



Policy and Education Committee

07 December 2020

London College of Osteopathic Medicine- RQ Specification (reserved)

Classification	Public
Purpose	For decision
Issue	Approval of the Review Specification for renewal of the Recognised Qualifications (RQ) review at the London College of Osteopathic Medicine.
Recommendation	To agree the review specification for the London College of Osteopathic Medicine of RQ review.
Financial and resourcing implications	The costs of the review will be budgeted for within the 2021-22 financial year are incorporated into our current contract with Mott MacDonald at a cost of £14,305.185.
Equality and diversity implications	Equality and diversity issues are explored as part of the RQ renewal process and are explicitly referenced as part of the review criteria set out in the Interim Quality Assurance Handbook at Item 2 of this agenda.
Communications implications	The review specification is shared with the London College of Osteopathic Medicine, Mott MacDonald and will be shared with the Visiting Team when they are appointed and it is publicly available.
Annex(es)	Draft review specification for the London College of Osteopathic Medicine Renewal of Recognition review.
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Background

1. The London College of Osteopathic Medicine currently provides the following qualifications which are due to expire on 16 July 2022: Member of LCOM. The College does not hold academic validation.
2. The last RQ Visit took place in December 2018 and the Education Committee agreed to recommend renewal the RQ for shorter period of three years with specific Conditions to Council at its meeting on the 12 June 2019. This recommendation was agreed by Council at its meeting on 17 July 2020 and Member of LCOM programme received Privy Council approval on 29 October 2019.
3. In order to renew the recognition of the qualification before it expires, a GOsC RQ Review should commence in by June 2021. Before the review is scheduled, the Committee will be asked to approve a team of appropriately qualified Visitors under s12 of the Osteopaths Act 1993. Suitable dates will be agreed with the London College of Osteopathic Medicine, taking into account the indicative timetable outline in the review specification at the Annex.
4. This paper asks the Committee to agree the review specification.

Discussion

Review Specification

5. Mott MacDonald will conduct the review visit on behalf of the GOsC, based on the review specification. An initial draft of the review specification is presented at the Annex for the Committee to approve.
6. The London College of Osteopathic Medicine RQ approval from 17 July 2019 to 16 July 2022 has six specific conditions and three general conditions attached. The Conditions are listed in the table below:

Conditions	
a.	Produce a single definitive course document that clearly outlines the purpose, structure, assessment strategy, fitness to practise policy and operation of the LCOM course to ensure consistency and continuity of delivery and understanding of the students in achieving their award;
b.	Undertake the mapping of the new Osteopathic Practice Standards (for implementation 1 September 2019) across all components of the LCOM course to ensure current and future students are equipped for professional practise;
c.	Implement the arrangements for enhancing the external scrutiny of the LCOM course to ensure comparability of academic standards and provide critical evaluation of the teaching and learning experience;

d.	Finalise the appointment of the moderator for the FCCA examination to optimise the validity, reliability and consistency of assessment;
e.	Finalise and implement the revised admissions arrangements through the introduction of the process, where applicable, for assessing clinical competence;
f.	Implement the identified deliberate steps to inform and assure the Board of Trustees and stakeholders that the College fulfils its responsibility for the delivery of the osteopathic practice standards;
g.	The London 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.
h	<p>The London 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"> • substantial changes in finance • substantial changes in management • changes to the title of the qualification • changes to the level of the qualification • changes to franchise agreements • changes to validation agreements • changes to the length of the course and the mode of its delivery • substantial changes in clinical provision • changes in teaching personnel • changes in assessment • changes in student entry requirements • 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) • 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) • changes in teaching accommodation changes in IT, library and other learning resource provision
i.	The London 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: 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 included in this assessment. Any changes in these requirements will be communicated in writing to the London College of Osteopathic Medicine giving not less than 9 months notice.
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7. The RQ Visit report also recommended seven areas for development which the College reported on as part of its 2018-19 annual report submission.

Areas for development	
1	Review and formalise arrangements for staff personal development and review to ensure all individuals continue to be effectively supported and developed.
2	Develop further the arrangements for gathering feedback on the experience and views of patients to enhance the quality of service delivery.
3	Raise awareness of the patients' complaint process as part of their involvement as users of the clinic.
4	Make clear the terms of reference and provide standard agendas to support the deliberative meetings for ensuring consistency of approach across the College.
5	Develop further the use of the computerised accounting system to provide reports on planned and actual expenditure in maintaining the effective cost centre control of the College and clinic.
6	Ensure the process for validating and signing off documents for external distribution is clearly defined.
7	Ensure the continued management of risks through the updating, monitoring and review of the risk register

8. The Committee discussed the renewal of LCOM RQ at its meetings in March, May and June 2019. Members raised a number of concerns with regards to this institution before agreeing to recommending the renewal of the RQ for a shorted period of three years. A summary of the issues identified are:

- Serious issues with the institution's governance with a board which had in place an Acting Chair and appointing Trustees who may be conflicted;
- Insufficient evidence demonstrating oversight in governance leadership which highlighted serious concerns about the quality of the qualifications;
- Concerns about the attitude of the Board and their lack of acknowledgement regarding the situation at the LCOM.
- There were concerns about the extent to which the Board of Trustees engages with academic issues and implementing appropriate governance controls.

- The Committee agreed at its October 2019 meeting that no recruitment should take place until the Committee is completely satisfied that the requested evidence demonstrating sufficient progress against the specific conditions and milestones in the updated action plan have been made.
- The Committee agreed at its March 2020 meeting sufficient progress had been made against the specific conditions for LCOM to progress with the active recruitment of students in order to commence a new cohort. This timeline for the recruitment of a new cohort has been delayed as a result of the coronavirus pandemic. Students are currently due to commence in March 2021.
- Members raised concerns at the October 2020 meeting about the lack of progress LCOM have made with regards to the action plan taking into account the Coronavirus pandemic. LCOM are due to submit their 2019/20 Annual Report in December 2020, this will enable further review of the progress that has been made with regards to the Conditions.

Next steps

9. The review specification may be subject to change due to changing circumstance prior to the review. Any changes to the specification will be notified to the Committee.
10. Committee papers and action plans are available from GOsC.

Appointment of Visitors

11. Section 12 of the Osteopaths Act 1993 provides that 'The Education Committee' may appoint Visitors to report to the Education Committee on the nature and quality of instruction and such other matters as was required to report on by the Committee.
12. The Visitors are in the process of being appointed and members will be asked to confirm their appointment electronically in January 2021.

Recommendation:

To agree the review specification for the London College of Osteopathic Medicine RQ Review.

Draft Review Specification for the London College of Osteopathic Medicine- Renewal of Recognised Qualification Review

1. The London College of Osteopathic Medicine (LCOM) currently provides the following qualifications which are due to expire on 16 July 2022:

Member of the London College of Osteopathic Medicine

2. The LCOM wishes to renew this qualification. A copy of the current Recognised Qualification award the last Quality Assurance Agency for Higher Education (QAA) Report is attached for information.

Review Specification

3. The GOsC requests that Mott MacDonald schedules a renewal of recognition review for Visitors to report on the following qualification:

- Member of the London College of Osteopathic Medicine

4. The aim of the GOsC Quality Assurance process is to:

- Put patient safety and public protection at the heart of all activities
- Ensure that graduates meet the standards outlined in the Osteopathic Practice Standards
- Make sure graduates meet the outcomes of the Guidance for Osteopathic Pre-registration Education (2015) and the Quality Assurance Subject benchmark statement: Osteopathy (2015)
- Identify good practice and innovation to improve the student and patient experience
- Identify concerns at an early stage and help to resolve them effectively without compromising patient safety or having a detrimental effect on student education
- Identify areas for development or any specific conditions to be imposed upon the course providers to ensure standards continue to be met
- Promote equality and diversity in osteopathic education.

5. The format of the review will be based on the new Mott MacDonald Handbook reported to the Committee for approval under item 2 at this meeting, and the Osteopathic Practice Standards (2019). Associated guidance will also include the Guidance for Osteopathic Pre-registration Education (2015)

<http://www.osteopathy.org.uk/training-and-registration/becoming-an-osteopath/guidance-osteopathic-pre-registration-education/>

6. In addition to the usual review format for a renewal of recognition review (appropriate to the state of development of this course), the Committee would like the to ensure that the following are explored:

- Implementation of the requirements of outstanding Conditions and the action plan, specifically with regard to:

- i. Implementation of the admissions policy; how the policy has been used for the recruitment of the current cohort of students and the rigour of the admissions process
 - ii. the development and implementation of the five-year strategic plan;
 - iii. the strength of the Governance process, including a review of the roles and responsibilities of the board of trustees and the engagement of Board members with the academic provision and decision making.
 - iv. the development and implementation of the single definitive course document;
- Review the progress made with regard to the Areas for Development in the last RQ Visit to ensure that they do not develop to pose a risk to the delivery of the OPS.

Table 1- Outstanding Conditions

a.	Produce a single definitive course document that clearly outlines the purpose, structure, assessment strategy, fitness to practise policy and operation of the LCOM course to ensure consistency and continuity of delivery and understanding of the students in achieving their award.
b.	Undertake the mapping of the new osteopathic practice standards (for implementation 1 September 2019) across all components of the LCOM course to ensure current and future students are equipped for professional practise;
c.	Implement the arrangements for enhancing the external scrutiny of the LCOM course to ensure comparability of academic standards and provide critical evaluation of the teaching and learning experience;
d.	Finalise the appointment of the moderator for the FCCA examination to optimise the validity, reliability and consistency of assessment;
e.	Finalise and implement the revised admissions arrangements through the introduction of the process, where applicable, for assessing clinical competence;
f.	Implement the identified deliberate steps to inform and assure the Board of Trustees and stakeholders that the College fulfils its responsibility for the delivery of the osteopathic practice standards;
g.	The London 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.

h	<p>The London 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"> • substantial changes in finance • substantial changes in management • changes to the title of the qualification • changes to the level of the qualification • changes to franchise agreements • changes to validation agreements • changes to the length of the course and the mode of its delivery • substantial changes in clinical provision • changes in teaching personnel • changes in assessment • changes in student entry requirements • 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) • 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) • changes in teaching accommodation changes in IT, library and other learning resource provision
i.	<p>The London 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: 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 included in this assessment. Any changes in these requirements will be communicated in writing to the London College of Osteopathic Medicine giving not less than 9 months notice.</p>

Table 2- Areas for development

1	Review and formalise arrangements for staff personal development and review to ensure all individuals continue to be effectively supported and developed.
2	Develop further the arrangements for gathering feedback on the experience and views of patients to enhance the quality of service delivery.
3	Raise awareness of the patients' complaint process as part of their involvement as users of the clinic.

4	Make clear the terms of reference and provide standard agendas to support the deliberative meetings for ensuring consistency of approach across the College.
5	Develop further the use of the computerised accounting system to provide reports on planned and actual expenditure in maintaining the effective cost centre control of the College and clinic.
6	Ensure the process for validating and signing off documents for external distribution is clearly defined.
7	Ensure the continued management of risks through the updating, monitoring and review of the risk register

Provisional Timetable

7. The provisional timetable for the London College of Osteopathic Medicine be as follows:

Month/Year	Action/Decision
December 2020	Committee agreement of review specification
January 2021	Committee agreement and statutory appointment of visitors
10 weeks before the visit (March / April 2021)	Provider submits mapping tool to Mott MacDonald
June 2021	RQ Visit takes place (including observation of teaching and learning both clinical and academic and opportunities for discussions with staff, students members of the board of trustees. Patient feedback will also be taken into account as part of the visit.)
5 weeks following visit (August 2021)	Draft Report to London College of Osteopathic Medicine for comments-statutory period.
September 2021	Preparation of Action Plan to meet proposed conditions (if any)
October 2021	Recommendation from the Committee to Council to whether to approve the RQ programme
November 2021	Recognition of Qualification by the General Osteopathic Council
Before July 2022	Privy Council Approval

This timetable will be the subject of negotiation with the London College of Osteopathic Medicine, GOsC and Mott MacDonald to ensure mutually convenient times