

**Education Committee**  
**14 December 2010**  
**Public session**  
**Quality Assurance Preliminary Review- Revision of Annual Reports**

<b><u>Classification</u></b>	Public
<b><u>Purpose</u></b>	For Decision
<b><u>Issues</u></b>	<p>This paper considers the review of the annual reports produced by the osteopathic educational institutions (OEIs) for the General Osteopathic Council (GOsC) as part of the preliminary QA Review.</p> <p>The Committee is asked to agree the draft Annual Report for consultation alongside the QAA Handbook.</p>
<b><u>Financial &amp; Resourcing Implications</u></b>	None
<b><u>Equality &amp; Diversity Implications</u></b>	Particular data needs to be collected to ensure that OEIs and GOsC are continue to meet equality and diversity obligations in relation to osteopathic education.
<b><u>Communications Implications</u></b>	The revised annual report will be consulted on with relevant stakeholders including the osteopathic educational institutions (OEIs).
<b><u>Annexes</u></b>	Annex A Extract of QAA Analysis of the 2009 Annual Report submissions

### **Summary**

1. This paper considers the review of the annual reports produced by the osteopathic educational institutions (OEIs) for the General Osteopathic Council (GOsC) as part of the preliminary QA Review.
2. The Committee is asked to agree the draft Annual Report for consultation alongside the QAA Handbook.

### **Background**

3. The Education Committee considered the issues with the Annual Report process as identified through feedback from the OEIs at its meeting on 17 March 2010. The Committee endorsed the plans for the revision of the content of the Annual Reports by the Quality Assurance Agency for Higher Education (QAA). The 2008/09 edition of the Annual Report to be revised is attached at Annex A for reference.

### **Discussion**

#### *Purpose of the Annual Report*

4. The Osteopaths Act 1993 provides that:
  - a. The Education Committee 'shall have the general duty of promoting high standards of education and training in osteopathy and keeping the provision made for that education and training under review.' See S11 of the Osteopaths Act 1993.
  - b. The Education Committee may require 'any such institution to give... such information as the Committee may reasonably require in connection with the exercise of its functions under the Act.' See s18 Osteopaths Act 1993.
5. This enables us to use the Annual Report for the following purposes:
  - a. To ensure that the education and training provided by the OEIs meets our requirements. (Review of standards of education and training)
  - b. To encourage the sharing of good practice and to enhancement of performance within OEIs. (Development of standards of education)

#### *The content of the Annual Report*

6. The QAA undertook a review of the Annual Reports submitted for 2009 and produced an analysis which included a review of the purpose of the report and recommendations on how it could be developed further. An extract of the QAA Analysis is provided at Annex B outlining the recommendations.

Paragraph 25 of the QAA Analysis of the Annual Reports states:

'our overall conclusion is that there may be benefits to the GOsC and the OEIs in shortening the Annual Report while also placing greater emphasis on the reporting of good practice. The benefits to the GOsC of this approach would be to heighten its awareness and understanding of the main areas of risk; lessen the time and resources required to analyse the data; and promote the dissemination of good practice. OEIs would benefit by a lower administrative burden and more opportunity to learn about good practice from other institutions.'

7. The QAA view of the Annual Report fits with both the monitoring and development requirements inherent in our statutory responsibilities. This means that there is scope to improve the Annual Report whilst also being aware of the limitations highlighted by the QAA relating to the lack of triangulation of findings for self-reported information.
8. In the review of the QAA Handbook, the QAA has also identified a use for the Annual Report to report on the progress of Action Plans which will encourage the OEIs to make their own proposals for meeting Recognised Qualification conditions as part of the Review process. This helps to strengthen the 'monitoring' aspect of the report and will also help the report to be clearly stitched in to the other elements of the QA process.
9. A draft Annual Report is being finalised for presentation to the Education Committee. The report will consider each question in the 2008/09 Annual Report and will consider:
  - a. How the question provides data which usefully meets the purpose of the Annual Report.
  - b. Whether each question is clear and precise.
  - c. The format the data is to be provided in to ensure that OEIs can easily submit the data.
  - d. Whether any additional questions should be asked in relation to the following:
    - i. Good practice (including a definition)
    - ii. The analysis of patient feedback and identification of areas of improvement.
    - iii. Student fitness to practise information and summaries of cases to identify learning points for OEIs and GOsC.
    - iv. Complaints received by staff, students, outcomes and what changes have been made as a result of information received.
    - v. Appropriate statistical data to help us to understand how OEIs have implemented and are monitoring equality and diversity matters.

10. The revised version of the draft Annual Report will be circulated to the Education Committee by email (to follow).
11. The Committee will be asked to approve the draft Annual Report for sharing with the OEIs alongside the consultation on the QAA Review Method Handbook.

#### Next steps

12. The Annual Report will be consulted on alongside the revised QAA Handbook. The results of the consultation will be considered by the Education Committee in Summer 2011.

#### **Recommendation**

13. The Education Committee are invited to agree the draft Annual Report for consultation alongside the QAA Handbook.

## **Annex A – Extract from QAA Annual Report Analysis 2009**

### **Feedback on annual reporting**

22. The final section of this report gives our feedback on the process of annual reporting. This feedback is based on what OEIs have to say about the benefits and challenges of completing the Report, our experience of analysing them, and QAA's wider knowledge of annual monitoring in other parts of the higher education sector.

23. The Annual Report is a rich source of evidence and many of the OEIs acknowledge and appreciate that the process stimulates critical reflection on the health of osteopathic and, in so doing, helps to reveal strengths and weaknesses which were poorly appreciated beforehand. However, most OEIs also perceive significant problems with the process, including the recalculation of data to fit the Report's definitions (which are in themselves regarded as imprecise), and the sheer time taken to complete a long and complicated document normally at the same time as the institution is producing similar (but not identical) information for other stakeholders, such as awarding bodies. Six OEIs gave estimates of the time taken to fill in the Report. The minimum time reported was 12 hours; the maximum 112 hours. Several OEIs questioned if this was all time well spent, particularly given that they have not received any feedback from GOsC hitherto.

24. OEIs' views resonate with our experience of analysing the Reports. We agree that the data definitions are ambiguous (and this is probably the main reason why several OEIs give partial returns or inconsistent data), and that the time required of OEIs to complete the Reports, and of QAA to analyse them, represents a considerable and possibly disproportionate investment considering the small number of problems which the process has identified. We also found the Reports repetitive, both internally and of other evidence (for instance, OEIs are required to append original external examiner reports and complete a section on external examiners within the Report itself); cumbersome to analyse (for example, comparisons of quantitative data requires the analyst to extract the data manually); comprised of some information which is ostensibly interesting but arguably of little value to monitoring the health of courses; containing redundant information where the OEI had had a more recent QAA review; and tending to militate against a full reporting of potential good practice.

25. Against this background, our overall conclusion is that there may be benefits to GOsC and OEIs in shortening the Annual Report while also placing greater emphasis on the reporting of good practice. The benefits to GOsC of this approach would be to heighten its awareness and understanding of the main areas of risk; lessen the time and resources required to analyse the data; and promote the dissemination of good practice. OEIs would benefit by a lower administrative burden and more opportunity to learn about good practice from other institutions.

26. Clearly GOsC needs to balance our feedback against its statutory obligations to monitor the health of osteopathic courses. In addition, any changes to the Annual Report should be consistent with the impending reforms to the GOsC review method, which will not be decided until later this year. We have not, therefore, produced detailed proposals on how we think the Annual Report should respond to the problems identified above. However, we have identified a set of broader points for consideration as the process develops. We would encourage GOsC to:

- a. Develop a shorter risk-based Annual Report form, which continues to allow GOsC to discharge its statutory obligations while lessening the burden on OEIs and on itself

- b. Pursue greater consistency between the Annual Report and the Self Evaluation Document produced for GOsC review
- c. Place a greater emphasis on the reporting of good practice
- d. Introduce more precise data definitions
- e. Avoid asking for data in a format which OEs do not have, or at least keep the number of such requests to an absolute minimum
- f. Avoid asking for information about areas where assurance can be provided through other existing evidence
- g. Consider exempting OEs which have a QAA review in the 12 months prior to the Education Committee's discussion of the Annual Reports
- h. Consider asking OEs to submit quantitative data through a web portal or similar and allowing them to compare their data against other providers
- i. Analyse and provide feedback on the Reports within two months of their submission

# Draft Recognised Qualification Annual Report Form

The purposes of annual monitoring are:

- to provide assurances to GOsC, pursuant to its statutory responsibilities, about the health of osteopathic education courses with recognised qualification (RQ) status, and their providers
- to identify examples of good practice in osteopathic education for dissemination across the sector

With regard to the assurances required by GOsC, annual monitoring is designed to be proportionate in terms of the administrative burden on OEIs. It also recognises that OEIs are already engaged in annual monitoring as part of their own quality assurance arrangements and responsibilities; wherever possible this process seeks to use evidence from existing arrangements rather than ask for bespoke information.

### **What happens to the information you provide**

The information you give in Part A will be analysed by GOsC. If this analysis raises any questions and/or suggests any concerns about the course and/or the provider, GOsC may follow this up directly with you. The information you give may also help GOsC to identify and address issues of general concern to the osteopathic education sector.

The information you give in Part B will inform a report about good practice in the sector, which GOsC will disseminate to all providers with the aim of enhancing the provision of osteopathic education. GOsC aims to disseminate this report within three months of the deadline for submitting this form.

### **Completing the form**

You should complete a separate form for each course you provide which has RQ status. For your convenience we have already entered some information. The reporting period is the last academic year. Please complete the form electronically; the boxes will expand as you fill them in. There is a checklist of attachments at the end of the report.

### **Deadline**

The deadline for submitting this form is [date]. If you have any queries about it, please contact [name and email address].

## Name of institution

[to be completed by GOsC]

## Awarding body (if different from above)

[to be completed by GOsC]

## Course name

[to be completed by GOsC]

## Part A: monitoring the health of the provision

### 1. Student data

Please provide or attach the following data on student admissions, progression and achievement in the reporting period:

- the number of students who applied to the course
- the number of students admitted to the course
- the number of students enrolled in each year group or stage
- the number and proportion of students in each year group or stage who progressed to the next year or stage
- the number and proportion of students in the final year or stage who successfully achieved the award

You may present this information in any format you choose provided it is clear and fulfils all the criteria above.

If the progression rate for any of the year groups or stages is less than 90 per cent, please explain why and describe what, if anything, you are doing to improve retention.

### 2. RQ specific requirements

The specific requirements attached to this qualification are as follows:

- [bulleted list to be completed by GOsC]

Please describe below any action you have taken in response to these requirements during the reporting period.



### 3. RQ general requirements

Please briefly summarise in the next box any changes or proposed changes in educational provision that require, or may require, notification to the GOsC's Education Committee.

Example of changes may include, but are not limited to:

- substantial changes in finance
- substantial changes in management
- changes to the title of the qualification
- changes to the level of the qualification
- changes to franchise agreements
- changes to validation agreements
- changes to the length of the course and the mode of its delivery
- substantial changes in clinical provision
- changes in teaching personnel
- changes in assessment
- changes in student entry requirements
- changes in student numbers
- changes in patient numbers passing through the student clinic
- changes in teaching accommodation
- changes in IT, library and other learning resource provision

### 4. External examiner report

Please attach the most recent external examiner report for this course. Please also attach your response to the report. If you would like to comment on the external examiner report, please do so below.

### 5. Annual monitoring report

Please attach the most recent annual monitoring report you have completed for the course. This may have been for your own institution or your awarding body.

If you would like to comment on the report, for example to describe what you are doing in response to its findings, please do so in the box below. Alternatively, if you have already developed or been given a follow-up report or action plan for or by your own institution or awarding body, you should attach that instead.

### 6. Programme specification or handbook

Please attach the current definitive course document. This may be called a programme specification or course handbook. If it has changed during the reporting period, please say

where, how and why below. Where relevant, please reference your comments to the GOsC *Standard of Proficiency*.

**7. Feedback from students**

Please summarise below:

- your arrangements for obtaining feedback from students
- the most significant issues that have arisen from student feedback in the reporting period and how you have responded to them

**8. Complaints**

Please describe below any complaints you have received from students on the course, or patients treated by those students, during the reporting period and the outcome of your investigations of these.

**9. Appeals**

Please describe below any appeals students on the course have made during the reporting period and the outcome of your investigation of these (or the outcome of the investigation carried out by the awarding body).

**10. Annual accounts and insurance**

Please attach copies of all relevant insurance documents. These may include, but are not limited to:

- Employers Liability insurance
- Public Liability insurance
- Professional Indemnity/Medical Malpractice insurance
- Trustees Indemnity insurance
- Building and Contents insurance

Private providers should also attach a copy of the most recent audited accounts. GOsC obtains information about publicly funded providers from other sources.

### Part B: good practice

The purpose of this part is to identify examples of good practice which may be disseminated across the sector with the aim of enhancing the provision of osteopathic education. For this purpose, good practice is defined as practice which is:

- innovative
- successful in achieving positive results
- sustainable, in that it may be repeated or made routine

Good practice need not be unique. However, given the aim described above, you should not include examples which you know reflect standard practice elsewhere.

Please provide further information about any aspect of the management and/or delivery of the course which you regard as an example of good practice. For each example, please explain:

- why you chose to adopt it
- what it is designed to achieve
- how you designed or developed it (e.g. was it transferred from another discipline? was it completely novel?)
- how you are monitoring its effectiveness or impact

If you have any evidence to support the examples you provide, please append it to this form. It is helpful if you group any examples you provide according to the following headings:

- course aims and outcomes (including students' fitness to practice)
- curricula
- assessment
- achievement
- teaching and learning
- student progression
- learning resources
- governance and management

If you are in any doubt as to whether something is good practice, please include it.

Please note that by providing examples of good practice you are agreeing for these examples to be disseminated to other providers. In some cases GOsC may follow up the examples you provide to elicit more information, perhaps in order to inform a case study.

## Declaration

I confirm that the information provided within, and appended, to this form is comprehensive and accurate.

Name and position

Signature and date

## Checklist and feedback

Thank you for completing this form. You should return it electronically to [email address]. Please make you sure you have appended the following information:

- student data on admissions, progression and achievement (unless this is within the form itself)
- the most recent external examiner report and your response to it
- the most recent annual monitoring report and your response to it (or the subsequent action plan)
- the current definitive course document
- copies of relevant insurance documents
- the most recent audited accounts (for private providers only)

Please tell us approximately how long it has taken you to complete this form. We would also welcome any other feedback on this process.