



Policy and Education Committee

7 March 2024

North East Surrey College of Technology (Nescot) – Recognition of Qualification (RQ)

Classification Public

Purpose For decision

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

- Bachelor of Osteopathic Medicine (BOst)

Recommendation To agree:

- **Either Option 1:** To recommend that Council recognises the BOst (part time) programme for a period to coincide with the expiry date of the current Nescot MOst and BOst (full time programmes) of 1 November 2023 to 31 October 2028 subject to the general conditions, subject to the approval of the Privy Council.
- **Or Option 2:** That the evidence outlined is sufficient to indicate that the conditions related to the full-time programmes have been met, and agree to recommend to Council that it recognises the MOst and BOst (full time) and the BOst (part time) without an expiry date, subject to the approval of Privy Council.

Financial and resourcing implications The RQ Visit was included in the 2023-24 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 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 this Nescot qualification



will be considered on the public agenda of Council in May 2024.

Annexes

- A. The Nescot review specification
- B. The Nescot initial RQ Visit Report

Author

Steven Bettles and Banye Kanon

Key Messages

- The visitor report contains recommendation for approval of the recognition of Nescot's Part Time Bachelor of Osteopathy qualification with no conditions.
- The visitor report addresses an update on conditions imposed on the full time programmes in 2023, and which it is suggested are being met.
- Options are outlined for consideration of recognition of the BOst (Part Time) programme for a period to coincide with that of the existing Nescot programmes, or to recommend that all Nescot programmes including the BOst (Part Time) are recognised with no expiry date.

Background

1. The renewal visit for Nescot's full time MOst and BOst programmes took place in October 2022. The outcome was reported to the Committee in [March 2023](#), with the Committee recommending approval subject to the conditions outlined.
2. Nescot were also planning the introduction a part time BOst programme, but this had not been notified for inclusion at the October 2022 visit. A further visit was therefore also agreed to consider the initial recognition of the part time programme specifically, with the [RQ Specification](#) being agreed at the March 2023 Committee meeting. This is attached as Annex A.
3. The proposed visitors were reported to and agreed by the Committee under s12 of the Osteopaths Act 1993 in [June 2023](#).

Discussion

4. The visit took place in November 2023. An issue arose during the visit when it became apparent that there may be a conflict of interest between one of the visitors and a member of Nescot teaching staff. The issue was raised with GOsC at the time, and the decision taken, to avoid any potential perception of bias, to remove the visitor concerned from the panel. This was discussed with all parties including the Nescot programme lead, who confirmed that they were happy to proceed with just two visitors. The visit went ahead on this basis, and the report referenced in this paper was prepared by the remaining two visitors.
5. The visit report was drafted and sent to Nescot on 13 December 2023 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.
6. Nescot responded with what they considered to be two minor factual inaccuracies on 25 January 2024, and these were considered by the Education Visitors and amended in the final report.
7. The final report was sent to Nescot on the 31 January 2024.

8. The final visitors' report is attached at Annex B. The recommendation of the Visitor for the programmes is for approval. 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 several specific areas of strength and good practices in the final report, including:
- The decision to co-teach full-time and part-time students, thus ensuring consistency of classroom experience, and facilitating cohesion of the overall student body, is considered a strength of the part-time programme.
 - The department has managed to foster a culture that is open, inclusive and nurturing to students and staff. This is a real asset to the College.
 - The LRC have experience of working with part-time students on other programmes which will benefit part-time students of osteopathy.
 - The open culture that has been developed in the department allows students to feel they are able to challenge without recourse.
 - The support offered to students through the LRC and by teaching staff should be commended; this continues to be of high quality and flexible in nature which will support part-time students as well.

Conditions

10. No conditions are required.

Recommendations

11. 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.
12. These are:
- Staff development days should be used to prepare the teaching staff with less experience of the needs of part-time students. (3i)
 - It is recommended that the department continue to develop feedback practices within the team through sharing of good practice and additional training so that any perceived inconsistencies can be addressed. (3v and 6iv)
 - The College should continue its endeavours to provide inter-professional learning opportunities through their links with LSBU. (3vi)
 - The College should explore more formal mechanisms to allow for students from the same and different cohorts to work together and learn from each other. (3vi)
 - The College should consider the use of electronic notes within the clinic. (5iii)
 - Protected clinic time should be scheduled for part-time students who are entering clinic so that they can be fully inducted into the administrative processes within the clinic. (6i)

- The College should review how patient data is managed alongside their strategic marketing plan which can enable targeted advertising to ensure that a sufficient depth and breadth of patients are attending the clinic. (7ii)
 - It would be beneficial for the College to review data collection and review practices, to identify areas which can be strengthened which will further support decision making around student breadth and depth of experience. (7ii)
 - The osteopathy teaching team is encouraged to consider and develop ways in which they can share their own part-time experience as students and teachers with the rest of their colleagues to better support part-time student learning. (8ii)
13. 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 about these specific areas as part of their 2023-24 Annual Report submission.

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 recognition for the qualifications:
- Bachelor of Osteopathic Medicine (BOst) (Part time delivery)
17. The visitor's report recommends recognition of qualification status, which means that the visitors have determined that the course will deliver graduates 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 below.

CONDITIONS	
1	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.
2	Nescot must inform the Education Committee of the General Council as soon as practicable, of any change or proposed substantial

	<p>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
3	<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

19. 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 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.”

20. Nescot’s current Fulltime MOst and BOst programmes have an expiry date of 31 October 2028.
21. In the review of Nescot’s full time programme reported to the Committee in March 2023, the following specific conditions were recommended and agreed:

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.

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

to a full range of musculoskeletal and non-musculoskeletal presentations, to ensure that students see a sufficient depth and breadth of patients.

22. As will be seen, progress was further reviewed in the review of the part time programme (Theme 7 of the SET – Clinical Experience). The visitors reported as follows:

'The 2022 RQ visit felt that the College did not meet this standard fully and therefore attached conditions to this section, which centred on the collection and use of data to evidence that students see the requisite number of new patients and that they are exposed to the full breadth and depth of patient presentations.'

During the visit, the Curriculum Manager and reception staff confirmed that patient data is produced weekly and monthly for departmental meetings. This data is used to assign patients to students, however they spoke GOsC and Mott MacDonald 36 of the difficulty in balancing patients' confidentiality with gaining enough information to be able to ensure students are seeing a broad range of presentations.'

The Curriculum Manager and the marketing department confirmed during the visit that this patient data is not currently used to inform the marketing plan which was a recommendation of the visiting team from 2022. Therefore, the College should utilise patient data to enable a strategic marketing plan which can enable targeted advertising to ensure a sufficient depth and breadth of patients are seen by part-time students.'

For the part-time programme, data collection practices need to continue to be strengthened so that they can inform the osteopathic team regarding student breadth and depth of experience and further inform the marketing of the clinic.'

Overall, the data collected by the College is sufficient to ensure that students see the requisite number of patients and that they see a broad range of patients and presentations, therefore meeting the previous condition for the full-time programmes in the 2022 RQ visit. The data is also sufficient to inform a more targeted marketing strategy. However, we feel that there are further enhancements which could be made to this process and this data could be used to better effect for the benefit of patients and students.'

23. Recommendations are made as outlined in the report, but the visitors were thus satisfied that the data collected is sufficient to ensure that students see the requisite numbers of patients and meet the depth and breadth required in the Graduate Outcomes.

24. In terms of recognition, options for consideration are therefore:

- Agree to recommend that Council recognises the BOst (part time) programme for a period to coincide with the expiry date of the current Nescot MOst and BOst (full time programmes) of 1 November 2023 to 31 October 2028 subject to the general conditions, **OR**
- Agree that the evidence outlined above is sufficient to indicate that the conditions related to the full-time programmes have been met, and agree to recommend to Council that it recognises the MOst and BOst (full time) and the BOst (part time) without an expiry date, subject to the approval of Privy Council

25. In the event that there is no expiry date, the general conditions will form an action plan published alongside the approval.

Recommendation:

To agree:

- **Either Option 1:** To recommend that Council recognises the BOst (part time) programme for a period to coincide with the expiry date of the current Nescot MOst and BOst (full time programmes) of 1 November 2023 to 31 October 2028 subject to the general conditions, subject to the approval of the Privy Council.
- **Or Option 2:** That the evidence outlined is sufficient to indicate that the conditions related to the full-time programmes have been met, and agree to recommend to Council that it recognises the MOst and BOst (full time) and the BOst (part time) without an expiry date, subject to the approval of Privy Council.