



Council
29 January 2014
Periods of Adaptation Guidance

Classification	Public
Purpose	For decision
Issue	The publication of guidance about periods of adaptation.
Recommendation	To publish guidance on periods of adaptation for applicants and educational institutions.
Financial and resourcing implications	The costs of this work are incorporated into the current budget and mainly comprise staff time.
Equality and diversity implications	Compliance with legislation requires mutual recognition of qualifications in certain circumstances. Further detail about this is outlined in this paper and in the guidance attached at Annex A.
Communications implications	The guidance will be published on our website and brought to the attention of applicants for registration as well as those who can offer a period of adaptation.
Annexes	A. Draft guidance on periods of adaptation for applicants and educational institutions B. Responses to the Period of Adaptation Consultation and General Osteopathic Council response
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Background

1. On 20 June 2013, the Council considered the need for Guidance on periods of adaptation for applicants and educational institutions (Guidance). This paper is available at: http://www.osteopathy.org.uk/uploads/public_item_15_guidance_on_periods_of_adaptation_final.pdf
2. Council agreed that the draft Guidance should be published for consultation.
3. This paper summarises the results of the consultation and asks Council to agree to the publication of the Guidance attached at Annex A subject to a further legal check ahead of publication.

Discussion

4. The Guidance was formally published for consultation on 7 October 2013 and the consultation concluded on 30 November 2013.
5. The consultation was publicised as follows:
 - On our public website at: www.osteopathy.org.uk
 - On our Facebook page at: https://www.facebook.com/goscnews?skip_nax_wizard=true
 - GOsC e-bulletin dated 25 October 2013 and 20 November 2013
 - Through a presentation to the Alliance of UK Regulators (AURE) meeting on 24 October 2013
 - In an email to the Forum for Osteopathic Regulation in Europe (FORE) on 25 October 2013
 - To osteopathic educational institutions on 16 October 2013 (with a request that they publicise this through their own networks)
 - Discussion groups were held with the osteopathic educational institutions on 7 May 2013 and 11 September 2013 as part of the pre-consultation engagement.
6. Three consultation responses were received. The consultation responses are outlined at Annex B.
7. The document is very technical and so it is not surprising that few consultation responses have been received. The document has been discussed extensively with osteopathic educational institutions which would be expected to oversee periods of adaptation. It has been more difficult to reach prospective applicants for registration – although we did circulate the document to the Forum for

Osteopathic Regulation in Europe to attempt to flag the document to these potential applicants affected by the Guidance.

8. The main response related to the beginning of the document. We have made some small changes to more clearly summarise the process at the beginning of the document before moving into the detailed guidance.
9. It is intended that our guidance will be subject to regular review and that we will continue to seek and log feedback to ensure that it is fit for purpose and useful.
10. Ahead of publication, we will also ensure that the document is subject to a final legal check.
11. Taking into account all these factors, along with our legal obligations in this area, Council is asked to agree to publish the guidance.

Recommendation: To publish guidance on periods of adaptation for applicants and educational institutions.



General
Osteopathic
Council

Draft Guidance on periods of adaptation for applicants and educational institutions

Background

1. All osteopaths must be registered with the General Osteopathic Council in order to practise, calling themselves an osteopath in the UK. Information for applicants applying for registration with the General Osteopathic Council is contained on our website at: <http://www.osteopathy.org.uk/practice/How-to-register-with-the-GOsC/>. This section provides an accurate summary of our process for registration and the information that must be provided by applicants in order to be registered.
2. In summary, applicants who qualified in an institution outside the United Kingdom (where the education is not, therefore, quality assured by the General Osteopathic Council) must undertake a three stage process involving assessment of their qualification, a further evidence of practice questionnaire and an assessment of clinical performance to demonstrate that they meet our standards. However, applicants with 'mutual rights' to recognition under European legislation are able to undertake a different process should they wish to do so.
3. Further detail about the process of registration for internationally qualified applicants and information about 'mutual rights' and 'periods of adaptation' is set out below in this Guidance.

The process of registration for internationally qualified applicants

4. Internationally qualified applicants undertake a three stage application process for registration.
 - **Assessment of qualification** – Applicants are asked to provide an academic transcript, a certified copy of their academic transcript and a certified translation of their academic transcript (in English), which outlines the results achieved for each module studied and a course guideline/handbook which outlines the modules studied.
 - **Further evidence of practice questionnaire** – The questionnaire comprises a number of questions related to the applicant's practice. It asks applicants to provide examples of specific aspects of practice where they have taken sole clinical responsibility. They are asked to describe the case histories and clinical presentations, and to submit anonymised copies of clinic records to support the critical discussions provided. The examples should be as recent as possible and ideally within the last two years of practice. The questionnaire provides an opportunity for the applicant to

demonstrate their ability to meet aspects of the *Osteopathic Practice Standards* in terms of their:

- theoretical knowledge
 - knowledge of testing procedures, and
 - how these are used to interpret findings in a clinical situation.
- **Assessment of Clinical Performance (ACP)** – The ACP involves the applicant managing two new patients in a clinical setting over a period of three hours. This includes taking a case history, performing any necessary examinations and undertaking appropriate treatment (or referral). The ACP provides an opportunity for an applicant to demonstrate the remaining aspects of the *Osteopathic Practice Standards* in terms of their:
 - Case history/communication
 - Differential diagnosis/interpretation/clinical reasoning/knowledge base – biomedical sciences and osteopathic principles
 - Clinical examination/osteopathic evaluation
 - Formation of diagnostic conclusions/treatment and management plans.
5. All internally qualified applicants are required to go through all three stages of the registration process to demonstrate all the *Osteopathic Practice Standards* as part of their application for registration – except those demonstrating mutual recognition rights – see below).
 6. Successful completion of the process outlined in paragraph 4 will enable an applicant to be registered subject to satisfactorily completing the remaining statutory requirements for the registration including: demonstrating good health and good character (including relevant enhanced checks and a certificate of current professional status, where appropriate), payment of the fee and relevant professional indemnity insurance. Once registration is granted, applicants must activate Professional Indemnity Insurance before commencing practice.
 7. Applicants who are able to demonstrate 'mutual recognition rights' under European law (see paragraphs 9 to 12 below) may not have to complete each of the three stages of the registration process as outlined above.
 8. If the applicant is entitled to mutual recognition rights, they may be registered at any stage of the process (subject to satisfactorily completing the remaining statutory requirements outlined in paragraph 6 above). Further, applicants entitled to mutual recognition may also have access to compensatory measures, such as an ACP or take a 'period of adaptation' (see paragraphs 13 and 14 below) to show they meet the *Osteopathic Practice Standards*.

Mutual recognition rights

9. Under European Union law¹, if a person is fully qualified to practise a specific profession in one relevant European state, there is a presumption that, in principle, they should be permitted to practise that profession in any other relevant European state. However, if there are substantial differences between the education and training and experience of the applicant and the requirements for the practice of that profession in the host state, the applicant may be asked to demonstrate compliance with the standards in practice or to undertake compensatory measures.
10. For this purpose, 'fully qualified' means that the applicant meets all of the requirements in order to practise in their home state, whatever they may be. If a profession is regulated in their home country, this may simply mean holding a qualification, and in others there may be a compulsory period of supervised training. In member states where a profession is not regulated, the applicant will need to prove that they are 'established' in that profession by having practised for at least two out of the last ten years.
11. In order to claim mutual recognition rights, applicants must demonstrate that they are a national of a relevant European state or have 'acquired rights' (for example through marriage to an EU national) and that they are entitled to practise as an osteopath in a relevant European state.
12. A relevant European state includes Switzerland or any of the member states of the European Economic Area (EEA) which are:

Austria	Latvia
Belgium	Liechtenstein
Bulgaria	Lithuania
Cyprus	Luxembourg
Czech Republic	Malta
Denmark	Netherlands
Estonia	Norway
Finland	Poland
France	Portugal
Germany	Romania
Greece	Slovakia
Hungary	Slovenia
Iceland	Spain
Ireland	Sweden
Italy	United Kingdom

¹ See Directive 2005/36/EC of the European Parliament and of the Council and the European Communities (Recognition of Professional Qualifications) Regulations 2007 and The European Qualifications (Health and Social Care Professions) Regulations 2007

The registration process for applicants who qualify for mutual recognition rights is as follows:

- **Stage 1: Assessment of qualification:**
 - Some applicants who qualify for mutual recognition rights will demonstrate that their educational qualifications are not substantially different to those in the UK. In these cases, applicants will be able to register immediately, subject to satisfying other requirements of registration such as health and character references and payment of a fee.
 - If applicants are not able to demonstrate such equivalence, they will move to the next stage – the further evidence of practice questionnaire.
- **Stage 2: Further evidence of practice questionnaire:**
 - Some applicants who qualify for mutual recognition rights will demonstrate that they practise in accordance with the *Osteopathic Practice Standards* through both their qualification and the further evidence of practice questionnaire and they may be able to register at this point (subject to satisfying other registration requirements).
 - Some applicants will be able to demonstrate aspects of the *Osteopathic Practice Standards* in this questionnaire and will be able to move forward to the next stage, the Assessment of Clinical Performance or they could choose to undertake a period of adaptation to demonstrate equivalence. The General Osteopathic Council may provide advice to the applicant about the most appropriate route depending on their circumstances. The applicant would receive a letter setting out the areas of the *Osteopathic Practice Standards* that still need to be demonstrated. The applicant would then seek to undertake bespoke compensatory measures through a period of adaptation by contacting an osteopathic educational institution (OEI).
- **Stage 3: Assessment of Clinical Performance**
 - Applicants who pass the Assessment of Clinical Performance (ACP) will be able to be registered immediately on completion of other registration requirements such as health and character checks and payment of a fee.
 - Applicants entitled to mutual recognition rights who do not pass the ACP will still be entitled to undertake a period of adaptation.

What is a period of adaptation?

13. A period of adaptation is a period of supervised practice and/or academic training intended to make up for significant shortfalls which have been identified in an application. These are in areas where, in the opinion of the assessors, the *Osteopathic Practice Standards* have not been met.

14. It is completed when an institution is satisfied that the applicant has met the requirements of the *Osteopathic Practice Standards*.

How is a period of adaptation organised?

15. A period of adaptation would normally take place under the supervision of an osteopathic educational institution (OEI) which offers qualifications recognised by the General Osteopathic Council (GOsC). A list of these institutions is available at: <http://www.osteopathy.org.uk/practice/becoming-an-osteopath/training-courses/>
16. The applicant would normally discuss the contents of the letter from the GOsC identifying the areas of practice where the *Osteopathic Practice Standards* have not been demonstrated and explore the development of an individual learning plan, taking into account the applicant's previous experience in the field and the findings identified in the GOsC letter to help the applicant to meet current UK standards.
17. The length of the period of adaptation would be agreed between the applicant and the OEI and should enable the applicant to demonstrate that they practise in accordance with the *Osteopathic Practice Standards*. Periods of adaptation should normally take no longer than three years. The precise length of time should be agreed between the applicant, the supervisor and GOsC.
18. The applicant should be supervised by a registered and practising osteopath.
19. The finding and the funding of the period of adaptation is the responsibility of the applicant. The GOsC is not able to assist applicants to find or fund a placement.

Guidance for osteopathic educational institutions offering a period of adaptation

20. There is no obligation on an organisation to provide a period of adaptation.
21. However, if osteopathic educational institutions (OEIs) can assist, this can be beneficial to both the applicant and also the organisation. The applicant benefits by gaining familiarity and experience within UK settings and working practices, as well as being able to achieve GOsC registration. The supervisor and the institution can benefit because the activity of supporting and supervising an applicant in completing a period of adaptation could be a useful opportunity to develop their teaching and mentoring skills, which could be of wider benefit to the employer. This might also be a useful part of CPD activity for the supervisor.
22. A formal requirement is that the supervisor must be a registered osteopath. Appropriate insurance should also be in place. However, as with any other aspect of professional practice, the person must have sufficient experience and training to take on the role. This might include experience of teaching, supervising or mentoring others. It might also include experience of assessing performance. The supervising registrant will also need to be familiar with the *Osteopathic Practice Standards*.

A note for supervisors

23. It is the responsibility of the applicant to find and arrange their period of adaptation. They have to ensure that they arrange the experience they need to meet our requirements and demonstrate they meet our standards.
24. However, supervisors have an important role to play in supporting and supervising applicants who are undertaking a period of adaptation.
25. If you are able to act as a supervisor, your role will be to provide support and supervision to help an applicant achieve our standards. This might include teaching, mentoring and supervised practice, in a similar way as you might help and support students.
26. Before you begin your supervisor role, you will need to see a copy of the record of assessment which is sent to the applicant from the GOsC. This will tell you the areas in which there are significant shortfalls in the applicant's knowledge and skills, to assist you in structuring a placement to meet these needs.
27. You should meet with the applicant before the adaptation period begins to discuss the record of assessment and to agree how you will assess whether they have met the *Osteopathic Practice Standards*.

During the period of adaptation

28. You can treat the applicant in the same way as you might treat a student. As working practices vary between member states and healthcare settings, it is good practice to offer an orientation and induction phase before the adaptation period begins. This will allow the applicant to become more familiar with the local practices such as record-keeping and health and safety requirements.
29. During the period of adaptation, you may find that there are areas not included in the record of assessment where you feel that the applicant needs additional experience. Our requirements are flexible enough to allow you to make decisions about the work an applicant needs to undertake based on your own professional experience and your knowledge of the applicant.
30. As a registered professional, your main responsibility is to your patients. The tasks you ask an applicant to perform will necessarily depend on your professional judgement about their ability to undertake tasks safely and effectively. It will also depend on the policies and protocols of the work place. If you have concerns about your role or the way an applicant is working during their period of adaptation, you should inform the Principal or Head of Department of the osteopathic educational institution.

Confirming the completion of the adaptation period

31. Once the adaptation period is completed, the osteopathic educational institution (OEI) will need to confirm to the GOsC in writing whether or not the applicant meets the *Osteopathic Practice Standards*.

32. This letter must include:

- The full name of the applicant
- The name of the supervisor, registration number and signature
- Where the adaptation period took place
- The start and end dates of the adaptation period
- A declaration that: 'I have read the original recommendations of the GOsC assessors and I am satisfied that the applicant has/has not remedied the deficiencies outlined in the GOsC letter dated xx/xx/xxxx and meets/does not meet the *Osteopathic Practice Standards* and has the necessary skills and knowledge to be able to practise safely.' Along with a short statement explaining why the applicant should/should not be registered.
- The letter must be countersigned by the Principal of the OEI or the appropriate Head of Department.
- The letter forms a recommendation to the Registrar of the General Osteopathic Council.

Further information

33. Further information about the registration process and periods of adaptation is available from the Registration Department of the General Osteopathic Council at: registration@osteopathy.org.uk or 020 7357 6655 x256.

ACKNOWLEDGEMENT

34. We gratefully acknowledge that this draft guidance is drawn heavily from the Health and Care Professions Council, Periods of Adaptation, 2012 available at: http://www.hpc-uk.org/assets/documents/100033E2PeriodsofAdaptationA5_final.pdf and accessed on 26 September 2013. All errors remain our own.

Responses to the Period of Adaptation Consultation and General Osteopathic Council response

1. Three consultation responses were received. The consultation responses were as follows:

Question	Consultation Response	Consultation Comments	GOsC Response
Background - 4. Is this section clear?	Yes – 2 No – 0 Other - 1	Wording could be made clearer: 1st Paragraph, last line may be better ... in order to be registered with the GOsC & practice in the UK using the protected title of Osteopath. It may be beneficial to have the process listed first then fleshed out (as in draft document) e.g. Assessment of Qualification Evidence of practice (in form of questionnaire) Practical assessment of Clinical Competency IELTS If International ? However, there is an exception to this rule ... Mutual Recognition needs to be put in the above as this is an exception to the rule and needs to be made clear at outset. Flesh out as in draft document.	A clearer summary has been inserted into the document to make these points clearer.
Background - 5. Are there any gaps?	Yes – 0 No – 3 Other - 0	None	No response required.

Annex B to 14

Question	Consultation Response	Consultation Comments	GOsC Response
Mutual recognition rights - 6. Is this section clear?	Yes – 2 No – 1 Other – 0	None	We have reviewed this section carefully and guidance from elsewhere and no changes have been made.
Mutual recognition rights - 7. Are there any gaps?	Yes – 1 No – 2 Other – 0	None	See above – we have not been able to identify any gaps and so no changes have been made.
The registration process for applicants who qualify for mutual recognition - 8. Is this section clear?	Yes – 2 No – 1 Other – 0	None	We hope that the summary at the beginning of the document supports this section to be clearer.
The registration process for applicants who qualify for mutual recognition - 9. Are there any gaps?	Yes – 1 No – 2 Other – 0	None	See above – we have not been able to identify any gaps and so no changes have been made.
What is a period of adaptation? - 10. Is this section clear?	Yes – 2 No – 1 Other - 0	None	We have reviewed this section carefully and guidance from elsewhere and no changes have been made.

Annex B to 14

Question	Consultation Response	Consultation Comments	GOsC Response
What is a period of adaptation? - 11. Are there any gaps?	Yes – 0 No – 2 Other – 0	None	No response required
How is a period of adaptation organised? - 12. Is this section clear?	Yes – 2 No – 1 Other – 0	None	We have reviewed this section carefully and guidance from elsewhere and no changes have been made.
How is a period of adaptation organised?- 13. Are there any gaps?	Yes – 0 No – 3 Other – 0	None	No response required.
Guidance for osteopathic educational institutions offering a period of adaptation - 14. Is this section clear?	Yes – 2 No – 1 Other – 0	None	We have reviewed this section carefully and guidance from elsewhere and no changes have been made. We also note that the OEIs seemed content with the Guidance at the two seminar sessions held in May and September 2013.
Guidance for osteopathic educational institutions offering a period	Yes – 0 No – 3	None	No response required.

Annex B to 14

Question	Consultation Response	Consultation Comments	GOsC Response
of adaptation - 15. Are there any gaps?	Other – 0		
Confirming completion - 16. Is this section clear?	Yes – 3 No – 0 Other – 0	None	No response required
Confirming completion - 17. Are there any gaps?	Yes – 0 No – 3 Other - 0	None	No response required
Equality and diversity - 18. Do you consider that any proposals in this Guidance may adversely impact on anyone because of their gender, race, disability, age, religion or belief, sexual orientation or any other aspect of equality?	Yes – 0 No – 3	None	No response required
Further comments - 19. Do you have any further comments about the draft Guidance about periods of	Yes – 0 No – 3	None	No response required

Annex B to 14

Question	Consultation Response	Consultation Comments	GOsC Response
adaptation for applicants and osteopathic educational institutions? (Optional)			