



Policy Advisory Committee

9 October 2019

Review of Guidance for Osteopathic Pre-registration Education and Standards for Education

Classification	Public
Purpose	For decision
Issue	The review of Guidance for Pre-registration Osteopathic Education and Standards for Education
Recommendation	To agree the approach and strategy for the review of the Guidance of Osteopathic Pre-registration Education including the development of more specific Standards for Education.
Financial and resourcing implications	The review will be managed in-house, and costs will be met from existing departmental budgets in so far as they arise in the current financial year.
Equality and diversity implications	Equality and diversity implications will be taken into account, and an Equality Impact Assessment developed in relation to the project. It is proposed that advice be sought also from an equality consultant.
Communications implications	There will be communications implications in relation to the development of the project, liaison with stakeholders, consultation, publication and implementation which are referenced within this paper.
Annex	Annex A – Summary table showing comparative Standards for education published by other UK health regulators. Annex B – Draft terms of reference for Stakeholder Reference Group. Annex C - Review strategy to outline stakeholder engagement strategies.
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Background

1. The GOsC published its Guidance for Osteopathic Pre-registration Education (GOPRE) in March 2015, following an extensive and collaborative development process. The guidance is intended to support the [Osteopathic Practice Standards](#) (OPS) and provide a reference point for students, educational providers, patients and others. It sets out the outcomes that osteopathic students are expected to demonstrate before graduation in order to show that they are able to practise in accordance with the OPS.
2. Other reference points that inform the development of osteopathic pre-registration include:
 - The Quality Assurance Agency Benchmark Statement for Osteopathy
 - The Quality Assurance Agency UK Quality Code for Higher Education
 - Guidance on Student Fitness to Practise
 - Guidance about the management of Health and Disability
3. The GOPRE references standards for osteopathic education and training, but largely in the context that osteopathic educational providers must deliver a curriculum that ensures the outcomes set out in the guidance and the Osteopathic Practice Standards are met. The guidance also states that OEIs must comply with the Quality Assurance Agency UK Quality Code for Higher Education¹, on the appropriate delivery and assessment of a curriculum, in particular the elements relating to:
 - Programme design and approval
 - Admissions
 - Learning and teaching
 - Student support, learning resources and careers education, information, advice and guidance
 - Student engagement
 - Assessment of students and accreditation of prior learning
 - External examining
 - Programme monitoring and review
 - Complaints and appeals
 - Management of collaborative arrangements
 - Research degrees
4. At its meeting of 12 June 2019, the Committee considered a range of issues in relation to Quality Assurance risk and assurance, including the proposed review of GOPRE as outlined in our draft business plan for 2019-20, and the development of more explicit standards for education. Originally, the plan was to report to the Committee with further plans in this respect in March 2020. However, in reviewing the indicative timetable for the project, it was felt that

¹ <https://www.qaa.ac.uk/quality-code#>

this should be brought forward so as to aim for an implementation of updated guidance from September 2021. This paper, therefore, further sets out proposals regarding the review of GOPRE and the development of definitive Standards for Education.

Discussion

5. It is approaching some five years since the Guidance for Osteopathic Pre-registration Education was published. Much has changed within that period, including:
 - a. The updating of the Osteopathic Practice Standards (OPS) (implemented from 1 September 2019). The updated OPS, as the Committee will be aware, feature some key changes:
 - the Standard of Proficiency and Code of Practice combined into one set of standards.
 - overall standards reduced from 37 to 29
 - reduced repetition and combined some standards where appropriate
 - some standards moved to guidance
 - some standards moved to another theme
 - reviewed language throughout
 - duty of candour featured explicitly in a standard
 - includes enhanced guidance, particularly in relation to boundaries with patients.
 - b. The classification of osteopaths as Allied Health Practitioners² (AHPs) in England. This recognition means that the profession is part of the debate as to the future role of AHPs in contributing to the health needs of the nation, particularly at a time when the NHS has a considerable shortfall in medical and nursing staff, and there is an increased need for primary contact practitioners. The Institute of Osteopathy (iO) have contributed to a recent joint statement by the Academy of Royal Medical Colleges³ into interdisciplinary working and workforce planning, and to the Musculoskeletal core capabilities framework for first point of contact practitioners⁴. The iO and the Council for Osteopathic Educational Institutions are working on mapping the various institutions' curricula to this framework. We are also liaising with Health Education England (HEE) and other regulators in response to HEE's development of an Advanced Practice Competencies Framework⁵.
 - c. Changes to the way that GOsC quality assures recognised qualifications – for example, the move towards a removal of RQ expiry dates and greater

² <https://www.england.nhs.uk/ahp/ahps-into-action/>

³ https://www.aomrc.org.uk/wp-content/uploads/2019/07/2019-07-31_Joint_professions_statement.pdf

⁴ https://www.csp.org.uk/system/files/musculoskeletal_framework2.pdf

⁵ <https://www.hee.nhs.uk/our-work/advanced-clinical-practice>

scrutiny as to the continued delivery of the OPS within pre-registration education.

6. There is therefore now a need to review the guidance, to ensure that it:
 - continues to provide a realistic and comprehensive set of outcomes to be met by graduates of recognised qualifications, demonstrating an ability to practise in accordance with the Osteopathic Practice Standards;
 - takes into account developments within the profession, and ensures that graduates are well placed to meet the opportunities afforded by the inclusion of osteopaths as Allied Health Practitioners;
 - remains consistent, as appropriate, with the outcomes set by other UK healthcare regulators.

Standards for osteopathic education

7. As reported at the Committee meeting of 12 June 2019 and further outlined above, we do not publish a single, definitive set of standards for education. The standards are a composite of the requirements of the Guidance for Osteopathic Pre-registration education, The Osteopathic Practice Standards, the QAA Benchmark Statement for Osteopathy⁶, and the UK Quality Code for Higher Education⁷. The UK Quality Code articulates fundamental principles that should apply to higher education quality across the UK. It sets out expectations for standards and for quality, with common and core practices in each case.
8. It is proposed that having more explicit standards for osteopathic education would provide greater clarity for current and prospective osteopathic educational institutions, students and prospective students, patients, other healthcare professionals and others. Such standards would not replace the requirements of the QAA Benchmark Statement, The Quality Code for Higher Education or the Osteopathic Practice Standards, but would rather support the delivery of these, and demonstrate what meeting these frameworks looks like in practice.
9. It is suggested, also, that being more explicit regarding education standards would support the Policy Advisory Committee (as statutory Education Committee) in fulfilling its function in relation to the approval and monitoring of osteopathic education, and support the educational institutions to better understand and meet the needs of the Committee.
10. In Annex A we have summarised in a table the standards for education issued by the General Medical Council, General Dental Council, General Chiropractic Council, General Optical Council, Nursing and Midwifery Council, Health and Care Professions Council, General Pharmaceutical Council, and also, in relation to ourselves, the UK Quality Code for Higher Education. Links are provided to the

⁶ https://www.qaa.ac.uk/docs/qaa/subject-benchmark-statements/sbs-osteopathy-15.pdf?sfvrsn=489bf781_8

⁷ <https://www.qaa.ac.uk/quality-code>

full standards and/or guidance in each case. Although each varies in design and presentation, there are some consistent themes across all the regulators and the UK Quality Code, with the regulators tending to provide more detailed guidance as to how the standards should be implemented, and what 'good' would look like. Key areas across the various regulators standards for education include:

- Learning environment and culture
- Programme design and development
- Teaching, learning and assessment
- Clinical experience
- Educational governance, leadership and management
- Supporting learners
- Supporting educators
- Quality evaluation and review/Continuous improvement/Quality Assurance
- Protecting patients/patient safety
- Programme admissions
- Equality and diversity

Review strategy

11. The review will comprise a broad and layered approach which will include:
 - An initial scoping period to seek feedback from key stakeholders (for example, OEIs, QAA visitors and the Institute of Osteopathy), in order to inform the development of an initial draft.
 - A Stakeholder Reference Group to provide input on the initial draft, consultation draft, and post-consultation findings and final version for approval by Council. Representation to be sought from the Institute of Osteopathy, The Council of Osteopathic Educational Institutions, National Council for Osteopathic Research, The Osteopathic Alliance, patients and students/newly qualified osteopaths and potentially including a perspective of a health profession outside the profession of osteopathy.
 - A consultation period to seek feedback in broad ranging and accessible ways, including via the GOsC website, and by direct contact with key stakeholders.
12. Draft terms of reference for a Stakeholder Reference Group are set out at Annex B.
13. A review strategy to set out key stakeholders in more detail, with suggestions as to how we will engage with them during the review process is set out in Annex C.

Timetable

14. An indicative timetable for the project is indicated in the table below. The aim is to implement the updated GOPRE and standards for education from 1 September 2021, to coincide with the beginning of a standard academic year.

Month	Activity
October 2019 Policy Advisory Committee	To agree the approach and strategy for the review of the Guidance of Osteopathic Pre-registration Education including the development of more specific Standards for Education.
November 2019	Reporting to Council
January to March 2020	Initial gathering of feedback from key stakeholders (OEIs, iO) to inform early development
April 2020	Stakeholder Reference Group - initial meeting to consider proposals in the light of early feedback
April – September 2020	Development of draft update GOPRE and Standards for Education
September 2020	Further input from Stakeholder Reference Group on developing drafts
October 2020 Policy Advisory Committee	Report to Committee with initial consultation draft for consideration
November 2020	Report to Council with consultation draft for approval
January 2021 – April 2021	Consultation – to include: Questionnaire feedback via GOsc website Focus Group Webinar
May 2021	Stakeholder Reference Group meeting to consider outcomes of consultation
June 2021	Report to Committee with consultation analysis and post-consultation changes for consideration
July 2021 Council	Report to Council
September 2021	Implementation of updated GOPRE

15. We are keen to seek initial feedback from the Committee, in particular, in relation to:

- a. The proposal to review the Guidance for Osteopathic Pre-registration Education.
- b. The proposal to develop more specific Standards for Education in relation to osteopathic education.
- c. The proposed timetable for the project
- d. The proposed review strategy
- e. The draft terms of reference for the Stakeholder Reference Group

Recommendation: To agree the approach and strategy for the review of the Guidance of Osteopathic Pre-registration Education including the development of more specific Standards for Education.