



### Policy Advisory Committee (Education Committee)

8 May 2019

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

**Classification** Public

**Purpose** For decision

**Issue** Update on issues in relation to

1. The London College of Osteopathic Medicine (LCOM) seeking renewal of its current RQs for: Member of London College of Osteopathic Medicine, as set out in the paper to the Committee at its meeting of 13 March 2019.
2. The response to LCOM's annual report, initially reported to the Committee's meeting of 13 March 2019.

**Recommendations**

1. To consider this addendum paper alongside the paper to the Committee regarding LCOM's RQ renewal on 13 March 2019.
2. 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 17 July 2019 until 16 July 2022 subject to the general conditions outlined in paragraph 16 of Item 2.
3. To agree the updated action plan at Annex B of the Addendum to Item 2.

**Financial and resourcing implications** Additional unplanned monitoring reviews are not included in our existing budgets and would normally be funded from our reserves.

**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.



General  
Osteopathic  
Council

**Annexes**

- A. Initial draft Action Plan with comments from QAA Visitors.
- B. Updated Action Plan.

**Author**

Steven Bettles

## **Addendum to 2**



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.
iv. Review dates	Last reviewed in December 2019 (this visit report is the subject of this paper). Next scheduled review (tbc)
v. Status of any specific RQ conditions attached to the course/s	Although the previous review report recommended no conditions, this RQ review was brought forward due to concerns identified by the Committee in relation to governance. Further information about this is outlined in the cover paper at Item 2 and also in the review specification attached at Annex A to that paper. The visit report recommends a number of conditions as outlined below.

2. Although this paper was listed for consideration at the Committee's meeting of 13 March 2019, due to unforeseen circumstances, the meeting became inquorate for this item only. The Committee was therefore unable to make any decisions about this recognised qualification (RQ). The meeting has been reconvened on 8 May 2019 to enable the Committee to make decisions in relation to the renewal of the RQ.
3. This paper brings the Committee up to date on issues that have arisen since its meeting on 13 March, and offers further options for consideration.

## **Discussion**

### *Renewal of Recognised Qualification*

4. Original item 5 of the public agenda of the Committee meeting on 13 March 2019 (now renamed as Item 2 of the Agenda on 8 May 2019) sets out the details of the RQ renewal visit which took place in November and December 2018. This also contains the LCOM renewal specification as Annex A, and the QAA/GOsC final report as Annex B.



5. The Committee will note that the recommendation of the Visitors for the Member of LCOM programme is approval with conditions. The conditions are outlined below. Paragraph references in brackets refer to the paragraph numbers of the QAA RQ visit report at Annex A to Item 2:
- 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).
6. Since writing the paper at Item 2, we received an initial draft action plan from LCOM in relation to the recommended RQ conditions, which was sent to the QAA for feedback by the visitors. A copy of this with feedback from the visitors is included as Annex A to this Addendum paper. The Committee will note that the feedback is extensive, and points to a plan that, in many regards, fails to provide the necessary degree of assurance as to how and when the conditions will be met.
7. LCOM indicated that they were keen to work with us to support them to deliver the required standards. Therefore, the executive suggested a revised action plan template with indicative content in a tabular format, to break each condition down into
- Objectives required to meet the condition



- Tasks
  - Responsibility
- Outcome required to meet objective
  - Deadline/completion date
  - Progress update
  - Status
8. On 12 April 2019, the Chief Executive, the Director of Education, Standards and Development, the Policy Manager and the Quality Assurance Liaison Officer met with the newly appointed Course Director and Deputy Course Director designate, who will be fully taking over when the Current Course Director steps down in August 2019 to discuss, frankly, the GOCs concerns about the delivery of the RQ at LCOM. We discussed the nature and content of the action plan and the objectives and tasks to deliver the required assurance to the Committee that the RQ was only being awarded to students meeting the Osteopathic Practice Standards.
  9. The meeting was very positive, and the Course Director indicated that they had already started to redraft the action plan, and that this, to a large extent reflected the changes that we had subsequently suggested. This updated action plan was subsequently received by the executive shortly before the intended despatch of this paper to the Committee, and is now attached as Annex B.
  10. The plan now also includes the commissioning of an independent review of governance in order to provide objective feedback on this, and contribute towards the meeting of Condition 6 in particular. The LCOM have indicated that their trustee board agreed that an independent review would be helpful and they have already sought the advice of another osteopathic educational institution to explore how to commission such a review.
  11. 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 13 (g), (h) and (i) below. In the action plan in Annex B, mention is made of conditions 1 to 6, which correlate with conditions a-f.
  12. The GOC 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.
  13. The conditions are as follows:

CONDITIONS
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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 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 London College of Osteopathic Medicine fulfils its responsibility for the delivery of the osteopathic practice standards (paragraph 52).
g.	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.
h.	<p>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 quality of the course leading to the qualification and its delivery, including but not limited to:</p> <ol 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></ol>



	<ul style="list-style-type: none"><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>
i.	<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>

14. The Committee should note that condition (d) above was omitted from the paper to the Committee on 13 March in the first instance. It was originally felt that this could be included under the arrangements for external scrutiny referenced in condition (c), but, on reflection, it is suggested that this now be retained for clarity. Although a moderator may provide an external perspective, the role is distinct from that of an external examiner in a quality assurance context.

15. In relation to condition (e) above, we would suggest a modification of the wording to the following:

*Finalise and implement the revised admissions arrangements through the introduction of the process, **to include, where applicable**, assessing clinical competence (paragraph 33 and 50)*

The addition of 'to include, where applicable' aims to broaden the scope of this condition to not only arrangements for assessing clinical competence, but the whole admissions process.

16. In relation to the recommended conditions in general, rather than modify these further, it is proposed that these be retained as suggested (subject to the



change referenced in paragraph 15 above), but that details of how these will be met are set out in much more detail within the action plan as set out in Annex B.

17. From the Committee’s perspective, we would suggest that the key issue is to ensure that there are clear steps taken or planned in relation to the meeting of all of the conditions, and that the revised action plan provides much more detail as to the how each condition will be met.

### *Recognition period*

18. 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, we initially recommended that the Member of the London College of Osteopathic Medicine qualification is recognised for a period of three years from 8 May 2019 to 7 May 2022. Originally, the 8 May 2019 was suggested as it was the earliest date that Council could make a decision on the RQ renewal. We would now suggest that the commencement date changes to coincide with Council’s next meeting on 17 July 2019. There are further options in terms of any RQ period, however, which the Committee could consider, and these are set out below:

Option	Comment
<p>1. Recommend approval of the RQ for three years from 17 July 2019, to 16 July 2022.</p>	<p>This would involve a further RQ Renewal visit around June 2021, and in the meantime, ongoing monitoring of conditions. If the Committee felt that the conditions were not being met satisfactorily, or further concerns arise, then it has the ability to recommend an earlier accelerated visit, as it did in 2018.</p> <p>The advantage of the three-year RQ period is that it is sufficient to indicate that the Committee is concerned about this provider, but flexible enough to enable the Committee to require a visit at any point during that RQ period. In practice, this would be any time between March 2020 to July 2021.</p> <p>Any visit required by March 2020, would require the RQ specification to be considered by the Committee at its June meeting.</p>





Option	Comment
2. A recommendation of shorter RQ renewal.	<p>Another option, in view of the extensive nature of the conditions, is to recommend a shorter renewal period – for example, until 16 July 2021. This would require an RQ renewal visit to take place around May-June 2020. If a shorter RQ was recommended, then an RQ Specification for a renewal visit in 2020 would need to be agreed at the June 2019 Committee, prior to Council actually agreeing the recommendation in July 2019.</p> <p>However, it is suggested that such a short RQ period would simply restrict the ability of the Committee. It would be required to have a visit by July 2020 regardless of the progress made by LCOM or the evidence submitted during this period.</p>
3. The Committee may modify the recommended conditions. For example, it may require that no further admissions to the programme be made until sufficient progress is made in meeting some or all of the conditions.	<p>This is for discussion. In relation to admissions, we understand that there is no fixed start date for the next planned cohort, and that the College aims to ensure that their admissions process and course documentation is finalised prior to recruitment of the next cohort. In the updated action plan, it is stated that the Trustees have made the decision not to run the next course until at least December 2019 to allow time for any conditions recommended as a result of their externally commissioned review to be implemented. Advertising of the programme is stated to continue, but on the basis that a review is in progress and the course will not commence until this has been completed.</p>



Option	Comment
4. Withdrawal of the 'recognised qualification'	Whilst withdrawal of the RQ is an option for Committee consideration in light of the extensive nature of the conditions and also the visitor response to the Action Plan, we suggest that LCOM have responded well to the GOSc's feedback and that mechanisms are in place to maintain the delivery of the Osteopathic Practice Standards.

### *Final Comments*

19. The executive is encouraged by the positive way in which the new Course Director has responded to our communications and suggestions in relation to the development of the action plan to meet the recommended conditions. We have indicated that we are keen to support him in doing this, and in taking the institution forward, and indications are that this has been well received.
20. At a recent meeting of clinical leads from the Osteopathic Educational Institutions, LCOM were represented by their newly appointed Deputy Course leader, and by one of the trustees. LCOM are also attending the GOSc / OEI meeting on 29 April 2019. This, again, is encouraging and is an indication that the College is starting to fulfil its stated aim of being more engaged with COEI and the wider sector.

### **Recommendations:**

1. To consider the contents of this addendum paper alongside the contents of the paper to the Committee regarding LCOM's RQ renewal on 13 March 2019.
2. 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 17 July 2019 until 16 July 2022 subject to the general conditions outlined in paragraph 16 of Item 2.
3. To agree the updated action plan at Annex B of the Addendum to Item 2.