



Policy Advisory Committee (Education Committee)

18 October 2018

European School of Osteopathy (ESO) – Renewal of Recognised Qualification (RQ)

Classification	Public
Purpose	For decision
Issues	<p>The European School of Osteopathy (ESO) is seeking renewal of its current RQs for the</p> <ul style="list-style-type: none">a. Master of Osteopathy –four years full timeb. Bachelor of Science (Hons) Osteopathy – four years full time
Recommendations	<ul style="list-style-type: none">1. 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 C.
Financial and resourcing implications	This planned 'recognised qualification' review was included in our 2017/18 financial schedule, with a budget of £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 OEIs awarding 'Recognised Qualifications' quality assured by us.
Annexes	<p>Annex A – ESO review specification (as at October 2017)</p> <p>Annex B – QAA/GOsC review report for the ESO review dated April 2017</p> <p>Annex C – Updated Action plan from ESO after Visitors Comments</p>
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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: <ul style="list-style-type: none"> • Implementation of the new assessment strategy • Governance review • Student Fitness to Practice • Patient Feedback <p>The review specification at Annex A sets out the Committee requirements in relation to each of these areas in more detail.</p>

2. This paper outlines the findings of the final GOsC/QAA RQ report along with the response of the ESO 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 ESO to meet the proposed specific conditions. Further information is outlined below.

Discussion

3. The Committee originally agreed the RQ specification for the European School of Osteopathy on 10 October 2017. The RQ specification is attached at Annex A.
4. On 10 October 2017, 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 April 2018.
6. The visit report was drafted and sent to ESO for comment on the 1 June 2018 for a period of no less than one month, in accordance with the Osteopaths Act 1993.

7. The response of ESO (received on 29 June 2018) focussed on points of factual clarification and was considered by the Education Visitors.
8. On 11 July 2018, the ESO notified us of a significant change that three of the eight trustees had resigned leaving five trustees on the Board. We were also advised that 'David Tasker a newly appointed trustee (19 April 2018) was appointed by the remaining trustees as the new permanent Chair.' In terms of the impact on the Osteopathic Practice Standards, the ESO advised that 'An action plan concerning Board of Trustees reform will be submitted as part of the School's response to the RQ conditions arising from the recent RQ renewal review.'
9. The final report of the Visitors dated 20 July 2018 is attached at Annex B and takes into account the comments of the ESO.
10. The recommendation of the visitors for the Master of Osteopathy and the Bachelor of Science (Hons) Osteopathy programmes is approval with conditions. The conditions 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 (paragraphs 21, 23, 28 and 68)
 - 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 (paragraph 63)
 - 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 (paragraph 65)
 - complete and implement the five-year strategic plan to secure the future direction and success of the School (paragraph 67).

Findings

11. The following is a summary of the review team's main conclusions:

Strengths:

- the revised integrated curriculum that provides students with a cohesive framework of understanding and competence to equip them for osteopathic practice (paragraphs 9, 12, 15 and 19)
- the culture of openness and professionalism together with the responsiveness of management to ensure the quality of the students' learning (paragraphs 12, 17, 19, 64, 73 and 74)

- the use of e-portfolios to support students in developing as reflective practitioners and preparing them for professional working life (paragraph 16, 19 and 44)
- the inclusion of Elective options in the revised curriculum to develop students' specialist interest and competences (paragraphs 16 and 45)
- the role of the Learning Technologist in developing the digital literacy of staff and students to enhance the opportunities for technology-based learning (paragraph 41)
- the range and availability of learning and pastoral support to underpin student learning and success (paragraphs 42 and 43).

Good practice:

- the emphasis within teaching and learning on the importance of consent and working in partnership with patients to prepare students as competent health professionals (paragraphs 9 and 12)
- the introduction of problem-based learning in levels 4 and 5 to reinforce the teaching and learning strategy and prepare students for supervised clinical practice (paragraphs 16, 19, 24 and 40)
- the redesigned proportionate and innovative assessment strategy to reinforce students' learning and achievement (paragraph 16, 22, 24 and 25)
- the opportunity for students to develop the skills to engage with the GOsC's new CPD scheme in preparing for working life (paragraph 36).

Areas for development:

- update and embed the three interrelated policies Fitness To Practise, Fitness To Study, and the Student Disciplinary Policy and provide the necessary staff training and development to support their implementation (paragraphs 13 and 14)
- identify and embed approaches to assure students that clinic tutors and classroom teachers are in regular communication about the content of lectures to achieve consensus on the evidence base for taught interventions (paragraph 20)
- review the policy and consistency of second marking, in applying the academic regulations of the two validating universities, to ensure fair and effective assessment practice (paragraphs 26, 28 and 29)
- build on staff training to enhance the quality and consistency of written feedback on students' assessed work, ensuring that clear guidance on how to achieve further improvement is offered to all students (paragraphs 30, 31 and 32)
- increase the current and prospective students' awareness of the exit points and awards available to them where the achievement of the full award is not possible (paragraph 35)
- explore approaches to engage recent graduates in helping to inform curriculum development and enhancement of the student experience (paragraph 38).

12. An initial draft of the action plan was submitted by ESO on 2 August 2018. This was immediately sent to the Visitors who responded on 14 August 2018. The Visitors comments as summarised by the QAA were:

'The visitors consider that the action plan submitted by ESO sets out a clear and realistic approach together with a reasonable timeframe in meeting the conditions resulting from the RQ visit. The visitors also note the progress that has been made in achieving actions to date that have been identified within the plan.'

The following observations, however, have been made to help further strengthen the action plan and its achievement:

- *Consideration should be given to how the School will evidence a clear documented record of the processes undertaken and decisions made in achieving the action plan.*
- *The action plan has set out how the condition relating to governance will be achieved. There may be merit in the governing body cross-references in its activity, as part of the action plan, against The Charity Commission's guidelines/documents. Two publications, that may be of use, have been identified. The first is the charity governance code (<https://www.charitygovernancecode.org/en/front-page>) and the second is the essential trustee: what you need to know, what you need to do (CC3) (<https://www.gov.uk/government/publications/the-essential-trustee-what-you-need-to-know-cc3>)*

In addition, it has been identified that the GOsC should seek assurance that the School has the necessary staff infrastructure to support the successful delivery of the action plan.'

13. The updated plan from the ESO dated 31 August 2018 to respond to the feedback from the Visitors.

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. Master of Osteopathy
 - b. Bachelor of Science (Hons) 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. Refuse 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 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 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 21 e. f. and g. below.
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 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.	<p>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:</p> <ul style="list-style-type: none"> i. substantial changes in finance ii. substantial changes in management

	<ul style="list-style-type: none"> 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
g.	<p>The European School of Osteopathy 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 European School of Osteopathy giving not less than nine months notice.</p>

Recognition period

21. 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 21 a. b. c. d. e. f. and g. are approved from 1 September 2019 until 31 August 2024.

Recommendations:

1. 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 C.