

Consultation on changes to the quality assurance of osteopathic education

Analysis of consultation responses

Introduction

1. This document presents an analysis of responses to proposals of the General Osteopathic Council (the GOsC) and the Quality Assurance Agency for Higher Education (QAA) for changing the quality assurance of osteopathic education.

Background

2. In February 2011 the GOsC and QAA published a consultation on proposed changes to the quality assurance of osteopathic education. The proposed changes encompassed both the method of reviewing osteopathic courses and course providers, known as GOsC review, and the Annual Monitoring Reports which course providers are obliged to submit to the Education Committee of the GOsC.

3. The consultation documents comprised:

- a description and explanation of the proposed changes
- a proposed new Handbook for course providers for GOsC review
- a proposed new Handbook for visitors for GOsC review
- a range of proposed new ancillary information for GOsC review
- a proposed new Recognised Qualification Annual Report form
- a consultation questionnaire.

4. The consultation questionnaire comprised 18 questions. Some of these questions focussed specifically on the proposed changes; others gave respondents the opportunity to suggest other changes or make any comments they wished.

5. The duration of the consultation period was just over 12 weeks. All the course providers and GOsC review visitors were notified of the consultation by email. QAA publicised the consultation primarily through its regular email bulletin and the GOsC promoted it on its website, in its magazine and e-bulletins. The GOsC also distributed the consultation directly to the osteopathy course providers, patient groups and other healthcare regulators; encouraged course providers to make the document available to students on their intranet websites; promoted the consultation at recent GOsC talks held with students and at an osteopathic educational conference. In addition, a presentation and seminar took place at a meeting of the Council of Osteopathic Educational Institutions at which all the course providers were able to contribute.

6. As public bodies it is incumbent on the GOsC and QAA to publish an account of the views expressed in this consultation and the changes that have been made and the reasons for these changes. The consultation documents indicated this would happen in July.

Analysis of the responses to the consultation

7. QAA received six responses to the consultation. Four of these were from course providers (Leeds Metropolitan University, The British School of Osteopathy, The College of Osteopaths and Oxford Brookes University); one was from the Osteopathic Teachers and Tutors Association (the staff association at the European School of Osteopathy); and one was from a current student who wished to remain anonymous.

8. The following analysis of the responses is organised according to the consultation questions.

Overall aims of the changes to GOsC review

9. The consultation document stated that the overall aims of the changes to GOsC review were to:

- reflect changes made since the current handbook was published
- incorporate formal and transparent processes for confirming the fulfilment of conditions, conducting unscheduled monitoring reviews and considering unsolicited information
- enhance the accessibility and user-friendliness of the review handbook and ancillary information.

10. The first two questions asked whether these aims were appropriate and if the GOsC and QAA ought to pursue other aims instead or in addition. Respondents overwhelmingly agreed that the aims of the changes were appropriate. Two respondents suggested other aims in relation to the purpose of the Annual Report and the protocol for handling unsolicited information. These are dealt with under the appropriate headings below.

Fulfilling RQ conditions

11. Questions 3 and 4 asked about the process for confirming the fulfilment of conditions based on an action plan developed by the course provider. None of the respondents objected to this proposal and one of the course providers expressed strong support for it. Another course provider suggested that it would be helpful to clarify that the action plan was meant to deal with specific conditions arising from GOsC review and not the general conditions on all Recognised Qualifications.

Unscheduled reviews

12. The next question dealt with the procedure for unscheduled monitoring reviews, which the consultation proposed to formalise. Again none of the respondents objected to these proposals. Two course providers asked for clearer guidance on the circumstances when an unscheduled monitoring review might be required. The proposed Handbook for course providers states that such a review is required, '...where the GOsC needs assurance about a particular course or provider,

perhaps in relation to the fulfilment of conditions from a previous recognition or renewal review, or because of some important development in the course or provider.'

Unsolicited information

13. Questions 6 and 7 related to the proposed protocol for handling unsolicited information – this is written documentation given to the visitors by teaching staff, students, patients or other stakeholders not acting on the course provider's behalf. The consultation proposed to allow unsolicited information submitted in advance of the review visit.

14. The proposed protocol stimulated the most interest of any of parts of the consultation. None of the respondents objected to the protocol in principle but there were several suggestions for enhancing it, including:

- making the GOsC and QAA, rather than the course providers, responsible for promoting the existence of the protocol
- promoting the protocol to part-time staff who may not be available to meet the QAA review team during the visit
- providing for the protection of the identify of people submitting unsolicited information (NB: this is already provided for in the proposed protocol)
- defining what is meant by 'stakeholders'
- confirming that any unsolicited information will be shared with the course provider for its response (NB: again this is already provided for).

15. Under questions 6 and 7 the anonymous student respondent suggested co-opting a student onto the visiting team to act as a liaison with other students and a conduit for student feedback. The student stated, 'This may help to elicit a more accurate picture of educational provision as the students would be familiar faces and will have a background knowledge of the institutions themselves.'

16. Also under questions 6 and 7 one of the course providers suggested a more formal timetable and process for the consideration of unsolicited information, '...which describe how the information will then be used by the team and will this be dealt with as part of the review or separate from it.'

Other proposed changes to GOsC review

17. Questions 8 – 10 covered the user-friendliness of the new material, the substitution of 'strengths' for 'good practice', the proposed definitions of 'good practice' and 'areas for improvement', the proposed criteria for review judgements and any other enhancements to GOsC review which respondents wished to suggest.

18. The changes to the presentation of the review method, and in particular the use of diagrams, were generally welcomed, as were the more explicit criteria for the various findings. However, at the Council of Osteopathic Educational Institutions meeting, course providers drew attention to the different definitions of 'good

practice' in the review handbooks and the proposed Annual Report¹. To resolve this, they suggested either harmonising the definitions or adopting different terms for good practice identified by visitors in GOsC review (perhaps reverting to the term 'strengths') and that volunteered by course providers in annual reporting.

19. Question 11 dealt with the proposed ancillary information in support of GOsC review, which comprised:

- indicative agenda for meetings with students
- guidance on developing an action plan after GOsC review
- GOsC review report structure
- review coordinator's self-evaluation checklist
- visitors' self-evaluation analysis template
- protocol for handling unsolicited information.

20. There was only one comment made against this question: that Annex C of the Handbook for course providers should be amended to clarify that at least two members of a visiting team would have current experience in teaching on osteopathic programmes with RQ status and wide experience of academic management and quality assurance at institutional level in UK higher education.

21. Question 12 asked for any other comments on the proposed revisions to GOsC review. The staff association suggested that GOsC review should look more carefully at the number and training of internal and external examiners for the final clinical competence test. This is already provided for in the review method under assessment. In due course, the GOsC may wish to consider the training and experience of teachers and external examiners to aid consistency in this area.

Annual Report form

22. The last set of consultation questions, 13 – 18, concerned the Annual Report. The proposals were based on QAA's analysis of the 2009 Annual Reports and its recommendation, which was endorsed by the GOsC Education Committee, that the Reports be shortened while also placing a greater emphasis on the reporting of good practice. These proposals were generally welcomed by the four course providers who responded, though they also made a number of suggestions for enhancing the exercise, including:

- reintroducing requests for information about Fitness to Practise, diversity of students and numbers of new patients seen by each student in order to demonstrate adherence to GOsC's Quality Assurance policy and the osteopathy benchmark statement

¹ The proposed Handbooks for GOsC review define 'good practice' as, '...practice which the visitors regard as making a particularly positive contribution to your provision of osteopathic education', while the proposed Annual Report defines it as, '...practice which is innovative, successful in achieving positive results and sustainable.'

- adding more guidance on what GOsC considers a significant change in student numbers (e.g. a drop of more than 20 per cent in admissions from the previous year)
- providing clarification of what constitutes the definitive course document (about which the proposed Report form asks the provider to describe any changes made during the reporting period).

23. Within the context of the proposals to publish a report about good practice identified through the Annual Report, one of the course providers also questioned the extent to which providers would be willing to share examples of practice they regarded as either 'business sensitive' or potentially already in operation at other institutions. The latter concern was echoed by another provider, which doubted whether many providers had a detailed knowledge of practice in other parts of the osteopathic education sector.

Summary of key points

GOsC review:

- a course provider suggested that it would be helpful to clarify that the action plan was meant to deal with specific conditions only (paragraph 11)
- two course providers asked for clearer guidance on the circumstances when an unscheduled monitoring review might be required (paragraph 12)
- proposals for enhancing the protocol on unsolicited information included (all in paragraph 14):
 - making the GOsC and QAA responsible for promoting the protocol
 - promoting the protocol to part-time staff
 - providing for the protection of the identify of people submitting unsolicited information
 - defining what is meant by 'stakeholders'
 - confirming that any unsolicited information will be shared with the course provider
- the anonymous student suggested co-opting a student onto the visiting team (paragraph 15)
- one of the course providers suggested a more formal timetable and process for the consideration of unsolicited information (paragraph 16)
- course providers highlighted the different definitions of 'good practice' in the review handbooks and the Annual Report (paragraph 18)
- one of the course providers suggested clarifying that at least two members of a visiting team would have current experience in teaching on osteopathic programmes and wide experience of academic management (paragraph 20)
- the staff association suggested that GOsC review should look more carefully at internal and external examining (paragraph 21).

Annual Report forms

- suggestions for enhancing the Annual Report form included (all in paragraph 22):

- reintroducing requests for information about Fitness to Practise, diversity of students and numbers of new patients seen by each student
 - adding more guidance on what GOSc considers a significant change in student numbers
 - providing clarification of what constitutes the definitive course document
- one of the course providers also questioned the extent to which providers would be willing to share examples of good practice, this was echoed by another provider, which doubted whether many providers had a detailed knowledge of practice in other parts of the osteopathic education sector (paragraph 23).