



Policy and Education Committee
15 June 2021
Update on Quality Assurance (reserved)

Classification	Public
Purpose	For decision
Issue	The Committee is asked to consider and provide feedback on the planned approach to development of quality assurance this year.
Recommendations	<ol style="list-style-type: none">1. To agree the proposal to change the GOsC Annual Reporting process and provide direction on which option to use for the 2020/21 submissions process.2. To note the update on development of Risk Based Approach to Quality Assurance
Financial and resourcing implications	The annual report analysis is undertaken as part of our contract with Mott Macdonald. The overview analysis is conducted in house.
Equality and diversity implications	Equality and diversity implications are dealt with as part of the annual report submissions process.
Communications implications	We will share the findings with the osteopathic education institutions and our QA provider. The committee's decision will inform which template which will be presented for decision at the private meeting in June 2021.
Annex	Pilot specification for proposed revised annual report process
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Key messages from the paper

- This paper outlines a proposal for a revised approach to the annual report process for 2020-21, based around the draft Standards for Education and Training and feedback from the osteopathic educational institutions.
- The advantages and disadvantages of this are outlined for consideration.
- A brief summary of work carried out in relation to the development of risk profiles is provided, which will be developed further in a paper to the Committee at its meeting on 29 June 2021.

Background

1. The GOsC's Annual Report requirement for Osteopathic Educational Institutions (OEIs) is part of the current arrangement for assuring the ongoing quality of the delivery of 'recognised qualifications' (RQs). An RQ qualification is necessary for UK graduates to apply for registration with the GOsC.
2. The format of the current template has been in use since 2015, with relatively minor changes and additions made every submission period. This paper explains the Executive's approach to the development of quality assurance by making changes to the 2020-21 annual report template and administrative process.
3. The Committee is asked to discuss the proposals to change the GOsC Annual Reporting process.

Discussion

4. The 2019/20 Annual Report submission process highlighted a number of historical and recurring issues with the template and reporting process. Following the analysis of submissions, The Council of Osteopathic Education Institutions (COEI) reported on some concerns with the format of the current template in a letter to the Education Committee Chair dated 29 March 2021. A key concern stated was that "the Annual Report Form supplied (2019-2020 submission period) did not provide enough clarity and direction to enable OEIs to complete the forms to include all of the information and narrative that Mott McDonald appeared to require".
5. Some of the key issues that OEIs have raised during one-to-one engagement with the Executive include:
 - a. a lack of understanding about the requirements of the template;
 - b. what type of narrative and evidence they are supposed to provide;
 - c. the expectations of the PEC; and
 - d. lack of clarity about how the questions relate to the OPS.
6. There is a reported perception that the questions and expectations of what OEIs are required to demonstrate changes every year. There is an apparent lack of

cohesion on the OEIs' interpretation of the questions, the analysis by the independent QA provider and the requirements of the Education Committee.

7. Mott MacDonald also provided general feedback on the process (as reported to the Committee at its March 2021 meeting) and reported that the level of detail and quality of responses did vary widely from each response. This was challenging in the analysis as a more limited evaluation could take place on some responses. They also reported that there were challenges with the administration of the overall submission process.
8. The papers presented on the analysis Annual Report submissions to the Committee at the March 2018, 2019 and 2020 meetings have included substantial supplementary information by the Executive. This has often involved requesting additional information and/or clarification from OEIs. These actions have been resource intensive for both parties.
9. We are proposing making significant changes to our quality assurance approach to using the annual report process to ensure RQ standards are met. This paper presents two options for the 2020-21 submission period and the Committee is asked to consider our proposal.

Option 1 – modelling the annual report form around the draft Standards for Education and Training

10. Our proposal for the 2020-2021 Annual Report submission requirement is to structure the reporting process around the nine themes of the draft GOsC Standards for Education and Training (SET). OEIs will be asked to provide an explanation and evidence to demonstrate how they meet the individual standards within the nine themes of the SET. Although the Standards for Education are in draft form and are shortly to be consulted on, it is considered that the themes and individual standards within each one is developed enough to provide a framework for OEIs to report against. This will, in effect, form a pilot process, both to consider the format of the review itself, but also to provide an opportunity for OEIs to fully engage with the draft standards and provide feedback to add to the consultation process itself. This should in turn ensure that the final standards for education and training have been robustly considered, and support the implementation of these by OEIs from September 2022.
11. Another objective of this proposed approach is to address some of the issues raised by OEIs and Mott MacDonald in relation to last year's template. A key concern, as reported above was the potential lack of consistency in reporting, with OEIs unsure as to the level of detail required, and the appropriate balance between narrative and evidence. The variation of context in which OEIs deliver programmes is wide, as the Committee will be aware, and a standards-based reporting process will require all to demonstrate how they meet the standards in whatever context they function. This should also help with the effective analysis of information supplied against clear criteria. The outcomes from the pilot will

contribute to the ongoing review of the existing quality assurance method to update the risk-based approach to quality assurance.

12. For the purposes of this pilot submission, and with the understanding that these are draft standards; OEIs will be asked to report on and reflect on their current position in relation to the individual standards in two ways:
 - a. **How they believe that they are meeting the standard-** they will be expected to provide the required explanation and evidence as set out in the guidance.
 - b. **Whether they believe that they are partially meeting or are currently not meeting the standard;** they will be expected to clearly set out what the areas for development are and when and what specific actions will be taken to meet the requirements of the standards.
13. Any issues or significant areas of concerns identified will be addressed through our current QA processes.
14. As mentioned above, we suggest that one of the key advantages of basing the annual report template on the draft SET is that it enables the reporting by OEIs, analysis by Mott MacDonald and decision making by Committee against the same set of common standards. Specifically, OEIs will be reporting on the same set of standards which should enhance consistency in submission and analysis. The expectation is that reporting against standards should enable the Committee to have a clearer and more structured insight and understanding of the status of individual OEIs in relation to meeting the requirements of the OPS.
15. This pilot would encourage a more self-reflective approach against the SET and will include explicit guidance which should provide the OEIs with examples of the type of narrative and evidence that should be provided to demonstrate how they are meeting the individual standards.
16. It is our expectation that the self-evaluative and reflective approach of this pilot will enhance the value of the process for the OEIs and will enhance learning opportunities for the OEIs and the GOsC. It will also enhance the quality process and support OEIs to be in a better position to continue to develop programmes in line with the new SET when they are finalised in early 2022.
17. We are also proposing that Mott MacDonald take responsibility of the administrative element of the process currently managed by the GOsC Executive. The template will be sent out to the OEIs by Mott and returned to them for completion of the analysis and report writing. It is expected that direct communication and engagement between Mott and OEIs should make it easier to seek further clarification when required which should result in a more accurate final report. The rationale for this approach is to streamline the process and further enhance the independence of the analysis of the information submitted. The Executive would still have management oversight of the overall process and will make the final recommendations to the PEC.

18. If agreed and adopted, the submission process and template will in time, closely align with the current mapping tool template currently used by Mott MacDonald for the RQ Visit process. We do not expect OEIs to repeat the information that has already been submitted in preparation for their RQ Visit. A standalone guidance document will also be provided.
19. This proposed pilot should also contribute to development of the work we are doing developing risk profiles for OEIs and risk-based approach to quality assurance. It should also enable OEIs to report on the risks that they have identified and explain the mitigating actions that will be or have been put in to ensure that these do not impact the delivery of the OPS.
20. OEIs will still be required to submit data for areas such as students and educators and fitness to practice as part of this new process. This approach will support our methods to use data and intelligence to enable more risk based decision making.
21. We consulted with the OEIs at a GOS-COEI meeting on 18 May 2021 on this proposal, and highlighted the possible advantages and disadvantage of the proposed changes to the Annual Report submission, as set out below:

Expected Advantages		Potential Disadvantages
1	Standardised approach/framework.	Resource heavy (initially) but better use of resources moving forward.
2	All OEIs will report and provide evidence against common standards.	Repetition of information in some sections/challenges in cross reference
3	Enable OEIs to identify and report potential gaps/issues specifically in relation to the delivery of the OPS.	High volume of information and evidence required for submission.
4	Enable implementation culture of reporting of continuous improvement.	
5	Over time, would enable the submission to be updated by the OEI on a continual basis, providing the narrative and evidence base for RQ visits and Annual Report submissions simultaneously (leading to reduced burden ultimately)	

Expected Advantages		Potential Disadvantages
5	Identify and report on areas of strengths and areas/opportunities for development – providing a value to the OEI as well as a regulatory requirement	
6	Improved reporting and management risks identified	
7	Support approach to light touch regulation	
8	Development of model based on increased understanding leading to more trust and individual responsibility	
9	Opportunity to use already available information	
10	More outcome focused submission, based on established processes and application of policies.	
11	Better alignment with requirement of internal reporting processes (QA, Governance) and external reporting requirements (validating university, OfS)	
12	Clearer approach to the GOsC assessment and decision-making process	

22. Overall, the education providers welcomed the positive approach being taken by GOsC and Mott MacDonald to address the issues with the current annual report process. It was suggested that all OEIs reporting to the same standards is a key benefit because it provides clarity on the type of information they are expected to provide and what standards their submission will be assessed against. The clearly defined requirements and guidance was described as a positive move.
23. There were some concerns raised about the potential increase in time resources that would be required to make the initial submission. The Executive acknowledged and understood that the initial submission could be resource intensive but also highlighted the potential benefits that could be gained. The benefit is that this would help to establish a baseline, and if received positively as a pilot, would form a consistent format that could then be maintained by

OIEs as a 'live' document, to be updated on an ongoing basis in preparation for an annual submission.

24. All OIEs have agreed to take part in this pilot and also provide consultation feedback on the SET. The pilot specification is provided in the Annex.

Option 2 – retain the current annual report format for the 2020-2021 submission

25. There is an alternative option of staying with the current Annual Report template questions and process. The advantages of this might be reduced time for completion, and the familiarity of the format, but this does not make any substantial move towards addressing the feedback received from COEI or Mott MacDonald. It would also miss the opportunity of using the draft SET as a template for the report submission, which will not only provide useful feedback as part of the development process, but will support the OIEs in embedding the standards within their programmes in readiness for their implementation in 2022.
26. At the meeting with COEI on 18 May mentioned above, the option of retaining the current annual report format for this year was raised with education providers, but all were happy to proceed with the pilot version as outlined.
27. The Committee's feedback at this public meeting will be used to inform the model of the QA Annual Report submission template which will be presented for approval at the Private meeting on 30 June 2021.

Impact on timetable of consultation on updated Guidance on Osteopathic Pre-registration Education and Standards for Education and Training

28. It should be pointed out that using the annual report process as a means of seeking feedback on the draft Standards for Education will mean that the final post consultation version of these will then be reported to the March 2022 meeting of the Committee, rather than its October 2021 meeting as originally planned. The final version would then be reported to Council in May 2022. The advantage, however, is that the annual report process becomes, in effect, part of the implementation phase itself, ensuring that OIEs are fully focused on the content of the standards and how they meet these, ready for full implementation from September 2022.

Update on development of Risk Based Approach to Quality Assurance

30. The Committee considered [a paper in March 2020](#) which presented updates on the proposed approach to developing the Quality Assurance and Risk Profiles for the OIEs. The paper provided an explanation of the risk levels and draft risk profiles for each individual OIE. These included the key sources of information and the key areas that were considered which contributed to the OIE risk profiles. The Committee suggested that the explanation for the risk levels were

highly subjective and consideration should be given to making the assessments more objective.

31. The Executive have reviewed the approach to risk and methods to developing risk profiles for the OEIs. The updated proposals will be presented to the Committee at the Private meeting on 29 June 2021. The updated approach to determining risk levels and the mechanisms of risk profiles for individual OEIs will be based on the outcomes of the following research and review processes:
 - a. review of the quality assurance processes and models used by other UK healthcare regulators .
 - b. consultation and feedback from Mott MacDonald.
 - c. the quality assurance liaison officer led a workshop at the April 2021 healthcare regulators Educator's Manager's Meeting and discussed risk-based approach to quality assurance.
 - d. in-depth one-on-one discussions with colleagues at the Health and Care Professions Council (HCPC) and the General Dental Council (GDC) on their approach to quality assurance and risk and the models they use.
 - e. The approach to risk management by other regulators such as the Office for Students (OfS); Professional Standards Authority and the Australian Health Practitioner Registration Agency (AHPRA).
32. The findings suggests that the ongoing review of the GOsC approach to QA Risk management aligns with sectoral standards and norms. We are proposing a risk-based model that aims to use a risk scoring matrix to enable a more objective approach to determining levels of risk. This approach aims to identify high, medium, and low risks which would impact students meeting the requirements of the OPS. The outcome from the scoring matrix should determine what type of response is required to ensure that the issues identified are effectively addressed.
33. The specific criteria for which risk levels are determined will be aligned the final Standards for Education and Training. The updated proposal to determining levels of will be presented to the Committee at the June 2021 private meeting and will further explain our approach, the rationale and the expected outcomes.

Recommendations:

1. To agree the proposal to change the GOsC Annual Reporting process and provide direction on which option to use for the 2020/21 submissions process.
2. To note the Update on development of Risk Based Approach to Quality Assurance

Annex

Pilot specification- 2020-21 Annual Report submission

1. This section presents the key specifications for the proposed piloted which sets out the objectives and the measures that will be used to assess their effectiveness. There are two key questions which the objectives listed in the table below are based:
 - a. Will constructing the template on the draft standards for education and training requirements enhance our approach to quality assurance and improve the annual report submissions process?
 - b. How will the pilot process contribute to and inform the ongoing consultation for the SET and enhance the development of the draft standards?

Area/Subject	Objectives	Outcome Measures
Annual Report Template and Process	<p>To assess the effectiveness changes in relation to:</p> <ul style="list-style-type: none"> • achieving the objective of the annual report submission process of confirming the maintenance of OPS, • the new template in enabling the standardisation of submissions by OEIs and analysis of submissions by Mott MacDonald, • the administrative management of the annual report process, • contributing to the review of the levels of assurance provided by the existing quality assurance method and explore mechanisms for enhancing assurance and informing QA activities.(and risk-based approach to quality assurance) • How much resources are required for completion by OEIs and analysis by Mott MacDonald 	<ul style="list-style-type: none"> • Findings from Mott MacDonald analysis of 2020/21 Annual Report submissions. • Feedback from stakeholders. • Quality Assurance: annual report analysis and themes presented at March 2022 PEC meeting. • Improved an effective identification and reporting of risks
Draft Standards for Education and Training	<ul style="list-style-type: none"> • To test/assess the application of the standards in a live environment. 	<ul style="list-style-type: none"> • Feedback from the stakeholder group

	<ul style="list-style-type: none"> To contribute to the consultation process for the Standards for Education and Training. 	
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Methodology

2. This section provides an explanation of the methodology that will be used to manage the processes for the pilot to ensure that it achieves the objectives in the table set out in paragraph 1. If approved by the Committee, this pilot process is expected to be completed in seven phases set out in the table.

Phase		Phase Description
1	Approval Initiation of Process	<ul style="list-style-type: none"> June 2021- Approval of GOsC 2020-21 Annual Report submission process Mott MacDonald send template and guidance to eight OEIs by 30 August 2021
2	Feedback and engagement on live process	<ul style="list-style-type: none"> September 2021- OEIs complete feedback questionnaire reporting on the experiences of the live annual report process and standards. The Executive and Mott review feedback October 2021- Initial findings presented to PEC. Specific feedback on standards included as SET consultation process.
3	Return and analysis of completed Annual Report submission	<ul style="list-style-type: none"> December 2021- OEIs return the completed annual report template to Mott MacDonald. Mott MacDonald complete analysis of submissions and write reports.
4	Feedback and Engagement post completion and submission	<ul style="list-style-type: none"> January 2022- OEIs complete feedback questionnaire reporting on the overall pilot process. Focus group discussion during COEI meeting. January/February 2022- Executive/ Mott MacDonald hold pilot review workshop.

5	Quality Assurance: annual report analysis and themes	<ul style="list-style-type: none"> • March 2022-Report to PEC on outcome of the process and how well the pilot objectives have been met, lessons learnt, impact on Quality Assurance Objectives set out in the business plan. • Assess the contribution of pilot on development of SET.
6	Contribution to final stages of consultation activities	<ul style="list-style-type: none"> • Feedback received in regard to the draft Standards for Education and Training will, together with formal consultation responses, help shape the final version to be presented to Committee, providing additional assurance that these have been fully worked through and considered in practice.
7	June 2022	<ul style="list-style-type: none"> • PEC decide whether to formally adopt new process