinical competence tested using facilities already in place for the teaching of approved foundation, BSc and MSc degrees.

HEIs would issue a certificate for passing each element of the test and the candidate would submit this certificate as evidence of their eligibility to join the register.

### **Adaptation period**

Those candidates choosing an adaptation period will require a notified supervisor responsible for the candidate's actions and signing off completion of work towards demonstration of prescribed competences. Candidates will be given a log book in which to record their completion towards meeting the requirement. The Education and Training Committee and Examining Body could where they felt appropriate require a candidate choosing to undergo an adaptation period to also pass a competence test at one of the approved test centres. For example, it is likely all aptitude candidates would be required to pass a test to prove understanding of the Code of Practice but the Committee may feel other high risk competences require testing.

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