



Policy Advisory Committee (Education Committee)

9 October 2019

BCOM – removal of Recognised Qualification expiry date (reserved)

Classification Public

Purpose For decision

Issue The removal of the expiry date for the following recognised qualifications awarded by the British College of Osteopathic Medicine:

- a. Masters in Osteopathy (M.Ost)
- b. Bachelors in Osteopathic Medicine (B.OstMed)

Publication of the associated Action Plan.

- Recommendations**
1. To agree to recommend that Council recognise the qualifications Masters in Osteopathy and the Bachelors in Osteopathic Medicine awarded by the British College of Osteopathic Medicine, with no expiry date and with no conditions, and to seek approval of the recognition from the Privy Council.
 2. To publish the BCOM Action Plan attached at the annex.

Financial and resourcing implications There are no cost implications from the removal of the expiry date. The Committee will still require a periodic visit as part of its approach to quality assurance. This visit may take place at any point between year 4 and year 6 instead of before the end of year 5 whilst the expiry date is in place.

Equality and diversity implications None.

Communications implications If the recommendation of the Committee is accepted by Council and approved by the Privy Council, the revised approval order will be published on the website alongside the most recent RQ visit report. In addition to this, an action plan providing a current update about general



conditions / requirements and any specific matters of interest to the Committee will be published on our website.

Annex

BCOM Action plan dated 20 September 2019

Author

Fiona Browne

Background

1. The purpose of removing expiry dates from RQ orders for eligible institutions enables more flexibility for the Committee in terms of scheduling visits (so that they can coincide with for example, validation visits, changes to curricula or assessment, rather than being held within a small window). This approach also enables increased transparency in terms of the matters that are being actively monitored by the Committee being outlined in a published action plan providing more information in the public domain about the quality picture of an institution.
2. At its meeting in July 2018, following a recommendation from the Policy Advisory Committee in June 2018, Council agreed:
 - the principle of removal of expiry dates and the approach of publication of 'conditions'.
 - the approach to further development of the implementation process.
3. In March 2019, the Committee agreed to the new QAA / GOsC Handbook which outlines the process for quality assurance of institutions which have expiry dates removed. This Handbook is available at <https://www.qaa.ac.uk/reviewing-higher-education/types-of-review/general-osteopathic-council-review#>
4. This paper outlines the evidence to support the Committee recommendation to Council to remove the expiry date from the BCOM 'recognised qualification' and to attach the existing general conditions to the published Action Plan for BCOM. It also recommends that the Committee agree that the next visit for BCOM may take place in year 6 of the quality assurance cycle.

Discussion

5. The Education Committee agreed the RQ specification for the BCOM review on 13 October 2016. In the period between the agreement of the visit specification and the conclusion of the visit, BCOM decided to withdraw the DO qualification from the RQ process.
6. On 31 March 2017, the Committee appointed a team of three Education Visitors under s12 of the Osteopaths Act 1993 to undertake the review in accordance with the review specification. The visit component of the review took place in October 2017.
7. The Visit report was drafted and sent to the BCOM on 30 September 2017 for a period of no less than one month in accordance with the Osteopaths Act 1993. BCOM responded with factual corrections on 8 January 2018. The subsequent report by the Visitors took most of these factual comments into account. In relation to the bank loan covenants in paragraph 68, the report was considered to be factual at the time that it was made.
8. The final report of the Visitors is available at: <https://www.osteopathy.org.uk/news-and-resources/document-library/about-the->

[gosc/bcom-renewal-of-recognition-review-october-2017/](https://www.gosc.org.uk/bcom-renewal-of-recognition-review-october-2017/) . The recommendation of the Visitors for the programmes is approval without specific conditions.

9. On 15 March 2018, the Committee considered the Visitors report and noted the strengths, good practice and areas for development outlined. The Committee agreed with the recommendation of the Visitors, that no specific conditions in relation to the provision should be imposed. The Committee agreed that the general conditions, applying to all RQs should be attached to this RQ and that these have been reviewed by the Head of Regulation and agreed to be appropriately worded.
10. The Committee recommended that, subject to the approval of the Privy Council, Council recognises the Masters in Osteopathy and the Bachelors in Osteopathic Medicine subject to the following general conditions outlined from 1 October 2018 until 30 September 2023.

CONDITIONS	
a.	The British 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.
b.	<p>The British 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> <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

c.	The British 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 British College of Osteopathic Medicine giving not less than 9 months notice.
----	---

11. On 3 May 2018, Council agreed to renew the recognition of the qualifications Masters in Osteopathy (M.Ost) and the Bachelors in Osteopathic Medicine (B.OstMed) awarded by the British College of Osteopathic Medicine from 1 October 2018 until 30 September 2023 subject to the general conditions ... and to seek approval of the recognition from the Privy Council.

12. The Privy Council approved the decision of Council on 5 July 2018. The RQ approval order is available at: <https://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/bcom-approval-letter-2018/>

13. Paragraphs 11 and 12 of the Handbook outline the osteopathic educational institutions which are eligible for removal of expiry dates. The handbook states as follows:

'11. The General Osteopathic Council will usually recognise qualifications for a fixed period of time in the following circumstances:

- A new provider or qualification
- An existing provider with a risk profile requiring considerable ongoing monitoring

12. For existing providers, the General Osteopathic Council will usually recognise qualifications without an expiry date (but subject to regular monitoring and review as outlined in the quality assurance policy paper at Annex A to this Handbook) in the following circumstances:

- An existing provider without conditions
- An existing provider with fulfilled conditions and without any other monitoring requirements
- An existing provider who is meeting all quality assurance requirements (providing required information on time)
- An existing provider with outstanding conditions, an agreed action plan and which is complying proactively with the action plan.
- An existing provider engaging with the GOsC.'

14. On 13 March 2019, the Committee agreed that BCOM was eligible for removal of its expiry date.
15. On 12 June 2019, the Committee considered the format and content of the action plan to be published alongside the RQ order with the expiry date removed.
16. There are no outstanding issues of concern which require reconsideration of the decision to remove the expiry date from the BCOM RQ.

Recommendations:

1. To agree to recommend that Council recognise the qualifications Masters in Osteopathy and the Bachelors in Osteopathic Medicine awarded by the British College of Osteopathic Medicine, with no expiry date and with no conditions, and to seek approval of the recognition from the Privy Council.
2. To publish the BCOM Action Plan attached at the annex.

.

British College of Osteopathic Medicine Action Plan

Updated 20 September 2019

Issue	Narrative	Progress	Date of review	Comments
<p>a. BCOM 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.</p>	<p><i>Annual Report analysis submitted in December 2018 and on time.</i></p>	<p><i>On track</i> <i>No outstanding issues.</i></p>	<p><i>December 2019 in next annual report</i></p>	
<p>b. The OEI 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> <p>i. substantial changes in finance</p>	<p><i>No reportable changes as at 20 September 2019.</i></p>		<p><i>December 2019 in next annual report</i></p>	

Annex to 9

Issue	Narrative	Progress	Date of review	Comments
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				

Annex to 9

Issue	Narrative	Progress	Date of review	Comments
<p>xi. changes in student entry requirements</p> <p>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)</p> <p>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)</p> <p>xiv. changes in teaching accommodation</p>				

Annex to 9

Issue	Narrative	Progress	Date of review	Comments
xv. changes in IT, library and other learning resource provision				
c. The OEI 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: Subject Benchmark Statement: Osteopathy, 2015, Quality Assurance Agency for Higher Education and Guidance for Osteopathic Pre-registration Education, 2015, General Osteopathic Council. The participation of real patients in a real clinical setting must be	<i>Real patients are involved in clinical assessments</i>	<i>On track</i>	<i>December 2019 in next annual report.</i>	

Annex to 9

Issue	Narrative	Progress	Date of review	Comments
included in this assessment. Any changes in these requirements will be communicated in writing to the Osteopathic Educational Institution giving not less than nine months notice.				