



Policy Advisory Committee

13 October 2016

College of Osteopaths – Renewal of Recognised Qualification (RQ)

Classification	Public
Purpose	For decision
Issue	<p>The College of Osteopaths is seeking renewal of its current RQs for the</p> <ol style="list-style-type: none">Bachelor of Osteopathy (5 years part time)Master of Osteopathy (5.5 years part time).
Recommendations	<ol style="list-style-type: none">To recommend that the Council recognises the Master of Osteopathy and Bachelor of Osteopathy awarded by the College of Osteopaths subject to the conditions outlined in paragraph 20 from 1 May 2017 to 30 April 2022 and subject the approval of the Privy Council.To agree the attached action plan attached at Annex E.
Financial and resourcing implications	This planned 'recognised qualification' review was included in our 2016/17 financial schedule, with a budget of £20,476.
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 OEIs awarding 'Recognised Qualifications' quality assured by us.
Annexes	<p>Annex A - College of Osteopaths review specification. Annex B - College of Osteopaths response Annex C – Visitors response to College of Osteopath's comments. Annex D – GOsC/QAA review report (Final). Annex E – Updated Action plan from College of Osteopaths</p>
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Background

1. The College of Osteopaths RQ provision for context is outlined below:
2. The provision for context in relation to the existing RQ is outlined below:

Courses with RQ status	Bachelor of Osteopathy (5 years part time) Master of Osteopathy (5.5 years part time)
Awarding bodies	Staffordshire University and Middlesex University Note: For the academic year 2014 -15, the Middlesex agreement covered years 4 – 5 on the London Campus, whilst years 1, 2 and 3 were covered by the Staffordshire agreement. NB: 2015-16 was the last year of this validation agreement and the last cohort of students exiting with a Middlesex degree. All students will be part of the franchised validated agreement with Staffordshire University from September 2016.
RQ period	1 May 2012 to 30 April 2017. This paper deals with the renewal of this recognition from 1 May 2017 – 30 April 2022
Status of any specific RQ conditions attached to the course/s	One ongoing condition: The College must draw up a five year rolling clinic marketing strategy for both provisions, aimed at recruiting patient numbers in line with current and projected student numbers and incorporating projections of resource availability and risk analysis, during the academic year 2012-13. The College must report on the implementation and outcomes of its clinic marketing strategy in its Annual Reports during the period of recognition aimed at recruiting patient numbers in line with current and projected student numbers and incorporating projections of resource availability and risk analysis.

3. This paper outlines the findings of the final GOsC/QAA RQ report along with the response of the College of Osteopaths and asks the Committee to make a statutory recommendation to Council to renew the 'recognised qualifications' for a further period subject to specific and general conditions. The Committee is also asked to agree the Action Plan submitted by the College of Osteopaths to meet the proposed specific conditions. Further information is outlined below.

Discussion

4. The statutory Education Committee agreed the RQ specification for the College of Osteopaths on 13 October 2015 and this is attached at Annex A.
5. On 27 January 2016, the Committee appointed a team of three Education Visitors under s12 of the Osteopaths Act 1993 to undertake the review.

6. The visit took place in May 2016.
7. The visit report was drafted and sent to the College on the 27 June 2016 for a period of no less than one month, in accordance with the Osteopaths Act 1993. The College's response (received on the 27 July 2016) is attached at Annex B. The response of the College was considered by the Education Visitors and the resulting changes are set out in Annex C. These focused on points of clarification. The final report of the Visitors is attached at Annex D.
8. The recommendation of the visitors for the BOst and MOst programmes is approval with conditions. The conditions are:
 - reinforce the awareness and understanding of student practitioners in seeking, articulating and obtaining valid patient consent in line with the Osteopathic Practice Standards (paragraphs 9, 21 and 37)
 - develop and implement an academic misconduct policy to strengthen the understanding, detection and management of plagiarism within assessment (paragraph 25)
 - articulate a strategic plan, post 2016, that sets a clear direction for osteopathic education at the College in line with its foundation and that is disseminated to all stakeholders (paragraph 67).
9. The following is a summary of the visitors' main conclusions:

Strengths

- The range of opportunities available for the student voice and the responsiveness of the College to student feedback (paragraphs 17, 66, 73 and 74).
- The role of Education Support Officers in supporting the student journey (paragraphs 22, 46 and 69).
- The responsiveness of the College in providing additional student clinical workshops to support and reinforce learning (paragraph 46).

Areas for development

- Identify opportunities for raising further the awareness of the distinction between the BOst and MOst with staff and students (paragraphs 8, 13 and 21).
- Review the effectiveness of the processes used to ensure the consistent delivery of lectures at both sites (paragraphs 31, 32 and 50).
- Develop further the management of new patients to provide students with the opportunity for providing continued treatment (paragraphs 34 and 60).
- Develop the use of technology to enhance the learning opportunities available to students (paragraphs 53 and 54).
- Review the reporting lines within the deliberative committee structure to ensure due consideration is given to annual monitoring documents before final signed off by the Quality Review Board (paragraph 75).

10. As with all specific conditions, our process incorporates an agreed 'action plan' between the institution, the Visitors and the Committee. The aim of the agreed action plan is to enable the Committee to consider whether evidence submitted by the College to evidence fulfilment of a condition deals with the expectations of the Committee and the Visitors at the time the condition was set. The action plan submitted by the College of Osteopaths is set out at Annex E.
11. An initial draft of the action plan was submitted by the College of Osteopaths on 30 August 2016. This was immediately sent to the Visitors who responded on 16 September and suggested ways in which actions within the initial action plan could be strengthened in relation to each of the conditions, as set out below.

- Condition: Reinforce the awareness and understanding of student practitioners in seeking, articulating and obtaining valid patient consent in line with the Osteopathic Practice Standards (paragraphs 9, 21 and 37)

The visitors acknowledged that the College has set out a way forward to address the condition however to strengthen the action proposed; the visitors feel that, if possible, consideration should be given to conducting the meetings with clinical tutors and student workshops on clinical consent at the start of the 2016-17 academic year rather than in January and April 2017.

- Condition: Develop and implement an academic misconduct policy to strengthen the understanding, detection and management of plagiarism within assessment (paragraphs 22, 46 and 69).

The visitors acknowledged that the College has set out a way forward to address the condition however the visitors consider that it would be beneficial for the proposal in the 'Note' (for this condition) to be developed as an action point to strengthen and support the policy through the use of plagiarism detection software to help identify academic malpractice as well as providing a tool to improve academic writing.

- Condition: Articulate a strategic plan, post 2016, that sets a clear direction for osteopathic education at the College in line with its foundation and that is disseminated to all stakeholders (paragraph 46).

The visitors acknowledged that the College has set out a way forward to address the condition however the visitors feel that there is a need to identify and establish milestones to ensure regular review of the Strategic Plan during its lifetime. (This would also allow the College to build on the proposal set out in the 'Note' for this condition.)

12. The GOsC returned the visitors comments on the action plan, as set out above, to the College of Osteopaths on 16 September 2016
13. On 23 September 2016 the College of Osteopaths submitted a revised action plan. This is attached at Annex E. The Action Plan appears to take on board the

comments of the Visitors and we suggest that the Committee may be content to agree the Action Plan on this basis.

Approval

14. 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.
15. The Committee is asked to consider the recommendations of the QAA Report and this paper for the renewal of recognition of the following qualifications as outlined below:
 - a. Bachelor of Osteopathy
 - b. Master of Osteopathy
16. The Committee is asked to decide whether to recommend that Council:
 - a. Recognises the qualifications without conditions
 - b. Recognises the qualifications with conditions
 - c. Refused recognition of the qualifications
17. In this case, the Visitors have recommended approval subject to conditions. The conditions proposed by the Visitors have been inserted alongside the general conditions outlined at paragraph 20 a. b. and c. below.
18. 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 statutory 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 20 below. They have been amended to reference updated documentation (The QAA *Subject Benchmark Statement: Osteopathy* (2015) has replaced the 2007 edition and we have also referenced our *Guidance for Osteopathic Pre-Registration Education* (2015).
19. 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.
20. The conditions are as follows:

CONDITIONS	
a.	The College of Osteopaths must reinforce the awareness and understanding of student practitioners in seeking, articulating and obtaining valid patient consent in line with the Osteopathic Practice

	Standards
b.	The College of Osteopaths must develop and implement an academic misconduct policy to strengthen the understanding, detection and management of plagiarism within assessment.
c.	The College of Osteopaths must articulate a strategic plan, post 2016, that sets a clear direction for osteopathic education at the College in line with its foundation and that is disseminated to all stakeholders.
d.	The College of Osteopaths 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.
e.	<p>The College of Osteopaths 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> <ul style="list-style-type: none"> i. substantial changes in finance ii. substantial changes in management iii. changes to the title of the qualification iv. changes to the level of the qualification v. changes to franchise agreements vi. changes to validation agreements vii. changes to the length of the course and the mode of its delivery viii. substantial changes in clinical provision ix. changes in teaching personnel x. changes in assessment xi. changes in student entry requirements 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) 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
f.	The College of Osteopaths 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 College of Osteopaths giving not less than 9 months notice.
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Recognition period

16. 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 19 a. b. c. d. and e. are approved from 1 May 2017 until 30 April 2022.

Recommendations:

1. To recommend that the Council recognises the Master of Osteopathy and Bachelor of Osteopathy awarded by the College of Osteopaths subject to the conditions outlined in paragraph 20 from 1 May 2017 to 30 April 2022 and subject to the approval of the Privy Council.
2. To agree the attached action plan attached at Annex E.

Annex A to 15

College of Osteopaths Review Specification agreed on 13 October 2015

Background

1. The College of Osteopaths currently provides the following qualifications which are due to expire on 30 April 2017:
 - a. Bachelor of Osteopathy – 1 May 2012 – 30 April 2017 (London and Stoke-on-Trent)
 - b. Master of Osteopathy – 1 May 2012 – 30 April 2017 (London and Stoke-on-Trent).
2. The College wishes to renew both of these qualifications. A copy of the current Recognised Qualification award and the last Quality Assurance Agency for Higher Education (QAA) review report of May 2012 for the College is attached for information.
3. A copy of recent Education and Registration Standards Committee papers relating to the College is attached to this specification.

QAA Review

4. The GOsC requests that the QAA schedules a combined renewal of recognition review of the following qualifications:
 - a. Bachelor of Osteopathy – 1 May 2012 – 30 April 2017 (London and Stoke-on-Trent)
 - b. Master of Osteopathy – 1 May 2012 – 30 April 2017 (London and Stoke-on-Trent).
5. The format of the review will be based on the GOsC/QAA Handbook (<http://www.qaa.ac.uk/reviews-and-reports/how-we-review-higher-education/general-osteopathic-council-review>) and the *Osteopathic Practice Standards* (<http://www.osteopathy.org.uk/standards/>).
6. In addition to the usual review format, the Education and Registration Standards Committee would like to ensure that the following areas are explored:
 - a. The effectiveness of clinic marketing in order to ensure that students are seeing an appropriate number and diversity of patients.
 - b. The impact of the review of assessment strategy recommended in the previous RQ review, including the assessment criteria employed and staff understanding and awareness of assessment requirements.

Annex A to 15

- c. Evidence of the continued engagement of the Senior Management Team and Board of Governors in strategic planning and quality assurance.
 - d. The robustness of the College's financial situation, financial forecasting and approach to managing financial risks.
 - e. Response to student feedback and in particular students' experience when using the Marylebone clinic operated by LCOM.
 - f. How any learning that can be identified from the receipt and consideration of complaints is used.
7. The provisional timetable for the College of Osteopaths RQ review will be as follows:
- October 2015 – ERSC agreement of review specification
 - By March 2016 – ERSC approval of Visitors and scheduling review timetable and visit dates
 - June 2016 – Submission of Self-evaluation document
 - September 2016 – Visit (including observation of teaching and learning both clinical and academic and opportunities for discussions with staff and students.)
 - December 2016 – Submission of draft report and statutory 28 days for comment on the report.
 - January 2017 – Preparation of Action Plan to meet proposed conditions (if any).
 - Winter/spring 2017 – Renewal of RQ considered by ERSC
 - Winter/spring 2017 – Decision to Recognise RQ considered by Council
 - Spring 2017 – Approval of Council decision to recognise RQ by Privy Council.

This timetable will be the subject of negotiation with the College, GOsC and the QAA to ensure mutually convenient times.

Annex B to 15



THE COLLEGE OF
OSTEOPATHS
ESTABLISHED 1948

Nina Schuller

Policy Officer, Professional Standards

General Osteopathic Council

176 Tower Bridge Road

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25th July 2016

Dear Nina

I enclose as requested the observations and objections made regarding the draft RQ report for the College of Osteopaths

Paragraph	Comment
5	Query meaning of assessment 'compact'?
13	On the 2011 programme, all students enrolled on the M.Ost. On the new re-approved 2016 programme all student will enrol on the B.Ost. A reviewed progression pathway is being discussed with Staffordshire University.
14	On the 2016 programme, Clinical Osteopathy 1 comprises 15 credits. All subsequent Clinical Osteopathy modules are 30 credit modules.

Annex B to 15

25	<p>The College adheres to Staffordshire University's regulations –</p> <p>The College of Osteopaths as a partner to Staffordshire University follows their Academic Misconduct procedure. All students are made aware of the University Policies and Procedures from the start of joining the College of Osteopaths as detailed in their student contract. Specifically, the Academic Misconduct Regulations can be found here:</p> <p>http://www.staffs.ac.uk/assets/Procedure%20for%20Dealing%20with%20Breaches%20of%20Assessment%20Regulations-Academic%20Misconduct%202016-17%20v1_tcm44-91272.pdf</p>
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