



Education and Registration Standards Committee

3 March 2016

Surrey Institute of Osteopathic Medicine Monitoring Review

Classification	Public
Purpose	For decision
Issue	The outcome of the monitoring review of the Surrey Institute of Osteopathic Medicine as part of a major change to the delivery of existing Recognised Qualification (RQ) provision.
Recommendations	<p>To agree that the Recognised Qualification for the Surrey Institute of Osteopathic Medicine should continue and that the following monitoring conditions and requirements will continue to be monitored throughout the duration of the RQ period:</p> <ul style="list-style-type: none">• Monitoring condition 1 – ‘Initially use the CPL route and associated processes only for graduates of ICOM and that this condition be reviewed at the next RQ renewal (paragraphs 20 and 36).• Monitoring condition 2 – ensure effective arrangements are in place for students to be able to travel to offsite clinics where these clinics form part of students' critical clinical experience (paragraphs 53)• Monitoring condition 3 - regularly monitor, analyse and report patient numbers to ensure that patient numbers and their diversity is sufficient to meet actual demand of CP and SEP students, while ensuring continuity for postgraduate practitioners and osteopathy services to patients are not compromised when student demand for patients falls (paragraph 57).’• RQ Condition B – ‘The SIOM develops and implements a marketing plan from September 2013 which is linked to forecast student numbers, underpinned by strengthened commitments to ensure that students are gaining the requisite breadth and depth of experience to deliver the Osteopathic Practice Standards and address ways of building relationships with existing patients. The SIOM should report on progress with the

implementation plan in each Annual Report submitted to the General Council within the recognition period). In future reports it should provide a yearly figure for patient numbers to demonstrate implementation".

- the College structures clinical activity so it is not scheduled at the end of the day to ensure CPL students are sufficiently alert and maintain OPS integrity.' (paragraph 26).
- Kingston University enters into a progression agreement that also includes, in this specific case, providing quality oversight of the ICOM provision
- SIOM is able to specifically to demonstrate how it ensures that students meet the required English Language standards.

Financial and resourcing implications

The costs of the additional unscheduled monitoring review were contained within the existing 2015/16 budget.

Equality and diversity implications

None arising from this paper.

Communications implications

The monitoring report will be published as it contains important information about changes to the Surrey Institute of Osteopathic Medicine 'Recognised Qualifications.

Annexes

- A. SIOM Review specification
- B. QAA Draft Monitoring Review Report
- C. SIOM Action Plan dated 10 February 2016
- D. Comments from the Visitors to the SIOM Action Plan dated 23 February 2016

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Background

1. The Surrey Institute of Osteopathic Medicine¹ (SIOM) initiated discussions with the GOsC in the autumn 2014 regarding developing Recognised Qualification (RQ) provision associated with the International College of Osteopathic Medicine (ICOM), Italy.
2. SIOM has a close working relationship with ICOM. This includes the delivery of non-RQ BSc and MSc 'top-up' programmes for ICOM osteopath diplomates at SIOM, and SIOM faculty roles as external moderators and examiners for ICOM Final Clinical Competence exams.
3. Following discussion of their options, the Surrey Institute of Osteopathic Medicine advised a key change to their existing 'Recognised Qualifications' which involved admitting a cohort of ICOM diplomates, accrediting their prior learning in accordance with University procedures and awarding them a 'Recognised Qualification' following additional training.
4. We confirmed the importance of demonstrating that any new, or adapted, RQ provision would clearly deliver the *Osteopathic Practice Standards* (OPS) for new and, where relevant, existing students and patients.
5. In June 2015, the Education and Registration Standards Committee considered information submitted by SIOM and agreed that a list of clarifications be prepared and a review specification be produced for a targeted RQ visit.
6. A review specification was agreed by the Committee in October 2015 via email and the monitoring review arranged by the QAA. The agreed review specification is attached at Annex A. The visit took place on 26 November and the outcome of that review is outlined in this paper for consideration by the Committee at this meeting.
7. As this is a monitoring review, which is part of an existing qualification, the Committee is considering whether the major changes proposed to the Recognised Qualification continue to deliver the *Osteopathic Practice Standards*.

Discussion

The Monitoring Review Report

8. The SIOM Monitoring Review Report is attached at Annex B. The report recommends approval with 'monitoring conditions'.
9. Approval with conditions means that the course will deliver graduates who meet the *Osteopathic Practice Standards* provided the conditions are fulfilled. The QAA/GOsC Handbook defines approval with conditions 'a small number of significant problems which ... will be resolved effectively and in an appropriate

¹ Please note that the North East Surrey College of Technology (Nescot) features in the appendices. The names Nescot and SIOM are used interchangeably for the purposes of this paper.

time by the application of conditions'. It also provides that approval with conditions will be recommended when '... the provider is capable of resolving significant problems within the appropriate time, [with a strong] governance and management and the provider recognises the problems ... identified.'

10. The GOsC/QAA Handbook also provides that Conditions should be:

- Targeted at a specific issue
- Proportionate to the scale of the perceived problem
- Transparent in specifying what should be done and by when.
- Related to the *Osteopathic Practice Standards*

11. Approval with monitoring conditions means that the Visitors are satisfied that the course – as proposed and outlined in the Monitoring Review Report will continue to deliver the *Osteopathic Practice Standards* subject to SIOM is making the following Monitoring Conditions:

- Monitoring condition 1 – 'Initially use the CPL route and associated processes only for graduates of ICOM and that this condition be reviewed at the next RQ renewal (paragraphs 20 and 36).
- Monitoring condition 2 – ensure effective arrangements are in place for students to be able to travel to offsite clinics where these clinics form part of students' critical clinical experience (paragraphs 53)
- Monitoring condition 3 - regularly monitor, analyse and report patient numbers to ensure that patient numbers and their diversity is sufficient to meet actual demand of CP and SEP students, while ensuring continuity for postgraduate practitioners and osteopathy services to patients are not compromised when student demand for patients falls (paragraph 57).'

Existing RQ monitoring

12. As this monitoring review is set on the context of an existing RQ, it is important for the Committee to take into consideration current monitoring arrangements in relation to the existing RQ. These are outlined below.

13. In addition to the proposed monitoring conditions, SIOM has one 'RQ' condition which is:

- RQ Condition B – 'The SIOM develops and implements a marketing plan from September 2013 which is linked to forecast student numbers, underpinned by strengthened commitments to ensure that students are gaining the requisite breadth and depth of experience to deliver the *Osteopathic Practice Standards* and address ways of building relationships with existing patients. The SIOM should report on progress with the implementation plan in each Annual Report submitted to the General Council within the recognition period).

14. Further, as part of its Annual Monitoring in February 2014, for the duration of the RQ, the Committee also asked for further information under its general powers under s18 of the Osteopaths Act 1993 as follows: "...the committee

agreed that the SIOM has reported on condition (b) as is required, but that in future reports it should provide a yearly figure for patient numbers to demonstrate implementation".

SIOM response to the Monitoring Review Report and the existing RQ monitoring

15. We wrote to SIOM on 19 December 2016 asking for their observations or objections to the report and asked them to respond by 21 January 2016.
16. SIOM responded on 18 January 2016 as follows: 'We have had opportunity to review with faculty members and our Quality department and are happy to confirm that we believe it to be a very fair reflection of our CPL pathway proposal and record of the monitoring visit. We would like to thank the QAA team for their work done and really helpful organisation of the review.'
17. We wrote to SIOM on 27 January 2016 asking them to prepare a composite action plan responding to the existing RQ monitoring and the proposed monitoring conditions suggested by the Visitors.
18. We advised SIOM that given the similarity between monitoring condition 3 and Condition B – it would be helpful to refresh the responses in the current Action Plan to the Committee to provide the Committee with assurance about how SIOM has been implementing the existing clinic marketing plan and how SIOM is managing patient numbers and the requisite diversity of patients and the evidence that SIOM intended to provide as the new pathway comes into being to provide assurance that patient numbers and diversity is sufficient to meet the needs of all the students.
19. We advised SIOM that the Committee may also find it helpful to see evidence of how SIOM has implemented the marketing plan successfully so far and increased patient numbers (including diversity of patients). Please note, in this respect that numbers of patients should be provided to demonstrate implementation of a successful marketing plan.
20. We also advised about our own additional reflections on the QAA Monitoring Report based on the findings of the Visitors as outlined below and suggested to SIOM and suggest to the Committee that it may also wish to keep the following areas under review as if they were Monitoring Conditions given the relevance to the *Osteopathic Practice Standards* particularly given the focus as outlined in the Review Specification at Annex A:
21. We suggest that the area for development bullet point 3 could be enhanced to read and should be considered as a further monitoring condition:
 - 'the College structures clinical activity so it is not scheduled at the end of the day to ensure CPL students are sufficiently alert and maintain OPS integrity.' (paragraph 26).

22. We suggest that the progression agreement with Kingston was given sufficient weight in the report for the Committee to keep this issue under review. The Committee is invited to monitor this issue as if it had been set as a monitoring condition to read:
- Kingston University enters into a progression agreement that also includes, in this specific case, providing quality oversight of the ICOM provision.
23. Finally, we noted that it would be helpful for us if SIOM would please note that whilst the report did deal with the support given to students whose first language is not English, a key focus for the Committee is to ensure that the students have sufficient command of English to meet the *Osteopathic Practice Standards*. We therefore suggested the following wording for the Committee to keep this issue under review:
- SIOM is able to specifically to demonstrate how it ensures that students meet the required English Language standards.
24. SIOM noted all our points and produced a comprehensive Action Plan which is attached at Annex C for consideration by the Visitors ahead of consideration by the Education and Registration Standards Committee.
25. The Action Plan was sent to the QAA Visitors on 10 February 2016 for comment.
26. The Visitors responded to the Action Plan on 23 February 2016 and this response is attached at Annex D. The response indicates broad agreement with the executive response and also the Action Plan prepared by SIOM. The one area where the Visitors emphasised further consideration was in relation to Monitoring Condition 2 and the need to ensure that adequate transport links were available students to benefit from offsite clinics. There will be a need to report on the outcomes of the feedback from students through the module review questionnaire. The Visitors also felt that CPL students should not attend evening clinic sessions when their working day, including the evening clinic session was greater than eight hours. This latter point appears to be accommodated in the SIOM response.
27. At the outset, it is very important to highlight that the response from SIOM as illustrated in their Action Plan to ensuring that the concerns and interests of the Visitors, Executive and the Committee are addressed demonstrates a commitment to ensuring that the quality of the programme is maintained. This open, transparent approach allows the Committee to have confidence that quality will be monitored and maintained.

Agreement to Monitoring Conditions and Action Plan

28. We therefore recommend that the Committee agrees to continue to monitor the RQ in line with the monitoring conditions outlined in this paper and agrees the Action Plan prepared by SIOM for regular review.

Recommendation: to agree that the Recognised Qualification for the Surrey Institute of Osteopathic Medicine should continue and that the following monitoring conditions and requirements will continue to be monitored throughout the duration of the RQ period:

- Monitoring condition 1 – 'Initially use the CPL route and associated processes only for graduates of ICOM and that this condition be reviewed at the next RQ renewal (paragraphs 20 and 36).
- Monitoring condition 2 – ensure effective arrangements are in place for students to be able to travel to offsite clinics where these clinics form part of students' critical clinical experience (paragraphs 53)
- Monitoring condition 3 - regularly monitor, analyse and report patient numbers to ensure that patient numbers and their diversity is sufficient to meet actual demand of CP and SEP students, while ensuring continuity for postgraduate practitioners and osteopathy services to patients are not compromised when student demand for patients falls (paragraph 57).'
- RQ Condition B – 'The SIOM develops and implements a marketing plan from September 2013 which is linked to forecast student numbers, underpinned by strengthened commitments to ensure that students are gaining the requisite breadth and depth of experience to deliver the Osteopathic Practice Standards and address ways of building relationships with existing patients. The SIOM should report on progress with the implementation plan in each Annual Report submitted to the General Council within the recognition period). In future reports it should provide a yearly figure for patient numbers to demonstrate implementation".
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