



**Policy Advisory Committee (Education Committee)**

**8 May 2019**

**London College of Osteopathic Medicine (LCOM) – Renewal of Recognised Qualification**

<b>Classification</b>	Public
<b>Purpose</b>	For decision
<b>Issue</b>	The London College of Osteopathic Medicine (LCOM)) is seeking renewal of its current RQs for: Member of London College of Osteopathic Medicine.
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To agree to recommend that, subject to the approval of the Privy Council, Council recognises the Member of London College of Osteopathic Medicine awarded by the London College of Osteopathic Medicine from 8 May 2019 until 7 May 2022 subject to the general conditions outlined in paragraph 16.</li><li>2. To agree that the Committee will consider the Action Plan at its meeting in June 2019.</li></ol>
<b>Financial and resourcing implications</b>	This planned 'recognised qualification' review was included in our 2018-19 financial schedule, with a budget of £21,871, and this is included in our 2018-19 budget.
<b>Equality and diversity implications</b>	None
<b>Communications implications</b>	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. The decision to recognise the LCOM qualifications will be considered on the public agenda of Council on 8 May 2019.
<b>Annexes</b>	<ol style="list-style-type: none"><li>A. LCOM review specification</li><li>B. QAA/GOsC review report (Final)</li></ol>
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## Background

1. This LCOM RQ provision for context is outline below:

i. Courses with RQ status	Member of London College of Osteopathic Medicine
ii. Awarding body	Member of LCOM
iii. RQ period	1 January 2015 to 31 December 2019. This paper deals with the renewal of this recognition from 8 May 2019 to 7 May 2024.
iv. Review dates	Last reviewed in March 2014 Next scheduled review (tbc)
v. Status of any specific RQ conditions attached to the course/s	There are no specific conditions attached to this course.

2. This paper outlines the findings of the final GOsC/QAA LCOM recognised qualification (RQ) report and asks the Committee to make a statutory recommendation to Council to renew the 'recognised qualifications' for a further period subject to the general conditions only. Further information is outlined below.

## Discussion

3. The Committee agreed the RQ specification for the LCOM review on 12 June 2018 for an accelerated review and this is attached at Annex A.
4. On 12 June 2018, the Committee appointed a team of three Education Visitors under s12 of the Osteopaths Act 1993 to undertake the review.
5. The visit took place in November and December 2018.
6. The visit report was drafted and sent to LCOM on the 18 January 2019 for a period of no less than one month in accordance with the Osteopaths Act 1993.
7. LCOM responded with factual corrections on 6 February 2018. The subsequent report by the Visitors took most of these factual comments into account
8. The final report of the Visitors is attached at Annex B.
9. The recommendation of the Visitors for the Member of LCOM programmes is approval with conditions. The conditions are:

- a. produce a single definitive course document that clearly outlines the purpose, structure, assessment strategy, fitness to practise policy and operation of the LCOM course to ensure consistency and continuity of delivery and understanding of the students in achieving their award (paragraphs 8, 9, 14, 17, 20 and 37)
- b. undertake the mapping of the new osteopathic practice standards (for implementation 1 September 2019) across all components of the LCOM course to ensure current and future students are equipped for professional practise (paragraph 11)
- c. implement the arrangements for enhancing the external scrutiny of the LCOM course to ensure comparability of academic standards and provide critical evaluation of the teaching and learning experience (paragraphs 18 and 62)
- d. finalise the appointment of the moderator for the FCCA examination to optimise the validity, reliability and consistency of assessment (paragraph 22)
- e. finalise and implement the revised admissions arrangements through the introduction of the process, where applicable, for assessing clinical competence (paragraph 33 and 50)
- f. implement the identified deliberate steps to inform and assure the Board of Trustees and stakeholders that the College fulfils its responsibility for the delivery of the osteopathic practice standards (paragraph 52).

## Findings

10. The following is a summary of the visitors' main conclusions:

### *Strengths*

- the varied perspectives and experience of medical and non-medical osteopathic lecturers which ensures a high standard of student learning, engagement, support and development in both the academic and clinical environments (paragraphs 29 and 32)
- the close working collegiate relationship among staff that ensures involvement in the communication process and exchange of information in supporting the students' learning experience (paragraphs 30 and 31)
- the responsive commitment to supporting students through their course of study and ensuring their success on the programme through effective feedback arrangements (paragraph 30 and 35)

- the level and availability of learning resources and staffing which support student achievement (paragraph 40).

#### *Areas for development*

- review and formalise arrangements for staff personal development and review to ensure all individuals continue to be effectively supported and developed (paragraph 31)
- develop further the arrangements for gathering feedback on the experience and views of patients to enhance the quality of service delivery (paragraph 41)
- raise awareness of the patients' complaint process as part of their involvement as users of the clinic (paragraph 42)
- make clear the terms of reference and provide standard agendas to support the deliberative meetings for ensuring consistency of approach across the College (paragraph 45)
- develop further the use of the computerised accounting system to provide reports on planned and actual expenditure in maintaining the effective cost centre control of the College and clinic (paragraph 54)
- ensure the process for validating and signing off documents for external distribution is clearly defined (paragraph 55)
- ensure the continued management of risks through the updating, monitoring and review of the risk register (paragraph 58).

#### *Approval*

10. 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.
11. The Committee is asked to consider the recommendations of the QAA Report and this paper for the renewal of recognition of the following qualification:  
Member of the College of Osteopathic Medicine.

#### *Conditions/Recommendations*

12. The Committee is asked to decide whether to recommend that Council:
  - a. Recognises the qualifications without conditions
  - b. Recognises the qualifications with conditions
  - c. Refuses recognition of the qualifications.

13. In this case, the Visitors have recommended approval of the conditions. The conditions proposed by the visitors have been inserted alongside the general conditions outlined below.
14. 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. These general conditions are outlined at paragraph 15 f. g. and h. below.
15. The GOsC Director of Regulation has previously reviewed the conditions under the Osteopaths Act 1993 and is content to recommend them as appropriately worded conditions to the Committee.
16. The conditions are as follows:

CONDITIONS	
a.	produce a single definitive course document that clearly outlines the purpose, structure, assessment strategy, fitness to practise policy and operation of the London College of Osteopathic Medicine course to ensure consistency and continuity of delivery and understanding of the students in achieving their award (paragraphs 8, 9, 14, 17, 20 and 37)
b.	undertake the mapping of the new Osteopathic Practice Standards (for implementation 1 September 2019) across all components of the London College of Osteopathic Medicine course to ensure current and future students are equipped for professional practise (paragraph 11)
c.	implement the arrangements for enhancing the external scrutiny of the London College of Osteopathic Medicine course to ensure comparability of academic standards and provide critical evaluation of the teaching and learning experience (paragraphs 18 and 62)
d.	finalise and implement the revised admissions arrangements through the introduction of the process, where applicable, for assessing clinical competence (paragraph 33 and 50)
e.	implement the identified deliberate steps to inform and assure the Board of Trustees and stakeholders that the London College of Osteopathic Medicine fulfils its responsibility for the delivery of the osteopathic practice standards (paragraph 52).
f.	The London College of Osteopathic Medicine 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.
g.	The London College of Osteopathic Medicine must inform the Education Committee of the General Council as soon as practicable, of any change or proposed substantial change likely to influence the

	<p>quality of the course leading to the qualification and its delivery, including but not limited to:</p> <ul style="list-style-type: none"> <li>i. substantial changes in finance</li> <li>ii. substantial changes in management</li> <li>iii. changes to the title of the qualification</li> <li>iv. changes to the level of the qualification</li> <li>v. changes to franchise agreements</li> <li>vi. changes to validation agreements</li> <li>vii. changes to the length of the course and the mode of its delivery</li> <li>viii. substantial changes in clinical provision</li> <li>ix. changes in teaching personnel</li> <li>x. changes in assessment</li> <li>xi. changes in student entry requirements</li> <li>xii. 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)</li> <li>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)</li> <li>xiv. changes in teaching accommodation</li> <li>xv. changes in IT, library and other learning resource provision</li> </ul>
h.	<p>The London College of Osteopathic Medicine must comply with the General 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: <i>Subject Benchmark Statement: Osteopathy, 2015</i>, Quality Assurance Agency for Higher Education and <i>Guidance for Osteopathic Pre-registration Education, 2015</i>, 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 LCOM giving not less than 9 months notice.</p>

### *Recognition period*

17. For established osteopathic educational institutions seeking recognition of a course, the general policy is to recognise for five years unless there are any serious concerns. In this case, it is recommended that the qualification outlined in paragraph 11 is approved for a period of three years from 8 May 2019 to 7 May 2022. We have suggested a three year approval period because the accelerated review has led to a number of conditions which are integral to delivery of the course. The action plan, once agreed, will require significant and ongoing monitoring by the Executive and the Committee.

18. Although the LCOM's current RQ does not expire until 31 December 2019, in view of this being an accelerated RQ visit, and because of the nature of the conditions recommended in the visitors' report, it is suggested that these conditions be attached to the programme at the earliest opportunity. Therefore, we have suggested a commencement date of 8 May 2019, which is the earliest date that Council could make such a decision, subject to the approval of the Privy Council.
19. This approach would require a further visit to take place by April/May 2021 at the latest but the Committee could also require a visit at an earlier date if the evidence suggests that this is a necessary and proportionate response.

#### *Action plan*

20. It is our usual process that in the case of approval with conditions, the Committee agrees an action plan so that there is clarity between the institution and the Committee about what evidence will demonstrate fulfilment of the conditions during the RQ approval period.
21. At the time of writing this report, an action plan from LCOM in relation to the recommended conditions has not been received. The deadline for receipt of the action plan is 15 March 2019. LCOM has reported that a replacement Course Director and Deputy Course Director have now been appointed (alongside the current Course Director, who will remain in post until August 2019). LCOM wish to involve the newly appointed Course Director and newly appointed Deputy Director in generating and owning the action plan. The Executive will work with LCOM on the action plan and evidence and a progress update will be provided to the Committee in June 2019.

#### **Recommendations:**

1. To recommend that, subject to the approval of the Privy Council, Council recognises the Member of London College of Osteopathic Medicine subject to the conditions outlined in paragraph 16 from 8 May 2019 to 7 May 2022.
2. To agree that the Committee will consider the Action Plan at its meeting in June 2019.