

Refere nce	Concern	Action taken	Rationale	Old paragraph reference	New paragraph reference
K1	Could we make reference more to consent? The OPS standards are set out in full but not the guidance.	No further action.	Paragraph 29 makes further reference to the extensive guidance to supplement the Osteopathic Practice Standards contained in the OPS. This guidance is not meant to replace the OPS for students but to centralise its importance and to highlight the need to turn to the OPS to read the extensive guidance.	29	29
J1	Breach of Human Rights Act as no route of appeal to GOsC on Student Fitness to Practise decisions.	Additional sentence added: ' <i>You should contact the OEI in order to establish your rights of appeal against decisions made.</i> '	There is no right of appeal to the GOsC for decisions by OEIs and HEIs about students as GOsC does not have a statutory remit for these decisions. Appeals are a matter for the HEI itself and we have no power to prescribe these.	12	12

J2. J3	<p>Lack of clarity about the relationship between the SFtP Guidance, OEIs and validating universities. Is it possible that the existing procedures might be at odds with the policy and need to be reviewed?</p>	<p>Additional words inserted into paragraph so that the differing relationships between validating universities, OEIs and the GOsC are clearer. This now reads '... The OEI policy <i>about student fitness to practise</i> should be <i>regularly reviewed to ensure that it is</i> consistent with the procedures actually in place at the OEI, the validating university and the clinical setting within which osteopathic care is delivered. These <i>local OEI and validating university statements</i> should be made clear to students at the outset of the course.'</p>	<p>The relationship between different OEIs and different validating universities will not be homogenous - thus words have been inserted to clarify this. FtP procedures will vary between OEIs and validating universities dependent on the specific regulations in place (and there are often conflicts about academic and professional procedures. We have no statutory remit in this areas and so we can only advise. This sentence means that the local policies and processes should be available and accessible to students and the beginning of the course as well as the GOsC guidance.</p>	16	16
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J4	<p>Lack of clarity - do you mean the clinical setting in paragraph 30? 'Students should be aware of their obligations to patients from an early stage in their course. If you have concerns about the behaviour of a colleague, you should bring your concerns to the attention of a responsible person within the setting to ensure that concerns may be addressed at an early stage.'</p>	<p>Amended to ensure that the focus is on bringing the issue to the fore at the earliest opportunity rather than setting. The words 'within the setting' have now been replaced by 'at the earliest opportunity' to read '... If you have concerns about the behaviour of a colleague, you should bring your concerns to the attention of a responsible person <i>at the earliest opportunity</i> within the setting to ensure that the concerns may be addressed at an early stage.'</p>	<p>The setting could be clinical - with a patient in the student clinic - or could be in a student practice session. To prevent confusion the emphasis is on informing someone 'at the earliest opportunity'.</p>	30	30
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J5	Annex C refers to competence standards, I assume you don't want to use that here.	No action taken.	This student guidance does not refer to competence standards but refers to the expert guidance if further detail is required. This issue is also slightly confused also by the different competence standards at different OElS and no consensus on 'what is osteopathy'.	31	
J6	This might suggest reasonable adjustments to the standards themselves (which the law doesn't require) as opposed to the way they are taught or assessed. The distinction is made clear in Annex C para 39.	No action taken.	The emphasis in the student guidance is about discussing the issue with their tutor and access to further resources. The paragraph is not factually incorrect and is designed to get the student to seek further advice rather than outline the technical situation.	31	
J7, J8, J9	As this is addressed to students, perhaps it should say 'will be taught'.	No action taken.	There is no requirement to 'teach professional behaviours' in the OPS or the QAA Benchmark statement and the status of the SFtP Guidance is guidance hence the use of the 'should be taught professional behaviours.' Perhaps we can strengthen this in our pre-registration curriculum content guidance.	32	32

J10	Not sure of the significance of no diagnosis being made.	Additional words added in so now reads: 'Treating family and friends unsupervised <i>particularly</i> if there is no <i>supervised</i> diagnosis made.'	This comment was added in following a consultation response from an osteopath. In student clinics, the student always makes a diagnosis under supervision of a registered osteopath. If they do this outside the clinical environment, there are risks of red flags being missed and treatment being contra-indicated. The students do not make diagnoses these are confirmed by practising osteopaths.	35	35
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J11, J12	<p>Lack of clarity about meaning of 'reasonable adjustments have failed'. Is it a failure by the OEI to make reasonable adjustments, or are you saying there's no reasonable adjustment that could ever be made, or that even with reasonable adjustments in place, the student isn't able to meet the competencies. Also not clear what 'this' relates to in last sentence.</p>	<p>Additional words inserted to assist with clarity. The sentence now reads '...Only if reasonable adjustments have <i>been tried but have failed not enabled the student to reach the standards because the reasonable adjustments have not been complied with in some way by the student</i>, or if there are issues in terms of the behavioural management of health impairments will the behaviour this be potentially subject to fitness to practise consideration.'</p>	<p>The wording 'reasonable adjustments have failed' was suggested by one of the consultation respondents. We have slightly amended this to aid clarity.</p>	36	36
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J11 - I think this is still a little confusing. TO DO: To look at once Counsel's comments have been returned.

11 The phrase 'because the reasonable adjustments have not been complied with...by the student' suggests that reasonable adjustments are things that have to be done by the student rather than for the student by the OEI. If this refers to the student's own management of their health, isn't this covered by the reference to behavioural management of health impairments?

J13	The document setting out the registration process on the website only talks about a reference to a GP.	Agreed, references to health reference from osteopath or other suitably qualified health professional removed. Amended to read 'We require a health reference from a GP doctor. <i>If the applicant is unable to obtain a reference from a doctor they should seek advice from the GOsC.</i>	Although the legislation provides for other information at the registrar's discretion, this is not published in the registration guidance.	43a	43a
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