



Council
10 May 2022

Initial Recognition of the BCNO Recognised Qualification and renewal of recognition of existing recognised qualifications

Classification Public

Purpose For decision

Issue The British College of Naturopathy and Osteopathy (BCNO) Group is seeking initial recognition of qualifications for the:

- Masters in Osteopathy (M.Ost),
- BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine

and renewal of recognition for the existing qualifications previously awarded by the BCOM and ESO and from September 2021 to be awarded by BCNO Group namely the:

- Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO)
- Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM)

Recommendations

1. To recognise the Masters in Osteopathy (M.Ost) and the BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine awarded by the BCNO Group from 1 September 2021 to 31 August 2026 subject to the Conditions outlined at paragraph 10, subject to the approval of the Privy Council.
2. To renew the recognition of the Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO) and the Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM) now to be awarded by BCNO Group from 1 September 2021 to 31 August 2026 subject to the conditions outlined in paragraph 10, and



subject to the approval of the Privy Council.

**Financial and
resourcing
implications**

The RQ Visit of the new merged curriculum was included in the 2021-21 financial schedule, with a budget of c.£15,000.

**Equality and diversity
implications**

Equality and diversity issues are reviewed as part of the RQ renewal process.

**Communications
implications**

We are required to 'maintain and publish' a list of the qualifications which are recognised in order to ensure sufficient information is available to students, patients and others about osteopathic educational institutions awarding 'Recognised Qualifications'.

Annexes

- A. The BCNO Group RQ Visit specification
- B. Mott MacDonald/GOsC review for BCNO Group – RQ Report (Final) - January 2022

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Key messages from the paper:

- The British College of Osteopathic Medicine and The European School of Osteopathy merged from 1 September 2021, under the new institution of the BCNO Group.
- The BCNO Group's existing RQ programmes are being taught out, and a new joint programme has been designed for delivery at each location from September 2022.
- An RQ visit took place in January 2022 to carry out an initial review of this new joint programme, and to also consider existing RQ programmes within this process.
- The visitors report recommended approval for the programmes with three specific conditions. This was considered by the Policy and Education Committee in April 2022.
- The Committee agreed to recommend that Council:
 - recognise the Masters in Osteopathy (M.Ost) and the BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine awarded by the BCNO Group, and
 - renew the recognition of the Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO) and the Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM) now to be awarded by BCNO Group, from 1 September 2021 to 31 August 2026 subject to the Conditions outlined at paragraph 10, and subject to the approval of the Privy Council.

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 and Education Committee (PEC) undertakes the functions of the statutory

Education Committee and this Committee is referred to as the 'the Committee' in remainder of this paper.

5. This paper describes the Committee recommendation that Council recognise of the Masters in Osteopathy (M.Ost) and the BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine awarded by the BCNO Group from 1 September 2021 to 31 August 2026 and to renew the recognition of the Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO) and the Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM).

Discussion

6. The Committee agreed the RQ specification for the BCNO Group on 07 October 2021.
7. On 07 October 2021, the Committee appointed a team of three Education visitors under s12 of the Osteopaths Act 1993 to undertake the review in accordance with the review specification. The review specification is attached at Annex A. The Visit component of the review took place in January 2022.
8. The visit report was drafted and sent to the BCNO Group on 14 February 2022 for observations allowing a period of not less than one month. The BCNO Group responded with what they considered to be factual inaccuracies on 25 February 2022, and these were considered by the Education Visitors. All comments were taken into account in the production of the final report. The report outlines the visitor's conclusions, including specific conditions, strengths areas of good practice and areas for development. The recommendation of the Visitors for the programmes is approval with three specific conditions. When we recognise an RQ, we also recognise in accordance with the general conditions which are also specified below.
9. The Committee considered the visitors report at its meeting on 04 April 2022. Due to the accelerated timeframe of the Committee meeting, the action plan was not submitted for review by the visitors prior to the Committee meeting.
10. The Committee agreed to recommend to Council that, subject to the approval of the Privy Council, Council recognises the programmes referred to in paragraph 5 above, subject to the specific and general conditions set out in the table below.

CONDITIONS	
1	The BCNO Group should prioritise the publication of BCNO Group specific policies to ensure that the governance of the Group is appropriate, accountable, consistent, and transparent. Where BCNO Group specific policies are aligned to existing policies already in place, this should be made transparent and clear that these are what are in place for the BCNO courses. The BCNO Group policies

	should be appropriately communicated to ensure that staff, prospective students, students, and stakeholders are aware of the content and expectations. The BCNO Group should produce a timetable for publication of these policies beginning with those specific to the new programmes, to ensure these are in place for September 2022.
2	The BCNO group should ensure that students enrolling on their modified attendance BSc programme are provided with a clear timetable for clinic attendance for the duration of the programme of study, in preparation for the September 2022 start date.
3	To ensure a clear student journey, the BCNO Group must complete the development of the details of module delivery for the BCNO Group programmes that are scheduled for delivery during the 2022-23 academic year.
4	The BCNO Group 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.
5	<p>The BCNO Group 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

	<p>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)</p> <p>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)</p> <p>xiv. changes in teaching accommodation</p> <p>xv. changes in IT, library, and other learning resource provision</p>
6	<p>The BCNO Group 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, 2019</i>, Quality Assurance Agency for Higher Education and <i>Graduate Outcomes for Osteopathic Pre-registration Education and Standards for Education and Training, 2022</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 BCNO Group giving not less than 9 months notice.</p>

Recognition period

11. The Committee were reminded of the policy outlined in the Interim Handbook which set out the current criteria regarding the period of RQ approvals stating:

"The maintenance of the RQ status currently follows a cyclical process. Where required, PEC may apply an expiry date to the RQ. This decision will be made based on anticipated level of risk that the RQ presents. GOsC will usually recognise qualifications for a fixed period of time in the following circumstances:

- A new provider or qualification
- An existing provider with a risk profile requiring considerable ongoing monitoring.

For existing providers, GOsC will usually recognise qualifications without an expiry date in the following circumstances:

- an existing provider without conditions or
- an existing provider with fulfilled conditions and without any other monitoring requirements or

- an existing provider who is meeting all QA requirements (providing required information on time) or an existing provider with outstanding conditions, an agreed action plan and which is complying proactively with the action plan and
- an existing provider engaging with GOsC.

This will be subject to satisfactory review of the providers annual report.”

12. The current British College of Osteopathic Medicine’s RQ programmes do not have a fixed expiry date. The European School of Osteopathy’s existing RQ programmes current RQ status expires on 31 August 2024. All programmes including the new joint programme were covered under the scope of the current RQ review process, as set out in the RQ specification and visitors’ report. As conditions are recommended by the visitors, the criteria for having no expiry date is not yet met.
13. For new OEIs seeking initial recognition, our usual policy is to recognise for a period of three years and then visit again prior to the first students graduating to ensure that standards are in place ahead of the ahead of that point.
14. The rationale for a three-year expiry date for new institutions relates to the importance of visiting the new institution prior to the point of graduation of the new students to confirm that the OPS are delivered by the new course and the new institution. As the BCNO Group is an amalgamation of two established OEIs with existing RQs, the Committee considered the proportionality and rationale for imposition of the three-year expiry date and the date of the visit in all the circumstances, and agreed to extend the initial RQ period to the standard five years granted to other established OEIs.
15. It is recommended the qualifications outlined in paragraph 5 are approved subject to the conditions outlined in paragraph 10 for a period of 5 years from 1 September 2021-31 August 2026.

Recommendations

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