

Reference	Concern	Action taken	Rationale	Old paragraph reference	New paragraph reference
J1, J2, J3, J4	Lack of clarity about 'failure of reasonable adjustments'. Is it a failure by the OEI to make reasonable adjustments or are you saying that there's no reasonable adjustment that could be made, or that even with reasonable adjustments in place the student isn't able to meet the competences? See also comments on Annex A para 36 - ie what does failure to make reasonable adjustments mean? Also this is the first time condition has been mentioned so link with health could be a bit clearer. J4 - This is slightly inconsistent with the opening words (it is only if). It needs to come earlier (... 'managing the [condition] and if patient safety is a concern , that	...The guidance provides some helpful examples of reasonable adjustments that have been used in osteopathic education and training. Fitness to practise will become relevant if patient safety is a concern. If reasonable adjustments have been tried but have not enabled the student to reach the student to reach the standards because the reasonable adjustments have not been complied with in some way by the student, or if there are issues in terms of the behavioural management of conditions, fitness to practise may be considered. It is only if reasonable adjustments have failed or there is an issue in terms of behaviour managing the condition that fitness to practise will become relevant if patient safety is a concern.	The wording 'failure to make reasonable adjustments' was suggested by one of the consultation respondents. Clarified using additional words. Sentence recast to make connections mentioned clearer.	9	9

J5	See comment on Annex B (Student guidance) about rights of appeal.	Additional sentence inserted so it now reads ' <i>...Although the GOsC is not a source of appeal for student fitness to practise decisions made by OEIs, GOsC will scrutinise the student fitness to practise procedures as part of its quality assurance activities. 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.	11	11
J6, J7	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?	Additional words inserted as follows 'All OEIs are expected to have a published statement about how student fitness to practise is managed and incorporated into the admissions process and the RQ course. The local policy should be <i>regularly reviewed to ensure that it is</i> consistent with the procedures in place at the OEI, the validating university and the clinical settings 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.	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.	13	13
J7	Lack of clarity about relationships between SFtP guidance, OEIs and validating universities.	Additional wording inserted to aid clarity. The sentence now reads 'OEIs should ensure that these statements <i>about fitness to practise</i> are made clear to students at the outset of their course and implemented effectively.'	See above	15	15

J8	Conceivably they might indicate the need for a reasonable adjustment - relating to SFtP issues brought up early in the course.	Additional sentence inserted so that it now reads '...For example, poor attendance at lectures, late submission of course work or inability to meet a particular requirement of the Osteopathic Practice Standards in the first year of the course may not be appropriate matters to involve student fitness to practise procedures. <i>It is also important to consider whether the issue raises concerns about health impairments or disability which may require reasonable adjustments....</i>	Requirement for reasonable adjustments inserted	20	20
J9	Is this a statement of fact or are you wanting the OEIs to do this in which case it should be 'should' in relation to delivery of the primary aim of the osteopathic provider.	Sentence amended to read as follows: 'When considering an application each OEI should take into account the fact that 'the primary aim of an osteopathic education provider is to educate students to become safe and effective osteopaths who are fully capable of working autonomously in a variety of clinical settings as primary contact healthcare practitioners'.	This is a statement from the QAA Benchmark guidance endorsed by the Education Committee. Changed as technically this is guidance rather than a legal requirement in the same sense as the Standard of proficiency and the code of practice.	26	26
J10	Do you mean all the information available to the applicant - the applicant wouldn't have control over other information about them.	Sentence amended to reflect that the applicant can only disclose information in their control as follows: 'This means that the applicant should <i>disclose all relevant</i> ensure that all available information is accessible to the OEI and should consent to the disclosure of further information to the OEI from other agencies where appropriate.	Ensure that there is clarity that the applicant should disclose all information they can and consent to the further disclosure of information to achieve the outcome that the OEI can get hold of relevant information to inform decisions.	33	33

J11	Lack of clarity about the purpose of the discussion after registration.	Some additional wording added to aid clarity as follows:.....'During the course, a disability or health condition or other impairment may make it impossible for a student to meet the requirements set out in the Osteopathic Practice Standards without assistance. The student should be offered the opportunity to have a full discussion about the types of reasonable adjustments that may enable them to reach the required standards and the contexts in which these requirements <i>to support safe practice</i> may need to be put into practice <i>by the individual</i> after registration.....	This is about ensuring that the applicant understands how osteopathy is practised to ensure that they are confident of being able to meet the standards in the OEI and also practise safely within limits of competence after registration. This is elaborated further in the health and disability guidance.	39	39
J12	Lack of clarity about which 'procedure' is meant in the sentence.	Sentence amended as follows: The procedure should be clear to both the student and those involved in the fitness to practise proceedings. The procedure should be consistent with that expected in the OEI and in the validating university but should also be consistent with the principles in this guidance.	Amended to make clear that the procedure referred to is the OEI procedure which should be consistent with that of the validating university and the GOsC guidance.	48	48
J13	The term 'service provider' has not been used elsewhere. It would be helpful to explain what this is or express this in a different way.	Sentence amended to remove the term 'service provider' as follows: 'Has the student shown a deliberate and reckless disregard to the processes for the delivery of the service <i>osteopathic care</i> or put the reputation of the service provider <i>OEI, clinic or other setting</i> at risk?'	To clarify what 'service provider' means in this context.	52	52

J14	Is it possible that a reasonable adjustment was required but was not in place? (in relation to the investigation process?)	Sentence amended as follows: 'Are there mitigating circumstances which have contributed to the fitness to practise issue which have been recognised? <i>Has the possibility of a reasonable adjustment being required been considered?</i> Have steps been taken to seek additional support in these circumstances?	Additional sentence inserted to refer explicitly to the requirement to consider reasonable adjustments.	54	54
J15	The adjudication process: the ftp panel - should this para say something about the panel being appropriately trained (including equality)?	Additional sentence to add this guidance in as follows: A mix of professional and lay expertise will normally make up the appropriate constitution of the panel. <i>All members of the panel should be familiar with this guidance, local guidance, the GOsC suite of guidance on the management of disability and health conditions and equality and diversity issues.'</i>	Guidance about being familiar with the relevant guidance has been added.	58	58
J16	The student may require reasonable adjustments to attend the student fitness to practise panel.	Additional sentence added in to make this explicit - 'Steps should be taken to explore whether reasonable adjustments may be required by the student to attend the panel'.	The requirement to consider whether reasonable adjustments are required to attend the interview to be made explicit.	59	59
J17	Non-compliance behaviour - assuming this means where the OEI makes an adjustment that depends partly on the student doing certain things (eg taking medication) which they don't do.	No further action.	This comment was what was intended in this paragraph.	83	83

J18	First sentence incomplete is this supposed to run on.	full stop replaced by comma to read If, in relation to the management of health impairments or disability, reasonable adjustments have failed because of 'non-compliance' behaviour but there is genuine willingness to manage the health impairment and the student has agreed to abide by conditions relating to, for example, medical condition, treatment and supervision- , it may be appropriate to agree further reasonable adjustments and impose conditions regarding behaviour.	To ensure sentence makes sense.	83	83
J19	Used only to emphasise last resort.	No further action.	Yes the word 'only' in relation to expulsion was used to emphasise that it was the last resort.	89	89
J20	Discontinuation on health grounds is different to expulsion. Not sure it is appropriate to include under expulsion. It's quite different and has nothing in common with the things addressed in paras 88 to 89.	New heading inserted 'Discontinuation on health grounds'	It is envisaged that most health ground issues would not require to go through the student fitness to practise procedures. Nevertheless to emphasise the difference, a separate heading has been introduced.	90	90
J20 - 31 Oct 2011	I don't know which of these it is but it might be better to put it the other way round ie 'where no reasonable adjustments can be made'.	TO DO: To amend when guidance is returned from Counsel.			

J21	<p>The document setting out the registration process on the website only talks about a reference to a GP. As the four year requirement is mentioned in para 102, perhaps it should be here too.</p>	<p>Sentence amended to be consistent with registration pack guidance as follows 'The application for registration also requests a health reference from a general medical practitioner <i>doctor</i> . <i>If the applicant is unable to obtain a reference from a doctor they should seek advice from GOSc.</i> If the applicant is not registered with a general medical practitioner, the applicant should provide a health reference from an osteopath or other suitable qualified health professional.</p>	<p>To be consistent with the registration pack guidance and the student guidance. Should the four year requirement be included?</p>	97	97
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