

Policy Advisory Committee (Education Committee) 13 March 2019 European School of Osteopathy (ESO) – Renewal of Recognised Qualification (RQ) (reserved)

Classification	Public
Purpose	For decision
Issues	 The European School of Osteopathy (ESO) is seeking renewal of its current RQs for the: a. Master of Osteopathy – four years full time b. Bachelor of Science (Hons) Osteopathy – four years full time
Recommendations	 To agree to recommend that, subject to the approval of the Privy Council, Council recognises the Master of Osteopathy and the Bachelor of Science (Hons) Osteopathy subject to the conditions outlined in paragraph 21 from 1 September 2019 to 31 August 2024.
	2. To agree the Action plan attached at Annex A.
Financial and resourcing implications	This planned 'recognised qualification' review was included in our 2017-18 financial schedule, with a budget of \pounds 20,476, and this is included in our 2017-18 budget.
Equality and diversity implications	None
Communications implications	We are required to 'maintain and publish' a list of the qualifications which are for the time being recognised in order to ensure sufficient information is available to students and patients about osteopathic educational institutions awarding 'Recognised Qualifications' quality assured by us.
Annexes	Annex A – Updated Action Plan Annex B (private) – Turnaround Plan Annex C (private) – Consultancy in Education and Research Report on ESO undertaken by Dr Ian Drysdale.
Author	Steven Bettles and Kabir Kareem

Background

1. The ESO RQ provision for context is outlined below:

Courses with RQ status	 a. Master of Osteopathy – four years full time b. Bachelor of Science (Hons) Osteopathy – four years full time
Awarding body	University of Greenwich
	Buckinghamshire New University (with effect from September 2017)
RQ period	1 September 2014 to 31 August 2019
	1 September 2019 to 31 August 2024 (the subject of the decision outlined in this paper)
Review dates	The ESO visit took place in April 2018.
Status of any specific RQ conditions attached to the course/s	There are no outstanding conditions. However, the RQ specification agreed by the Committee in October 2017 outlined the following matters for exploration: Implementation of the new assessment strategy Governance review Student Fitness to Practice Patient Feedback The review specification at available at: https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/pac-october-2018-item-9-european-school-of-osteopathy-renewal/?preview=true sets out the Committee requirements in relation to each of these areas in more detail.

- 2. In a report to the Policy Advisory Committee on 18 October 2018, the Committee were informed of the outcomes of the RQ visit. The visitors recommended approval of the Master of Osteopathy and Bachelor of Science (Hons) Osteopathy with conditions, which are:
 - evaluate the operation and impact of the revised academic governance and management structure to provide proportionate and accountable reporting which ensures the achievement of academic standards and the quality of students' learning experience
 - implement the proposals for the reform of the Board to provide a cohesive and responsive framework in supporting the effective future governance of the School

- evaluate the interim executive arrangements as part of establishing and implementing plans for the medium and long-term responsible and accountable leadership and management of the School.
- complete and implement the five-year strategic plan to secure the future direction and success of the School.
- 3. The report (available at: <u>https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/pac-october-2018-item-9a-annex-a-european-school-of-osteopathy/?preview=true</u>) also outlined the visitors' conclusions, including strengths, areas of good practice and areas for development, and these will not be repeated again in this paper. It was further stated that the ESO had provided an Action Plan on 2 August 2018, which had been sent to the visitors for comment. The visitors felt that the plan was realistic and clear and gave feedback to help strengthen this. This was reflected in the updated plan supplied by the ESO dated 31 August 2018.
- 4. In a supplemental report to the Policy Advisory Committee on 18 October 2018, the Committee were informed of several changes to the ESO's governance and management structure, which had arisen subsequent to the renewal of recognised qualification (RQ) visit in April 2018. These included:
 - i. The appointment of a newly appointed trustee as permanent Chair in July 2018.
 - ii. The resignation of three trustees from the Board reported in July 2018.
 - iii. A review of the executive management arrangements reported in September 2018.
 - iv. The resignation of the Dean from the executive team, reported on 16 October 2018.
- 5. The RQ visitors' report outlining the visit in April 2018 provided assurance that governance and management structures were in place sufficient to ensure that the Osteopathic Practice Standards were delivered within the ESO's RQ programmes. As a result of the changes within governance and management subsequent to the RQ visit, the Committee agreed that such assurance provided by the report was now weakened, and that it did not have the evidence to recommend to Council that it recognises the Master of Osteopathy and the Bachelor of Science (Hons). The Committee agreed that the ESO should be given sufficient time to produce a turnaround plan, demonstrating progress with the conditions, including a plan to manage and maintain academic governance, oversight and delivery of standards, and demonstrate current delivery of standards to enable it to have confidence that only students meeting the Osteopathic Practice Standards were awarded a recognised qualification.
- 6. The ESO's updated Action Plan is included as Annex A. This paper reports on this, and on the ESO's turnaround plan, (Annex B) discusses these in relation to each of the recommended RQ conditions, provides assurance as to the evidence

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supplied in each case, and recommends that the Committee make a statutory recommendation to Council to renew the recognised qualifications for a further period, subject to specific and general conditions.

7. To provide an objective overview of the ESO's current function across all areas, the School's executive team commissioned a report by Dr Ian Drysdale (Consultancy in Education and Research) (see http://www.cear.org.uk/about-cear/dr-ian-p-drysdale-bsc-phd-nd-do/). Dr Drysdale was the former Principal of the British College of Osteopathic Medicine and has extensive experience within the osteopathic educational sector in in research. A copy of the report is included as Annex C, and will be referred to in the following discussion.

Discussion

- The updated turnaround plan (Annex A) sets out the ESO's responses, outlines what action has been taken so far, and sets out planned actions. In each case evidence has been provided to support the reported actions or intended actions. The evidence is available to the Committee on request from Kabir Kareem (kkareem@osteopathy.org.uk).
- 9. The plan and supporting evidence have been subject to scrutiny by Steven Bettles (Policy Manager) and Kabir Kareem (Quality Assurance Liaison Officer). Both evaluated the plan and evidence separately, then compared notes to ensure objectivity. Feedback was provided to the ESO's CEO, (Ian Fraser) and Head of Quality, (Paula Fletcher) including requests for further evidence where required. All communications and requests have been met in a cooperative and positive way, and relations with the institution remain good from the executive's perspective.
- 10. We will now address each of the proposed conditions, and consider the ESO's response in relation to these:

Condition 1: evaluate the operation and impact of the revised academic governance and management structure to provide proportionate and accountable reporting which ensures the achievement of academic standards and the quality of students' learning experience.

- 11. The ESO reports that a review of the function of all its committees is underway, and due to be completed by October 2019. Early work on this has already led to some implemented changes, including subsuming the work of the Human Resources Committee into the Executive Team, and the recognition that internal expertise now means that there is no need for a Research Advisory Board. Ongoing evaluation of committee and board activity is being led by the Head of Quality (formerly the Vice Principal Governance and Compliance). This involves frequent observation of meetings, checking of agenda and minutes, attendance and output, and areas of overlap with other committees.
- 12. All of the various committee members are being asked to complete a questionnaire investigating their views and experience on each committee (a

copy of this has been supplied) and interviews are planned with committee/board chairs. The aim is to provide a detailed report to the ESO's Quality and Standards Committee for initial consideration.

- 13. When the initial RQ report was written, the 'revised academic governance and management structure' included a change from the former executive team with a Principal/CEO to a triumvirate arrangement between three senior executives. Since the departure of the former Academic Dean, the Senior Executive Team has now been further restructured. The Policy Advisory Committee were concerned at the potential impact of further changes on the ESO's ability to effectively deliver the Osteopathic Practice Standards. The revised Senior Executive Team now comprises a CEO (Ian Fraser), the Head of Quality (Paula Fletcher), a Dean of Academic Studies (Ceira Kinch) and a Head of Student Services (Jennie King). Ian Fraser and Paula Fletcher have worked at the ESO for many years. Ceira Kinch is an experienced educator and registered osteopath, and worked closely with the former Academic Dean. Jennie King has extensive senior management experience within primary education. The impact of these changes will be explored further in relation to condition 3 below.
- 14. In terms of academic governance and the quality of students' learning experience, the key ESO committees are their Academic Board and its subcommittee, the Quality and Standards Committee, and the Programme Committee, with its sub committees the Curriculum and Assessment Committee and The Student Experience Group. The function of each of these will be reviewed by the Head of Quality as outlined above. The ESO intends to provide quarterly reports to update progress made in meeting this condition supported by reports from a separately appointed auditor to provide further assurance to the School's own reports.
- 15. The items listed in the turnaround plan as appendices have all been supplied. These include:
 - i. a detailed matrix, indicating how the updated Osteopathic Practice Standards are embedded within and throughout the curriculum.
 - ii. a comparative summary of National Student Survey outcomes which show favourable responses for the ESO in comparison to other educational institutions in several instances.
 - iii. External Examiner reports (analysed in relation to the annual report within the Committee's private agenda meeting).
 - iv. Student handbooks for both the University of Greenwich programme (which is being taught out) and the Bucks New University programme (the new validator of the ESO's RQ programmes).
- 16. The OPS matrix referred to in 15(i) above is a detailed table extending to thirtysix pages. This demonstrates how each of the updated Osteopathic Practice Standards is reflected in the ESO's programme across all four years, citing the relevant learning outcomes and assessments in each case, and breaking this down between modules, component courses within modules and sessions within

each course. It provides a thorough and extensive mapping of the relationship between the curriculum and the OPS.

- 17. The report by Dr Ian Drysdale (Annex C) further confirms that the both the programmes validated by Greenwich University and by Bucks New University, align well with the updated OPS to be implemented from September 2019.
- 18. It is considered that the ESO has demonstrated that sufficient progress has been demonstrated towards meeting this condition, and that the Committee continue to monitor this.

Condition 2: implement the proposals for the reform of the Board to provide a cohesive and responsive framework in supporting the effective future governance of the School

- 19. The ESO was aware that their Board of Trustees was in need of reform, and had identified a series of steps to this effect in their original action plan in response to the RQ visitors' report. The updated action and turnaround plans, set out the current situation regarding this. In summary:
 - i. A new chair of Trustees was appointed in July 2018. His relationship with the Executive team has altered from that originally envisaged, with the move to a CEO, rather than the original triumvirate arrangement. The CEO reports to the chair, and other Executive Team members report to the CEO.
 - ii. Student Board members have been appointed. Two from Year 2, and two from Year 3, with one from each year group to attend each meeting. We have seen the email circulated to students to recruit students, as well as details of their training sessions and the agenda for first Board meeting 7 February 2019. We have also now seen the minutes of this meeting which confirmed the appointment of three students as trustees. We understand that an additional student was met with by the Chair of trustees, but it was agreed that due to their academic attendance record, it would not be in their interest to take on additional responsibilities at this time. It is intended that an additional student trustee will now be recruited.
 - iii. Additionally, four new trustees are being appointed comprising a clinic tutors, a lecturer and a member of administrative staff. Again, we have seen details of the recruitment and training process, and two of these new staff trustees attended the Board meeting on 7 February, with their appointment noted in the minutes. Two others were unable to attend this meeting, and the minutes state that confirmation of their appointment will be held over until the next Board meeting.
 - iv. A trustee with considerable commercial experience, and a trustee with extensive higher education and quality assurance experience, have also now been appointed, again evidenced in the Board minutes from 7 February 2019.

- v. Articles of Association of the Company are being reviewed. Initially, these were intended for sign off at the Board meeting of 7 February, for approval at the company AGM on 4 April. Proposed changes include limiting the length of service of trustees, to reflect good practice and sectoral norms. The minutes of the Board meeting of 7 February indicate, however, that the review of the Articles is likely to take a significant time, and are unlikely to be completed prior to the AGM on 4 April. The Board therefore agreed that a working party be established to review the Articles, and to call a General Meeting later this year to approve these.
- vi. A personal development review process has been introduced for Trustees, with training in this respect underway. Mid-term reviews to be completed by end of June 2019, and year end reviews to be completed by 20 December 2019. Evidence to demonstrate that these have taken place is outlined in the action plan, and will be submitted as indicated.
- vii. Trustees are to be linked to specific areas of school business, undertaking four visits per year to their linked service areas. Initial cycle to be completed by end April 2020.
- 20. The actions identified, and the evidence supplied in support of these indicates that considerable changes have been implemented to the Board of Trustees, though the impact of these will need to be evaluated and some aspects will not be fully implemented until 2020 as envisaged in the QAA report and the application of the proposed condition.
- 21. The report by Dr Ian Drysdale (Annex C) references the issues with the Board, and acknowledges that the articles of association last reviewed in 2010 are no longer fit for purpose. The recent recruitment of trustees based on function rather than personality was referred to as a 'refreshing development', and the alignment of the articles of association and the board constitution with board structures in similar higher educational institutions is reported as having brought a feeling of 'reinvigoration to the board and management structure'. The changes were discussed by Ian Drysdale with the Heads of Department group, who regarded these very positively. The Executive team were cautious in their approach to what may be seen as rapid changes to the Board's structure and membership, but the School's turnaround plan identifies this risk and it is mitigated by extending the transition to a membership without the longest serving trustees until the Chair and experienced colleagues are satisfied that the revised Board can function effectively.
- 22. In summary, it is suggested that sufficient and evidenced progress has been, and is being, made in relation to this condition, and that ongoing monitoring by the Committee is appropriate.

Condition 3: evaluate the interim executive arrangements as part of establishing and implementing plans for the medium and long-term responsible and accountable leadership and management of the School.

- 23. As reported in paragraph 13 above, initially, this condition related to the interim executive team arrangements, which were a triumvirate between three senior managers, implemented following the departure of the former CEO/Principal in 2017. It was the sudden further departure of the then Academic Dean in October 2018, that led to the Committee's concerns as to the effect of yet further managerial change on the institution generally, and on its ability to effectively deliver the Osteopathic Practice Standards within its programme.
- 24. The turnaround plan details recent changes following the departure of the former Academic Dean. As mentioned above, these include:
 - i. The appointment of Ian Fraser (formerly Corporate Operations Officer) as permanent CEO.
 - ii. The appointment of Dr Paula Fletcher (formerly Vice Principal Governance and Compliance) as Head of Quality.
 - iii. The appointment of Ms Ceira Kinch as Dean of Academic Studies (which includes her previous role as M.Ost Programme Leader).
 - iv. The creation of a new role of Head of Student Services and the appointment to this of Mrs Jennie King (formerly Academic Registrar).
- 25. It is reported that these roles, in fact, reflect earlier deliberations by the executive, including the former Academic Dean, and that the restructuring reflects this long-standing commitment, rather than representing a hastily thought through reaction to a sudden change in the team. The Head of Quality has been asked to remain in post until the end of 2019, when it is intended that she will retire. It is reported that this provides sufficient time for recruitment and handover options, and is reflected in the School's HR Action plan, a copy of which has been requested.
- 26. We asked the ESO to provide some evidence as to the impact of the recent changes on faculty, staff and students, to help gauge whether the effective delivery of the OPS had been compromised. As will be seen from their Turnaround plan response, they undertook a range of activities to this effect, including:
 - i. A series of meetings were held with faculty during November 2018 to inform of the recent changes, to introduce the Executive team and to gain feedback on the RQ action plan which had already been shared.
 - ii. Circulation of a feedback questionnaire to gain broad feedback and to give an opportunity to raise concerns to anyone not able to attend the meetings.
 - iii. A series of informal meetings with students, with no set agenda, but a presentation on the strategy of the School and an open discussion on any issue, including the management changes.

- 27. The outcomes of these meetings and the feedback generated were reported as being very positive, with high levels of support for the new Executive Team, and for the revised Board structure. We have seen evidence of the meetings and of the feedback.
- 28. The impact of the loss of the former Academic Dean was further investigated by Dr Ian Drysdale and is shown in his report. He reports having discussions with Heads of Department, and with students. The Heads of Department had most contact with the Dean, with others more at 'arms-length'. All felt that the loss of the Dean had had an impact, but that this had been mitigated effectively, had been short-lived and was well managed. The appointment of the new Dean of Academic Studies had been described as 'seamless', with no noticeable operational difference being experienced. In fact, it was reported that some areas of function had improved, with greater staff support being noticed.
- 29. Students, similarly, were dismissive of any noticeable impact as far as they were concerned. The conclusion reached was that although the departure of the former Academic Dean had an impact, this was mitigated by the appointment of the new Dean of Academic Studies, and the process had been well managed.
- 30. Again, it is suggested that sufficient progress has been reported and evidenced to demonstrate that the executive arrangements, which are no longer 'interim', are appropriate, and provide a sound basis for effective and accountable leadership of the institution. The changes evidence a better support structure. It is recommended that the implementation and impact of the new executive team continue to be monitored by the Committee.

Condition 4: complete and implement the five-year strategic plan to secure the future direction and success of the School.

31. The early strategy reported by the ESO in the initial RQ Review Action Plan was, it is reported, a reflection of the thoughts of the then Executive Team. This was influenced by the former Academic Dean, and included plans to implement a compressed/accelerated programme some 25% percent shorter than the current programme. The changing of the Executive Team under the leadership of a single CEO led to a review of this ambition. The Turnaround Plan commentary indicates that more detailed research in this area has thrown into doubt the validity of compressed programmes for multiple reasons including expense, faculty support, marketability and CEN compliance (CEN relates to the European Committee for Standardisation, who have issued a European standard for osteopathic healthcare provision¹). As a result of this, and bearing in mind the recent changes to both the Board and the Executive Team, the strategic direction reported is now one of consolidation prior to the development of new teaching programmes. The Executive Team, with Board backing has decided not to pursue compressed/accelerated programmes.

¹ https://www.cen.eu/news/brief-news/Pages/News-2016-008.aspx

- 32. Other objectives set out in the Action Plan have been retained, and updates on these are provided within the updated plan and Turnaround Plans. They include:
 - Ensure all programme module gross margins and their fixed costs are optimised for the academic year 2019-20. This process has begun and is due to be completed by the end of July 2019.
 - To restructure the International Department: This relates to the ESO's International Diploma, which is not a recognised qualification, and was not subject to RQ review.
 - To have achieved 'approved' status with The Office for Students by August 2019. Elements of the application are to be considered by Programme Committee and Academic Board at their respective March 2019 meetings, in time for the application deadline of 15 May.
 - Review of student administrative and site services: This is reported as being underway, and we have seen evidence of the reported review of library services.
 - To develop Tonbridge Road Clinic into a multidisciplinary health centre by October 2020: It is reported that the ESO already provides speciality clinics for the treatment of headaches, sports injuries, children and a women's health clinic, as well as diagnostic musculoskeletal ultrasound. Plans are in hand for a stroke rehabilitation clinic, and we have seen evidence of staff training in this area.
- 33. The ESO identify the risk of a strategy becoming unachievable as a result of poor support of stakeholders, and describe mitigating this by seeking school-wide stakeholder input, leading to a plan that they consider is reflective and achievable.
- 34. The consolidation strategy outlined by the ESO is supported by Dr Ian Drysdale in his report. In paragraph 43, he states that '*the future strategic direction requires careful consideration of the aspirations of the School before any thought of embarking on the more expansive, expensive and over ambitious projects envisioned by previous senior executives*'. In the summary, Dr Drysdale offers the opinion that future strategic thinking should be differentiated from 'blue sky' aspiration, and not rushed to an arbitrary time point without due consideration of the implications and potential unintended consequences.
- 35. The ESO has provided a plausible rationale for the revision to their original strategic plan, and has demonstrated that aspects of this are underway. It is suggested that the Committee continues to monitor this condition.

Summary

36. It is the executive's view that the ESO has engaged positively and progressed with the RQ conditions, and with the Committee's concerns regarding the impact of the further sudden change in the Executive team reported to the Committee

in October 2018 on the delivery of current and future standards. These changes appear to have been mitigated and managed appropriately, and the indication is that not only has the impact of this not been long lasting, but that the revised management structure works better than the former triumvirate arrangement. This is borne out by the independent and objective report provided by Dr Ian Drysdale, which ultimately concludes that:

- There is no evidence that the quality of learning at the ESO has diminished since the RQ review visit.
- There is good evidence that the recent change of validator to Bucks New University, the restructuring of the Executive Team under a single CEO, and the substantial review of the Board of Trustees, has been and will continue to be of significant benefit.
- Student academic and clinical experience conforms well with RQ and OPS criteria.

Approval

- 37. As the Osteopaths Act 1993 refers to qualifications, we have, in this section simply referred to the named qualifications rather than the descriptions of the different courses.
- 38. The Committee is asked to consider the recommendations of the initial QAA Report referenced with the paper to the Committee's meeting on 18 October 2018, and this paper for the renewal of recognition of the following qualifications as outlined below:
 - a. Master of Osteopathy
 - b. Bachelor of Science (Hons) Osteopathy
- 39. The Committee is asked to decide whether to recommend that Council:
 - a. Recognises the qualifications without conditions
 - b. Recognises the qualifications with conditions
 - c. Refuse recognition of the qualifications
- 40. In this case, the Visitors have recommended approval subject to conditions, though, for the reasons outlined above, changes to the Executive Team and Board subsequent to the RQ visit, lead to the Committee seeking further assurance concerning the delivery of the OPS within the ESO's programme.
- 41. The conditions proposed by the Visitors have been considered within this paper, and are reproduced alongside the general conditions outlined below. All 'recognised qualifications' are approved with 'general conditions'. General conditions set out key matters that could impact on the delivery of the Osteopathic Practice Standards and that need to be reported to the Education Committee along with an analysis of the impact on delivery of the Osteopathic Practice Standards through our RQ change notification process.

- 42. As was reported to the Committee in October 2018, The GOsC Head of Regulation has reviewed the conditions under the Osteopaths Act 1993 and is content to recommend them as appropriately worded conditions to the Committee.
- 43. The conditions are as follows:

COI	NDITIONS	
a.	The European School of Osteopathy must evaluate the operation and impact of the revised academic governance and management structure to provide proportionate and accountable reporting which ensures the achievement of academic standards and the quality of students' learning experience.	
b.	The European School of Osteopathy must implement the proposals for the reform of the Board to provide a cohesive and responsive framework in supporting the effective future governance of the School.	
C.	The European School of Osteopathy must evaluate the interim executive arrangements as part of establishing and implementing plans for the medium and long-term responsible and accountable leadership and management of the School.	
d.	The European School of Osteopathy must complete and implement the five-year strategic plan to secure the future direction and success of the School.	
e.	The European School of Osteopathy 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.	
f.	 The European School of Osteopathy 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: substantial changes in finance substantial changes in management changes to the title of the qualification changes to the level of the qualification changes to the level of the qualification changes to the length of the course and the mode of its delivery substantial changes in clinical provision changes in teaching personnel changes in student entry requirements 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 The European School of Osteopathy must comply with the General g. 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: Subject Benchmark Statement: Osteopathy, 2015, Quality Assurance Agency for Higher Education and Guidance for Osteopathic Pre-registration Education, 2015, 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 European School of Osteopathy giving not less than nine months notice.

Recognition period

44. For established OEIs seeking recognition of a course, the general policy is to recognise for five years unless there are any serious concerns. It is recommended that the qualifications outlined in paragraph 43 a. b. c. d. e. f. and g. are approved from 1 September 2019 until 31 August 2024, subject to ongoing monitoring by the Committee of conditions a, b, c and d as outlined in this paper.

Recommendations:

- 1. To agree to recommend that, subject to the approval of the Privy Council, Council recognises the Master of Osteopathy and the Bachelor of Science (Hons) Osteopathy subject to the conditions outlined in paragraph 21 from 1 September 2019 to 31 August 2024.
- 2. To agree the action plan attached at Annex A.