



Policy and Education Committee

8 March 2023

North East Surrey College of Technology (Nescot) – Renewal of Recognition of Qualification (RQ) and approval of RQ specification for the part time course (reserved)

Classification Public

Purpose For decision

Issue Consideration of the Recognised Qualification (RQ) review at the North East Surrey College of Technology (Nescot), in relation to:

- Master of Osteopathic Medicine (MOst)
- Bachelor of Osteopathic Medicine (BOst)

Recommendations

1. To recommend that Council recognises the Masters in Osteopathic Medicine (M.Ost) and the Bachelor of Osteopathic Medicine (BOst) awarded by Nescot from 1 November 2023 to 31 October 2028 subject to the Conditions outlined at paragraph 19, subject to the approval of the Privy Council.
2. To note the action plan provided by Nescot in relation to the specific conditions and to request an update on the actions outlined to the October 2023 Committee meeting.
3. To agree the draft review specification for Nescot's part-time BOst programme.

Financial and resourcing implications

The RQ Visit was included in the 2021-22 financial schedule, with a budget of c£15,000. There will be an additional cost to the review of the proposed part time delivery of the MOst programme which was not included in the original specification as we were not informed of this in time.

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 Nescot qualifications will be considered on the public agenda of Council in May 2023.

Annexes

- A. The Nescot review specification
- B. The Nescot initial RQ Visit Report
- C. Action Plan in relation to recommended conditions
- D. Draft RQ specification in relation to proposed part time BOst programme

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Key Messages

- The visitor report contains recommendation for approval renewal of the recognition of Nescot's qualifications with two specific conditions outlined at paragraph 19.
- 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.
- The Visitors have agreed the action plan as appropriate.
- The specification for the new part time NESCOT RQ is attached for approval.

Background

1. A draft RQ specification was approved by the Committee at its March 2022 meeting.

Discussion

2. The Committee agreed the RQ Specification for the Nescot visit 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.
3. The visit took place in October 2022.
4. The visit report was drafted and sent to Nescot on 24 November 2022 for a period of no less than one month in accordance with the Osteopaths Act 1993. An extension was given due to the Christmas holiday.
5. Nescot responded with what they considered to be factual inaccuracies on 13 January 2023, and these were considered by the Education Visitors. All comments were taken into account in the production of the final report.
6. The final report was sent to Nescot on the 27 January 2023. 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.
7. The final visitors' report is attached at Annex B. The recommendation of the Visitor for the programmes is approval with two 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

8. The visitors identified several specific areas of strength and good practices in the final report, including:
- The comprehensive annual review analysing student and staff data, which is reported and considered by senior College management and Governors.
 - The College's approach to mitigating the effects of the COVID-19 pandemic by effectively ensuring the continuation of teaching and student support.
 - Students report that the osteopathy programme staff are very accessible, supportive and enable a questioning culture, and that they are supported in developing as practitioners and when dealing with clinical uncertainty.
 - The proactive learning support team combined with the well-resourced Learning Resource Centre (LRC) and the engendered holistic approach to student learning.
 - The 'open door' policy is evident which enables regular effective informal channels of communication between the various levels of management, faculty and students and lends an immediacy to action.
 - The personal professional development record which was thought to be a well-considered vehicle for assessment, makes continuous reference to the OPS.

Recommendations

9. 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 eight recommendations for Nescot in this case. These areas should be monitored by the provider and the recommendations implemented, as appropriate. These areas must be reported on as part of the providers annual report submission to the GOsC. A request will be made for Nescot to provide a progress update with regard to these specific areas as part of their 2022-23 Annual Report submission.

Conditions recommended by the Visitors.

10. Two specific conditions have been identified in the report by the Visitors. These are:
- a. The College must refine their data capture and reporting methods to ensure coherent monitoring and forecasting of patient numbers as well as ensuring the attainment of the required hours in clinic.
 - b. While clinical audit is undertaken on a monthly basis, there does not appear to be a clear strategy to ensure the quality of the breadth of patient interactions that students encounter. The College must improve their recording of patient audit data, and management of student exposure to a full range of musculoskeletal and non-musculoskeletal presentations, to ensure that students see a sufficient depth and breadth of patients.

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 renewal of recognition for the existing qualifications:
- Master of Osteopathic Medicine (MOst)
 - Bachelor of Osteopathic Medicine (BOst)
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	
1	The College must refine their data capture and reporting methods to ensure coherent monitoring and forecasting of patient numbers as well as ensuring the attainment of the required hours in clinic.
2	While clinical audit is undertaken on a monthly basis, there does not appear to be a clear strategy to ensure the quality of the breadth of patient interactions that students encounter. The College must improve their recording of patient audit data, and management of student exposure to a full range of musculoskeletal and non-musculoskeletal presentations, to ensure that students see a sufficient depth and breadth of patients.
3	Nescot 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.
4	Nescot 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:

	<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
5	<p>Nescot 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 <i>Graduate Outcomes for Osteopathic Pre-registration Education and 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 Nescot giving not less than 9 months notice.</p>

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.”

21. Nescot’s current programmes have an expiry date of 31 October 2023.

22. 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 November 2023 - 31 October 2028.

Action plan

23. An action plan in relation to the specific conditions recommended has been provided by Nescot, and this is attached as Annex C.

24. In relation to the monitoring of student’s clinical experience, we asked a follow up question regarding steps taken in the event that a student’s clinical experience was found to be missing certain areas. The response was:

“The monthly audit looks at numbers pertaining to regions treated. Actions taken to address low numbers for any of these regions include reallocation of relevant follow up patients to these students, observation of colleagues

¹ [Mott MacDonald GOsC Interim Quality Assurance Handbook - General Osteopathic Council \(osteopathy.org.uk\)](https://osteopathy.org.uk)

treating these regions (although this observation isn't audited) and case study discussion in class for the less common regions. Marketing also do targeted email campaigns when there is a more general drop in the presentation of specific regions (in our marketing strategy there is an example of one for the shoulder)."

25. The action plan was sent to the visitors, who commented as follows:

"Overall, the action plan demonstrates recognition for more efficient auditing and recording of meetings and discussions should address the points made in the condition. Hopefully, the monthly audit meetings, mentioned in the action plan, will regularly involve marketing and therefore more effectively inform the marketing approach to patient recruitment. The regular formal meeting should also identify potential issues with patient numbers and presentations, thereby allowing appropriate actions and allocation."

Review of Part time MOst programme

26. As was reported to the Committee members by email on 11 October 2022, an issue had arisen in the week prior to the planned RQ visit, when we were told by Mott MacDonald that a new part time delivery had been referenced in the paperwork supplied by Nescot, but that they were lacking in information about this.

27. We were not aware about a part time programme and it was therefore not referenced in the RQ specification approved in [March 2022](#).

28. We enquired with the course lead at Nescot, and understand that they developed the part time programme as a result of market research which showed that many prospective local students were interested in part time delivery. They worked closely with London South Bank University (the new validator) in developing this, and it has been validated for roll out from September 2023. The key element is that it is the existing B.Ost programme (already referenced in the RQ Spec and now reviewed as reported above) but with a different mode of delivery. Students will attend the same lectures as full-time students, but just spread over a five year programme, so the experience will be equivalent.

29. Rather than 120 credits per year for the full-time programme, the credits will be:

- Year 1 80 credits
- Year 2 80 credits
- Year 3 100 credits
- Year 4 100 credits
- Year 5 120 credits (this is achieved by extending the taught period for year 5 beyond the usual May finish and into the summer, so part time students will finish 2-3 months later).

30. Questions arose from the email discussion, which meant that the RQ specification in relation to the proposed part-time BOST programme would be better coming back to the March 2023 Committee for a full Committee discussion, and thus the RQ review next week of the MOST and BOST went ahead in accordance with the original specification, rather than adding the part-time programme to the specification just days before the visit took place.
31. A draft specification in relation to a review of the part-time BOST is attached as Annex D.
32. A date for the review has not yet been finalised and neither have the visiting team been suggested at this stage. Once arrangements are in place, we will report further to the Committee for agreement to the review panel. Nescot will be able to recruit to and roll out the part-time programme from September 2023 even if the RQ review has not taken place, or if it has but Privy Council approval has not yet been given. It will need to make the situation clear to students, however.

Recommendations:

1. To recommend that Council recognises the Masters in Osteopathic Medicine (M.Ost) and the Bachelor of Osteopathic Medicine (BOST) awarded by Nescot from 1 November 2023 to 31 October 2028 subject to the Conditions outlined at paragraph 19, subject to the approval of the Privy Council.
2. To note the action plan provided by Nescot in relation to the specific conditions and to request an update on the actions outlined to the October 2023 Committee meeting.
3. To agree the draft review specification for Nescot's part-time BOST programme.