



Council
10 May 2022

London School of Osteopathy: Removal of Recognised Qualification expiry date

Classification	Public
Purpose	For decision
Issue	The removal of expiry date for recognised qualifications awarded by the London School of Osteopathy.
Recommendation(s)	To agree to recognise the qualifications Master of Osteopathy and Bachelor of Osteopathy, (full and part time) awarded by the London School of Osteopathy with no expiry date and with no specific conditions and to seek approval of the recognition from the Privy Council.
Financial and resourcing implications	There are no cost implications from the removal of the expiry date. The Policy and Education Committee (performing the role of the statutory Education Committee) will still require a periodic visit as part of its approach to quality assurance. This visit may take place at any point between year four and year six of the visit cycle instead of before the end of year five whilst the expiry date is in place.
Equality and diversity implications	None in relation to this particular issue.
Communications implications	If the Council agree the recommendation in this paper and it is approved by the Privy Council, the revised approval order will be published on the website alongside the most recent recognised qualification (RQ) visit report. In addition to this, an action plan providing a current update about general conditions or requirements and any specific matters of interest be published on our website.
Annex(es)	Background information: Legislative framework and Council decision to remove expiry dates.
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Key messages from this paper

- The London School of Osteopathy (LSO) Recognised Qualification (RQ) visit took place in October 2018. The recommendation of the Visitors for the programmes was approval without conditions.
- The Policy and Education Committee (PEC) monitored and reviewed various issues in relation to LSO delivery including areas for development recommended in the RQ Visit Report and arising from annual reporting, and a concern raised in 2021, and is now satisfied that these are all addressed.
- The PEC are now recommending Council recognise the qualifications awarded by the LSO with no conditions and no expiry date.
- The legislative framework for the decision is set out at the Annex for those members who require this information.

Background

1. The legislative background for the approval of a Recognised Qualification (RQ) and the background to Council agreeing to removal expiry dates is set out at Annex A.

Discussion

2. The Recognised Qualification (RQ) visit for the London School of Osteopathy (LSO) took place in October 2018. The final report of the Visitors is available at [LSO QAA Report - General Osteopathic Council \(osteopathy.org.uk\)](https://osteopathy.org.uk/LSO-QAA-Report-General-Osteopathic-Council).
3. The recommendation of the Visitors for the programmes was approval without conditions. This meant that the visitors determined the course will deliver graduates who meet the Osteopathic Practice Standards.
4. At its March 2019 meeting, the Policy and Education Committee (PEC) considered the Visitors' report and noted the strengths, good practice and areas for development outlined. The Committee further agreed that, subject to the approval of Privy Council, Council should recognise the Master of Osteopathy and Bachelor of Osteopathy, full and part time) awarded by the London School of Osteopathy from 1st September 2019 until 31 August 2024 subject to the general conditions as follows:

CONDITIONS	
a.	The London School of Osteopathy 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.
b.	The London School of Osteopathy 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

	<p>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
c.	<p>The London School of Osteopathy 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 London School of Osteopathy giving not less than 9 months notice.</p>

5. The Committee have monitored and reviewed various matters in relation to LSO delivery, including areas for development recommended in the RQ Visit Report and arising from annual reporting, and is now satisfied that these are all addressed.

Removal of expiry date

6. On 29 June 2021, the PEC agreed to recommend that Council recognises the qualifications (Master of Osteopathy and Bachelor of Osteopathy, full and part time) awarded by the London School of Osteopathy RQ programmes with no expiry date and with no conditions, and to seek approval of the recognition from the Privy Council. The PEC also considered the format and content of the action plan to be published alongside the RQ Order with the expiry date removed.
7. A potential concern had been raised with us in March 2021, but at that time the complainant was unwilling for this to be pursued under our formal [Management of Concerns policy](#). Subsequent to the June 2021 PEC meeting, the complainant gave us permission to pursue the concern under our policy.
8. As a result of this issue, we did not report to Council in July 2021 with the outcome of the Committee's decision regarding the removal of the expiry date, to allow time for the concern to be investigated and reported back to the Committee, if appropriate. At the Committee's October 2021 meeting, a decision was made to request further information from the LSO with regard to the issue, and to postpone its recommendation to Council with regard to the removal of the expiry date until this was resolved. Such information was provided alongside the LSO's annual report submission, and considered by the Committee at its March 2022 meeting.
9. As a result of this, the Committee agreed that sufficient information had been provided, and to reinstate its recommendation that Council recognises the qualifications (Master of Osteopathy and Bachelor of Osteopathy, full and part time) awarded by the London School of Osteopathy RQ programmes with no expiry date and with no conditions, and to seek approval of the recognition from the Privy Council.
10. For established osteopathic education institutions that are eligible for recognition without expiry date, the general policy is for visits to take place between years four and six of the visit cycle unless there are any serious concerns.
11. It is the duty of the PEC (in its capacity as Education Committee) to bring to the attention of Council any information which may indicate that the qualification is no longer or will no longer be evidence that graduates with that recognised qualification meet the Osteopathic Practice Standards under s16(1) of the Osteopaths Act 1993. The PEC has an extensive range of ongoing monitoring mechanisms to ensure standards. Section 16(1) means that if at any point, the PEC has information that the qualifications do not meet our standards, the PEC must bring this to the attention of Council.

12. Council can therefore be assured that the PEC is taking steps to ensure the ongoing identification, management and monitoring of standards and that the removal of the expiry date does not affect this process.

Recommendation: To agree to recognise the qualifications Master of Osteopathy and Bachelor of Osteopathy, (full and part time) awarded by the London School of Osteopathy with no expiry date and with no specific conditions and to seek approval of the recognition from the Privy Council.

Background information: Legislative framework and Council decision to remove expiry dates

1. Section 14(2) of the Osteopaths Act 1993 provides that 'where the Council is satisfied that ... '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(1) provides Council with a power but not a duty to impose a time period on a recognition of qualification.
3. 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.' Again, this is a power not a duty.
4. At its meeting in [July 2018](#), Council agreed the principle of removal of expiry dates, the approach of publication of conditions and the approach to further development of the implementation process.
5. In March 2019, the Policy and Education Committee (PEC) agreed to the then revised QAA/GOsC Handbook which outlined the process for quality assurance of institutions which have expiry dates removed. This Handbook is now superseded by the [Interim Quality Assurance Handbook](#) developed by our new QA provider, Mott MacDonald. This states:

'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.'