



Council
22 November 2023
University College of Osteopathy – Renewal of Recognition of Qualifications (RQ)

Classification Public

Purpose For noting

Issue The Visit report for the recognised qualifications offered by the University College of Osteopathy (UCO) as considered in October by the Policy and Education Committee:

- Master of Osteopathy
- Bachelor of Osteopathy.
- Master of Science in Osteopathy (pre-registration).

Recommendations

1. To note the outcome of the UCO RQ Visit, and the Policy and Education Committee's consideration of and decisions related to these, as outlined in this paper.
2. To note that the Visitor Report and the Action Plan will be published in accordance with our usual procedures.

Financial and resourcing implications The RQ Visit was included in the 2023-24 financial schedule, with a budget of c£15,000.

Equality and diversity implications Equality and diversity issues are reviewed as part of the visit process.

Communications implications We are required to maintain and publish a list of the qualifications which are for the time being recognised to ensure sufficient information is available to students and patients about osteopathic educational institutions awarding 'Recognised Qualifications' quality assured by us.

The Visitor report will be published on our website in due course.

As the UCO does not have an expiry date, any conditions or requirements arising out of the Visit report or other information received will be published on an agreed action plan which will be updated as appropriate.

Annexes

A. The UCO review specification (January 2023)

B. Final RQ Visit report (27 September 2023)

Author

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Key Messages

- An RQ visit took place in May 2023 in accordance with an agreed visitor specification (Annex A) and three Visitors were appointed by the Policy and Education Committee.
- The draft RQ report was sent to the UCO in June for a statutory period of not less than one month for factual comments, observations and objections.
- On 7 August a response was received outlining concerns about the factual report and lack of triangulation.
- GOsC met with Mott on 21 August 2023 to agree a process asking UCO to submit further information if they wanted to and to triangulate and verify the information and confirm the final report.
- Further evidence was requested from UCO by Mott and considered by the Visitors as part of the process of producing the final report.
- On 27 September 2023, Mott submitted a final report from the Visitors and this was shared with the Policy and Education Committee and the UCO at the same time (See Annex B).
- On 27 September 2023, UCO submitted reports outlining the recent changes to senior management at the UCO and an update about merger discussions and implications for the Osteopathic Practice Standards and a shareholder briefing about the merger.
- At its October meeting, the Policy and Education Committee:
 - Agreed to accept the visitor report.
 - Agreed the conditions arising from the report.
 - Considered the change of Vice Chancellor and any implications arising from this.
 - Noted the update about discussions about potential mergers.
 - Note the analysis of the financial accounts.
 - Considered the response to the conditions/action plan.
 - Considered the update about the possible merger.
 - Agreed to publish the decisions at a future date.

Background

1. UCO's Recognised Qualifications are:
 - Master of Osteopathy
 - Bachelor of Osteopathy.
 - Master of Science in Osteopathy (pre-registration).
2. These are recognised with no expiry date.
3. A draft RQ specification was initially approved by the Policy and Education Committee (The Committee) at its October 2021 meeting, with two options for timetabling of the visit. The Committee agreed the option of a slightly later visit to be held in May 2023.

Discussion

4. The Committee agreed reviewed the RQ Specification for the UCO visit and appointed a team of three Education Visitors under s12 of the Osteopaths Act 1993 to undertake the review in December 2022 and the specification is attached as Annex A.
5. The visit took place in May 2023. The visit report was drafted and sent to UCO on 28 June 2023 for a period of no less than one month in accordance with the Osteopaths Act 1993. An extension was given due to respond by 7 August 2023.
6. UCO responded on 7 August 2023, highlighting what they considered to be factual inaccuracies in the report using comments.
7. Mott MacDonald conducted a thorough review of the report in the light of the feedback in conjunction with the visitors, and gave UCO the opportunity to provide further evidence for consideration to address some of the issues raised in the feedback.
8. A copy of the final visitor report is attached at Annex B. The substantive conditions did not change, although some of the recommendations did.
9. The final report was sent to UCO on the 27 September 2023. OEIs are required to send an action plan to Mott MacDonald within two weeks of receiving the final report for the Visitor's to review the proposed action plan ahead of Committee consideration. We are working with the UCO on an action plan for agreement with the Visitors for publication.

Consideration of the Visit Report

10. Many strengths and good practice are outlined in the final report at Annex B.

11. There are also recommendations. Recommendations may be made by visitors when they consider that there is an opportunity for improvement, but a condition is not necessary. These areas should be monitored by the provider and the recommendations implemented, as appropriate. These areas must be reported on as part of the providers annual report submission to the GOsC but would not be published on the Action Plan. UCO is asked to provide a progress update about these specific areas as part of their 2022-23 Annual Report submission in December 2023.

Conditions recommended by the Visitors.

12. Three specific conditions have been advised in the report by the Visitors. These are:
- a. To provide assurance that the University has staff available for students to raise complaints and concerns in clinic (2iii), sufficient staff-student ratios that provide safe, accessible and appropriate quality of learning (5ii and 9iii), sufficient number of experienced educators (8iv), and an appropriate standard of patient safety within clinic (9i) the University must conduct a review of staff-student ratios in clinic and provide evidence of sufficient staff-student ratios.
 - b. By the beginning of the next academic year, the University must have all core policies (including staff policies and procedures) reviewed, adopted and published in line with their review dates to provide assurance that relevant and appropriate policies and procedure are in place, and that educators are provided with the resources to meet their responsibilities. Once all policies are up to date, a policy review schedule must be reported and monitored annually to ensure sustainability and to provide assurance that policies and procedures are reviewed regularly. (4iii)
 - c. The University must develop appropriate protocols for the management of students who are gaining clinical experience at external sites which contribute to their total clinic hours, in order to ensure student safety and to ensure the quality of the student learning experience. (7ii)

13. The UCO provided a response to the conditions / action plan attached. This was reviewed by the Committee and a further action plan is to be prepared by UCO for publication.

Changes to management at UCO and potential changes to the strategic direction

15. Since the RQ visit took place, there were announcements made regarding leadership and strategic direction at UCO. On 13 July, we heard from Charles Hunt that he would be stepping down as Vice Chancellor at UCO and that an announcement would be made the following week. UCO formally [announced](#) this on 20 July. It was cited that the Board had decided to pursue a strategic direction that Charles did not support. UCO subsequently made an

announcement regarding '[future proofing the UCO](#)', in which they announced their plans to work in closer partnership with AECC University College.

16. A letter from the UCO dated 2 August 2023 explained that the Vice Chancellor had left UCO. The Chief Executive and Registrar, Head of Policy and Education and the Senior Quality Assurance Officer met with Acting Vice Chancellor, Sharon Potter, on 14 August. In this meeting, it was confirmed that UCO are looking to explore a partnership with AECC University College, and that negotiations are underway. If all goes to plan, the changes may take effect from 31 July next year.
17. It was confirmed that UCO are looking to preserve the UCO identity, and to continue to offer osteopathic programmes as currently recognised. For future programmes - for example, new osteopathic programmes to be offered jointly at either site, for example, a further RQ process would be required.
18. Further meetings were held with UCO on 22 August and 19 September 2023 to update about progress and discuss the management of the update report from UCO about this. A [further announcement](#) was made by UCO on 9 October, confirming the merger is proceeding.

Decision

19. The Committee considered all of the above and (subject to ratification):
 - a. Agreed to accept the visitor report.
 - b. Agreed the conditions or requirements arising from the visitor report.
 - c. Noted and agreed the change of Vice-Chancellor and any implications and agreed any information requests arising from this.
 - d. Noted and agreed the update on discussions about potential merger, any implications, and agreed any information requests arising from this.
 - e. Noted and agreed the financial position, any implications, and agreed any information requests arising from this.
 - f. Noted and agreed the response to the conditions / action plan and agreed further information requests from the UCO to provide assurance of standards.
 - g. Agreed to publish the decisions made at a future date.

Expiry date

20. Where Recognised Qualifications have no expiry date as is the case with UCO's RQ programmes, there is a published action plan which would outline any conditions which arise either from the RQ process or from matters being

followed up following annual report analysis or otherwise reported. This avoids the need for Privy Council approval to each renewal, or the attaching of conditions to Privy Council approval when these are likely to be met relatively quickly. In this case, conditions could then be reflected within an action plan published on our website. This would then be updated as the conditions were deemed by the Committee to have been met.

21. The interim Quality Assurance handbook¹ sets out the current criteria regarding the period of RQ approvals stating:

"The maintenance of the RQ status currently follows a cyclical process. Where required, PEC may apply an expiry date to the RQ. This decision will be made based on anticipated level of risk that the RQ presents."

GOsC will usually recognise qualifications for a fixed period of time in the following circumstances:

- *A new provider or qualification*
- *An existing provider with a risk profile requiring considerable ongoing monitoring.*

For existing providers, GOsC will usually recognise qualifications without an expiry date in the following circumstances:

- *an existing provider without conditions or*
- *an existing provider with fulfilled conditions and without any other monitoring requirements or*
- *an existing provider who is meeting all QA requirements (providing required information on time) or an existing provider with outstanding conditions, an agreed action plan and which is complying proactively with the action plan and*
- *an existing provider engaging with GOsC.*

This will be subject to satisfactory review of the providers annual report."

22. As stated above, UCO's current programmes do not have an expiry date, and thus as the Committee accepts the findings of the visitors' report, it is not necessary to seek approval of Council or of Privy Council to the continued recognition of these programmes. The conditions from the visit report alongside any other requirements meeting the conditions threshold and will be featured in an action plan which would be published on our website and monitored by the Committee.

23. The rationale would be that UCO continues to meet the requirements as *'an existing provider with outstanding conditions, an agreed action plan and which is*

¹ [Mott MacDonald GOsC Interim Quality Assurance Handbook - General Osteopathic Council \(osteopathy.org.uk\)](http://osteopathy.org.uk)

complying proactively with the action plan and an existing provider engaging with GOsC'.

Recommendations:

1. To note the outcome of the UCO RQ Visit, and the Policy and Education Committee's consideration of and decisions related to these, as outlined in this paper.
2. To note that the Visitor Report and the Action Plan will be published in accordance with our usual procedures.