



**Council**

**10 May 2022**

**Review of Guidance for Osteopathic Pre-registration Education and development of Standards for Education and Training**

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| <b>Classification</b>                        | Public  |
| <b>Purpose</b>                               | For decision  |
| <b>Issue</b>                                 | The publication of the Guidance for Pre-registration Osteopathic Education (GOPRE) and Standards for Education and Training (SET).  |
| <b>Recommendations</b>                       | <ol style="list-style-type: none"><li>1. To note the agreement of the Policy and Education Committee to the change of name to Graduate Outcomes for Osteopathic Pre-Registration Education and Standards for Education and Training.</li><li>2. To note the agreement of the Standards for Education and Training and Graduate Outcomes for Osteopathic Pre-Registration Education as the statement of the Committee under Rule 3 of the General Osteopathic Council (Recognition of Qualifications) Rules 2000.</li><li>3. To agree to publish the Graduate Outcomes for Pre-registration Osteopathic Education and the Standards for Education and Training for implementation from 1 September 2022.</li></ol> |
| <b>Financial and resourcing implications</b> | <p>The review is being managed in-house. We have commissioned experts to review our Equality Impact Assessment and the Guidance for Osteopathic Pre-registration Education and Training and to review and advise on specific consultation questions in relation to equality, diversity and inclusion costing £2,500.</p> <p>In addition, we have made small payments to participants with particular protected characteristics as these views were under-represented in our pre-development feedback. Costs were less than £600.</p>  |
| <b>Equality and diversity implications</b>   | Equality and diversity implications are being taken into account. An Equality Impact Assessment has been developed. This identifies a range of associated actions during the development, consultation and decision-making  |



phases and subsequent actions necessary for implementation

As indicated by the equality impact assessment, we received specific advice on the draft guidance and on the equality impact assessment and we have held two focus groups and also interviews and correspondence with individuals in order to inform the development of the guidance and consultation questions.

A further review of the final documents has been commissioned to inform final editing ahead of publication.

**Communications implications**

We have been undertaking ongoing engagement with stakeholders throughout the development period.

**Annex**

- A. Consultation analysis report
- B. Updated Graduate Outcomes for Pre-registration Osteopathic Education (GOPRE) and Standards for Education and Training (SET)
- C. Current Equality Impact Assessment

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## Key messages

- This paper provides an analysis of the outcomes of the consultation on the Guidance for Pre-registration Education and Standards for Education and Training.
- The outcomes of the consultation were considered with the Stakeholder Reference Group on 28 February 2022.
- The updated draft GOPRE and SET reflecting the consultation outcomes as considered by the Stakeholder Reference Group was reported to the Policy and Education Committee on 4 April 2022.
- The Committee discussed the reference within paragraph 62 to osteopathic education 'typically' including 1,000 hours of clinical practice, and graduates having typically seen fifty new patients. The Committee were keen to strengthen the emphasis on the clinical hours, whilst also taking account of the quality of these.
- Subject to circulation of a revised wording for paragraph 62 which was subsequently agreed, the GOPRE and SET were agreed for recommendation to Council.
- PEC also agreed a change of name of GOPRE from 'Guidance' to 'Graduate Outcomes for osteopathic Pre-registration Education', and also a statement added to the SET to confirm that the meeting of these standards is something that the Committee will wish to be satisfied on before advising Council to recognise a qualification as provided under the Osteopaths Act. This is consistent with The General Osteopathic Council (Recognition of Qualifications Rules) 2000.
- Council is asked to agree the draft updated GOPRE and Standards for Education and Training for publication and implementation.

## Background

1. Council agreed at its [May 2021 meeting](#) that GOPRE and Standards for Education and Training could be published for consultation.
2. The Consultation took place from 15 June until 22 September, in accordance with the agreed [consultation strategy](#).
3. In addition, the Osteopathic Education providers took part in a pilot annual reporting process for the 2020-21 academic year in which they reported against the draft Standards for Education and Training. This provided a further level of scrutiny of the standards in practice, and generated feedback which assisted in the development of the final draft

4. The consultation analysis and updated draft GOPRE and SET were presented to the Policy and Education Committee (PEC) at its meeting in April 2022, and the Committee agreed to recommend the draft for approval by Council and publication.
5. This paper presents the analysis of consultation outcomes, and the updated draft GOPRE and SET for the Council to agree for publication and implementation from September 2022.

## Discussion

6. The consultation documents are available on our [website](#). These followed the format of the draft GOPRE and Standards document, setting out a summary of changes in each section, and asking a range of questions in each case. These included general questions and specific questions to explore views on issues raised throughout the development process, including:
  - Patient partnership and values.
  - Knowledge and skills outcomes.
  - Research outcomes.
  - Leadership, management and education outcomes, and options in relation to each of these.
  - Business skills.
  - Models of healthcare.
  - Clinical hours and experience, and how these might be met.
  - Common ranges of clinical presentation.
  - How common ranges of osteopathic approaches to treatment are referenced.
  - Whether equality, diversity and inclusion issues are sufficiently woven through the outcomes.
  - Mechanisms of implementation
7. In relation to the Standards for Education, we explored views on:
  - Equality, diversity and inclusion, again, as referenced within the standards.
  - Student, patient and public involvement in programme design.
  - Standards around 'speaking up' in relation to learning culture.
  - Whether the standards sufficiently address the meeting of students' diverse needs.
  - The requirement to provide a varied and diverse clinical experience.
  - Staff support, training and development standards.
  - Patient safety and wellbeing at the centre of osteopathic education.
8. The draft Standards for Education and Training set out nine themes, each with a set of standards that education providers must ensure and be able to demonstrate. These themes are:

- Programme design, delivery and assessment
  - Programme governance, leadership and management
  - Learning culture
  - Quality evaluation, review and assurance
  - Resources
  - Students
  - Clinical experience
  - Staff support and development
  - Patients
9. The consultation was promoted through our usual channels, including social media, ebulletins to registrants, and direct emails to key stakeholders, who included: educational providers, NCOR, The Institute of Osteopathy, the Osteopathic Alliance, other regulators, the Professional Standards Authority, and Health Education England and the devolved administrations.
10. We arranged a series of focus groups or discussions including with:
- Patients
  - COEI (as a focused session within a GOS/COEI meeting)
  - The Osteopathic Alliance (we attended their Committee meeting)
  - The iO Council (we introduced the consultation at an iO Policy and Standards Committee meeting)
  - Osteopathic Students
  - Osteopathic Educators
  - Regional Group Leads
  - Osteopaths working in NHS roles
  - Registration assessors
  - Other health professional representatives (CSP, HEE)
11. It was anticipated that this would not be a high-volume response consultation. Whilst this is an important area in terms of a key area of regulatory function, it's immediate impact on the profession generally may not always be evident. The focus group activities with a range of stakeholders were successful in gaining insights and perspectives, and have led to some rich feedback as reflected in the analysis report. The range of stakeholders was broad, and their input has ensured that the consultation was successful in terms of its outcomes, enabling the issues to be effectively explored and considered.

### *Analysis report*

12. The Consultation Analysis report is included as Annex A. The format of this is explained within the report itself, but includes a review of the themes arising with issues that arose in relation to each, and which were considered at a meeting of the Stakeholder Reference Group on 28 February 2022, and subsequently reported to the Policy and Education Committee. The report also reflects all the written feedback received in relation to the GOPRE and SET consultation questions in two tables, with commentary.

13. We have also received feedback from the osteopathic educational institutions who piloted the draft Standards for Education and Training and this has been incorporated into the final draft document.

*Updated draft GOPRE and SET*

14. The updated GOPRE and SET in Annex B reflect the changes outlined within the analysis, as discussed with the Stakeholder Group and agreed by the Policy and Education Committee.
15. Feedback from education providers in relation to the annual report pilot against the draft SET was generally positive, and related more to the process itself than the drafting of the standards. There was one comment in relation to the status of GOPRE and guidance, and the relationship with the SET:

*"In the many discussions held around GOPRE, it was made clear by GOsC that GOPRE was guidance not standards. However the new SET appears to lay out some new material and then add 'and GOPRE'. This suggests a change in the status of GOPRE contrary to the discussions held in the consultation phase.*

*Which brings us back in a loop to the specification of an arbitrarily determined number of clinic hours and new patient count."*

16. Whilst it is the case that some aspects of the current guidance offer a degree of flexibility in interpretation (for example, the expectation of clinic hours and numbers of new patients seen), it is not the case that the overarching outcomes are optional, and the GOPRE is a regulatory document against which the delivery of programmes is reviewed.
17. For clarification, we suggested that the word 'guidance' be removed from the document title, and instead rename this as Graduate Outcomes for Osteopathic Pre-Registration Education and Standards for Education and Training. This was agreed by the Committee.
18. A statement has been added to the SET to confirm that the meeting of these standards is something that the Committee will wish to be satisfied before advising Council to recognise a qualification as provided under the Osteopaths Act. This is consistent with The General Osteopathic Council (Recognition of Qualifications Rules) 2000, which provide:

*The **Committee shall publish a statement**, and may from time to time amend the statement, indicating—*

- *(a) matters on which the Committee will wish to be satisfied before advising the General Council to recognise a qualification under subsection (2) of section 14 of the Act; and*
- *(b) matters which may cause the Committee to advise the General Council not to recognise a qualification under that subsection.*

### *Clinical hours*

19. The draft GOPRE presented to the Committee contained the following as a suggested amendment to paragraph 62 regarding clinical hours (the red shows changes to the current GOPRE (2015):

‘Graduates must have the opportunity to consolidate their clinical skills before graduation. In order to support this, **pre-registration osteopathic education should typically include** 1,000 hours of clinical practice, though what is important is the meeting of outcomes rather than just accumulating hours. The gaining of sufficient depth and breadth of experience may be achieved in a variety of ways, for example, through simulations involving actors, virtual and remote clinics, through observation and direct clinical interaction, **placements with other osteopaths, health professionals or the NHS**, as well as the provision of hands-on clinical care in the teaching clinic. Graduates should **typically** have seen around 50 new patients in order to include the presentations set out below. Graduates should also ensure that they have seen patients on repeated occasions to enable them to explore these presentations fully.’

20. In discussion, the Committee were keen to strengthen the emphasis on the clinical hours, whilst also taking account of the quality of the clinical hours.
21. The Committee noted that an absolute requirement in relation to the clinical hours could have unintended consequences and be disproportionate in relation to a. specific students (a further year of study (including additional fees) to do an extra few hours, even if they were judged by an institution to have met the outcomes and b. institutions –at least one of which offers a shortened course to pre-qualified health professionals.
22. The Committee liked the form of words proposed by the current GOPRE, but recognised that enhancements could be made to the description of the clinical hours taking into account the consultation responses, but also the Committee’s view that the requirement on clinical hours should be strengthened.
23. The Committee noted that if the graduates of an institution were not delivering students meeting the outcomes and the OPS, that it was open to the Committee to take action including visiting the institution or in severe circumstances, removing an RQ. The Committee also noted that these actions took time to implement.
24. On balance, the Committee felt that an amended wording retaining the wording of the GOPRE (2015) describing the clinical hours but also the expansion of the description of these hours could meet their expectations, and agreed to recommend the Graduate Outcomes for Pre-registration Osteopathic Education and the Standards for Education and Training to Council for publication and

subsequent implementation from 1 September 2022 subject to the approval of the amended wording at paragraph 62 of the draft document.

25. The following wording of paragraph 62 was circulated to the Committee members and agreed for inclusion in the current version being reported to Council for approval:

'Graduates must have the opportunity to consolidate their clinical skills before graduation. In order to support this, **pre-registration osteopathic education should include a minimum** 1,000 hours of clinical practice, though what is important is the meeting of outcomes rather than just accumulating hours. The gaining of sufficient depth and breadth of experience may be achieved in a variety of ways, for example, through simulations involving actors, virtual and remote clinics, through observation and direct clinical interaction, placements with other osteopaths, health professionals or the NHS, as well as the provision of hands-on clinical care in the teaching clinic. Graduates should typically have seen around 50 new patients in order to include the presentations set out below. Graduates should also ensure that they have seen patients on repeated occasions to enable them to explore these presentations fully.'

#### *Equality Impact Assessment*

26. The updated Equality Impact Assessment is included as Annex C. We report in the consultation analysis on the outcomes of the consultation analysis in regard to EDI issues, and have reflected the suggested amendments in the updated draft as agreed by the Committee. We have also sought further input from the EDI consultants who originally advised on this.

#### *Implementation*

27. We have worked with the osteopathic education providers throughout this process, with COEI representatives on the Stakeholder Group, and in discussions at COEI meetings. The pilot annual report process for 2020-21, submitted in December 2021, provided an opportunity for OEIs to reflect on and report their current delivery of the draft Standards for Education and Training and to prepare for the final implementation of these. Analysis of the annual reports showed that OEIs were already meeting all themes of the draft SET. We will continue to work with COEI to support the implementation of the updated outcomes and SET once finalised in preparation for September 2022, and will raise this further at the meeting with GOsC/OEI to be held in May.
28. As part of the implementation we are looking to develop a series of workshops with OEIs and educators to explore and enhance various aspects of education delivery and practice to support standards. The annual report process for the 2021-22 academic year will comprise an update of last year's format against the final standards. Although this was an initially a fairly onerous process for providers, the updating of performance and reporting against standards should



be more proportionate, focusing on changes and enhancements to what was reported previously.

**Recommendations:**

1. To note the agreement of the Policy and Education Committee to the change of name to Graduate Outcomes for Osteopathic Pre-Registration Education and Standards for Education and Training.
2. To note the agreement of the Standards for Education and Training and Graduate Outcomes for Osteopathic Pre-Registration Education as the statement of the Committee under Rule 3 of the General Osteopathic Council (Recognition of Qualifications) Rules 2000.
3. To agree to publish the Graduate Outcomes for Pre-registration Osteopathic Education and the Standards for Education and Training for implementation from 1 September 2022.