



**General Osteopathic Council review of osteopathic courses and course providers**

**Bachelor of Osteopathic Medicine (BOstMed)**

**Master of Osteopathy (MOst)**

**Monitoring review**

**British College of Osteopathic Medicine**

**November 2009**

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## Foreword

Under the *Osteopaths Act 1993* the General Osteopathic Council (GOsC) is the statutory regulatory body for osteopaths and osteopathic education providers. The GOsC advises the Privy Council on which programmes of osteopathic education merit Recognised Qualification (RQ) status. The Privy Council grants RQ status to programmes where the governance and management of the course provider and the standards and quality of the programme meet the requirements laid down by the GOsC. In particular, students must meet the practice requirements of GOsC's *Standard 2000: Standard of Proficiency*.

Decisions concerning the granting, maintenance and Renewal of RQ status are made by the Privy Council following reviews of osteopathic courses and course providers. The Quality Assurance Agency for Higher Education (QAA) manages certain aspects of these reviews on behalf of GOsC. The role of QAA, by its conduct throughout the United Kingdom (UK) of reviews and audits of higher education provision and providers, is to maintain public assurance that the standards and quality of higher education are being safeguarded and enhanced. In developing its methods for higher education audit and review, QAA has published a wide range of materials designed to provide a background against which scrutiny can take place.

### GOsC review

GOsC review is a peer-review process. It starts when institutions evaluate their provision in a self-evaluation document. This document is submitted to QAA for use by a team of review 'visitors' who gather evidence to enable them to report their judgements on governance and management, the clinical and academic standards, and the quality of learning opportunities. Review activities include meeting staff and students, observing teaching and learning, scrutinising students' assessed work, reading relevant documents and examining learning resources. Full details of the process of GOsC review can be found in the *Handbook for the General Osteopathic Council review of osteopathic courses and course providers, second edition*, QAA 2005.

GOsC review may take one of three forms:

- review for the purpose of granting Initial RQ status
- review for the purpose of Renewal of RQ status
- review for the purpose of monitoring the operation of governance, management, standards and quality. Such 'Monitoring review' normally explores the content of an annual report on provision, the fulfilment of conditions attached by the Privy Council to RQ status, or some important development in the provider or the osteopathic programme.

In Initial recognition review, in Renewal review, and in some instances of Monitoring review, visitors make one of the following recommendations to GOsC:

- **approval without conditions**
- **approval with conditions**
- **approval denied.**

The recommendation made is that of the review visitors to the GOsC. In making its own recommendation to the Privy Council the GOsC may choose not to follow the recommendation of the visitors.

In some Monitoring reviews the GOsC does not require the visitors to make a formal recommendation for the programme.

## Introduction

This report presents the findings of a Monitoring review requested by GOSc following a change of validating partner at the British College of Osteopathic Medicine (the College). The programme reviewed was the Master of Osteopathy (MOst), incorporating the Bachelor of Osteopathic Medicine (BOstMed). The review was undertaken by visitors appointed by the General Osteopathic Council (GOSc) in accordance with GOSc's regulatory responsibilities for safeguarding Recognised Qualification (RQ) criteria under the *Osteopaths Act 1993*. A prime focus of the review was the relationship of the programme to the *Standard 2000: Standard of Proficiency (Standard 2000)* professional competence standard of the GOSc. The review was completed in the academic year 2009-10. The review visitors were Miss Janet Sinclair, Miss Sarah Wallace and Dr Andrew Thompson, and Mr Jeffery Butel (coordinator).

## A Formal recommendations

The recommendation given below is the recommendation of the review visitors to the GOSc. In making its own recommendation to the Privy Council the GOSc may choose not to follow the recommendation of the visitors.

The recommendation of the visitors for the programme is:

- |   |
|---|
| <ul style="list-style-type: none"><li>• <b>approval without conditions.</b></li></ul> |
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## B Findings

The following is a summary of the visitors' main conclusions:

### Strengths

- the manner in which the College kept students and staff informed of developments (paragraphs 17, 19)
- the prompt and effective response of the College to the need to find a replacement validating body (paragraph 21)

### Areas for development

- monitoring of students' conversion to the University of Westminster's ATHENS platform (paragraph 16)
- ensuring that external examiner reports are forwarded to the College in a timely fashion (paragraph 20)
- confirmation of the contract for intakes in 2010-11 and beyond (paragraph 22).

## C Description of the review method

The following section gives a general description of the GOsC review method. The full method is given in the *Handbook for the General Osteopathic Council review of osteopathic courses and course providers, second edition*.

The GOsC monitoring review method involves off-site consideration of written evidence by the visitors, and may involve a visit to the provider. The review period is typically of four weeks.

The visitors are selective in their lines of enquiry, and focus upon their need to arrive at findings and a recommendation against clearly-stated criteria. They refine emerging views on the provision against as wide a range of evidence as possible.

Documentary evidence typically used includes: financial accounts; strategic plans; financial projections; insurance schedules; student work; clinic management records; internal reports from committees, boards and individual staff with relevant responsibilities; together with external reports from examiners, verifiers, employers, validating and accrediting bodies.

Any meetings with students are strictly confidential between the students attending and the visitors; no comments are attributed to individuals. Any teaching and learning observation is governed by a written protocol.

Visitors respect the principle of proportionality in their enquiries and emerging conclusions.

Key features of GOsC monitoring review include:

- an emphasis on the professional competencies expected of osteopaths and expressed in GOsC's *Standard 2000*
- peer review: review teams include currently registered osteopaths and, frequently, at least one lay visitor with higher education interests
- a focus on the students' learning experience
- flexibility of process to minimise disruption to the provider; there is negotiation between QAA and the provider about the timings of the review and the nature of evidence to be shown
- a process conducted in an atmosphere of mutual trust; the visitors do not normally expect to find areas for improvement that the provider has not identified in its own self-evaluation document (SED)
- use of the annual report to GOsC as the key SED: this should have a reflective and evaluative focus
- an onus on the provider to supply all relevant information: any material identified in the SED should be readily available to visitors
- evidence-based judgements
- ensuring that the amount of time taken to conduct a review is the minimum necessary to enable visitors to reach robust findings
- providing transparency of process through the use of published GOsC criteria
- the role of the Institutional Contact, a member of the provider's staff, to assist effective communication between the visitors and the provider
- close monitoring by QAA officers.

Monitoring review has been made responsive to the possibility of annual variations in GOsC criteria for monitoring review. Monitoring review may be an entirely desk-based scrutiny of the programme provider and the provision; monitoring review may incorporate days of site visit.

GOsC's criteria and interests for the three 2006-07 Monitoring reviews are:

- monitoring of specific requirements in the conditions for the award of RQ
- exploring themes suggested by the annual reports submitted by the institution, particularly in relation to declared or intended changes in the provision
- exploring the institutional arrangements for the external examiners dedicated to the monitoring of the quality of clinical performance assessment
- exploring the institutional arrangements for the assessment of clinical performance.

### **Monitoring of specific requirements in the conditions for the award of Recognised Qualification**

The review specification did not require monitoring of specific requirements in the conditions for the award of RQ. The scope of this review is set out in Section D below.

## **D Specific requirements for this monitoring review**

The review is to address the following areas:

- confirmation from London Metropolitan University that the change in validating university was not a result of any inadequacies with the College programme or programme delivery
- confirmation that the validation agreement with the University of Westminster has been formalised, including the four-year term and number of student placements available (200 has been quoted)
- confirmation that students graduating in 2009 will be awarded a qualification from London Metropolitan University. If this is not the case, then an explanation of how these students will obtain a qualification is required
- confirmation that all academic credits of students already enrolled on the London Metropolitan University validated programme will transfer to the University of Westminster validated programme without detriment to those students
- an assessment of whether the change of validating university will have any specific adverse effects on the delivery of the programme, particularly in relation to new external examining arrangements or changes to other processes and documentation
- an assessment as to whether any further conditions should be recommended. The visitors should not add further conditions unless these are absolutely necessary.

## **E Commentary on the provision**

1 The programme continues to be delivered as reviewed by the Initial recognition review in 2008. There are no changes other than that of the awarding body, as reported elsewhere. The BOstMed is contained wholly within the MOst and offers an alternative exit award for students who pass all modules except the project. The BOstMed is a recognised award and graduates are eligible for GOsC registration. All references in this report apply equally to the BOstMed.

The visitors' findings in respect of the review specification are as follows.

### **Confirmation from London Metropolitan University that the change in validating university was not a result of any inadequacies with the course or course delivery**

2 The partnership with London Metropolitan University arose because the University of Westminster, the College's validation partner since 1991, had been unable to secure Higher Education Funding Council for England (HEFCE) funding. The findings of the Initial recognition review of the London Metropolitan University validated MOst programme in November 2008, commended the care taken by the College in selecting a new validation partner in order to ensure an appropriate match of aims, curricular provision, staff expertise and appropriate supporting learning resources.

3 The College describes a number of collaborative and productive opportunities that developed within this new partnership. These continued throughout the academic year, 2008-09, culminating with personnel from both organisations visiting potential overseas collaborators in June and July 2009, and a validation event for two proposed UK-based postgraduate programmes in August 2009. In addition, the Deputy Vice-Chancellor (Academic) at London Metropolitan University became an observing member of, and an active participant in, the College's Board of Governors.

4 The College notes that, early in the validating partnership with London Metropolitan, it became apparent that the University was in dispute with HEFCE over its student data reporting. The College considers that London Metropolitan was open about the situation and reassured its partners that it was expecting an equitable resolution with minimal impact on its business. The University described how a subsequent audit of student data had applied a stricter interpretation of the law and, as a result, an issue with progression statistics was identified. It had negotiated a strategy with the funding council to refund money over six years, stabilise student numbers and reduce staff numbers by some 330. In consequence, some 25 programmes would cease to recruit. The University announced that it was reviewing its partnership agreements and, reluctantly, one of the partnership agreements to be terminated was that with the College.

5 London Metropolitan University issued one year's written notice of termination to the College on 30 July 2009. On receipt of the notification, London Metropolitan would cease to pay funds to the College in respect of any students enrolled after that date. The University stated the decision had been made with great reluctance because of the adverse financial consequences which could arise from allowing the agreements to continue, but that they 'would continue to endeavour to seek such further assistance from HEFCE as might enable the University to withdraw its notice'.

6 The College states that at no stage has the academic, clinical or institutional integrity or excellence of the College been cited as a reason for this action by London Metropolitan University. The visitors concur and accept that, on the basis of the documentation provided detailing correspondence between London Metropolitan University and the College, London Metropolitan University made the decision to withdraw from the validation agreement solely on financial grounds and not as a consequence of any perceived inadequacies on the part of the College.

**Confirmation that the validation agreement has been formalised with the University of Westminster, including the four-year term and number of student placements available (200 has been quoted)**

7 London Metropolitan approached University of Westminster with a view to assisting the College in finding a new validation partner. The University of Westminster immediately stated its academic and planning interest in resuming its relationship with the College. In subsequent discussions, it was agreed that the University of Westminster would accept, wholesale, the outstanding contractual obligations of London Metropolitan University towards the College from the start of the 2009-10 academic year, described as a process of novation of contracts.

8 The ensuing contractual agreement with the University of Westminster is in two parts. First, at the start of the 2009-10 academic year the University of Westminster assumed London Metropolitan's responsibility towards the College as it existed at 1 August 2009, in line with the legal novation agreed between the two universities. This contract was signed on 1 December 2009.

9 Under the terms of this novation, the University of Westminster will provide HEFCE funding for continuing students and those enrolling in the 2009-10 academic year. This will be at the level of 85 per cent cost centre Anatomy and Physiology (price group B) for a maximum of 200 full-time equivalent HEFCE completions, minus 5 per cent of the total sum collected for full-cost student fees. Any enrolment of home or European Union students above this quota will be on a fee-only basis. There were 194 students enrolled on the MOst at the time of the Initial recognition review in October 2008. In accordance with the agreement for 2009-10, the University of Westminster has enrolled all College students, both continuing and new. For the MOst, this represents 73 new first-year enrolments, 51 year two, 35 year three and 45 year-four students. In addition, there are three year-two Master of Osteopathic Medicine students, and 15 students enrolled on the Conversion course. Total registrations are 222 students.

10 The second part of the contractual agreement is the negotiation of the contract for subsequent intakes. This is expected to be completed by the end of the current calendar year so that recommendations for the development of the newly formed partnership between the University of Westminster and the College can be considered by the University's Court of Governors in January 2010.

11 All students graduating in the 2008-09 academic year were awarded a degree from London Metropolitan University and were graduated at a ceremony on 30 October 2009. This brings to an end the formal relationship between London Metropolitan University and the College. However, the question of students requiring resits was raised. It was clarified with the London Metropolitan University Registrar that, once the novation is signed, all contractual arrangements between London Metropolitan University and the College will be terminated and students would become the responsibility of the University of Westminster. Following discussion, it was agreed that this would have to be clarified further as the legal position was unknown, and a possible caveat might need to be added to the novation.

12 Under the novation process, the University of Westminster will accept all terms of the London Metropolitan contract that were in place at the end of the 2008-09 academic year. This includes student credits gained across all modules and years completed up to that date. As a result, progressing students enrolled with the University of Westminster for the academic year 2009-10, just as they would have done for London Metropolitan University.

**An assessment of whether the change in validating authority will have any adverse effects on the delivery of the course, particularly in relation to new external examining arrangements or changes to other processes and documentation**

13 The College's claim that all provision is directed and delivered by, and within, BCOM is confirmed in the findings of the MOst Initial recognition review in 2008. The delivery of the aims and objectives of the MOst are, therefore, not affected by the change in validating university, and there are no changes to the delivery of, and engagement with, GOsC's *Standard 2000*, and the *Subject benchmark statement* for osteopathy published by QAA.

14 College staff stated that all arrangements for teaching, learning and assessment will remain essentially the same. There will be no significant alteration to programme structure, syllabus or assessment schedule. This will be assisted by the University of Westminster's prior knowledge and understanding of the College and the professional standards it is required to meet. The visitors concur with this understanding of the situation.

15 The MOst Initial recognition review commended the development of Osteonet, the College's tailor-made virtual learning environment. It provides a highly accessible resource to underpin student directed learning. This important provision is not affected by the change in validating partner.

16 As part of the collaboration between the College and London Metropolitan University, students were provided with full reference access to library catalogues, access to the University's intranet and Metronet facilities, and unrestricted access to a range of online journals. These electronic resources supplied by London Metropolitan are currently being replaced by access to the University of Westminster's ATHENS licence. While these arrangements are being finalised, students will continue to have access to London Metropolitan's facilities, although this is technically out of contract. The visitors commend London Metropolitan University for providing this continuing support for College students. As the University of Westminster was the validating partner of the College from 1991 to 2008, College academic staff are familiar with the use of ATHENS, and will be providing study skills to introduce students to this platform. The College will need to monitor students' transition to this learning platform.

17 The College's senior management team met each student year group to explain the changes involved in transferring back to the University of Westminster. This included the differences between the two university handbooks and the examination rules and regulations. Students were also informed about the access to the University of Westminster learning facilities. The College is commended for ensuring that students were kept informed of developments and for easing their transition to the University of Westminster.

18 In the interim, while the University of Westminster is finalising new Academic Regulations, it has been agreed that the College can continue to use the existing programme handbook derived from the London Metropolitan University validation. Students have been advised that they will be informed of any changes to regulations once a final University of Westminster branded handbook is available.

19 The College has endeavoured to keep its staff involved by making formal announcements and inviting key members of staff to strategic meetings for discussion. The visitors regard as a strength the College's commitment to keeping students and staff informed of the developing position.

20 The College is familiar with the University of Westminster's processes for external examining and assessment board procedures. It anticipates that transferring external examiner contracts will not be problematic. This process will be assisted by the similarity between the contractual remit and the employment of external examiners, by both the University of Westminster and London Metropolitan University. The visitors accept this, but

note that under the previous arrangement with the University of Westminster there had been delays in obtaining external examiners' reports from the University. The University and College will wish to ensure that this issue is resolved within the new agreement.

21 The College anticipates that there will be no major internal changes to their quality assurance processes. The MOSt Initial recognition review reported a well-structured quality assurance framework providing an effective and rapid response to issues arising. This view is reinforced by the College's response in finding a new validating partner within such a short period of time. The visitors regard this as a strength. There will be minor differences in the annual reporting and monitoring cycles due to the slightly different demands of the two universities. The College is familiar with the University of Westminster's processes and anticipates no negative impact on its own processes.

**An assessment as to whether any further conditions should be recommended. The visitors should not add further conditions unless these are absolutely necessary**

22 No further conditions are recommended as far as continuing students and the new first-year student intake in the academic year 2009-10 are concerned. However, the visitors note that the signing of the contract relating to subsequent intakes, from 2010-11 onwards, and referred to in the self-assessment as 'imminent', has been delayed. GOsC will expect a report on progress with this contract in the College's 2008-09 Annual Report, and immediate notification upon its completion.