



Policy and Education Committee

4 April 2022

British College of Naturopathy and Osteopathy (BCNO) Group (ESO-BCOM Merged Institution) Initial Recognised Qualification and Renewal of Qualification Review (RQ) (reserved)

Classification Public

Purpose For decision

Issue The British College of Naturopathy and Osteopathy (BCNO) Group is seeking initial recognition of qualifications for the:

- Masters in Osteopathy (M.Ost),
- BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine

and renewal of recognition for the existing qualifications previously awarded by the BCOM and ESO and from September 2021 to be awarded by BCNO Group namely the:

- Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO)
- Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM)

Recommendations

1. To recommend that Council recognises the Masters in Osteopathy (M.Ost) and the BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine awarded by the BCNO Group from 1 September 2021 to 31 August 2026 subject to the Conditions outlined at paragraph 19, subject to the approval of the Privy Council.
2. To recommend that Council renews the recognition of the Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO) and the Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM) previously awarded by the BCOM and ESO and from 1 September 2021 to 31 August 2026 to be awarded by BCNO Group subject to the conditions outlined in paragraph 19, and subject to the approval of the Privy Council.

Financial and The RQ Visit of the new merged curriculum was included in



**resourcing
implications**

the 2021-21 financial schedule, with a budget of c£15,000.

**Equality and diversity
implications**

Equality and diversity issues are reviewed as part of the RQ renewal process.

**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. A recommendation to recognise BCNO Group qualifications will be considered on the public agenda of Council on 10 May 2022.

Annexes

- A. The BCNO Group review specification
- B. The BCNO Group initial RQ Visit Report

Author

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Key Messages

- The visitor report contains recommendation for approval of initial recognition of the BCNO Group's qualifications and renewal of recognition of the qualifications now awarded by the BNCO Group but previously awarded by the European School of Osteopathy and the British College of Osteopathic Medicine with three specific conditions outlined at paragraph 19.
- Due to the unique nature of this initial RQ, the Committee have the option of recommending approval for a period of either three or five years.
- The Executive have recommended to the Committee agree to recommend to Council approval of initial RQ with specific and general conditions for the length of time agreed by the Committee. In the circumstances, we suggest that a five-year period is appropriate.

Background

1. As was reported to the Committee at its private meeting of 29 October 2020, the European School of Osteopathy (ESO) and the British College of Osteopathic Medicine were planning a merger. Further updates were provided to the Committee at its private meeting of 29 June 2021, with progress updates on the BCOM/ESO merger and next steps, and an update on the existing matters in the institutions. This included the development of a new joint curriculum, with the aim of delivering this at each institution from September 2022.
2. A draft RQ specification was approved by the Committee at its June meeting, and it was confirmed that the University of Plymouth will be the validating body, with a validation event planned for October 2021. It was also report that BCNO Ltd (BCOM) would be the lead in the merged BCOM/ESO entity. The merger took place on 1 September 2021.

Discussion

3. The Committee agreed the updated RQ Specification for the BCNO Group and appointed a team of three Education Visitors under s12 of the Osteopaths Act 1993 to undertake the review on 7 October 2021 and this is attached at the Annex A.
4. The visit took place in January 2022.
5. The visit report was drafted and sent to the BCNO Group on 14 February 2022 for a period of no less than one month in accordance with the Osteopaths Act 1993.
6. The BCNO Group responded with what they considered to be factual inaccuracies on 25 February 2022, and these were considered by the Education

Visitors. All comments were taken into account in the production of the final report. (An analysis of the comments and response is available on request.)

7. The final report was sent to the BCNO Group on the 22 March 2022. OEIs are required to send an action plan to Mott MacDonald within two weeks of receiving the final report for the Visitor's to review the proposed action plan ahead of Committee consideration. The deadline for submission is 4 April 2022. Due to the accelerated timeframe of the Committee meeting, the action plan has not yet been submitted for review by the visitors. The action plan can be reviewed by the Committee at its meeting in June 2022 and this does not prevent a recommendation in relation to the RQ at today's meeting.
8. The final visitors' report is attached at Annex B. The recommendation of the Visitor for the programmes is approval with three specific conditions. When we recognise an RQ, we also recognise in accordance with the general conditions which are also specified below.

Strengths and good practices

9. The visitors identified five specific areas of strength and good practices in the final report. These include the BCNO Group providing the opportunities for staff and stakeholder to provide their views and feedback on organisational changes. The Executive also note that the patients and students are included on all academic committees, this is a positive step because it demonstrates approach to ensuring patients and students have an active voice.
10. The actions taken by the individual precursor organisations (European School of Osteopathy and British College of Osteopathic Medicine) in adapting their existing provisions in response to the Covid-19 is also identified in this area. The effective engagement between the governance, leadership and faculty function ensured that delivery of the programmes was maintained during the pandemic. The actions taken and the process put in place also ensured that student teaching, learning and assessment resumed effectively, and students continued to receive the appropriate support. It should be noted that the actions taken by the ESO and BCOM in response to the Coronavirus pandemic were reported to the Committee in June/October 2020
11. The report highlights the BCNO Group's use of innovative technology and adoption of good practice from other institutions. The examples highlighted in the report include the introduction digital online notice boards that allows real time collaboration between learners and educators which has enabled effective mapping of content across levels in a coherent and transparent manner. They have also adopted the University College London inclusive curriculum health check to embed the principles of inclusivity into the academic cycle.

Recommendations

12. Recommendations may be made by visitors when they consider that there is an opportunity for improvement, but a condition is not necessary. The visitors have made six recommendations for the BCNO Group in this case. These areas should be monitored by the provider and the recommendations implemented, if appropriate. These areas must be reported on as part of the providers annual report submission to the GOsC. A request will be made for the BCNO to provide a progress update with regard to these specific areas as part of their 2021-21 Annual Report submission.

Conditions recommended by the Visitors.

13. Three specific conditions have been identified in the report by the Visitors. These are:
 - a. The BCNO Group should prioritise the publication of BCNO Group specific policies to ensure that the governance of the Group is appropriate, accountable, consistent and transparent. Where BCNO Group specific policies are aligned to existing policies already in place, this should be made transparent and clear that these are what are in place for the BCNO courses. The BCNO Group policies should be appropriately communicated to ensure that staff, prospective students, students and stakeholders are aware of the content and expectations. The BCNO Group should produce a timetable for publication of these policies beginning with those specific to the new programmes, to ensure these are in place for September 2022. [1.4 of the Visit report at Annex B]
 - b. The BCNO group should ensure that students enrolling on their modified attendance BSc programme are provided with a clear timetable for clinic attendance for the duration of the programme of study, in preparation for the September 2022 start date. [3.1 of the Visit report at Annex B]
 - c. To ensure a clear student journey, the BCNO Group must complete the development of the details of module delivery for the BCNO Group programmes that are scheduled for delivery during the 2022-23 academic year. [7.2 of the Visit report at Annex B].
14. In addition to the specific conditions, we also attach general conditions to RQ's with an expiry date. We have updated the condition related to the Guidance for Osteopathic Pre-registration Education below to take account of the new edition of this document and the new Standards for Education and Training. These conditions are outlined below.

Approval

15. 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.
16. The Committee is asked to consider the recommendations of the Mott MacDonald Report and this paper for the initial recognition of the following qualifications awarded by the BCNO group:

- Masters in Osteopathy (M.Ost),
- BSc (Hons) Osteopathy, (BSc (Hons) Osteopathic Medicine

and for the renewal of recognition for the existing qualifications previously awarded by the BCOM and ESO and from September 2021 to be awarded by BCNO Group namely the:

- Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO)
- Masters in Osteopathy (M.Ost) and
- Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM)

17. The visitor's report recommends recognition of qualification status subject to conditions being met. this means that the visitors have determined that the course will deliver graduate who meet the [Osteopathic Practice Standards](#).
18. All 'recognised qualifications' with expiry dates 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 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 below.
19. If the Committee agrees that specific conditions should be imposed, then the conditions to be attached to the 'recognised qualifications are as follows:

| CONDITIONS | |
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| 1 | The BCNO Group should prioritise the publication of BCNO Group specific policies to ensure that the governance of the Group is appropriate, accountable, consistent, and transparent. Where BCNO Group specific policies are aligned to existing policies already in place, this should be made transparent and clear that these are what are in place for the BCNO courses. The BCNO Group policies should be appropriately communicated to ensure that staff, prospective students, students, and stakeholders are aware of the content and expectations. The BCNO Group should produce a timetable for publication of these policies beginning with those specific to the new programmes, to ensure these are in place for September 2022. |
| 2 | The BCNO group should ensure that students enrolling on their modified attendance BSc programme are provided with a clear timetable for clinic attendance for the duration of the programme of study, in preparation for the September 2022 start date. |

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| 3 | To ensure a clear student journey, the BCNO Group must complete the development of the details of module delivery for the BCNO Group programmes that are scheduled for delivery during the 2022-23 academic year. |
| 4 | The BCNO Group 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. |
| 5 | <p>The BCNO Group 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 |

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| 6 | The BCNO Group 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, 2019</i> , Quality Assurance Agency for Higher Education and <i>Graduate Outcomes for Osteopathic Pre-registration Education</i> and <i>Standards for Education and Training, 2022</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 BCNO Group giving not less than 9 months notice. |
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Recognition period

20. The interim Quality Assurance handbook¹ sets out the current criteria regarding the period of RQ approvals stating:

"The maintenance of the RQ status currently follows a cyclical process. Where required, PEC may apply an expiry date to the RQ. This decision will be made based on anticipated level of risk that the RQ presents.

GOsC 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.

For existing providers, GOsC will usually recognise qualifications without an expiry date in the following circumstances:

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

This will be subject to satisfactory review of the providers annual report."

¹ [Mott MacDonald GOsC Interim Quality Assurance Handbook - General Osteopathic Council \(osteopathy.org.uk\)](https://osteopathy.org.uk/mott-macdonald-gosc-interim-quality-assurance-handbook)

21. The current British College of Osteopathic Medicine's RQ programmes do not have a fixed expiry date. The European School of Osteopathy's existing RQ programmes current RQ status expires on 31 August 2024. All programmes including the new joint programme were covered under the scope of the current RQ review process, as set out in the RQ specification and visitors' report. As conditions are recommended by the visitors, the criteria for having no expiry date is not yet met.
22. For **new** OEIs seeking initial recognition, our policy is to recognise for a period of three years and then visit again prior to the first students graduating to ensure that standards are in place ahead of the ahead of that point. As the BCNO Group is an amalgamation of two established OEIs with existing RQs, the Committee may consider extending the initial RQ period to the standard five years granted to other established OEIs. The rationale for a three-year expiry date for new institutions relates to the importance of visiting the new institution prior to the point of graduation of the new students to confirm that the OPS are delivered by the new course and the new institution. Recommending three years would mean that a further visit would be required to take place in September 2023. The Committee would need to consider the proportionality and rationale for imposition of the three-year expiry date and the date of the visit in all the circumstances.
23. It is recommended that the qualifications outlined in paragraph 16 are approved subject to the conditions outlined in paragraph 19 for a period of 5 years from 1 September 2021 - 31 August 2026.

Recommendations:

1. To recommend that Council recognises the Masters in Osteopathy (M.Ost) and the BSc (Hons) Osteopathy, BSc (Hons) Osteopathic Medicine awarded by the BCNO Group from 1 September 2021 to 31 August 2026 subject to the Conditions outlined at paragraph 19, subject to the approval of the Privy Council.
2. To recommend that Council renews the recognition of the Master of Osteopathy and BSc (Hons) Osteopathy (formerly awarded by the ESO) and the Masters in Osteopathy (M.Ost) and Bachelors in Osteopathic Medicine (B.OstMed) (formerly awarded by the BCOM) previously awarded by the BCOM and ESO and from 1 September 2021 to 31 August 2026 to be awarded by BCNO Group subject to the conditions outlined in paragraph 19, and subject to the approval of the Privy Council.