



General
Osteopathic
Council

To: Council
From: Steven Bettles
Date: 17 July 2019
Paper: C19/024

London College of Osteopathic Medicine (LCOM) – Renewal of Recognised Qualification

Classification	Public
Purpose	For decision
Issues	The London College of Osteopathic Medicine (LCOM) seeking renewal of its current RQ for: Member of London College of Osteopathic Medicine
Recommendation	To renew the recognition of the qualification - Member of London College of Osteopathic Medicine, awarded by the London College of Osteopathic Medicine, subject to the conditions outlined in paragraph 17, for a period of three-years from 17 July 2019 to 16 July 2022, and to seek approval of the recognition from the Privy Council.
Financial and resourcing implications	The Recognised Qualification review is undertaken as part of our contract with the Quality Assurance Agency for Higher Education (QAA). This accelerated 'recognised qualification' review was included in our 2018-19 financial schedule and budget, with a budget of £21,871.
Equality and diversity implications	None
Communications implications	We are required to 'maintain and publish' a list of the qualifications which are for the time being recognised in order to ensure sufficient information is available to students, patients and others about osteopathic educational institutions awarding 'Recognised Qualifications' quality assured by us.
Annexes	Annex A – LCOM Review Specification Annex B – QAA Visitors Report from the LCOM Review (December 2018)

Introduction

1. Section 14(2) of the Osteopaths Act 1993 provides that 'where the Council is satisfied that (a) a qualification granted by an institution in the United Kingdom is evidence of having a required standard of proficiency, it may, with the approval of the Privy Council, recognise that qualification for the purposes of this Act.'
2. Section 15(4) provides that 'The General Council may, in recognising a qualification under section 14, direct that the qualification is to remain a recognised qualification only so long as such conditions as the General Council sees fit to impose are complied with in relation to the qualification.'
3. Section 14(6) of the Osteopaths Act 1993 provides that 'Before deciding whether or not to recognise a qualification under this section, the General Council shall consult the Education Committee.'
4. This paper considers the advice of the Education Committee. The GOsC Policy Advisory Committee undertakes the functions of the statutory Education Committee and this Committee is referred to as 'the Committee' in the remainder of this paper.
5. This paper outlines the Committee's recommendation that Council renew the Recognised Qualification (RQ status) for the current qualification awarded by the London College of Osteopathic Medicine, which is one of the nine educational institutions offering osteopathic qualifications recognised by the GOsC.

Discussion

6. The Committee agreed the RQ specification for the London College of Osteopathic Medicine (LCOM) on 12 June 2018.
7. On 14 August 2018, the Committee were sent for approval notification of a team of three Education Visitors under s12 of the Osteopaths Act 1993 to undertake the review in accordance with the review specification. The Committee members confirmed their approval by email. The review specification is attached at Annex A. The visit component of the review took place in December 2018.
8. The visit report was drafted and sent to LCOM on 18 January 2019 for a period of no less than one month in accordance with the Osteopaths Act 1993.
9. The response of LCOM (received on 6 February 2019) focussed on points of factual clarification and was considered by the Education Visitors. The Visitors submitted their final report and this is attached at Annex B.
10. The Visitors report recommended approval of the Member of the London College of Osteopathic Medicine award with conditions, which were:
 - produce a single definitive course document that clearly outlines the purpose, structure, assessment strategy, fitness to practise policy and operation of the London College of Osteopathic Medicine course to ensure consistency and continuity of delivery and understanding of the students

in achieving their award (paragraphs 8, 9, 14, 17, 20 and 37 of the Report at Annex B)

- undertake the mapping of the new Osteopathic Practice Standards (for implementation 1 September 2019) across all components of the London College of Osteopathic Medicine course to ensure current and future students are equipped for professional practise (paragraph 11 of the Report at Annex B)
- implement the arrangements for enhancing the external scrutiny of the London College of Osteopathic Medicine course to ensure comparability of academic standards and provide critical evaluation of the teaching and learning experience (paragraphs 18 and 62 of the Report at Annex B)
- finalise the appointment of the moderator for the FCCA examination to optimise the validity, reliability and consistency of assessment (paragraph 22 of the Report at Annex B)
- finalise and implement the revised admissions arrangements through the introduction of the process, where applicable, for assessing clinical competence (paragraphs 33 and 50 of the Report at Annex B)
- implement the identified deliberate steps to inform and assure the Board of Trustees and stakeholders that the London College of Osteopathic Medicine fulfils its responsibility for the delivery of the osteopathic practice standards (paragraph 52 of the Report at Annex B).

11. The report also outlined the visitors' conclusions, including strengths and areas for development.
12. Although a report on LCOM's RQ renewal was listed for consideration at the Policy Advisory Committee (the statutory Education Committee and referred to in this paper as 'the Committee') meeting of 13 March 2019, due to unforeseen circumstances, the meeting became inquorate for this item. The Committee was therefore unable to make any decisions about this recognised qualification (RQ). The meeting was reconvened on 8 May 2019.
13. At its meeting of 8 May 2019, the Committee concluded that there was insufficient evidence to agree the recommendation for the renewal of the Recognised Qualification on 8 May, and that subject to the provision of satisfactory evidence, a decision on the recommendation to Council whether to renew the award would be made at its meeting on 12 June 2019. To further inform its decision making, the Committee required assurance that current students due to graduate in August 2019 will meet the Osteopathic Practice Standards and that the updated action plan would be delivered within the timeframe stipulated.
14. At its meeting of 12 June 2019, the Committee considered the Visitors' Report in the light of further evidence subsequently provided by LCOM, and agreed to recommend to Council that, subject to the approval of the Privy Council, Council

recognises the Member of London College of Osteopathic Medicine qualification subject to the specific and general conditions outlined in paragraph 17 below from 17 July 2019 to 16 July 2022.

15. The Committee agreed, however, that the following conditions recommended in the Visitors' Report should be enhanced as outlined below:

From Visitors' Report	Updated Committee recommendation
finalise and implement the revised admissions arrangements through the introduction of the process, where applicable, for assessing clinical competence (paragraph 33 and 50)	finalise and implement the revised admissions arrangements through the introduction of the process, to include, where applicable, for assessing clinical competence
implement the identified deliberate steps to inform and assure the Board of Trustees and stakeholders that the London College of Osteopathic Medicine fulfils its responsibility for the delivery of the osteopathic practice standards (paragraph 52).	implement a proportionate governance approach and associated assurance process to inform and assure the Board of Trustees and stakeholders that the London College of Osteopathic Medicine fulfils its responsibility for the delivery of the Osteopathic Practice Standards.

16. All proposed conditions have been reviewed by the Director of Fitness to Practise and agreed to be appropriately worded.

17. The conditions are:

CONDITIONS	
a.	The London College of Osteopathic Medicine must produce a single definitive course document that clearly outlines the purpose, structure, assessment strategy, fitness to practise policy and operation of the London College of Osteopathic Medicine course to ensure consistency and continuity of delivery and understanding of the students in achieving their award.
b.	The London College of Osteopathic Medicine must undertake the mapping of the new Osteopathic Practice Standards (for implementation 1 September 2019) across all components of the London College of Osteopathic Medicine course to ensure current and future students are equipped for professional practise.
c.	The London College of Osteopathic Medicine must implement the arrangements for enhancing the external scrutiny of the London College of Osteopathic Medicine course to ensure comparability of

	academic standards and provide critical evaluation of the teaching and learning experience.
d.	The London College of Osteopathic Medicine must finalise the appointment of the moderator for the FCCA examination to optimise the validity, reliability and consistency of assessment.
e.	The London College of Osteopathic Medicine must finalise and implement the revised admissions arrangements through the introduction of the process, to include, where applicable, for assessing clinical competence.
f.	The London College of Osteopathic Medicine must implement a proportionate governance approach and associated assurance processes to inform and assure the Board of Trustees and stakeholders that the London College of Osteopathic Medicine fulfils its responsibility for the delivery of the Osteopathic Practice Standards.
g.	The London College of Osteopathic Medicine must submit an Annual Report, within a three month period of the date the request was first made, to the Education Committee of the General Council.
h.	<p>The London College of Osteopathic Medicine must inform the Education Committee of the General Council as soon as practicable, of any change or proposed substantial change likely to influence the quality of the course leading to the qualification and its delivery, including but not limited to:</p> <ul style="list-style-type: none"> i. substantial changes in finance ii. substantial changes in management iii. changes to the title of the qualification iv. changes to the level of the qualification v. changes to franchise agreements vi. changes to validation agreements vii. changes to the length of the course and the mode of its delivery viii. substantial changes in clinical provision ix. changes in teaching personnel x. changes in assessment xi. changes in student entry requirements xii. changes in student numbers (an increase or decline of 20 per cent or more in the number of students admitted to the course relative to the previous academic year should be reported) xiii. changes in patient numbers passing through the student clinic (an increase or decline of 20 per cent in the number of patients passing through the clinic relative to the previous academic year should be reported) xiv. changes in teaching accommodation

	xv. changes in IT, library and other learning resource provision
i.	The London College of Osteopathic Medicine must comply with the General Council's requirements for the assessment of the osteopathic clinical performance of students and its requirements for monitoring the quality and ensuring the standards of this assessment. These are outlined in the publication: <i>Subject Benchmark Statement: Osteopathy, 2015</i> , Quality Assurance Agency for Higher Education and <i>Guidance for Osteopathic Pre-registration Education, 2015</i> , General Osteopathic Council. The participation of real patients in a real clinical setting must be included in this assessment. Any changes in these requirements will be communicated in writing to the LCOM giving not less than 9 months' notice.

18. The Committee also agreed the detailed Action plan submitted by LCOM. The Action Plan outlines a series of tasks and regular monitoring both by the LCOM, the executive and the Committee. The next update will be considered by the Committee at its meeting in October 2019 with ongoing engagement between the executive and LCOM in the intervening period.
19. In the event that there are matters arising from the progress updates which require the earlier attention of the Committee, the executive would take immediate steps to bring these to the attention of the Committee for consideration in accordance with our usual procedures which in turn would bring any relevant matters to the attention of Council.

Recognition period

20. For established osteopathic educational institutions seeking recognition of a course, the general policy is to recognise for five years unless there are any serious concerns. In this case, the Committee have recommended that the Member of the London College of Osteopathic Medicine qualification is recognised for a shorter period of three years from 12 June 2019 to 13 June 2022 reflecting the extensive nature of the conditions and the nature of the Committee discussions. We would now suggest that the commencement date changes to coincide the date of this Council meeting on 17 July 2019 for a three year period.

Recommendation: To renew the recognition of the qualification Member of the London College of Osteopathic Medicine awarded by the London College of Osteopathic Medicine, subject to the conditions outlined in paragraph 17, for a period of three-years from 17 July 2019 to 16 July 2022, and to seek approval of the recognition from the Privy Council.