

Quality Assurance Consultation Analysis - actions

GOsC Review Method

Subject	Suggested Amendment	QAA recommendation	Discussion	Agreed Action
Fulfilling RQ conditions	'...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.'	The QAA agrees with this request and recommends that the Handbook for course providers and ancillary guidance on developing action plans should be amended so as to clarify that action plans are meant to deal with specific conditions only.	This would seem a sensible amendment to ensure that all parties are clear about the purpose of the action plan.	To amend the Handbook and the ancillary guidance on developing action plans to state that they deal with specific conditions only. That the Chair of Committee will sign off wording
Unscheduled reviews	'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	The current wording on the circumstances giving rise to an unscheduled monitoring review gives the GOsC a flexibility which it may wish to retain. Alternatively, the wording of the Handbook could be amended to state that a monitoring review would be required only where the GOsC has evidence that a course provider may not be fulfilling a general or specific condition on a Recognised Qualification.	The first suggestion from the QAA is consistent with the provisions of Section 18 of the Osteopaths Act 1993 which provide a discretion for the Education Committee to require institutions to provide such information as it may reasonably require in the exercise of its functions under this Act.' This is a wide power and it is	The wording in relation to unscheduled reviews should remain unaltered

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	review, or because of some important development in the course or provider.”		<p>proposed that this should not be fettered.</p> <p>The alternative suggestion would not be consistent with the provisions of s18 of the Osteopaths Act 1993</p>	
Unsolicited information	<p>‘making the GOsC and QAA, rather than the course providers, responsible for promoting the existence of the protocol’</p> <p>‘promoting the protocol to part-time staff who may not be available to meet the QAA review team during the visit ‘</p>	<p>GOsC review schedules should be announced on the GOsC website and/or on any bulletin emails the GOsC distributes as soon as they have been agreed with the course provider. The announcement should link to the protocol for handling unsolicited information</p> <p>course providers should send a standard email (provided by QAA) to all staff and students notifying them of the existence of the protocol and providing a hyperlink to it</p> <p>the GOsC or QAA should provide course providers with a standard poster about GOsC review and the protocol for handling unsolicited information for displaying in the provider’s clinic in the run up to GOsC review.</p>	<p>Whilst the QAA and GOsC have a role in promoting the protocol for unsolicited information, the OEIs have an equal obligation to make staff, students and patients aware of the protocol. This is reflected in the suggestions made by the QAA.</p>	To agree the QAA recommendations
Unsolicited	‘providing for the protection of	That this is already contained within the	Whilst contained within the	No change to text of

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information	the identify of people submitting unsolicited information (NB: this is already provided for in the proposed protocol) 'confirming that any unsolicited information will be shared with the course provider for its response (NB: again this is already provided for).'	protocol.	protocol it would seem sensible to ensure that these points are stressed in any promotion of the protocol as suggested above	document, but to ensure that this point is stressed in any communication of the protocol
Unsolicited information	'defining what is meant by 'stakeholders''	the protocol should be amended to clarify that 'stakeholders' encompass any third party		To agree the QAA recommendation
Unsolicited information	Under questions 6 and 7 the anonymous student respondent asked QAA to consider co-opting a student onto the visiting team to act as a liaison with other students and a conduit for student feedback.	Visitors meet students, including student representatives, as a matter of course. Staff members may not attend meetings with students and the comments which students make in these meeting are not attributed. In this context, the additional benefits of co-opting a student member onto the team are not compelling. QAA does not co-opt student members in any of its other review methods.	Whilst the use of a student co-optee might be useful in terms of logistics for the visiting team, i.e. one point of access, this may cause other issues: That by relying on one student to represent the whole, there is a risk of biasing the process and others opinions being misrepresented. That there may not always	That the current team specifications are flexible enough to allow student visitors where necessary and that a compulsory student liaison would not improve the process.

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			<p>be a student who would want to fulfil this role, especially given the responsibility required and the possibility that it may cause conflict between them and their educational institution.</p> <p>To offset these problems, it would seem a sensible approach for the use of a student visitor to remain an option for the team rather than having a compulsory liaison appointment for each institution. This would allow flexibility to structure a team to target specific issues, i.e. an institution where student feedback has been poor in the past, could have a student visitor appointed at its next review.</p> <p>Given the transitory nature of students, the QAA would need to identify in advance of a review where a student</p>	

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			<p>member was needed and recruit at that point.</p> <p>The process of student feedback will also be bolstered by earlier recommendations to promote the protocol of unsolicited information directly to students through emails and posters.</p>	
Unsolicited information	Again under questions 6 and 7 one of the course providers suggested a more formal timetable and procedure for the consideration of unsolicited information. The consultation response in question does not explain what it thinks the purpose of a formal timetable and procedure is.	In QAA's view this is unnecessary; a less flexible timetable may inhibit, rather than promote, the disclosure of important information about the course provider; and the protocol already makes clear the fact that visitors are obliged to corroborate any unsolicited information they receive with other sources of evidence	From the perspective of an institution renewing or establishing a recognised qualification, it would not want this process to be held up indefinitely by protracted investigation of unsolicited information as this may affect the marketing of a course and future recruitment. It might also lead to the RQ expiring before a new one is approved. Whilst it is understandable the an institution would want a clear cut-off date for when unsolicited information	<p>For the current policy on unsolicited information to remain as drafted for the GOsC Review process.</p> <p>For the GOsC to establish its own policy for receiving unsolicited information and clearly define how this interacts with the policy outlined in GOsC Review.</p>

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			<p>could be submitted, the GOsC would not want to discourage this feedback from any third party. The ability to feedback on a course should be there at any time.</p> <p>The policy on unsolicited information is in place for when the review is taking place. Complaints can also be received at any time after the review and a clear protocol for how GOsC should deal with these complaints would probably address the concerns raised by the OEIs</p>	
Other comments	However, at the Council of Osteopathic Educational Institutions meeting, course providers drew attention to the different definitions of 'good practice' in the review	GOsC review should revert to the identification of 'strengths' rather than 'good practice' in order to mitigate the risk of confusion arising from two different definitions of 'good practice' between GOsC review and the Annual	This does not deal with the feedback that we have had from the OEIs which is the issue about standard practice being commended as good practice in another	<p>That the GOsC review should look to identify both strengths and good practice as these were distinct</p> <p>That the standard</p>

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	handbooks and the proposed Annual Report ¹ . 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.	Report. Thus, the definition of a strength in GOsC review would be, '...something which the visitors regard as making a particularly positive contribution to your provision of osteopathic education'.	institution. The example of external examiners is always given described as a good practice in one but standard (and therefore not commented upon) in others. This inconsistency could be addressed through the training of QAA assessors.	definition of Good Practice used in the Annual Report should replace the definition within the Handbook: '...practice which is innovative, successful in achieving positive results and sustainable.' To ensure the training for QAA assessors includes consistency in identifying areas of strengths and good practice

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.'

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Other comments	<p>'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.'</p>	<p>The proposed Handbooks specify that collectively visiting teams will be able to demonstrate the two qualities outlined in paragraph 19. Specifying that two of the team would have these qualities would give less flexibility in the composition of teams, perhaps militating against the recruitment of visitors from a wider pool of people, such as students and recent graduates.</p>	<p>The specification for a Visiting Team rather than the competencies expected of each individual increases the flexibility of constructing a team in order to address specific concerns that may arise at different institutions. Overall the team must meet the specifications outlined in Annex C. It is suggested that insistence on characteristics of individual team members would be a step backwards.</p> <p>The concern that a team might not be qualified to assess the OEI is mitigated by the teams being agreed with the OEI and the Education Committee. In future, extra assurance could be given by the QAA clearly outlining why a specific team has been constituted</p>	<p>That no change is required to Annex C of the Handbook, but that QAA is clear in its communications to the OEIs and GOSc that the Visiting teams have the necessary experience between them in relation to the review that is taking place.</p>

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Other comments	'Question 12 asked for any other comments on the proposed revisions to GOsC review. One respondent 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.	The QAA recommendation is something that the Education Committee may want to consider as part for further developments of the QA of osteopathy education. It is suggested that this would form part of a longer-term strategy rather than be addressed in this preliminary review.	No further action required at this stage, but to consider the training and experience of osteopathy teachers and external examiners as part of a longer term strategy for QA.

Annual Report

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Annual Report	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.	One way of overcoming this concern would be for the analysis of the Annual Reports to incorporate a bilateral dialogue between the GOsC and each provider after the reports are submitted, during which the providers could be informed, in confidence, whether the examples of good practice given satisfy the criterion for innovation or rather represent practice which is common to other course providers. In this way, the exercise may also help providers to benchmark their provision against sector norms. Only genuinely innovative or outstanding examples of good practice would then be distributed to all providers in the subsequent report.	The purpose of requesting information on Good Practice is for the sector to share this information between them in order to encourage the continual enhancement of standards. The GOsC is currently acting as a facilitator but it would like to encourage this sharing of information directly between institutions in the future, perhaps through a body such as the Council for Osteopathic Educational Institutions. The GOsC does not want to tether or impede this free flow of ideas and information by setting detailed criteria of what is and isn't considered good practice. It also does not wish to divulge confidential information in particular institutions. To mitigate the concerns, when GOsC does	No change required.

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			provide feedback on Good Practice to the sector it does this through anonymised reports. The next sharing of Good Practice will be in September and here, the OEIs have identified a topic and the GOsC has sourced an expert to facilitate the sharing of good practice, drawing on examples from other sectors.	
Annual Report	'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'	The Annual Report form should reintroduce requests for data about Fitness to Practice, diversity of students and numbers of new patients seen by each student	<p>The GOsC requires information on Fitness to Practise and Equality & Diversity in order to meet its statutory requirements. This data was requested this year in the shortened annual report and should be collected as part of future reports.</p> <p>The number of new patients seen by each student is important as it</p>	<p>That the data on Fitness to Practise and Equality and Diversity statistics that was used in the 2010 Annual Report is replicated in the new annual report template.</p> <p>That the OEIs are asked to provide confirmation on the mechanisms in place to ensure that 50 new patients are seen by each student.</p>

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			<p>is part of the agreed educational standards listed in the Osteopathy Benchmark Statement, i.e. that all students must see a minimum of 50 new patients over the duration of the course. The GOsC would want assurance that this is being achieved.</p> <p>The removal of producing a vast range of statistics was one area which the OEIs considered a great improvement on the previous report. The GOsC needs to consider regulatory burden in this context and the Government's desire to reduce the unnecessary collection of data. The GOsC would not want to return to a statistics-heavy annual report without clear justification for doing so. To provide</p>	

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			assurance with minimal impact, the institution could be asked for confirmation of the mechanisms in place to ensure that all students see the minimum of 50 new patients over the duration of the course.	
Annual Report	'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)'	The Annual Report from should specify that an increase or decline of more than 20 per cent in admissions relative to the previous reporting period is sufficient to trigger an explicit commentary from the provider	<p>Some indication of what constitutes a significant change is required. The use of percentages is the most sensible solution to this, but it should be noted that this is more likely to trigger a requirement to notify us for smaller institutions where student numbers are low.</p> <p>However, the requirement is simply to notify us and does not automatically correspond with a penalty for that institution. The</p>	To agree the QAA recommendation of a 20% increase/decline level will indicate a significant change and trigger a reporting requirement for GOsC. To amend the Annual Report appropriately.

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			GOsC/QAA would simply need to take the context into account when considering a fall in student admissions.	
Annual Report	‘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).’	Under the section on Programme specification or handbook, the Annual Report form should ask providers to append all the information which the QAA’s ‘Guidelines for preparing programme specifications’ expects to be included in a programme specification ² but which may legitimately appear in other documents instead		Agree the recommendations of the QAA

² This information includes: awarding body/institution, teaching institution (if different), details of accreditation by a professional or statutory body, name of the final award, programme title, UCAS code, criteria for admission to the programme, aims of the programme, relevant subject benchmark statements and other external and internal reference points used to inform programme outcomes, programme outcomes, teaching, learning and assessment strategies to enable outcomes to be achieved and demonstrated, programme structures and requirements, levels, modules, credits and awards, mode of study, language of study and the date at which the programme specification was written or revised.