



**Education and Registration Standards Committee**  
**18 June 2015**  
**Clinical responsibility in registration assessments**

<b>Classification</b>	Public
<b>Purpose</b>	For decision
<b>Issue</b>	An update of the review of clinical responsibility at Assessments of Clinical Performance (ACPs).
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To note the review of clinical responsibility at ACPs.</li><li>2. To agree the proposed clarifications of ACP clinical responsibility.</li></ol>
<b>Financial and resourcing implications</b>	None arising from this paper.
<b>Equality and diversity implications</b>	None arising from this paper.
<b>Communications implications</b>	If the proposed clarifications are agreed then they will be reflected in updated in the ACP Guidelines and associated documentation.
<b>Annexes</b>	<ol style="list-style-type: none"><li>A. ACP Patient Information Sheet: international candidates</li><li>B. ACP Patient Information Sheet: fitness to practise candidates</li></ol>
<b>Author</b>	Kit Holmes

## Background

### *Introduction*

1. As reported to the Committee at its last meeting in March 2015, one of the project streams of the Registration Assessment Review is a review of clinical responsibility at our current Assessment of Clinical Performance (ACP) practical tests.
2. ACPs assess an applicant's ability to fulfil specific aspects of the *Osteopathic Practice Standards (OPS)* through the applicant's management of two 'new' patients in a clinical setting, under assessment conditions.
3. It was identified through the Registration Assessment Review that there has been some lack of clarity regarding ACP clinical responsibility. This has been classified as an area of high risk in the GOsC Risk Register. A review of clinical responsibility has therefore been undertaken to:
  - Clarify the scope of effectively assuming and discharging ACP clinical responsibility
  - Confirm the role holders of ACP clinical responsibility
  - Identify any process and documentation changes required to reflect ACP clinical responsibility.

### *Overview of Assessments of Clinical Performance*

4. ACPs are undertaken in two circumstances: 1) as part of a non-UK qualified osteopath's application for registration or 2) as part of an osteopath's fitness to practise finding.
5. For non-UK qualified applicant osteopaths, an ACP is held when GOsC registration assessors have concluded that the applicant is safe to proceed following a review of the applicant's qualification and written portfolio of osteopathic practice evidence, assessed against aspects of the OPS. In the case of an osteopath who is required to complete the assessment as part of a fitness to practise finding, they too have been deemed safe to proceed to this assessment. The ACP assessment team have access to these details, which inform the ACP assessment.
6. ACPs are held at the British School of Osteopathy's (BSO) student clinic. Patients are recruited by the BSO student clinic reception team but are made aware that they will be participating in a GOsC clinical assessment. These patients are considered to be 'new patients' as they are unknown to the ACP assessment team and applicant. They receive a GOsC ACP Patient Information Sheet on the day of the assessment.
7. ACPs consist of the applicant taking a case history, performing any necessary examinations and undertaking appropriate treatment (or referral) for two

patients under assessment conditions. Applicants must justify their clinical reasoning and decision-making process to the assessment team in order to proceed with the examination and treatment/referral stages.

8. The assessment team is comprised of two GOSc-appointed and trained assessors and one moderator (all assessors are able to hold the moderator role). All assessors/moderators are registered, practising osteopaths. Each assessor takes the lead for the assessment regarding one patient session per candidate. The moderator samples the assessments for both of the candidate's patient sessions.
9. A member of GOSc staff provides administrative support at ACPs.
10. The current ACP Guidelines for candidates and the assessment team are available here: <http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/assessment-of-clinical-performance-guidelines/>

### Discussion

11. Currently there are some inconsistencies in the ACP Guidelines and related documentation regarding who holds clinical responsibility and how this is assumed and discharged.
12. Discussions have been undertaken with the British School of Osteopathy (BSO) and professional indemnity insurers to inform our proposed clarifications.
13. The ACP format is very similar to the Clinical Competence Assessment (CCA) model that Osteopathic Education Institutions (OIEs) such as the BSO use. However, there are a number of differences because ACPs are externally hosted and involve external candidates, and so forth. Therefore we have drawn on OEI practice but sought to adapt it to our context.
14. The table below summarises proposed clarifications regarding the key features of clinical responsibility at ACPs.

<i>Feature</i>	<i>Proposed clarification</i>
Scope of assuming and discharging clinical responsibility	<p>It is proposed that the following list comprises the key aspects of assuming and discharging clinical responsibility at an ACP. That is, the clinical responsibility holder(s) must ensure that:</p> <ol style="list-style-type: none"> <li>1) The patient understands the content and approach to the session</li> <li>2) The patient's expectations of the session are understood</li> </ol>

	<p>3) The patient is aware of how to raise concerns and complaints</p> <p>4) The patient provides informed consent throughout the session</p> <p>5) The patient understands what their next steps are (relating to follow-up treatment, referral and after-care advice)</p> <p>6) The patient is offered a copy of their patient notes from the session (the original should be stored at the BSO clinic and a copy - with redacted patient information – stored by the GOsC)</p> <p>7) They intervene to stop the session if the applicant is presenting a risk to the patient – this requires the role holder to be present to observe the applicant with the patients at all times (whilst being mindful of their behaviour to avoid unsettling the applicant – as is currently advised).</p> <p>General information about each area should be included in the Patient Information Sheet and reiterated by the clinical responsibility holder. Information specific to the individual patient (for example, referral advice) should be explained by the clinical responsibility holder.</p>
Clinical responsibility role holders	<p>The GOsC assessment team of two assessors and one moderator hold clinical responsibility for the patients seen/treated by the applicants they assess.</p> <p>One member of the assessment team must be present to observe the applicant with the patients at all times in order to hold clinical responsibility.</p> <p>In addition to being present to observe the applicant, they may need to speak with the patient independently of the applicant to cover all aspects of clinical responsibility detailed above.</p>
Insurance	<p>All individuals undertaking the assessor/moderator roles are required to hold individual professional indemnity insurance as osteopaths. We have confirmed with the professional indemnity insurers that these existing policies cover their role in holding clinical responsibility at ACPs.</p>

	<p>Note that the GOsC would indemnify assessors/moderators regarding any claims related to their performance of the assessment process (that is, separate to holding clinical responsibility).</p>
Documentation	<p>Documentation amendments are required to reflect the suggested clarifications/amendments to clinical responsibility outlined above. Patient Information Sheets have been redrafted (one for the non-UK process and one for the fitness to practise process). These are attached at Annexes A and B, respectively.</p> <p>This redrafting is also intended to support the assessment team by providing patients with further information about matters such as who to speak to about concerns, for example.</p> <p>The ACP Guidelines will require amendment to align with the clarifications above.</p> <p>An agreement should be developed with the BSO to confirm the relevant clarifications above.</p>

15. The Committee will recall that we previously noted the possibility of exploring the involvement of 'model/expert' patients in place of 'real' patients. Such patients could present as 'real' patients with genuine symptoms, but their medical history would already be known to the assessment team and they would be fully aware of the assessment content, approach and next steps. This could therefore lessen the responsibilities of the assessment team in patient management.
16. We have committed to commence planning for a major review of our registration assessments next year. Through this we will be able to consider the possibility of different practical assessment methods and approaches which might include the involvement of model/expert patients.
17. However at the present time the focus has been to clarify clinical responsibility matters within our current ACP model. It is suggested that the clarifications in this paper will mitigate current risks immediately.

### **Recommendations:**

1. To note the review of clinical responsibility at ACPs.
2. To agree the proposed clarifications of ACP clinical responsibility.

**Fact sheet for patients attending an appointment with an osteopath seeking UK registration with the General Osteopathic Council*****International Applicants*****Introduction**

- The appointment you have booked for today is an *Assessment of Clinical Performance*, which is managed by the General Osteopathic Council (GOsC). This is where an osteopath who qualified overseas and wishes to practise in the United Kingdom is assessed on the osteopathic care that they provide for you, the patient.
- We are grateful that you are contributing to this important assessment and have provided some information below about the process. If you have any questions at any time, then please speak to the osteopath applicant, a member of the assessment team or the GOsC coordinator.

***What is the purpose of an Assessment of Clinical Performance?***

- All osteopaths practising in the UK must be registered with the GOsC, which is the statutory body that regulates the osteopathic profession. An osteopath holding a qualification obtained overseas who wishes to register with the GOsC must 'satisfy the Registrar that they have reached the required standard of proficiency' (Osteopaths Act 1993 section 3 (6)). Part of the registration process is the *Assessment of Clinical Performance* (ACP).
- ACPs are held, with the permission of the Principal, at the student clinic of the British School of Osteopathy (BSO).

***What is involved in an Assessment of Clinical Performance appointment?***

- Your ACP appointment will involve the osteopath applicant taking your case history, including your medical history, and completing an examination. At this point, they will step out to discuss your case with their assessors. This is to provide the assessors with an opportunity to discuss in confidence with the osteopath his/her approach to your treatment.
- You will then be given a working diagnosis of your symptoms and how osteopathy might be able to help. If appropriate, and you are happy to proceed, you will then receive treatment or referral. You will be offered a copy of your patient notes at the end of the session.
- At the end of the session it may be recommended that you book a future appointment as a 'new patient' at the BSO clinic for further osteopathic treatment (at which a BSO osteopath would need to take detailed information from you

again). The assessment team will explain such recommendations and options to you.

- It is likely that your consultation will take longer than a usual osteopathic appointment. Please therefore allow approximately 1 ½ - 2 hours. It is possible that some osteopath applicants may run over that allocated time, depending on the complexity of your case for example. Please do speak to the assessment team if you have any concerns. No charge will be made for your appointment.

### ***Who is involved in the appointment?***

- In addition to the osteopath applicant who will conduct the consultation, there is an assessment team of three assessors, one or two of whom will be present throughout your appointment to observe and examine the osteopath applicant. All assessors are GOsC-registered, practicing osteopaths as well as approved examiners. They may ask you questions as part of the assessment. They may intervene if necessary and have responsibility for your care.

### ***If I am concerned about something or want to ask questions, what should I do?***

- If you have any questions at any time, then please speak to the osteopath applicant, a member of the assessment team or the GOsC coordinator.
- You have the right to ask the osteopath applicant and/or the assessors to leave the room without affecting your current or future osteopathic care.

### ***What if part way through I want to withdraw?***

- You have the right to withdraw from the consultation at any point. Please speak to the osteopath applicant, a member of the assessment team or the GOsC coordinator if you wish to do so. This will not have any impact on your current or future osteopathic care.

### **Further information, feedback or concerns**

- For further information about the statutory regulation of osteopaths, please contact the GOsC on 0207 357 6655.
- Should you have feedback or have concerns about your appointment today please contact the GOsC on 0207 357 6655.



General  
Osteopathic  
Council

Osteopathy House  
176 Tower Bridge Road  
London SE1 3LU

T +44 (0)20 7357 6655  
DX 80729 Bermondsey  
[www.osteopathy.org.uk](http://www.osteopathy.org.uk)

## Fact sheet for patients attending an appointment with an osteopath for registration with the General Osteopathic Council

### Introduction

- The appointment you have booked for today is an *Assessment of Clinical Performance*, which is managed by the General Osteopathic Council (GOsC). The GOsC is the statutory body that regulates the osteopathic profession in the UK.
- We are grateful that you are contributing to this important assessment and have provided some information below about the process. If you have any questions at any time, then please speak to the osteopath candidate, a member of the assessment team or the GOsC coordinator.

### ***What is the purpose of an Assessment of Clinical Performance?***

- The osteopath applicant that will be carrying out your appointment today will be assessed on the osteopathic care that they provide for you, the patient. This is part of their requirements for registration with the GOsC to practise as an osteopath.
- ACPs are held, with the permission of the Principal, at the student clinic of the British School of Osteopathy (BSO).

### ***What is involved in an Assessment of Clinical Performance appointment?***

- Your ACP appointment will involve the osteopath candidate taking your case history, including your medical history, and completing an examination. At this point, they will step out to discuss your case with their assessors. This is to provide the assessors with an opportunity to discuss in confidence with the osteopath his/her approach to your treatment.
- You will then be given a working diagnosis of your symptoms and how osteopathy might be able to help. If appropriate, and you are happy to proceed, you will then receive treatment or referral. You will be offered a copy of your patient notes at the end of the session.
- At the end of the session it may be recommended that you book a future appointment as a 'new patient' at the BSO clinic for further osteopathic treatment (at which a BSO osteopath would need to take detailed information from you again). The assessment team will explain such recommendations and options to you.



- It is likely that your consultation will take longer than a usual osteopathic appointment. Please therefore allow approximately 1 ½ - 2 hours. It is possible that some osteopath candidates may run over that allocated time, depending on the complexity of your case for example. Please do speak to the assessment team if you have any concerns. No charge will be made for your appointment.

### ***Who is involved in the appointment?***

- In addition to the osteopath candidate who will conduct the consultation, there is an assessment team of three assessors, one or two of whom will be present throughout your appointment to observe and examine the osteopath applicant. All assessors are GOsC-registered, practicing osteopaths as well as approved examiners. They may ask you questions as part of the assessment. They may intervene if necessary and have responsibility for your care.

### ***If I am concerned about something or want to ask questions, what should I do?***

- If you have any questions at any time, then please speak to the osteopath candidate, a member of the assessment team or the GOsC coordinator.
- You have the right to ask the osteopath candidate and/or the assessors to leave the room without affecting your current or future osteopathic care.

### ***What if part way through I want to withdraw?***

- You have the right to withdraw from the consultation at any point. Please speak to the osteopath candidate, a member of the assessment team or the GOsC coordinator if you wish to do so. This will not have any impact on your current or future osteopathic care.

### **Further information, feedback or concerns**

- For further information about the statutory regulation of osteopaths, please contact the GOsC on 0207 357 6655.
- Should you have feedback or have concerns about your appointment today please contact the GOsC on 0207 357 6655.