



Council
20 November 2019

British College of Osteopathic Medicine – removal of expiry date from recognition of qualification

Classification Public

Purpose For decision

Issue The removal of the expiry date for the following recognised qualifications awarded by the British College of Osteopathic Medicine:

- a. Masters in Osteopathy (M.Ost)
- b. Bachelors in Osteopathic Medicine (B.OstMed)

Recommendation To agree to recognise the qualifications Masters in Osteopathy and Bachelors in Osteopathic Medicine awarded by the British College of Osteopathic Medicine, 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 direct cost implications from the removal of the expiry date. The Policy Advisory 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 year five whilst the expiry date is in place.

Equality and diversity implications None

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 RQ visit report. In addition to this, an action plan providing an update about current general conditions or requirements and any specific matters of interest to the Committee will be published on our website.

Annex None

Authors Kabir Kareem, Steven Bettles and Fiona Browne

Background

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(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. On 17 July 2018, following a recommendation from the Policy Advisory Committee ('the Committee': undertaking the statutory functions of the statutory Education Committee), Council agreed:
 - the principle of removal of expiry dates and the approach to publication of 'conditions'
 - the approach to further development of the implementation process.
5. This approach was subsequently developed and agreed by the Committee as outlined in the Quality Assurance Agency / General Osteopathic Council Quality Assurance Handbook which outlines the process for quality assurance of institutions which have expiry dates removed. This Handbook was published in April 2019 and is available at: <https://www.qaa.ac.uk/reviewing-higher-education/types-of-review/general-osteopathic-council-review#> and outlines a range of mechanisms for assuring standards.
6. 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.'
7. This paper considers the advice from the Education Committee. It outlines the Committee's recommendation that Council recognise the qualifications Masters in Osteopathy and the Bachelors in Osteopathic Medicine awarded by the British College of Osteopathic Medicine (BCOM), with no expiry date and with no conditions. BCOM is one of nine educational institutions offering osteopathic qualifications which are recognised by the GOsC.

Discussion

8. The Committee agreed the RQ specification for the BCOM review on 13 October 2016. In the period between the agreement of the visit specification and the

conclusion of the visit, BCOM decided to withdraw the DO qualification from the RQ process.

9. On 31 March 2017, 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 visit component of the review took place in October 2017.
10. The Visit report was drafted and sent to the BCOM on 30 September 2017 for a period of no less than one month in accordance with the Osteopaths Act 1993. BCOM responded with factual corrections on 8 January 2018. The subsequent report by the Visitors took most of these factual comments into account. In relation to the bank loan covenants in paragraph 68 of the QAA visit report, the report was considered to be factual at the time that it was made.
11. The final report of the Visitors is available at: <https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/bcom-renewal-of-recognition-review-october-2017/> . The recommendation of the Visitors for the programmes was approval without specific conditions.
12. On 15 March 2018, the Committee considered the Visitors' report and noted the strengths, good practice and areas for development outlined. The Committee agreed with the recommendation of the Visitors, that no specific conditions in relation to the provision should be imposed. The Committee agreed that the general conditions, applying to all RQs should be attached to this RQ and that these have been reviewed by the Head of Regulation and agreed to be appropriately worded.
13. The Committee recommended that, subject to the approval of the Privy Council, Council recognises the Masters in Osteopathy and the Bachelors in Osteopathic Medicine subject only to the general conditions outlined below from 1 October 2018 until 30 September 2023.

CONDITIONS	
a.	The British 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.
b.	The British 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: <ol 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

	<ul style="list-style-type: none"> 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 British 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 British College of Osteopathic Medicine giving not less than 9 months' notice.</p>

14. On 3 May 2018, Council agreed to renew the recognition of the qualifications outlined and this was subsequently approved by the Privy Council.

Removal of expiry date

15. For established osteopathic educational 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. In this case, the Committee, have recommended that the qualifications Masters in Osteopathy and the Bachelors in Osteopathic Medicine awarded by the British College of Osteopathic Medicine be recognised with no expiry dates and no conditions.

16. On 13 March 2019, the Committee agreed that BCOM was eligible for removal of its expiry date.

17. On 12 June 2019, the Committee considered the format and content of the action plan to be published alongside the RQ order with the expiry date removed.

18. There are no outstanding issues of concern which require reconsideration of the decision to remove the expiry date from the BCOM RQ.
19. It is the duty of the 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 Committee has an extensive range of ongoing monitoring mechanisms to ensure standards. Section 16(1) means that if at any point, the Committee has information that the qualifications do not meet our standards, the Committee must bring this to the attention of Council. Council can therefore be assured that the Committee 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 Masters in Osteopathy and the Bachelors in Osteopathic Medicine awarded by the British College of Osteopathic Medicine, with no expiry date and no specific conditions and to seek approval of the recognition from the Privy Council.