

# Assessment for quality and standards initial conditions B7 and B8

**BCNO Limited**

**Provider legal name:** BCNO Limited

**Provider trading name:** BCNO

**UKPRN:** 10000911

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# Contents

<b>Executive summary</b>	<b>2</b>
<b>Introduction and background</b>	<b>5</b>
<b>Assessment process</b>	<b>8</b>
Initial condition B7: Quality	8
Initial condition B8: Standards	9
<b>Part 1: Assessment of condition B7: Quality</b>	<b>10</b>
Condition B1: Academic experience	10
Criterion B1.2	10
Criterion B1.3.a	10
Criterion B1.3.b	15
Criterion B1.3.c	17
Criterion B1.3.d	19
Criterion B1.3.e	22
B1 conclusions	24
Condition B2: Resources, support, and student engagement	24
Criterion B2.2.a	24
Criterion B2.2.a	27
Criterion B2.2.b	30
B2 conclusions	32
Condition B4: Assessment and awards	32
Criterion B4.2.a	32
Criterion B4.2.b	36
Criterion B4.2.c	39
Criterion B4.2.d	40
Criterion B4.2.e	42
B4 conclusions	43
<b>Part 2: Assessment of condition B8: Standards</b>	<b>44</b>
Requirement – standards	44
Requirement – achievement of students	48
<b>Annex A: Approach to sampling of evidence</b>	<b>51</b>
<b>Annex B: List of abbreviations</b>	<b>52</b>

# Executive summary

Type of assessment	Initial conditions B7 (quality) and B8 (standards)
For	BCNO
Advice to the OfS on B7	BCNO has credible plans that would enable it, if registered, to comply with conditions B2 and B4, but does not have credible plans that would enable it, if registered, to comply with condition B1.
Advice to the OfS on B8	The standards set for the courses BCNO intends to provide, and the achievement of students on these courses, <b>appropriately reflect sector-recognised standards.</b>

1. This report is an independent assessment of BCNO Limited (hereafter BCNO) about its compliance with the Office for Students' (OfS's) initial conditions of registration for quality (condition B7) and standards (condition B8).
2. The report shows the findings of an independent assessment team, and is based on the evidence made available to the assessment team during its visit to the provider and subsequent enquiries. **It does not represent a decision by the OfS about the BCNO's compliance with these conditions of registration.**
3. The OfS's regulatory framework sets out that a provider wishing to access the benefits of registration must register with the OfS.<sup>1</sup>
4. As part of the registration process, the OfS must assess whether a provider satisfies the initial conditions of registration, including initial conditions B7 (quality) and B8 (standards).
5. Concerning the OfS's initial condition of registration for **quality (condition B7)**, the assessment team found that, if registered:
  - BCNO does not have credible plans that would allow it to comply with the OfS's ongoing conditions of registration for academic experience (condition B1)
  - it does have credible plans that would allow it to comply with the OfS's ongoing conditions of registration for resources, support and student engagement (condition B2), and assessment and awards (condition B4).
6. Concerning the OfS's initial condition of registration for **standards (condition B8)**, the assessment team found that, if it is registered:
  - the standards set and applied for any relevant awards granted to students who complete a higher education course that BCNO intends to provide appropriately reflect applicable sector-recognised standards.

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<sup>1</sup> See OfS, Regulatory framework for higher education in England.

## How we assess providers applying to register

For providers seeking registration with the Office for Students (OfS), the OfS will assess their application and relevant evidence to determine whether the provider satisfies the initial conditions of registration. For providers that applied for registration on or after 1 May 2022, this includes an assessment of whether the provider satisfies initial conditions B7 (quality) and B8 (standards) as set out in the regulatory framework (November 2022).

For this assessment, the OfS appoints an assessment team that includes external academic experts. The assessment may include a visit to the provider by the assessment team, after which it produces a report. The report does not consider matters which may have occurred after that period.

As part of the registration process the OfS also assesses risk against the related revised ongoing conditions of registration. These cover the following areas: academic experience (condition B1), resources, support and student engagement (condition B2), assessment and awards (condition B4) and sector-recognised standards (condition B5).

7. Trading as BCNO Limited, the BCNO group comprises the British College of Osteopathic Medicine (BCOM) and the European School of Osteopathy (ESO), which merged in 2021. BCNO specialises in osteopathic education and delivers a number of courses both in and outside England. It delivers courses in England via a franchise agreement with the University of Plymouth (UoP), with the exception of a Masters in Osteopathy delivered through a franchise agreement with Buckinghamshire New University (BNU) which is in a teach out phase. BCNO delivers its courses outside England via a validation partnership with the University of Plymouth.<sup>2</sup> It also delivers an international Level 7 diploma awarded by Crossfields Institute which it is teaching out to be replaced by BCNO's own diploma.
8. In England, BCNO has two campuses, one in London and one in Kent. After the assessment visit, BCNO told the assessment team that it planned to close its London campus by 2028. BCNO also has two campuses in Denmark, one in Armenia, and one in Singapore. BCNO has significant plans to expand its course provision outside the UK. BCNO is developing campuses in the Netherlands in collaboration with OsEAN (European Osteopathic Schools), Austria, and Iceland. It also has three campuses in Portugal, Spain and Italy, respectively, where it currently has no higher education courses. BCNO has no plans to recruit for these three campuses.
9. In accordance with the guidance on registering with the OfS (Regulatory advice 3)<sup>3</sup>, the OfS decided that it was necessary to undertake an assessment visit to BCNO to gather evidence and provide advice to inform the OfS's decision about whether BCNO satisfies the initial conditions B7 and B8. The OfS decided that this assessment should be undertaken by assessors able to provide expert academic judgement.

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<sup>2</sup> Validation enables a provider to deliver higher education when it might not otherwise have the expertise and resources to create new courses itself, or have the powers to make the award.

<sup>3</sup> See OfS, [Regulatory advice 3: Registration of English higher education providers with the OfS](#).

10. The purpose of the assessment is to provide advice to the OfS to enable the OfS to decide whether initial conditions B7 and B8 are satisfied and whether there is any regulatory risk associated with the provider's ability to meet ongoing conditions of registration.
11. The evidence from the assessment informs the OfS's decisions about whether to register BCNO and, if registered, whether any mitigation is necessary.
12. The OfS appointed an assessment team that consisted of two academic expert assessors and a member of OfS staff. It asked the team to give its advice and judgement about BCNO's compliance with initial conditions B7 and B8.
13. The team considered a range of information submitted by BCNO as part of its application for registration.
14. The assessment team visited BCNO's London campus in November 2024 during which time it met with students and staff, including students from the Denmark campuses via video conference, observed teaching, and viewed the premises of the London campus. The team also accessed video tours of the Kent campus, the two campuses in Denmark, and the campus in Armenia, but not of the Singapore campus.

# Introduction and background

15. BCNO was formed through the merger of two providers, the British College of Osteopathic Medicine (BCOM) and the European School of Osteopathy (ESO), in 2021. BCOM was founded in London as the British College of Naturopathy in 1936. ESO was founded in Paris in 1951, moved to England in 1965, and opened its Kent campus in 1971. Both providers were registered with the OfS in the 'Approved' category prior to their merger in 2021.
16. BCNO submitted an initial application for a change of registration category to 'Approved (fee cap) Higher' in November 2023. This assessment has been undertaken as part of the OfS's consideration of that application.
17. In the UK, BCNO has a campus in north London and a campus in Maidstone, Kent. BCNO also has two campuses in Denmark, one campus in Singapore, and one campus in Armenia. BCNO is developing campuses in the Netherlands and Austria in collaboration with OsEAN (European Osteopathic Schools), and in Iceland. BCNO has campuses in Italy, Spain and Portugal, with no current or planned higher education students.
18. BCNO delivers the following courses in England:
  - Masters in Osteopathy (four-year integrated masters' course, Level 7)
  - Bachelor of Science (Hons) Osteopathic Medicine (three-year undergraduate course, Level 6)
  - Bachelor of Science (Hons) Osteopathy (modified attendance) (four-year undergraduate course, Level 6)
  - Masters in Osteopathy, in a teach-out phase until 2025 (four-year integrated masters' course, Level 7).
19. BCNO plans to deliver the following course in England from 2027:
  - Master of Science Osteopathic Medicine (one- or two-year postgraduate course).
20. BCNO delivers all but one of the above courses through a franchise agreement with the University of Plymouth. The Masters in Osteopathy that it is teaching out is also an integrated masters' delivered through a franchise agreement with Buckinghamshire New University (BNU). The franchise partners both undertake periodic reviews of BCNO's programmes, with the most recent review in 2023.
21. The bachelors' and masters' courses that BCNO delivers in England are recognised by the General Osteopathy Council (GOsC), as the courses lead to registration as an osteopath which is a protected title under the Osteopathy Act 1993.
22. BCNO delivers, or is validated to deliver, the following courses outside England in partnership with the University of Plymouth:
  - In Denmark, a Master of Science in Osteopathy for Diplomates (one-year postgraduate course)

- In Armenia, a Bachelor of Science (Hons) in Osteopathy for Diplomates top up (one-year undergraduate course)
  - In Armenia, a Postgraduate Certificate (PGCert) in Nutrition and PGCert Osteopathic Sports Care, for which there are no current students nor plans to recruit.
23. BCNO is significantly expanding its provision outside England and plans to deliver the following courses in partnership with the University of Plymouth:
- In Iceland, a Bachelor of Science (Hons) in Osteopathy for Diplomates and Master of Science in Osteopathy for Diplomates, starting 2027 subject to site approval by the University of Plymouth.
  - In Singapore, a Bachelor of Science (Hons) in Osteopathy for Diplomates and Master of Science in Osteopathy for Diplomates, starting 2027 and 2028 respectively following site approval by the University of Plymouth.
  - In the Netherlands, a PGCert Osteopathic Education, starting 2025 and in collaboration with OsEAN.
  - In Austria, a PGCert Osteopathic Education, starting 2025, in collaboration with OsEAN, subject to site approval from the University of Plymouth.
24. BCNO does not currently plan to recruit higher education students to its campuses in Spain, Italy and Portugal. During the assessment, the provider did not disclose any information about current or planned activities at these campuses.
25. BCNO also delivers two Level 7 Diplomas in Osteopathy (International) courses in Denmark. One course is accredited by Crossfields Institute, an Ofqual-registered awarding body, currently in a teach-out until 2026. Students can top up this qualification to an Extended Diploma with the addition of a 30-credit research module. The second Level 7 Diploma in Osteopathy (International) course is certified by BCNO and replaces the Crossfields Institution diploma. BCNO also plans to deliver this Level 7 Diploma in Osteopathy (International) in Singapore and Iceland, but has not yet planned a start date.
26. BCNO also provides non-higher education short courses below Level 4 in Belgium, France and Spain.
27. BCNO has 231 registered higher education students in England as of October 2024.
28. During the assessment, BCNO told the assessment team that it forecasts to have 214 students in England, all at the London campus by 2027-28. It subsequently told the assessment team, after the assessment visit, that it intends to close its London campus although it did not provide any further information about a proposed closure date or the arrangements being made for students at that time. This information has been considered separately by the OfS and has not formed part of this assessment.
29. In Denmark, BCNO has 38 students registered on the MSc Osteopathy for Diplomates as of October 2024. It also has 78 students registered on the Diploma in Osteopathy (International)

accredited by Crossfields Institution as of October 2024. It has 56 students registered on BCNO's Diploma in Osteopathy (International).

30. In Singapore, BCNO has 15 students registered on its own Diploma in Osteopathy (International) as of October 2024.
31. In Armenia, BCNO has no students on the Bachelor of Science (Hons) in Osteopathy for Diplomates top up, the Postgraduate Certificate (PGCert) in Nutrition and PGCert Osteopathic Sports Care, and has not confirmed any plans for future recruitment at the time of assessment.
32. BCNO has 255 members of staff, comprising 241 part-time and 14 full-time staff. Within this, there are 129 academic staff, of whom 127 are part time and two are full time. The faculty to student ratio is 1:1.8.
33. BCNO has a board of trustees, comprising a chair of trustees, an honorary treasurer, a staff trustee, a student trustee, and seven trustees. BCNO has a senior management team, comprising the Chief Executive Officer (CEO), the principal, and the head of Human Resources.



# Assessment process

## Initial condition B7: Quality

34. BCNO submitted a quality plan and supporting evidence, as required by the OfS's guidance for providers applying for registration (Regulatory advice 3).<sup>4</sup> It submitted a second quality plan covering its provision outside of England on 8 November 2024 which the team refers to as its 'international quality plan' in this report.
35. The assessment team sought further evidence from BCNO on several occasions and which it received on 24 September 2024, 1 October, 9 October and 18 October. The assessment team also requested and received further evidence from BCNO during its assessment visit.
36. The assessment team undertook an assessment visit to BCNO's London campus on 14-15 November 2024, where it met with:
  - a range of students studying on all levels and years, including students from the Denmark campuses
  - academic staff, both permanent and sessional/visiting
  - administrative and support staff
  - management staff, including the chief executive, the principal, and representatives from the board of trustees.
37. During the assessment visit, the team assessed the teaching and learning resources at BCNO's London campus and observed teaching on the Masters in Osteopathy course, specifically a Year 3 class on 'Osteopathic Technique'. It had access to, and assessed, the virtual learning environment (VLE) from 8 November 2024.
38. The team also received videos of BCNO's campuses in Kent, Denmark and Armenia on 31 October 2024 informing the team of the resources available, although a video tour of the Singapore campus was not provided.
39. The assessment team used this evidence to provide advice on whether BCNO complies with the requirements set out in initial condition B7. Condition B7 requires that BCNO has credible plans that would enable it, if registered, to comply with conditions of registration B1, B2 and B4, and requires it to have the capacity and resources to deliver these plans.

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<sup>4</sup> See Regulatory advice 3: Registration of English higher education providers with the OfS - Office for Students.

## Initial condition B8: Standards

40. BCNO submitted information relevant to the academic standards of the courses it intends to provide, if registered, including course documentation, programme specifications and module outlines.<sup>5</sup>
41. BCNO submitted evidence of student achievement in assessed work and associated records of this achievement for courses it currently offers and that it intends to continue to provide following its application for a change of registration category. (See also Annex A for the approach to sampling.)
42. The 'sector-recognised standards' are set out in a document published by the OfS.<sup>6</sup> These set out the standards that all registered providers are required to meet and were used by the assessment team for its assessment.
43. The standards the OfS has identified as applicable are:
  - A.1: Qualifications at each level
  - A.2: Volumes of credit
  - A.3: Qualification descriptors, specifically:
    - A.3.1 Descriptor for a qualification at Level 4
    - A.3.2 Descriptor for a qualification at Level 5
    - A.3.3 Descriptor for a qualification at Level 6
    - A.3.4 Descriptor for a qualification at Level 7
  - B: Classification descriptors for Level 6 bachelors' degrees.
44. The assessment team considered the evidence available to provide advice on whether BCNO complies with the following requirements set out in condition of registration B8: that BCNO demonstrates, in a credible manner, that any standards to be set and/or applied in respect of any relevant awards granted to students who complete a higher education course provided by, or on behalf of, BCNO, if registered, whether or not BCNO is the awarding body, appropriately reflect any applicable sector-recognised standards.

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<sup>5</sup> See Annex I of Regulatory advice 3: Registration of English higher education providers with the OfS - Office for Students.

<sup>6</sup> See the sector-recognised standards, OfS.

## Part 1: Assessment of condition B7: Quality

45. This section sets out advice on whether BCNO has credible plans that would enable it, if registered, to comply with conditions B1, B2 and B4 from the date of registration.

### Condition B1: Academic experience

#### Criterion B1.2

**Does BCNO have credible plans to ensure that the students registered on each higher education course receive a high quality academic experience?**

46. The assessment team considered BCNO's plans to ensure that students registered on each higher education course will receive a high quality academic experience. In doing so, the assessment team first considered the factors set out below at B1.3 alongside any other information relevant to ensuring a high quality academic experience.

#### Criterion B1.3.a

**Does BCNO have credible plans to ensure that each higher education course is up to date?**

#### Advice to the OfS

47. The assessors' overall view is that BCNO has credible plans to ensure that each higher education course it offers in partnership with an awarding body is up to date. The courses offered by BCNO in partnership with an awarding body are up to date as they cover the latest thinking and practice in osteopathic medicine. These courses are appropriately informed by professional development and adopt recent professional standards for education and training as covered in the Guidance for Osteopathic Pre-registration Education.
48. BCNO informed the assessment team towards the end of the assessment visit that it would certify its own Level 7 Diploma in Osteopathy (International) course. A second 'international quality plan' and supporting evidence had been requested and was submitted to the assessment team on 8 November 2024. The international quality plan outlined the Level 7 Diploma in Osteopathy (International) course that BCNO intends to provide from 2026. As evidence of how the course is up to date, BCNO provided a copy of the World Health Organisation (WHO) and GOsC standards to which the course is aligned. A programme handbook and BCNO's academic regulations were also provided as evidence to show how this course is up to date. The assessors agreed that these documents were up to date but noted that, in contrast to BCNO's other courses, there were no plans within the second international quality plan for how its own Level 7 Diploma will be developed and implemented to remain up to date. The assessment team noted that BCNO's own Level 7 Diploma in Osteopathy was added to the scope of assessment very late in the assessment process, and as such the assessment team was concerned that the limited documentation submitted was

not sufficient to evidence the provider's plans to ensure this particular course remains up to date. However, the assessment team has given weight to the strength of evidence available for other courses, which did have adequate measures to ensure courses were kept up to date. Therefore, overall, the assessment team was satisfied that, in their view, the provider has credible plans for ensuring courses are up to date.

## Reasoning

49. The assessment team found good mapping of the Graduate Outcomes and Standards for Education and Training set by GOsC to all learning outcomes for courses that BCNO offers in partnership with an awarding body, based on a representative sample of programme specifications provided in line with the sampling approach set out in Annex A. It is clear from the programme specifications that through achievement of the learning outcomes, successful students will achieve the 'Recognised Qualification' through the Osteopathic Practice Standards (set by the GOsC) and will receive registration status to allow them to practise as an osteopath. The modules for courses that BCNO offers in partnership with an awarding body are clearly mapped to the most recent GOsC educational requirements. This evidences how GOsC's learning outcomes are mapped into BCNO learning outcomes and align with up to date professional standards. This is then further reflected in the content and delivery of teaching, topics and material provided in modules and across BCNO courses.
50. The assessment team considered whether BCNO's courses are appropriately informed by recent subject matter developments. It assessed a representative sample of programme specifications, GOsC Annual Reports, and BCNO Approval Report. The assessment team found that the courses BCNO offers in partnership with awarding bodies are appropriately informed by recent industrial and professional developments and the evidence reviewed showed BCNO offers coherent osteopathic courses, delivering a variety of pathways of professional outcomes for students.
51. The assessment team considered whether BCNO's courses are appropriately informed by recent industry and professional developments. It took account of GOsC Graduate Outcomes and Standards for Education and Training in the UK and assessed the GOsC's Osteopathic Education Institution Annual Report of BCNO 2021-22 and GOsC Education Quality Assurance Renewal of Recognised Qualification Report of BCNO. The assessment team found BCNO's provision is up to date and aligned to educate students to meet UK industry and professional standards. The assessment team also found BCNO curriculum was up to date and reflective of the skills, knowledge base, attitudes and values set out in the Guidance for Pre-registration Osteopathic Education. The osteopathic elements of BCNOs courses have been developed and are taught by BCNO educators who are registered with the GOsC (or another UK statutory health care regulator) providing students with up-to-date practice developments and teaching techniques.
52. The assessment team considered whether BCNO's courses are appropriately informed by recent developments in teaching and learning, including learning resources. It assessed programme specifications, module guides and external examiner reports for professional subjects. It found that the course and module reading lists provided to the assessment team contain references to up-to-date academic theory and professional research. However, the assessment team found variability of up-to-date reading lists cited across module guides, with some having less up-to-date published reference lists (journal articles, web articles and

textbooks). For example, the most recent citation on the reading list for Osteopathic Visceral Techniques (MSc for Diplomate) was published in 2019. While the assessment team acknowledges that key concepts to the discipline can precede the last five years, it would be anticipated that recent research (for example, focusing on visceral manipulation within the field of osteopathic medicine) would also include key sources from journals such as the *Journal of the American Osteopathic Association* and *Journal of Osteopathic Medicine*, which provide up-to-date and cutting edge research in the field. Further module guides broadly cited whole databases as a module resource without linking specific up-to-date resources to the module content. Other module guides have no indicative reading list, suggesting resources are located elsewhere on MS Teams and the VLE. Therefore, an inconsistent approach to maintaining up-to-date materials was identified.

53. There were a few anomalies that the assessment team also found difficult to resolve: for example, the psychology module (integrated Master of Osteopathy course, Level 6) contained a mixture of relevant and outdated materials which did not appear to be directly relevant to the learning outcomes. For example, Freudian case studies from 1915 are part of the recommended reading list and core support for the module and, while interesting, are not directly relevant to the assessment or learning outcomes. Overall, the assessment team agreed that course content and reading lists contain and cover a range of current views and contemporary subject matter on recent developments in osteopathy, with up-to-date references. The depth of resources and citations of up-to-date reading list for students varies across individual module guides. However, the assessment team understood that reading lists were not definitive as to all the resources provided or referenced for each course, which also included resources located on the VLE, for example, in weighting the evidence in relation to this condition.
54. BCNO's programme specifications state that the subject benchmark statements are 'utilised to develop the framework for the course'. The assessment team reviewed the programme specifications for the international and English programmes which clearly referred to osteopathy subject benchmark statements from 2019. The assessment team queried with BCNO if the 2024 updates to the relevant subject benchmark statement have been considered within their courses. BCNO subsequently submitted the updated 2024 benchmark to the assessment team for review. The BCNO Approval Report illustrates changes that have been made as part of the up-to-date, professional standards for education and training requirement as covered in the Guidance for Osteopathic Pre-registration Education, and the assessment team can confirm this aspect of BCNO courses remains up to date.
55. The curriculum of courses offered by BCNO outside of England use the WHO Benchmark Training in Osteopathy. These benchmarks provide industry standard guidance and levels for training osteopathic practitioners. The benchmarks serve as an external reference point for national authorities to use when creating training systems, examinations and licences that support the safe, qualified practice of osteopathy. One of BCNO's awarding partners approves some of the courses that BCNO delivers overseas, to ensure they are up to date. The assessment team has understood this approval to include consideration of currency of the structure, learning outcomes, assessment, content and teaching of the BSc in Osteopathy for Diplomates, the MSc in Osteopathy for Diplomates, the PGCert in Nutrition and the PGCert in Osteopathic Sports Care.

56. The assessment team considered whether the programmes that BCNO offers, or plans to offer overseas, are up to date. It assessed the programme approval report for the BSc (Hons) and MSc Osteopathy for Diplomates course from the relevant awarding partner, and the Programme Handbook for the current Level 7 Diploma and found topics and module content is appropriately informed by two up-to-date, key international standards for osteopathy: the Comité Européen de Normalisation (CEN) Standard and the WHO Benchmarks for Training in Osteopathy. During the site visit, international teaching staff at BCNO and its senior managers informed the assessment team they work closely with local stakeholders and territory regulators to represent current thinking and practice.
57. BCNO stated that it also considers professional standards local to the international courses provided: for example, it told the assessment team that it considers Austrian standards in its courses in Vienna. BCNO's international quality plan indicates that the Osteopathic European Academic Network (OsEAN) provides a certification scheme to evaluate if osteopathic education providers meet the 'Standard for the Management of Osteopathic Educational Providers' (ISO/IEC170651) for its courses. BCNO's international quality plan outlined the nature of OsEAN's certification and audit process but the assessment team was unable to substantiate that BCNO uses the OsEAN scheme and did not review its certification and membership number.
58. BCNO's international quality plan outlined its intention to certify its Level 7 Diploma in Osteopathy (International) from 2026. There is no external awarding body for the BCNO Diploma in Osteopathy (International) – which is replacing the Diploma awarded by Crossfields Institute – and this programme was not considered as part of the GOsC's Osteopathic Educational Institution Annual Report or its Education Quality Assurance Report. The Diploma programme handbook 2024-25 was reviewed by the assessment team and has a clear and appropriate level of course learning outcomes across the 23 modules, of which the content is current and reflective of the topics of study necessary for the profession. The Level 7 Diploma in Osteopathy programme handbook learning outcomes refer directly to the WHO and CEN standards and shows the course is up to date and reflective of the osteopathy standards. However, the Diploma programme handbook has a section called 'external bodies involved with the programme' where a range of organisations are described – including GOsC, the OfS, the Quality Assurance Agency, and both of BCNO's awarding partners. This could be misleading because these organisations have no role or relationship with the course.
59. The assessment team reviewed clear plans of how BCNO's England courses are regularly reviewed by multiple organisations to ensure they remain up to date. BCNO's awarding partners for its English provision undertake periodic reviews to ensure that the degrees they award through BCNO are valid and up to date. The documents reviewed by the assessment team show a high level of scrutiny from awarding partners to BCNO courses and show robust assessment of conditions (when necessary) for BCNO to respond and evidence that the courses are up to date. The team saw evidence that Buckinghamshire New University, in its role as one of BCNO's awarding partners, undertakes further internal monitoring through a self-assessment exercise. BCNO submitted a self-assessment of evidence to show how it meets OfS conditions to the awarding partner. The awarding partner considers the self-assessment evidence submitted by BCNO via the partner monitoring reports and provide a judgement as to what category it internally awards (gold, silver or bronze). This internal rating system by one of BCNO's awarding partners ranks the quality of evidence provided against OfS conditions. The assessment team reviewed the partner monitoring reports and outcome

ranking for condition B1 (BCNO's self-audit). BCNO was awarded a silver category. This indicates BCNO's awarding partner is satisfied that the courses delivered are up to date. External examiners consistently report that programmes are up to date with respect of subject, research, industry standards, professional standards and developments in learning and teaching.

60. During the assessment visit, faculty members described the approaches BCNO takes to ensure that course content is up to date, over and above the requirements of GOsC and the awarding partners, and to ensure that the provider has the resources and capacity to deliver its plans in practice through the development of its teaching staff. This included assessing the content and quality of teaching and learning material through teaching observations, and sharing examples of good practice with other educators.
61. During the visit, staff coherently discussed the formal induction processes for new staff and felt supported in accordance with BCNO's learning and development policy. One of BCNO's awarding partners also monitors staff allocations. BCNO holds staff development days to ensure it keeps faculty members up to date on learning and teaching developments. It uses staff development days to promote current trends, thinking and innovations related to the osteopathy profession, which helps to ensure that pedagogic practice remains up to date. BCNO plans to offer a PGCert in Osteopathic Education, validated by one of its awarding partners. The programme aims to enhance osteopathic educational delivery and support educators in staying up to date with developments in teaching theory and practice. The programme specification refers to several subject benchmark statements to illustrate its credibility and currency, and the documentation describes a range of appropriate modules and assessments. The assessment team reviewed this and believes it will support staff to develop pedagogical principles and application to support the up-to-date delivery of the courses.
62. BCNO's senior management team is responsible for ensuring all courses under development, and those that are delivered, are kept up to date. During the visit, the senior management team explained its remit in managing quality, ensuring goals are met, and monitoring progress. The evidence the assessment team reviewed in the quality plans showed clear processes of how the senior management team distributes actions to the relevant staff members and/or committees (e.g. programme committees; board of studies; board of trustees; academic quality and planning; academic board; student welfare) and tracking the completion of actions to ensure the courses remain up to date. For its validated international courses, BCNO can propose changes to module content and material if it saw a need to tailor its provision and keep it up to date. During the assessment visit, a representative from one of BCNO's awarding partners expressed confidence in BCNO's plans to develop and deliver future, up-to-date, learning experiences for prospective students. The assessment team observed how the senior management team manages the recommendations and outcomes from quality assurance reviews – such as Osteopathic Educational Institution Annual Report and the GOsC Education Quality Assurance Report – and are satisfied the courses remain up to date.
63. The assessment team's overall judgement is that BCNO has demonstrated compliance with B1.3.a. The evidence satisfies the team that there are clear processes for course design, approval and monitoring. Processes are in place to regularly review and update theory and practice in line with regulatory and quality assurances which can be seen from annual review

action plans. From what the assessment team reviewed, BCNO ensures it continually aligns with up-to-date operational and academic standards.

## **Criterion B1.3.b**

**Does BCNO have credible plans to ensure that each higher education course provides educational challenge?**

### **Advice to the OfS**

64. The assessment team's advice is that, overall, BCNO has credible plans to ensure that each higher education course provides educational challenge. The curricula challenge students intellectually, offering advanced content that builds upon prior foundational concepts while encouraging problem solving and critical thinking. The integration of clinical experience alongside theory and regular assessment points promotes educational challenge for students.
65. However, during the assessment visit, students on BCNO's England courses raised concerns about a reduction in face-to-face contact hours, limited academic challenge in the delivery of some theory modules and lack of challenge in some theory-based formative assessments. Students blamed the new courses introduced following the merger of BCOM and ESO. The assessment team sought additional evidence to identify the nature of these students' complaints and if and how BCNO had or intended to address them. There remains a concern that online delivery of some of BCNO's courses (particularly theory modules) do not provide sufficient rigour and difficulty for students as they progress from Levels 4 to 7 on the courses. It is noted that BCNO had acknowledged these concerns to students, and had taken steps to implement positive change in response. In the assessment team's view, the residual impact of these student concerns was limited because of the provider's improvement work and so did not change the team's view that, on balance, the provider has credible plans for ensuring courses provide educational challenge.

### **Reasoning**

66. The assessment team considered BCNO's plans to ensure that all courses provide educational challenge. BCNO supplied an extensive range of evidence in its two quality plans which the assessment team considered. The assessment team reviewed a representative sample (in line with the approach included at Annex A) of programme and module handbooks at Levels 4, 5, 6 and 7 alongside formative and summative assessments of students' work. It also considered a sample of external examiner reports. The assessment team found sufficient educational challenge in the clinical and practical teaching of the BCNO courses that it sampled. These sessions are delivered face-to-face by appropriately qualified and experienced BCNO staff, including experienced osteopaths who continue to practise clinically. During the visit, the assessors observed for instance a Level 6 'Osteopathic Techniques' practical teaching session, which in their view provided appropriate educational challenge. Students were engaged and challenged throughout the observed practical skills sessions. During the visit, students also confirmed good academic challenge and stretch in the practice modules provided across each year.



67. The assessment team found that detailed programme learning outcomes show achievement and challenge across levels of understanding, intellectual skills, professional and practical skills and transferrable skills. All modules across each level have appropriate learning outcomes and appropriate academic challenge through the assessment methods. The assessment team reviewed a selection of example marking criteria for Level 7 coursework. The criteria were in different formats for different courses, and some were limited in the detail provided, potentially leading to misinterpretation of the student's level of achievement. The assessment team noted a limited amount of criticality and challenge across a small sample of modules at the 50 per cent pass level within this Level 7 sample. However, the assessment team acknowledges that other mark schemes emphasised a clear difference between Level 6 and Level 7 work to markers, providing evidence to the team that BCNO appropriately addresses this concern elsewhere for some of its courses.
68. While BCNO's awarding partners regulate learning outcomes across many of BCNO's courses, the assessment team found that use of sector-recognised standards could be more explicit. The predominant terminology applied across some modules, and specifically with reference to Functional Nutrition (Level 5 module), could be more explicitly aligned with descriptors for higher education qualifications at Level 5. In this example, the module's assessed learning outcomes align more closely to Level 4 descriptors ('understand, describe and explain') with only one assessed learning outcome (LO3) appropriately reflective of educational challenge at Level 5. This suggests limited stretch and difficulty for students as they progress from Level 4 to 5 in this subject area. Students undertaking BCNO's England courses also raised concerns to the assessment team about the limited academic challenge provided in the content and teaching delivery of a Level 5 Functional Nutrition module. The assessment team triangulated online content and lecture delivery for this module and found good interaction with students but limited academic challenge within the session aligned to Level 5 standards. Key principles and foundational knowledge of macro and micronutrients and the EatWell guide were discussed well but there was limited stretch and application of these principles applied to appropriate case studies and interrogation of empirical evidence (expected at a Level 5 standard). The triangulation of evidence reviewed by the assessment team demonstrates some areas of BCNO's England courses do not provide sufficient academic challenge within taught theory modules.
69. National Student Survey (NSS) results for 2022-23 and 2023-24 reviewed by the assessment team show a decline in the students' educational experience. During the visit, students told the assessment team that the amount of educational challenge had reduced. For example, a reduction in face-to-face teaching had made interactions in class less challenging and they gave an example of a formative exam repeated as a summative exam. The assessment team sought additional evidence to explore these concerns and if and how BCNO had addressed them. All BCNO student year groups (except one) told the assessment team that their course provided limited educational challenge as they progressed from Level 4 to 6. The assessment team reviewed one formal complaint from year three students about the limited stretch, quality and academic challenge of the course, and requested information about the steps BCNO planned to take to address the matter in the form of its response to the students. In a letter to students dated 26 October 2024, BCNO acknowledged that students raised concerns about academic quality and lack of educational challenge across the first two years of their BSc study and proposed an immediate review by the academic department regarding online learning resources, clinic tutor communication and assessment preparation. However, during

the assessment visit in mid-November 2024, its students continued to raise ongoing concerns around the lack of educational difficulty and challenge the programme provided. Students had not identified any significant change in the course or improvement of academic challenge in taught, online sessions following the formal complaint and BCNO's acknowledgement and action plan for change. However, the assessment team notes the short time frame (less than one month) between the provider's letter to students and the assessment visit, which would have a limiting effect on the amount of change visible to students. Therefore, on balance, in the assessment team's view, the provider had credible plans to ensure educational challenge in the higher education courses offered.

## **Criterion B1.3.c**

**Does BCNO have credible plans to ensure that each higher education course is coherent?**

### **Advice to the OfS**

70. BCNO has credible plans to ensure that each higher education course is coherent as it has clearly structured curricula with well-defined learning outcomes. There is a logical order and progression of knowledge and skills development with both practical and practice-based components taught in an appropriate order. Module choices also allow students to construct a coherent clinical pathway.
71. Although the documentation provided in relation to the Level 7 Diploma in Osteopathy (International) was more limited, the assessors were still able to identify evidence of course coherence within the programme handbook.

### **Reasoning**

72. The assessment team reviewed BCNO's plans to offer coherent programmes aligned to osteopathic education through consideration of a representative sample of course documents. BCNO aims for its programmes to provide osteopathic qualifications to different groups of students and to provide access to these qualifications through a range of pathways. Evidence reviewed by the assessment team confirms BCNO provides an appropriate level of breadth and depth for the courses and takes account of the educational standards outlined by GOsC. The assessment team also viewed examples of periodic reviews undertaken by GOsC of the courses to ensure that its professional and educational expectations are met in relation to the courses delivered in England. BCNO programmes included in the courses sampled also meet the requirements of its awarding partners which quality assures a coherent journey for the student. The assessment team reviewed final conditions documentation for the BSc Osteopathy and MSc Osteopathy for Diplomates which showed clear scrutiny from awarding partners of the coherence of programmes and how BCNO satisfied conditions required.
73. BCNO provides students with an appropriate level of information about their course in a programme handbook which are consistent with programme specifications, and other documentation provided to students. Programmes have internal coherence in that the range of modules align with the programme outcomes. This is evidenced by extensive mapping of module learning outcomes to programme learning outcomes, as outlined at paragraph 49

74. BCNO programmes teach relevant skills and subject matter in an appropriate order that build upon each other throughout the levels. For example, the Bachelor of Science course introduces foundational concepts (anatomy, biomechanics, nutrition and osteopathic techniques) at the appropriate level and concepts progress as the students move through the course. One of the Masters in Osteopathy courses provides elective modules at Levels 6 and 7 to allow students to develop their areas of practice further. This also appropriately introduces, consolidates and provides advance leadership skills and entrepreneurial opportunities which are beneficial to the profession.
75. Students that met with the assessment team raised concerns about their ability to safely practise on specific patient groups (particularly children) when they graduate due to limited opportunities to practise osteopathy with children in clinics. The Student Survey action plan 2023-24 included an action to 'monitor patients characteristics in clinic' and the joint board of studies further noted students' desire to see more patients. BCNO staff provided evidence at the visit of how they monitor the range and number of patients that students see during their time on clinical placement and how they track the number of hours students spend in different clinical areas. BCNO specifically monitors the number of patient cases related to lumbar/pelvic, cervical, thoracic, head, child, maternity, and post-natal presentations using a red-amber-green system. During the visit, BCNO confirmed that it did not require students to see a set number of conditions and patient presentations, and this met the requirements of GoSC. Student assessment portfolios did not require students to see a specific number of patients, but portfolios did require a single sign-off for a list of competencies demonstrated and BCNO supports students to achieve this. BCNO provides students with a breakdown of the range of patients seen in a year. Practice team and clinic tutors support students should they need to increase their practice hours to meet the requirement. While acknowledging the concerns raised by students, the assessment team's view was that there was sufficient evidence of a coherent tracking system to ensure the provider monitors and supports students accordingly in practice and clinical settings.
76. Towards the end of the assessment process, BCNO disclosed to the assessment team its plan to deliver its own Level 7 Diploma in Osteopathy (International) course in 2026 once its partnership with Crossfields Institute ceases. BCNO's quality plan submitted as part of its application did not mention this programme because BCNO believed it to be out of scope of the assessment. The team received an additional quality plan on the 8 November 2024 with supporting evidence to cover all BCNO's provision internationally and how it believes it complies, or will comply, with conditions B1, B2 and B4 from the date of registration. This second international quality plan and supporting evidence provided an outline of the Level 7 Diploma in Osteopathy (International) course that BCNO intends to provide from 2026 through a programme handbook and BCNO's academic regulations. Although the provider did not supply the assessment team with detailed plans for the design, development and implementation of the Level 7 Diploma, the assessment team considered that evidence from BCNO's current delivery of the taught Level 7 Diploma (validated by Crossfields Institute) shows coherence of a well-structured curricula with well-defined learning outcomes and further supports the credibility of its plans to continue to do so from 2026.

## Criterion B1.3.d

**Does BCNO have credible plans to ensure that each higher education course is effectively delivered?**

### Advice to the OfS

77. The assessment team's view is that there are elements of courses delivered in England where BCNO does not have credible plans to ensure that each higher education course is effectively delivered. There is evidence that the delivery of BCNO's programmes in England, particularly where the provider uses online delivery methods, is not effective. The assessment team found evidence of consistent communication problems between BCNO and students, and gave particular weight to concerns that indicated that the use of different delivery methods may not have been clearly understood by students and was impeding the effective delivery of these courses. There were also concerns raised about the clarity of course content with certain topics, such as naturopathy, supposedly part of a masters' course, but not explicitly referenced in any of the supporting materials provided. Taken together, issues with communication about course delivery, as well as concerns around how certain aspects of courses were in actuality delivered, meant that the assessment team was not satisfied that plans for effective delivery were sufficient.
78. BCNO has credible plans to effectively deliver its international courses and some aspects of its England courses. BCNO's courses have a range of learning activities that provide an appropriate balance between delivery methods as the modules involve lectures, seminars, osteopathic techniques, and clinical placements. All courses also have an appropriate balance of directed and independent study, although the assessment team noted some examples where this did not appear to have been clearly communicated to students.

### Reasoning

79. The assessment team reviewed a range of evidence submitted to accompany BCNO's quality plans. BCNO effectively implements its teaching, learning and assessment strategies and module records to deliver the theoretical, practical and clinical elements of its programmes. The framework for effective delivery at a local level is outlined in module guides which awarding partners approve. External examiners also consider whether BCNO effectively delivers courses but focus primarily on the effective delivery of assessments.
80. The assessment team reviewed staff CVs and found that BCNO has appropriately qualified staff with the relevant knowledge and experience to effectively deliver the current courses. All clinical staff who teach on BCNO courses are current GOsC registered osteopaths. BCNO has 255 members of staff, comprising 241 part-time and 14 full-time staff. Within this, there are 129 academic staff, of whom 127 are part-time and two are full-time. The faculty to student ratio is 1:1.8, in part due to the large number of part-time staff members. Many educators/faculty members at BCNO have substantive clinical roles elsewhere and BCNO employs them part-time. Senior leaders, students and faculty told the assessment team that this model of staffing enables BCNO to teach skills more effectively because it enables staff to draw on clinical cases to enhance theory education and provide career advice.

81. One of BCNO's awarding partners reviews staff appointments and the allocation of staff to ensure that faculty are appropriately allocated to teach theory or clinical skills modules. Newly appointed teaching staff that met with the assessment team appreciated the BCNO induction programme and the support offered by programme leads and heads of academic studies to monitor and support the quality of their teaching. This induction, supported by the learning and development policy, enables the more senior team to support newer members of staff to teach effectively. BCNO conducts teaching observations and routine student evaluations of teaching sessions to further support new members of staff. Module leaders also reflect on the effective delivery of teaching and assessment as part of the annual cycle of module evaluations and monitoring processes.
82. Research is a core aspect of all programmes delivered by BCNO, which has a dedicated research lead who is responsible for ensuring that research is effectively undertaken. BCNO staff support students to undertake independent research projects, and the assessment team saw a range of research equipment at the London campus. The team reviewed a sample of student dissertations which showed often novel and well formulated research ideas, indicating that BCNO effectively teaches research skills and concepts.
83. During the visit, students described to the assessment team high quality face-to-face teaching events, with clinical teaching sessions being particularly strong. Students were complimentary of staff, citing staff availability, helpfulness and insight, and ability to deliver effective education sessions in a clinical environment. BCNO regularly sought student feedback on specific teaching events. The assessment team observed a teaching session during the visit and found the teaching to be of high quality with good interaction and engagement from students. Students who met with the assessment team during the visit told them that they thought that they would benefit from more face-to-face teaching and valued the sessions delivered in person and on campus. Programme leads monitor online teaching, joining sessions at the end to speak to students about delivery. The assessment team viewed a sample of online learning and teaching events provided by BCNO which showed a variety of teaching techniques to engage students during classes, including the use of polls, quizzes and recap discussions.
84. BCNO provided further examples of how it enriches students' educational experiences. It supplies students with additional learning resources including workbooks, a reflective portfolio across all years of study, and off-site prosection (a prepared dissection of a cadaver or body part that is used to teach students about anatomy) at a local hospital. It advertises further opportunities for additional learning to students in the BCNO student newsletter. However, some of these opportunities incur an additional financial cost to students: for example, the kinesiology rock tape course (50 per cent cost reduction by BCNO) and Level 2 advanced needling and electrotherapy. These wider opportunities provide additional support and educational challenge for students who may wish to pursue a particular pathway, for example in sports performance. These advanced techniques and training opportunities would be of benefit to students when qualified.
85. BCNO provided a sample of student timetables to highlight the range of activities students engage in and their duration. The timetable indicated that BCNO staff primarily offered taught theory sessions online (synchronous and asynchronous), rather than face to face. Students that met with the assessment team thought that they were receiving less face-to-face contact than previous cohorts had received and expressed concerns about perceived reductions in

teaching in subjects like anatomy. BCNO students on the England courses told the assessment team that they were led to believe that BCNO would deliver Business Planning lectures face-to-face or online, but received lectures recorded two years ago, with only two lectures across the module taught in person. Students also noted some concerns about how BCNO manages cancelled sessions, telling the assessment team that BCNO had cancelled Pathology and Physiology lectures but did not inform students why. Students had concerns that they were missing educational content that BCNO had led them to expect.

86. BCNO advised the assessment team that in early 2024 they received feedback from students about the quality of education with specific references made to the low quality of delivery of online lecture content (synchronous and asynchronous). BCNO's senior management team met with students to discuss students' concerns, and the minutes record several actions including additional staff training, the sharing of good examples of online teaching sessions, and the hiring of an external company to support the creation of online materials.
87. At the assessment visit, BCNO students told the assessment team about their concerns associated with the breakdown of the 200 learning hours per 20 credit modules. Students reported that online teaching staff repeatedly outline an expectation that 20 per cent of their learning hours comprises online lectures and the remaining 80 per cent is independent learning. Student timetables show that face-to face delivery and contact time is in line with published module handbooks and sector norms. Module handbooks provide a clear breakdown of contact hours which aligns with typical learning hours based on credit norms. However, module handbooks, which outline hours per teaching activity, do not explicitly refer to the 20 per cent versus 80 per cent split in delivery modes that students discussed, which may have caused confusion for students. BCNO's module handbooks and its teaching staff are thus inconsistent in their communication to students regarding face-to-face contact which might drive students' concerns about the effective delivery of courses.
88. The assessment team had concerns with how BCNO staff communicate changes of course content, teaching delivery and wider coherence of the programme to students. Evidence reviewed by the team demonstrate BCNO is not effective in how it communicates the delivery of its courses to its students. One external examiner also noted issues with the communication of information to support their assessments and attendance at boards. Students raised concerns with the assessment team about the coherence of specific aspects of their courses and how some BCNO teaching staff appear to have limited knowledge about the course when students ask questions, with students inferring that this may be because many staff are part time and only teach the online sessions without wider engagement in course planning and college life.
89. Students told the assessment team that BCNO's communication with students was at times poor and, while students recognised efforts to improve communication through a newsletter and other means, the team considered these efforts ineffective. The minutes from the Student Engagement Group on 26 February 2024 note the poor communication between various parts of the organisation and used words such as 'confusing', 'unprofessional' and 'erroneous'. Student representatives and the Student Experience Group raised further concerns about the communication of registry, which minutes from a Student Engagement Group meeting describe as confusing, the tone obnoxious, unprofessional, difficult to make sense of and containing errors. Although communication issues specifically relating to the style of communication did not, in and of themselves, directly affect the delivery of courses,

the assessment team noted that significant communication issues, taken together with the concerns raised about course clarity raised below, could constitute a significant issue with effective course delivery.

90. During the visit, the assessment team heard that students have concerns with how BCNO staff communicate programme changes. Second and third year students in England had raised concerns to the BCNO senior management team about changes to the course they had enrolled on. Some students cited the opportunity to study naturopathy as one of the main drivers for choosing to study at BCNO but told the assessment team that BCNO had removed it from the course. The principal responded to queries from the assessment team about such claims and confirmed that BCNO continued to teach naturopathy in the Master of Osteopathy course and that students were incorrect in their assumptions because BCNO had repurposed the topic within other modules. However, it was difficult for the assessment team to verify this from specific module learning outcomes, assessments and programme documentation provided – as there was no explicit wording of naturopathy located in these documents. The issue suggests that students lacked awareness of where naturopathic content is now taught and repurposed within modules. The assessment team again noted a lack of clear communication from BCNO staff to students to clearly document where changes have occurred to courses and to identify to students where naturopathy is now taught across their courses. The lack of clarity expressed by students about whether or not naturopathy content had been included in their modules indicated that this aspect of the course had not been effectively delivered.

## Criterion B1.3.e

**Does BCNO have credible plans to ensure that each higher education course, as appropriate to the subject matter of the course, requires students to develop relevant skills?**

### Advice to the OfS

91. BCNO has credible plans to ensure that each higher education course, as appropriate to the subject matter of the course, requires students to develop relevant skills. BCNO demonstrates a clear integration of skills development across all courses. There is a clear framework where each course integrates relevant skills and these include clinical competencies alongside discipline-specific, transferable skills (e.g., communication, critical thinking) which all align with intended learning outcomes. Curriculum design embeds the development of relevant skills in the courses, with appropriate assessment methods to measure students' progress in acquiring these skills.
92. BCNO offers skills-based courses orientated towards the osteopathy profession, for students both in England and internationally. Records and evidence of courses delivered by BCNO in England with its awarding partners show that the courses require students to develop relevant skills for osteopathic practice, as verified by GOsC accreditation.

## Reasoning

93. All programmes offered by BCNO are professionally orientated and support students to develop relevant skills valued by the osteopathic profession. As outlined at paragraph 51, the skills are aligned to the criteria set out by a range of professional bodies. In England, programmes focus on the development of relevant skills to enable graduates to meet the standard for registration as an osteopath by GOSC. BCNO's awarding partners and the GOSC review BCNO's programmes to ensure that BCNO's courses provide relevant skills to students. Diploma in Osteopathy (International) documentation suggests that diploma students are taught similar skills.
94. The learning outcomes reviewed by the assessment team reflect relevant skills as defined by the OfS. All courses provide academic skills such as critical thinking, research skills, problem-solving, writing and analysis, which are essential for succeeding in higher education and which are mapped to the subject matter and at the appropriate level of the higher education courses. BCNO also designs the development of professional skills – including communication, teamwork and leadership – into the courses which, in the assessment team's view, are relevant skills necessary to support students to meet the standard of registration as an osteopath.
95. The programme specifications, module outlines and assessment briefings illustrate a range of assessment approaches and opportunities for students to demonstrate the achievement of specific skills. Several modules focus on teaching skills, including Osteopathic Visceral Techniques and Professional Skills and Identity. BCNO has a variety of assessment approaches, many of which are appropriate for the course(s) and include Integrated Structured Clinical Examinations. The team reviewed robust clinical marksheets: for example, a marksheet for an applied osteopathic technique assessment which evaluated whether students had achieved a range of essential professional skills included 'knowledge of how to complete a skill', 'physical skills – technical', 'physical skills – practitioner and patient handling', and 'communication and professionalism'.
96. BCNO uses portfolios to monitor students' skills development in clinical practice. Staff at BCNO told the assessment team that they review student portfolios and provide additional sessions for any students they are concerned about. Staff also told the assessment team that monitoring students' portfolios was part of their standard clinical duties. A Clinical Tutor job description outlines the responsibility to 'ensure that students record their clinical findings, actions and other data in a coherent, comprehensive and accessible means using the relevant and acceptable notations' – suggesting that requiring students to use portfolios is required practice. The assessment team's judgement is that monitoring of portfolios in theory should support students to reflect, understand and develop the necessary professional skills required to qualify and register as an osteopath.
97. Teaching staff have relevant professional qualifications and professional expertise to teach and help students acquire relevant skills. The assessment team received sample materials demonstrating how students develop academic skills during their time at BCNO. The materials showed lecture skills related to literature searching, research methods and statistics quizzes, transferable skills sessions, and a range of academic skills sessions provided during student induction. As noted at paragraph 83, the assessment team observed a skills teaching session, which was effectively delivered.



## B1 conclusions

**Does BCNO have credible plans that would enable it, if registered, to comply with condition B1 from the date of registration?**

98. BCNO has multiple strengths identified in the assessment of condition B1. The majority of BCNO's provision complies with condition B1 and the assessment team concluded that BCNO broadly provides a high quality academic experience.
99. However, there are some aspects where BCNO does not consistently ensure that the students registered on each higher education course receive a high quality academic experience. Specifically, there are some areas of its courses that are not always effectively delivered, particularly in relation to online delivery methods and the clarity of course content delivery. The assessment team found examples of communication problems between BCNO and students, and a lack of clarity about the delivery of some aspects of the course content, that impeded the effective delivery of its courses in England and therefore considered that this criterion was not met.

## Condition B2: Resources, support, and student engagement

### Criterion B2.2.a

**Does BCNO have credible plans for how each cohort of students would receive resources which are sufficient for the purposes of ensuring:**

- i. a high quality academic experience for those students**
- ii. those students succeed in and beyond higher education?**

### Advice to the OfS

100. BCNO has credible plans for how each cohort of students would receive resources that are sufficient for the purposes of ensuring a high quality academic experience for those students and that those students succeed in and beyond higher education. BCNO's plans demonstrate appropriate physical and digital infrastructure, with up-to-date VLE support and resources to support students and their learning, and the provider has taken appropriate steps to resolve teething problems associated with the introduction of an updated VLE.
101. The assessment team found that, while there are fewer resources available to students at the BCNO international campuses, those that the assessment team sampled are adequate for delivering a high quality academic experience for its current students and are appropriate for the size of current student cohorts at each international campus.
102. However, the assessment team was concerned about an absence of hard copy books at the Armenian campus and no access to e-books for BCNO's Diploma students via BCNO's own VLE learning platform. BCNO's international quality plan states that BCNO provides libraries

to comply with this condition, but none were viewed by the assessment team via the virtual tour of the Armenia campus. The lack of hard copy resources and e-book access for the Level 7 Diploma at the Armenia campus demonstrates to the assessment team that resources are currently insufficient for a high quality academic experience. The assessment team understands that there are currently no Diploma students at this campus, and gave weight to this factor when considering the credibility of the provider's plans, which did include providing library facilities at each campus. The team therefore found that the plan was credible, but is not yet in place, which creates an obvious risk if the plan is not implemented before any future recruitment.

103. The assessment team did not receive or review evidence as to the facilities provided at the Singapore campus, as part of this assessment.

## Reasoning

104. The assessment team visited the London campus and observed that students have access to good physical learning spaces and resources. It has an excellent on-site osteopathy clinic with access to clinic teaching rooms, patients, a small multi-use library and computer suite, and a range of equipment to support research. BCNO also provides good student recreational spaces. A virtual tour of the Kent campus showed similar physical and digital resources for students. The small computer lab and desktop computers available on both campuses are dated and the assessment team observed a potential risk that older computers may have limited functionality and may not support all software applications needed for modern, taught courses on an ongoing basis. However, no evidence was identified during the visit that showed this to affect current students' academic experience.
105. For courses delivered overseas that are validated by one of BCNO's awarding partners, the partner undertakes a site audit of all new international campuses to quality assure that learning and digital infrastructures are of an appropriate level to deliver a high quality education. Reports reviewed by the assessment team of these audits show consideration of wheelchair access and teaching arrangements for each campus prior to approval by the UK partnership manager of the validating partner. The assessment team reviewed three of the international campuses' physical resources available to students via a virtual tour of BCNO's facilities in Armenia and Denmark. The assessment team found that the two Denmark campuses have appropriate learning and clinic spaces, with good student learning space sufficient for providing a high quality academic experience and for enabling students to succeed.
106. The video tour of the Armenia campus showed an insufficient study space given the future plans for student recruitment in Armenia that BCNO submitted to its awarding partner. The assessment team considered the space insufficient for the delivery of a high quality academic experience because there is no access to computers, library (e-books are not provided via BCNO's own VLE platform, although they will be available only to non-Diploma students via the awarding partner) and student recreational and learning space. Teaching spaces are small and limited for growth plans, accommodating approximately six to ten students in one teaching classroom with approximately six training couches. There are a further two small clinic rooms with one couch per room for practice clinics. BCNO told the assessment team, however, that the awarding partner had approved the campus for delivery based on its own virtual assessment of the premises.

107. BCNO's international quality plan states that BCNO complies with condition B2.2.a through the provision of a library and core texts they already provide for all campuses and courses. The Armenia campus virtual tour showed no library or computer room and a limited student learning space (consisting of two chairs and a small, two-person table) located in a corridor, meaning that BCNO's campus in Armenia does not currently provide the facilities that BCNO says it would provide in its quality plan. These limited campus facilities present insufficient provision of a high quality academic experience because the absence of digital infrastructure or adequate technological resources does not support modern teaching and learning methods required for higher education courses and might not enable students to succeed in their higher education studies. The limited learning space also prohibits or limits how students study or engage with their peers in an appropriate environment conducive to learning. The team noted that no students were currently enrolled in Armenia, and that the plans, once implemented, would be sufficient to satisfy condition B2.2.a. The team therefore assessed that, in relation to the Armenia campus, the provider did have credible plans to provide adequate resources, but there was a risk that these would not be implemented sufficiently before the first students arrived.
108. The multi-use library space at the London campus provides a good selection of artefacts and anatomical models that students can access. Students who met with the assessment team noted that they were happy with the library resources and spaces to study and told the assessment team how they valued the BCNO London librarian who supported access to the traditional learning materials (textbooks and anatomical structures). Minutes from the Student Experience Group and NSS quantitative feedback both indicate that students find that the library provides adequate resources to support BCNO's England courses. Module performance reports often considered the use of student resources and how to deploy additional resources; these appear sufficient. BCNO's previous NSS scores for learning resources (when formerly known as ESO) have increased significantly between 2022-23 and 2023-24.
109. Given that not all campuses currently have library facilities, the assessment team considered whether BCNO provides sufficient e-books or similar resources. BCNO's senior managers told the assessment team that it did not provide digital e-books for students because of prohibitive costs. However, BCNO's awarding partners, particularly the universities, offer extensive digital resources to support their students. During the visit, students across both the Kent and London campuses told the assessment team of difficulties accessing the VLE of one of BCNO's awarding partners which was a barrier to its utility. Online resources from BCNO's awarding partners are not available to BCNO's Level 7 Diploma in Osteopathy (International) students. Students registered on the Level 7 Diploma (all international students) can only access BCNO's limited online resources which does not include e-books. This is of concern if students recruited to BCNO's Diploma in future require digital access to e-books or similar resources to support their learning.
110. BCNO has recently launched a new VLE (October 2024). The VLE is designed to support student learning and provide instructor-directed learning experiences. The assessment team found that the VLE provides a wide range of documentation, such as assessment schedules, student handbooks, university regulations, and a range of learning resources: for example, BCNO provides a technique library page relevant to each year of study. Based on this evidence, the assessment team confirms that the new VLE supports a high quality academic experience and will help students to succeed.

111. Students have mixed views about BCNO's VLE, and some teaching staff also reverted to using other software with which they are more familiar to teach. BCNO is taking steps to improve the VLE's adoption and utility, and recognises the challenge of transitioning from one system to another for some students. It had provided additional training to ensure students maximised its potential. BCNO also monitors VLE use and gathers data on how students navigate the site and make use of the resource to inform how it updates online resources and to ensure students actively engage with material recommended for modules.
112. BCNO's VLE was designed to support students' educational achievement but, as noted above, it has experienced issues with its adoption. It routinely stores online lectures on the VLE along with additional learning materials. BCNO said that lectures from previous years are available in the archive and that staff routinely update lectures on an annual basis. Students told the assessment team that some of the materials on the VLE are dated. Issues related to out-of-date online videos were mentioned at the Student Engagement Group meeting. During the assessment team's meeting with BCNO's senior management team, the management team suggested that students had misunderstood the role of the archive and acknowledged that it needed to ensure students understood the purpose of the historical resources available on the VLE. The management team also highlighted that it requires – as a core expectation of the role – that lecturers update their online materials annually. The lecturer job description states 'Video technique lectures and upload video materials relevant to the specific lecture within a week of the session taking place', while the programme lead job description requires leads to 'Monitor, evaluate and review the delivery of academic services'. While there is a framework in place to update academic materials at appropriate intervals and for an academic leader to evaluate them, the testimony of students suggests it might not work effectively in practice.
113. The assessment team viewed online resources in conjunction with the planned teaching timetables provided and considered that teaching resources through BCNO's VLE and the awarding partner's VLE platform are sufficient to provide adequate learning and teaching resources and material. BCNO told the assessment team that it meets the regulatory requirements of GOsC and provides students with an appropriate amount of contact time, and time in clinical practice. BCNO maintains a good ratio of five practising students to one tutor (10:1 total teaching ratio) to ensure effective and efficient teaching and supervision. During the visit, students were enthusiastic about face-to-face and clinical teaching and learning opportunities provided by BCNO, and emphasised that they preferred more face-to-face and clinical time over online delivery.

## **Criterion B2.2.a**

**Does BCNO have credible plans for how each cohort of students would receive support which is sufficient for the purposes of ensuring:**

- i. a high quality academic experience for those students**
- ii. those students succeed in and beyond higher education?**

## Advice to the OfS

114. BCNO has credible plans for how each cohort of students would receive support which is sufficient for the purposes of ensuring a high quality academic experience for those students and that those students succeed in and beyond higher education. BCNO's plans demonstrate its commitment to providing sufficient and effective support for its students. It provides good careers support and additional professional enrichment opportunities. This illustrates BCNO's commitment to support students to succeed beyond higher education. Academic support is provided through personal academic tutors, and wider well-being services include mental health services and counselling to ensure students have the resources they need to manage personal challenges alongside their academic courses. BCNO's courses delivered outside of England do not have access to the same level of academic support through personal academic tutors but do receive this through their course coordinator and or student representative.

## Reasoning

115. BCNO provides all students (England and International courses) with a comprehensive student handbook and VLE. These provide a good level of information relating to access to resources and support for students. Examples include learning outcomes, course schedules, key personnel, and module and assessment details, as well as relevant academic processes and procedures, such as on academic misconduct, assignment submission, extenuating circumstances, and complaints and grievance.
116. The assessment team reviewed staff CVs and found that BCNO has appropriately qualified staff with the relevant knowledge and experience to provide a high quality academic experience for students. All clinical staff who teach on BCNO courses are current GOsC registered osteopaths. BCNO has 255 members of staff, comprising 241 part-time and 14 full-time staff. Within this, there are 129 academic staff, of whom 127 are part-time and two are full-time. The faculty to student ratio is 1:1.8 in part due to the large number of part-time staff members. Many educators/faculty members at BCNO have substantive clinical roles elsewhere and BCNO employs them part-time. Senior leaders, students, and faculty told the assessment team that this model of staffing enables BCNO to teach skills more effectively because it enables staff to draw on clinical cases to enhance theory education and provide career advice.
117. One of BCNO's awarding partners reviews staff appointments and the allocation of staff to ensure that faculty are appropriately allocated to teach theory or clinical skills modules. Newly appointed teaching staff that met with the assessment team appreciated the BCNO induction programme and the support offered by programme leads and heads of academic studies to monitor and support the quality of their teaching. This induction, supported by the learning and development policy, enables the more senior team to support newer members of staff to teach effectively. BCNO conducts teaching observations and routine student evaluations of teaching sessions to further support new members of staff. Module leaders also reflect on the effective delivery of teaching and assessment as part of the annual cycle of module evaluations and monitoring processes. The assessment team was satisfied that BCNO has measures in place to ensure courses are delivered by appropriately qualified staff.

118. BCNO monitors student outcomes, including students' continuation, completion and progression. The assessment team looked at the student characteristics report and found good progression and achievement across BCNO courses for Master of Osteopathy (Level 5 continuation rate is 95 per cent and Level 3 is 92 per cent). Lower rates were achieved for Level 4 Master of Osteopathy (for under 21 year-olds, the continuation rate was 78.5 per cent; for those 21 years and over, it was 63 per cent). Level 4 BSc Osteopathy also recorded lower continuation rates: 50 per cent for students under 21 years and 72 per cent for those 21 years and over). BCNO considers these statistics as part of its annual report to one of its awarding partners. The latest iteration generated a number of outcomes to support students: for example, ensuring regular reviews of programmes take place; scheduling extra tutorials in anatomy and physiology; moving clinic observation from semester one to semester two for year one; moving the year three careers fair from semester two to semester one; and introducing a careers fair in year one. This level of evaluation indicates to the assessment team that BCNO can identify and improve student support mechanisms to help students succeed across levels.
119. BCNO provides students with formative assessment opportunities, which include quizzes, assessment progress checklists, in-class tests and post-lecture self-assessment worksheets. BCNO submitted documents that demonstrate that it provides students with feedback, feedforward and action plans prior to the submission of summative assessments. In some instances, it provides cohort-level feedback following mock exams – these share elements of good practice and identify improvements. BCNO gives students guidance to support their approach to assessments. Some groups of students requested more formative opportunities, through the Student Engagement Group, and this feedback was fed forward to the programme team. External examiner reports confirm that assessments included satisfactory formative and summative opportunities.
120. The assessment team found variations in the amount of feedback provided across assessments. The assessment team also found that summative feedback provided to students was of inconsistent quantity and quality across assessments. An external examiner reported to BCNO a lack of consistency in the amount of feedback provided to students in a 2022 report. This evidence suggests that effective support for student learning through assessment feedback might be limited, because some students receive more detailed feedback and feedforward than others, potentially impacting students' awareness of how to improve before the next assessment cycle.
121. BCNO has guidance on its procedures for the management of Assessment Offences and Research Misconduct. This document is underpinned by and aligned to the academic regulations at its awarding partners, and its awarding partners also provide guidance on the management of academic misconduct. BCNO produced a separate document about academic misconduct for the Diploma in Osteopathy (International) students according to its own regulations for the diploma. If accused of academic misconduct, BCNO would investigate students directly, establishing its own Academic Offences Panel and allowing them to bring a fellow BCNO student or staff member to the panel to support them.
122. BCNO provides an excellent range of activities to support students academically and to support students in becoming osteopaths. For example, the assessment team reviewed useful workshop material delivered in areas such as study skills, referencing and stress management. BCNO also provides resources to support students' wellbeing, with free access

to on-site counsellors and a student assist programme. Student wellbeing leaflets and discussions with the student welfare officer suggest students have access to good support services including BCNO counsellors. BCNO has a reasonable adjustment policy which is managed by the student welfare officer. All new students are required to complete a health questionnaire as part of the interview process and BCNO keeps a log of students with declared disabilities and chronic illness. This is managed centrally by a part-time student welfare officer, covering all UK and international students and campuses.

123. BCNO provides good careers advice and support for students. BCNO organises an annual careers fair targeted at students at different levels of study. Students develop a professional identity which supports them beyond the course. For example, there are key modules which emphasise professional working. BCNO advertises job vacancies on the VLE and provides sessions on writing and enhancing CVs.

## **Criterion B2.2.b**

**Does BCNO have credible plans for how it would ensure effective engagement with each cohort of students which is sufficient for the purpose of ensuring:**

- i. a high quality academic experience for those students**
- ii. those students succeed in and beyond higher education?**

## **Advice to the OfS**

124. BCNO has credible plans for ensuring effective engagement with each cohort of students which is sufficient for the purpose of ensuring a high quality academic experience for those students, and that those students succeed in and beyond higher education. BCNO has tailored engagement strategies for each of its courses. There are targeted resources for students to provide continuous feedback to ensure a high quality academic experience.

## **Reasoning**

125. The assessment team found evidence of student membership and contribution of the student voice across all committees and structures of BCNO courses in England. The assessment team reviewed documentation for the Board of Trustees, Academic Board, Programme Committee, Joint Board of Studies and Programme Committees. All of these groups include student members. Furthermore, a student-led Student Experience Committee aims to improve the student experience. A Student Engagement Group aims to promote 'a positive learning environment for all students' and the group also aims 'to get students' feedback and to monitor feedback satisfaction'. The minutes from multiple Student Engagement Group meetings demonstrate that BCNO gathers and acts upon student feedback. Furthermore, BCNO surveyed members of the Student Engagement Group to identify new ways of gathering feedback and ways to further engage with the committee.
126. BCNO monitors the number of student representatives across its courses to ensure that all programmes have at least one representative from each programme. The only programmes without representation are the current and planned Diploma in Osteopathy (International) courses. BCNO provides student representation training for all its students. Students on

BCNO courses told the assessment team that they find the student representative system effective and that they can express concerns via their student representative. Evidence shows that the student representative role works well, and students value the difference they make by representing the wider student voice.

127. The inclusion of students at international campuses in BCNO's committee structures is not apparent. For students at campuses outside of England, their primary point of contact is their course coordinator or student representative. During the visit, students from international campuses spoke of how they valued having a dedicated central point of contact, although they noted that they did not know how to contact BCNO directly. Students on BCNO's courses delivered outside of England do not have access to the same level of academic support through personal academic tutors or involvement in wider student committee groups compared with those on the England courses, but they do receive support through their course coordinator and/or student representative.
128. BCNO has gathered feedback from students at campuses outside of England but the response rate was poor at seven per cent (1/14). This limits the usefulness of the information – which shows that non-UK students have not communicated positives or negatives of their experience as students to BCNO. There is evidence of training and preparing students based overseas for representative roles; however, uptake appears to be low. The implication for the low uptake is that BCNO is unable to respond to student feedback from students based overseas. The impact is that BCNO Student Engagement Group is not considering the student voice across BCNO's international provision.
129. The assessment team observed a strong informal and personal approach between staff and students at the London campus. From discussions with students at the assessment visit, it appears that BCNO's engagement with students is strong and personalised due to the small size of the college. Students who met with the assessment team gave examples of confidently discussing issues directly with the principal and commended BCNO for the speed and efficiency with which it responds to students. While the assessment team noted a disconnect between students' knowledge and access to their personal tutors, students report confidently giving and receive feedback to BCNO tutors and directly to the principal on a regular basis.
130. In line with the practice of two of its awarding partners, BCNO asks students to provide individual anonymised module feedback for modules and across each semester. BCNO further encourages students to participate in feedback by using emails and newsletters. BCNO uses the results of this feedback to generate robust action plans and act on the feedback and guidance from the student cohorts to improve the student experience. BCNO students in the UK studying under franchise arrangements gave feedback through their participation in the NSS. Students can email staff or visit them in person with any concerns about any module delivery, assessment, feedback or queries associated with clinical practice, so that staff can address issues before waiting for formal routes. Staff and students at the campus visit confirmed channels of communication (through module leaders, the principal and the Welfare Officer) and that any concerns were responded to in a timely fashion.
131. The handbook for the current Diploma in Osteopathy (International) programme informs students of student feedback mechanisms, class representatives and opportunities to meet with members of the senior management team – suggesting that student feedback



mechanisms are required by BCNO across all its provision. Student representative training reviewed by the assessment team for Denmark and Singapore students also highlights where within the BCNO management structure the student voice and feedback mechanisms are present. Therefore, the programme team have made students aware of how to share their feedback and the importance of the student voice across all BCNO's formal governance committees.

## **B2 conclusions**

**Does BCNO have credible plans that would enable it, if registered, to comply with condition B2 from the date of registration?**

132. BCNO is an established provider of higher education osteopathy qualifications and broadly has sufficient resources and support in place, or planned, to provide a high quality academic experience from the date of registration. The assessment team recognised, however, the risk around implementation at the Armenia campus, outlined above, and the lack of evidence relating to the Singapore campus. The assessment team's campus tours, observation of the VLE and digital resources, discussions with staff and students, alongside study support material and careers support, demonstrate sufficient resources and support to ensure a high quality academic experience. BCNO has both informal and formal feedback mechanisms that students can engage in, including participating in BCNO committees. Evidence from its awarding partners and BCNO itself shows that BCNO engages effectively with students.
133. The evidence provided by BCNO for its Level 7 Diploma (Armenia campus) demonstrated a limited provision of some physical and digital resources for students who intend to register for this course. The limited physical facilities at BCNO's Armenia campus demonstrates it does not currently comply with this condition in its own delivery plan for those courses where significantly there are no physical library and digital facilities. This is contrary to BCNO's own quality plan, which articulates such physical resources. The assessment team's judgement is that there is evidence the resources for the Armenia campus are not sufficient to provide a high quality academic experience. BCNO relies upon its university awarding partners for substantial online library and digital e-book resources for most of its courses and it cannot share these academic resources to students it recruits to non-university awarding programmes (such as its own Level 7 Diploma). The assessment team understands that there are currently no Diploma students at this campus, but did not identify any evidence demonstrating how the provider plans to address this in the event of future recruitment.

## **Condition B4: Assessment and awards**

### **Criterion B4.2.a**

**Does BCNO have credible plans to ensure that each higher education course is assessed effectively?**

## Advice to the OfS

134. BCNO has credible plans to ensure that each higher education course is assessed effectively. Within the courses, relevant skills appropriately reflect to the requirements of the professional body and BCNO assesses them effectively to stretch and challenge students as they progress through the courses. The forms of assessments featured across courses test an appropriate range of clinical and academic skills. Overall, the assessment of students at BCNO is effective because an effective framework for assessments is provided by its awarding partners and which BCNO follows.
135. The assessment team found some evidence of inconsistent practice in relation to assessment design, marking procedures and the quality of handwritten feedback. However, the team recognised that the risks posed by these potential inconsistencies are being actively addressed through an action plan, which adequately manages any risk to effective assessment. Therefore, in the assessment team's view, the concerns they identified constituted areas for continuous improvement, rather than evidence of the provider's inability to effectively assess students as required by B4.2.a. BCNO's evidence contained examples of high quality assessments, marking and feedback. The impact is that some students will experience well-designed assessments with high quality feedback, while others are assessed using less reliable assessment criteria. In addition, students who receive poor quality feedback are limited in their ability to use feedback for academic development. The assessment team noted that the provider had identified this issue proactively, through student feedback, and had created and begun implementation of an effective action plan in response. The assessment team was satisfied that this action plan adequately addressed the concerns raised, and noted that validating partners were also actively involved in supporting its implantation. Therefore, in the assessment team's view, on balance, the provider's plans to ensure each course was assessed effectively are sufficient.

## Reasoning

136. The partnership agreements between BCNO and awarding bodies outline where responsibilities for assessment lie, and where an awarding body may have oversight. For courses delivered in these arrangements, the awarding partners design the assessment, and are responsible for ensuring that the assessments provide stretch and rigour, test relevant skills and are designed to uphold academic integrity. BCNO is responsible for conducting assessments, determining student marks (though marking and moderation), the management of marks, and the production of exam board spreadsheets. The documentation reviewed showed that BCNO had implemented the assessment framework provided by the awarding body as outlined in the agreement. Programme handbooks and quality handbooks clearly outline the awarding partners' framework for assessments to students. Other documents, including module handbooks and assessment briefings, also communicated the awarding partners' assessment framework to students (which included the learning outcomes and the standards expected). The assessment team found that BCNO documentation describes appropriate assessment methods for the discipline. The described assessment methods simulate or reflect clinical scenarios, to test learning outcomes. These assessments are drawn from the awarding partners and, when applied to students at BCNO, provide appropriate levels of stretch and rigour.

137. BCNO's governance and management structures suggest that the Academic Quality and Planning Committee has oversight of these processes. Awarding partners provide oversight through planning and review meetings, Joint Boards of Study and the Programme Committee meeting. The partnership agreement also indicates that BCNO is responsible for identifying external examiners, but there is an external examiner approval form, and a process that allows awarding partners to have oversight of the nomination.
138. During the visit, BCNO explained that module and course leads are responsible for collating marks and liaising with registry, and these practices are reviewed by programme committees. The minutes of Programme Committee meetings show formal mechanisms for faculty to report issues related to the delivery of assessments. BCNO also advised the assessment team that BCNO's registry department is split into two teams, which respectively manage the results of the courses of each of its university awarding partners. BCNO has operational responsibility for the delivery of assessments within the strategy, and structure is provided by awarding partners.
139. BCNO uses similar approaches to assessments across all its courses and the assessment team considers these collectively in this section. The framework for assessments for most BCNO courses is provided by the respective awarding partners. Therefore, awarding partners primarily design the assessments which BCNO delivers. Furthermore, the assessment structure is considered as part of each awarding partner's course approval and review process. However, BCNO's processes for local review and sign-off of assessments is less clear; some assessment documentation did not record when approval was granted, whereas dates for approval could be found on other documents. There was not always evidence that some local information about assessments had been approved (in accordance with awarding partner requirements), and appropriate oversight, checking and alignment of student-facing assessment information has not been consistently recorded. This may contribute to some of the inconsistencies in assessment practices observed at BCNO.
140. BCNO provides students with assessment briefings to outline the required assessment tasks and the learning outcomes tested by the assessment. Module record documents also communicate similar assessment-related information about assessment tasks and assessment criteria – meaning that BCNO communicates assessment information to students through a range of formats. The primary student-facing format appeared to be the assessment briefs, which aim to provide students with core information about the structure of their assessments. Assessment briefs use templates from the awarding partner – which ensures assessment information is communicated to students consistently. This supports effective assessment because students and staff have a clear outline of the assessment task, which can help students to prepare, and can also ensure that students receive similar assessment experiences.
141. An action plan in response to the 2024-25 NSS result of one of its programmes identified a number of assessment-related actions, including 'Review assessment schedule to be reflective of student workload', 'Further lecturer training in feedback, exams and moderation process', 'Improve awareness of assessment-related policies for both staff and students' and 'Review use of rubrics for written feedback'. These actions highlight that BCNO knows of and can identify areas where it can make improvements and there is evidence of BCNO taking action to address these action points, especially interims of increasing staff awareness of policies to reduce inconsistencies. BCNO's plans to improve student assessment experiences

are credible because they are driven by student feedback and will target inconsistencies in assessment experience between students, potentially addressing many of the issues identified by the assessment team. Some parts of the plan may involve extensive discussion with validating partners, especially the actions related to assessment scheduling and workload. During the visit, a representative from one of BCNO's awarding partners provided information about the ways it supports BCNO to develop its assessment practices, which provided additional assurance for the assessment team about this work.

142. BCNO staff often provide handwritten feedback to students. Handwritten feedback can sometimes impede student development, learning and understanding, and moderation between markers, as some comments are difficult to interpret. External examiner reports comment on the difficulty of interpreting staff handwriting which suggests that this format might not always be comprehensible by students. During the visit, BCNO senior management talked about plans to move entirely to digital feedback in the future but specified no date. These plans can build on the fact that BCNO already accepts electronic assessment submissions and that it already provides a proportion of feedback for written assessments electronically. Excel spreadsheets of exam questions and answers suggest that BCNO is preparing to deliver a greater number of exams electronically. BCNO provided examples of markers moving towards electronic forms of marking and feedback. When responding to external examiner comments, BCNO states that 'BCNO to trial during formative assessments using devices for assessors to type up the student feedback'. Therefore, BCNO is able to demonstrate that it is taking steps towards addressing external examiner concerns about paper-based assessments and handwritten feedback.
143. Most of the modules at BCNO have multiple assessment points and are weighted to examinations and clinical assessments, with a final competency assessment to verify whether students have achieved clinical competencies by the end of the programme. Broader modules (psychology, nutrition and dissertation) provide case studies and essay assessments. BCNO provided an example of a question bank for the pathology module, which contained a broad range of short answer questions. The large size of the bank ensured that BCNO could rotate questions between cohorts to avoid question sharing between students and over familiarity with the bank. These questions typically had pre-set marks for them, but the bank lacked model answers to support the standardisation of marking. The assessment team saw, however, other examples of exams with model answers to support markers' consistency. This evidence demonstrates effective assessment because it shows that BCNO has a substantial question bank and, in most cases, markers are supported with model answers which increases standardisation of marking.
144. BCNO follows the academic integrity policies of its awarding partners, to which students are subject. BCNO clearly communicates policies related to plagiarism to students including through dedicated study skills sessions. BCNO's programme handbooks and regulations state that plagiarism detection is active and applied to students' work. During the visit, BCNO faculty staff also discussed their operational understanding of the academic integrity processes. In addition, students sign a declaration of ownership which states that they understand that BCNO uses plagiarism detection software which is used to assess their work for plagiarism.
145. For students enrolled on the BCNO Diploma in Osteopathy (International), BCNO has a specific policy on academic offences. The policy covers BCNO's procedures for academic

offences and provides students with a clear outline of what BCNO considers an academic offence. It provides students at the Crossfields Institute Diploma in Osteopathy (International) with details of academic misconduct and regulation in the student information handbook: the handbook advises students that 'More information about avoiding plagiarism can be found within the centre's handbook and policies. More information and policies relating to plagiarism can be found in the Learner Handbook.' This information is sufficient to ensure that students have appropriate information about academic offences procedures, and that BCNO has an appropriate procedure in place for students on the diploma programme. External bodies review BCNO assessments as part of their annual processes and have concluded that BCNO successfully operates and implements assessments in its local setting. Reports from GOsC and the awarding partners are of the view that BCNO's assessed learning outcomes are appropriate for the level of the programme. External examiners consistently report their satisfaction with the academic quality and confirm their view that BCNO undertakes assessments in accordance with module specifications. External examiners also acknowledge coherence and currency of curricula, and that BCNO undertakes assessments in accordance with sector-recognised standards.

146. The evidence submitted by BCNO was most often related to programmes associated with the awarding partners. The senior management team at BCNO suggested that similar assessment types were applied to the Diploma; they compared the Diploma to a 'conversion course'. If the assessment procedures BCNO applies to awarding partner programmes are also applied to BCNO's Diploma, then the arrangements made by BCNO are sufficient to support effective assessment on this programme. The key areas where there are differences in procedures are in the appointment of external examiners (which for the Diploma is outlined in the Diploma's regulations) and in investigating and managing academic offences (as outlined in paragraph 139).

## **Criterion B4.2.b**

**Does BCNO have credible plans to ensure that for each higher education course assessment is valid and reliable?**

### **Advice to the OfS**

147. The assessment team's advice is that BCNO has credible plans to ensure that for each higher education course assessment is valid, because assessments take place in a way that results in students demonstrating knowledge and skills in the way intended by the design of the assessment. BCNO aligns assessments to test core skills and proficiencies necessary to become an osteopath. Assessed student work shows that students demonstrate knowledge and skills as intended by the learning outcomes and GOsC 'graduate outcomes'. Assessments are appropriate and valid because they appropriately test the intended learning outcomes.
148. BCNO moderates and second marks assessments as required by its awarding partners to ensure reliable assessment. It provides marking schemes and rubrics in student handbooks, module guides and assessment briefings, and it supports reliable assessment because it

gives staff a clear framework for assessment which it can apply across assessment types, and assessment events.

149. The assessment team noted inconsistencies in the approaches taken by individual members of staff in the design of marking schemes. This may limit the reliability of assessments between modules because it asks assessors to switch between different styles of scheme; in addition, it might be less comprehensible to students than a more standardised scheme with which students might become familiar. One external examiner also noted some inconsistency in marking practices. In addition, the assessment team found some marking schemes that use vague language. While these inconsistencies might be minor in isolation, collectively they present a risk to the consistency of assessments, and therefore, reduce reliability, as they may lead to an assessment that results in differences in the marks awarded to students demonstrating the same achievement. In the assessment team's view, this may lead to a risk that assessments are not consistently applied to the student population with the same standards. The implication of reduced reliability is that factors outside of the student performance might influence the marks students achieve – therefore, the potential marks awarded may not be a reliable indicator of the student's true ability (i.e. the outcome of the assessment maybe influenced by the approach the faculty member took in constructing the assessment, and faculty members often change between cohorts). However, the assessment team did not find credible evidence that this risk had materialised, and as such was satisfied that any potential for inconsistency was not materially affecting the provider's plans to ensure assessment is valid and reliable. Regardless, the assessment team urges the provider to review how it drafts and applies mark schemes to ensure consistency going forward.

## Reasoning

150. The assessment team reviewed examples of marked student work from a range of modules, as per the sampling approach set out in Annex A. The examples included assessments aligned to practices of osteopathy, therefore assessments were authentic and valid because they appropriately tested the intended learning outcomes. BCNO's awarding partners provide the framework for assessment, and BCNO relies upon them to ensure that assessments are valid and appropriate instead of running its own processes. Any changes that BCNO would like to make to the assessments go through a formal approval process involving the awarding partners. Each BCNO programme has a programme committee responsible for undertaking annual monitoring of programmes. The programme lead is responsible for assessment and the job descriptions sets out that they 'Monitor, evaluate and promote good practice amongst the faculty and the institution inclusive of teaching, learning, assessment and resourcing using feedback from stakeholders' and is responsible for overseeing assessment practices.
151. BCNO staff follow the Assessment Setting, Marking and Moderation Policy of the relevant awarding partner. For example, the marking and moderation policy of one awarding partner sets clear roles and responsibilities for the processes that underpin the management of marking and moderation. Academic staff who met the assessment team demonstrated good knowledge of assessment policies of the validating partners and confidently discussed assessment delivery and moderation of assessments with the framework of the awarding partner. BCNO staff discussed, for instance, the internal moderation forms which BCNO requires them to complete for each assessed component. BCNO provided examples of completed moderation documents which showed that BCNO staff followed this aspect of the guidance set out in the marking and moderation policy. The Assessment Setting, Marking and

Moderation Policy also showed that marking teams take care to ensure consistency between academic judgement, marks awarded and approaches to feedback. This helps to promote the reliability of assessment at BCNO.

152. Where required, BCNO implements second marking to ensure consistency and reliability of marking, and this was evidenced by the appearance of second marking on assessment scripts shared with the assessment team. Some external examiners complimented BCNO's robust approach to double marking.
153. Staff use a range of approaches to mark student work including grading against descriptors with marker comments and rubric-based grading. The assessment team identified a small number of rubrics where the assessment criteria used non-specific, general and vague language to describe student achievement at each level, blurring the boundaries between levels of achievement, and not providing markers with clear guidance to inform their academic judgements on where marks should be awarded. This is a risk to students because it may lead to staff misinterpreting the student's level of achievement and limit the reliability of assessment. External examiners noted instances of examiners using the descriptor 'good' for a lower/higher marking bracket. However, other mark schemes presented as evidence emphasised a clear difference between Level 6 and Level 7 work to markers. This suggests that BCNO has actively addressed such concerns or is in the process of making revisions. BCNO has taken action in this area: minutes from a Joint Board of Studies meeting reported that BCNO would 'encourage the markers to use the rubric which was approved by the externals, hopefully students can now understand how the marks are given, also before assessments students can see what they should be aiming for.' BCNO recognised the impact that this practice could have on student performance.
154. Mark schemes used across clinical assessments varied in the type and level of detail. For example, the criteria descriptions and the number of marking criteria used regularly differed between assessments: in some instance BCNO uses 'FPGE' – without explanation (the assessment team concluded that this was Fail, Pass, Good and Excellent) and in other instances it uses 'below expectations', 'meets expectations', and 'above expectations'; BCNO marks some skills out of three points and others out of four. BCNO shared a seven-point mark scheme and a five-point marking scheme ranging from 'Refer' to 'Best', while another assessment had an inverted mark scheme which ranged from one as excellent to five as poor. This suggests that the internal verification of assessment processes does not focus on the standardisation of mark schemes. There is a risk that this impedes reliable assessment because the number of marks used to calculate a pass can differ for each assessment type. In addition, a rubric which is unclear may be a risk to validity because markers may interpret student performance in a way that is inconsistent with other markers, or in a way that is not consistent with the awarding partner's specification to assess a certain set of acquired knowledge or skills. This inconsistency may also mean that student performance could be affected by the behaviour of the marker, which is a risk to validity. However, there is no evidence that this is happening, exam board minutes have not raised this as an issue, and the sample of moderation reports reviewed have not highlighted this as an issue.

## Criterion B4.2.c

**Does BCNO have credible plans to ensure that for each higher education course the academic regulations are designed to ensure that relevant awards are credible?**

### Advice to the OfS

155. BCNO has credible plans to ensure that for each higher education course the academic regulations are designed to ensure that relevant awards are credible. BCNO operates under the academic regulations of its awarding partners for all validated courses that it delivers. The regulations from both university awarding partners are designed to ensure that relevant awards are credible because they clearly communicate the typical regulatory processes related to progression, award, withdrawal and reassessment. Each set of regulations provides clear guidance on the management of students to ensure that students are treated in similar ways between courses and across cohorts.
156. BCNO has plans to ensure that the academic regulations for the BCNO Diploma in Osteopathy (International) are credible because BCNO has created documents which outline credible regulatory processes and procedures. BCNO's regulations cover standard areas such as progression, award, withdrawal, and reassessment. Some areas covered by BCNO's regulations are comparable to the regulations of its university awarding partners. However, the BCNO regulations are not as extensive or comprehensive, therefore the usual protections offered to students and academics by regulations is not complete for BCNO-only programmes.

### Reasoning

157. Most of BCNO's provision operates under the academic regulations of its awarding partners. Evidence shows that BCNO operates in line with these academic regulations: for instance, it provided evidence that it processes students' marks in accordance with the regulations of each awarding partner
158. BCNO Award Assessment Boards meet quarterly, with external representation, to review and ratify marks and awards. The Award Assessment Board meeting agenda suggests that the board should 'ensure that threshold academic standards of student performance are being maintained at award level on the basis of the reports received from each of the constituent Subject Assessment Panel chairs on the standard of assessment in subjects/modules, and are comparable with similar awards in other UK institutions, in the expert opinion of the Award External Examiner'. Award and subject board agendas and board minutes demonstrate adherence to this requirement and to academic regulations. This is also confirmed by external examiners, offering reassurance to students and awarding partners that the award has rigorous oversight.
159. It was not always clear from the BCNO award and subject board minutes that the board had considered the academic standards of student performance. An external examiner for one course noted in July 2024 that, while they considered the results comparable to other institutions, BCNO boards would benefit from having a section of the board which considered results graphically. Minutes of Subject Assessment Panels show that they encourage module



leads to reflect on outcomes. In some instances, the description of student outcomes was vague, such as 'very decent set of results'; 'a number of students were influenced by AI'. BCNO provided extensive records of subject and award boards, but minutes do not show that it routinely monitors degree outcomes or any increases and decreases in the classification of degrees awarded over time. As a result, evidence shows that, in some instances, academic teams do not reflect on student outcomes or the profile of student results. This might mean that mechanisms for reviewing the number of relevant awards and their classification are weaker than they could be.

160. BCNO has separate academic regulations for its Diploma in Osteopathy (International) which aim to provide a 'framework for academic standards, assessment, and progression across the Diploma programme'. These regulations also cover the Crossfields Institute provision, although this is not explicitly stated. The regulations allow for the award of the Diploma in Osteopathy (International) and its review in a credible manner. However, unlike other regulations (i.e. the regulations of the awarding partners), BCNO's regulations are not supported by other relevant BCNO specific policies, such as an academic integrity policy. BCNO's academic regulations are not part of a complete policy and quality assurance framework. The aims of policies are to establish clear guidelines and expectations of the operation of an institution and ensure consistency in processes and quality between students. The implications are that BCNO's practices and procedures are not fully articulated in policies, and it is therefore not clear to students what to expect, what their rights are, and what the responsibilities of BCNO are.

## Criterion B4.2.d

**Does BCNO have credible plans to ensure that, for each higher education course, the academic regulations are designed to ensure the effective assessment of technical proficiency in the English language in a manner which appropriately reflects the level and content of the applicable higher education course?**

## Advice to the OfS

161. BCNO has credible plans to ensure that, for each higher education course, the academic regulations are designed to ensure the effective assessment of technical proficiency in the English language in a manner which appropriately reflects the level and content of the applicable higher education course because evidence shows that most often markers considered technical proficiency in the English language when awarding marks.

## Reasoning

162. The academic regulations of BCNO's university awarding partners are underpinned by awarding partners' Assessment Setting, Marking and Moderation policies. This documentation provides a link to the awarding partner website which provides additional information on assessment design. This documentation is used to support the design of assessments that can assess students' understanding key and core terminology in their discipline. In addition, there are specific learning outcomes related to communication, which are explicitly assessed to ensure that students have an appropriate level of English

proficiency relevant to the professional requirements (e.g. 'deploy safe and effective professional and interpersonal skills in complex yet predictable clinical contexts; manage, communicate and engage with peers and colleagues, in a wide range of simulated clinical situations consistent with legal, professional and ethical standards'). The moderation process requires moderators to reflect on whether markers consider reliability and validity of the assessment of the learning outcomes. Therefore, learning outcomes considered English language proficiency as relevant to the discipline and profession (as seen in BCNO's learning outcome mapping). This is reflected in the design of assessments (as seen in BCNO's rubric and assessment criteria) and marking, and is then confirmed through the moderation of the assessment.

163. BCNO's regulations for the Diploma in Osteopathy (International) offer some consideration of English language proficiency by stating 'Please be aware that Danish/English dictionaries are permitted in the practical exam room, under the supervision of the examiner, for translation purposes only. The use of mobile phones or smartwatches is strictly prohibited in the exam room. For coursework, high standards of spelling and grammar are expected, as you will have time to prepare your submissions. All learners are encouraged to ask a colleague or friend to proofread their work. If you have learning differences, please speak to the Danish Programme Manager as your first point of contact'. This establishes the expectation that the course requires students to develop technical proficiency in English. The assessment team notes that they were not provided with evidence of equivalent guidance at other overseas campuses, but that this was not specifically requested from the provider.
164. External examiners are of the view that BCNO effectively assesses the technical proficiency of students in their use of the English language in a manner which appropriately reflects the level and content of the applicable higher education course. A sample of external examiner reports required examiners to confirm the effective assessment of English language proficiency via a checklist.
165. There is limited explicit assessment criteria on technical proficiency in the English language related to the level and content of the course in the mark schemes sampled and the use of language was not concisely commented on across students' work in the sample of assessed student work shared with the assessment team. Some dedicated markers pay attention to spelling and grammar, but other marked work made no reference to English language skills. Handwritten exams admittedly make the assessment of English language proficiency difficult for markers and this may account for some inconsistencies.
166. The assessment team found examples of BCNO considering English technical proficiency under a range of headings, for example a dissertation mark scheme does not explicitly direct markers to assess English language proficiency, but it allows five per cent of marks to presentation and referencing. A proportion of written assessments contain a 'performance' assessment criterion, where markers consider the logic of arguments, and the clarity of presentation and answers, where some markers did refer to communication issues. Some assessments allocate ten per cent of marks to 'presentation and writing'; others allocate 20 marks to 'style: a scholarly writing style with appropriate use of references'. The marking criteria for students at international campuses did consider English technical proficiency ranging from 'Excellent literary style (i.e. referring to grammar, spelling, use of English – showing no errors)' to 'Poor literary style (frequent grammatical errors, spelling mistakes and mistakes in the use of English)'. The marking and moderation policy of one of BCNO's

awarding partners does not explicitly direct markers in how to consider this assessment criterion.

## Criterion B4.2.e

**Does BCNO have credible plans to ensure that relevant awards granted to students are credible at the point of being granted and when compared to those granted previously?**

### Advice to the OfS

167. BCNO has credible plans to ensure that relevant awards granted to students are credible at the point of being granted and when compared to those granted previously because programmes are reviewed annually by awarding partners and the regulator.

### Reasoning

168. BCNO provided a substantial sample of award board papers to demonstrate how it collates module marks to calculate degree outcomes. The board sheets show how BCNO awards marks across modules, the number of credits associated with each module and the calculation of overall degree outcomes. This information indicates that BCNO ensures that it supports the granting of awards calculated in a consistent way between years, promoting the credibility of the awards BCNO processes. BCNO award boards aim 'to ensure that threshold academic standards of student performance are being maintained at award level'. The minutes of these boards showed that the board has a role in maintaining the credibility of awards that it helps to deliver – through overseeing the data and standards derived from BCNO courses and sharing with the awarding body.
169. External examiners were asked to confirm whether they were satisfied that the assessment regulations were followed in determining student marks, outcomes, classifications and awards. Across the external examiner reports sampled, all external examiners reported that they were satisfied.
170. Reviews and periodic reviews by awarding bodies and GOsC ensure that qualifications awarded by BCNO are credible and aligned with GOsC's expectations for qualifications in the field of osteopathy. Qualifications delivery by BCNO under the awarding body in England allow graduates to register with the profession. GOsC therefore reviews the education provision at BCNO to protect students (who are expecting to obtain a professional qualification in osteopathy), the profession, and patients and members of the public. GOsC plays a critical role in ensuring the credibility of the education at BCNO and the awards granted to students who graduate from BCNO programmes. The assessment team reviewed the reports provided by GOsC, and the evidence used by GOsC, to determine the credibility of the education provided by BCNO and the awards conferred. The minutes of award boards did not minute the consideration of trends over time, despite this being part of the agenda. BCNO provided details about enrolments and outcomes for the year 2023-2024. This data collection showed differences between some of BCNO's programmes and campuses. These trends were reflected upon in annual review processes to the awarding university. The BCNO Annual Review Report suggests that outcome data is considered as part of the review

process, and therefore is scrutinised by the awarding partners. External examiners were asked 'In the view of the examiner, the threshold standards of student performance are broadly comparable across partners/sites' and, in the sample of reports provided by BCNO, external examiner said 'yes' to this question.

171. BCNO's international provision is emerging and, to date, the provision developed is credible because meeting minutes highlight areas of future growth. A map of current and planned provision was provided to outline its immediate plans for expansion of provision. A document outlining projected international growth between 2025 and 2029 outlined steady recruitment to programmes in Denmark, Singapore and Iceland, and short visits to Belgium, France and Spain.
172. External examiners confirm that the programme is consistent in quality with similar programmes/qualifications in the sector. Periodic reviews by the awarding partners confirm that they are content with the credibility of awards in comparison with those previously granted.

## **B4 conclusions**

**Does BCNO have credible plans that would enable it, if registered, to comply with condition B4 from the date of registration?**

173. BCNO assessments are valid and represent a diverse mixture of authentic assessments aligned to professional standards. Globally, BCNO's assessment structure follows the structure provided by validating partners. There is good evidence of moderation and second marking. Academic regulations, including those relating to technical proficiency in English, were considered by the assessment team to be sufficient to meet the requirements of the condition.
174. The framework provided by validating partners for assessment allows BCNO to meet the basic requirements of condition B4. However, there was some evidence that the local delivery of this framework is inconsistent and fragmented across BCNO's educational delivery. This may have the potential to affect the credibility of a proportion of locally delivered assessments in the future, although the team saw no evidence of this to date. Inconsistencies in the local interpretation of the assessment framework were apparent, alongside inconsistencies in approaches to marking practices and feedback, and the assessment of English language proficiencies. However, in the assessment team's view, these concerns highlighted areas for continuous improvement by the provider and did not lead to a finding that they did not currently have credible plans that would enable it to comply with the high quality baseline requirements of B4.

## Part 2: Assessment of condition B8: Standards

175. This section sets out advice on whether BCNO has credible plans that would enable it, if registered, to comply with condition B8 from the date of registration.

### Requirement – standards

**Does BCNO demonstrate in a credible manner that the standards set for the courses it intends to provide, if it is registered, appropriately reflect any applicable sector-recognised standards?**

### Advice to the OfS

176. The assessment team's advice is that BCNO demonstrates in a credible manner that the standards set for the courses it intends to provide under awarding partner agreements, if it is registered, appropriately reflect any applicable sector-recognised standards because the qualifications have appropriate titles, courses have appropriate numbers of credits, and BCNO delivers the qualifications at appropriate levels of learning.

177. The team has a minor concern that the title of the Diploma in Osteopathy (International) could be misleading because it does not indicate the level or volume of the qualification.

### Reasoning

#### A.1: Qualifications at each level

178. The titles BCNO uses for the qualifications it currently runs, or has approval to run, convey appropriate information about the level of the qualification, the volume, nature and field of study. Of the courses currently running and planned to run, the following titles are not misleading:

- Integrated Masters in Osteopathy (two versions of this course delivered on behalf of two different awarding bodies)
- BSc (Hons) in Osteopathy (modified attendance)
- BSc Osteopathic Medicine
- MSc in Osteopathy for Diplomates
- BSc (Hons) in Osteopathy for Diplomates
- MSc Osteopathic Medicine
- PGCert Nutrition
- PGCert Osteopathic Sports Care
- PGCert Osteopathic Education

179. The titles above accurately communicate to students the level of the qualification they are working towards and that this is a specialist professional qualification. The impact on students is that they are aware of the professional nature of the courses and the outcomes they will receive upon successful completion. The words 'integrated' and 'diplomates' are used to communicate different pathways and offerings of the programme.

180. BCNO also runs Diploma in Osteopathy (International) courses. This title does not communicate the level of study. The implication for students is that the outcome and upper level of study are not clear to them when considering the appropriateness of this course.

## **A.2: Typical volumes of credit for qualifications**

181. BCNO uses a credit system that outlines the expected volume of learning for students enrolled on its courses, consistent with the typical credit volumes provided in Table 2 of the sector-recognised standards. Information in programme specifications clearly outlines the overall number of credits per award, the number of credits awarded per year, and the number of credits awarded per module.

182. BCNO degree programmes follow the credit structures of its awarding partner. The list of courses and their volumes of credit based on the programme specifications are as follows:

<b>Course</b>	<b>Level 4</b>	<b>Level 5</b>	<b>Level 6</b>	<b>Level 7</b>
Masters in Osteopathy	at least 240 credits		120 credits	120 credits
Masters in Osteopathy (teach out)	120 credits	120 credits	120 credits	120 credits
Bachelor of Science (Hons) Osteopathy (modified attendance)	120 credits	120 credits	120 credits	-
Bachelor of Science (Hons) Osteopathic Medicine	120 credits	120 credits	120 credits	-
Master of Science Osteopathy for Diplomates	-	-	-	180 credits
Master of Science Osteopathic Medicine	-	-	-	180 credits
Bachelor of Science (Hons) Osteopathy for Diplomates top up	-	-	120 credits	-
Postgraduate Certificate in Osteopathic Education	-	-	-	60 credits
Diploma in Osteopathy (International)	-	-	105 credits	385 credits

Course	Level 4	Level 5	Level 6	Level 7
Extended Diploma in Osteopathy (International)	-	-	105 credits	415 credits
BCNO Diploma in Osteopathy (International)	290 credits, at unspecified levels			

183. The volume of credit per module is 20 credits across all levels and each 20-credit module equates to 200 notational learning hours for students. For example, the 20-credit Clinical Methods BCNO5004 module provides 50 hours of lectures, 30 hours of tutorials and 130 hours of self-directed learning, as provided in the module handbook.
184. Two exceptions are the MSc Osteopathy for Diplomates which has six 20-credit modules and one 60-credit 'research investigation in osteopathic practice' module and the BSc in Osteopathy for Diplomates has a research project module which is 40 credits. During the assessment visit, the BCNO research lead clarified that the difference in the number of credits reflects the amount of time spent focused on the research project and level of study.
185. The Bachelor of Science and Masters awards require students to achieve both theory and practice elements and complete the required number of clinical practice hours, normally a minimum of 1,000.
186. Students completing the Diploma and Extended Diploma (Level 7) validated by Crossfields Institute achieve 520 credits for the Extended Diploma and 490 credits for the Diploma qualifications respectively. One credit value is equivalent to ten 'Total Qualification Time'. Credit volume per module varies for the Diploma (from five credits to 30) with 37 mandatory modules for students to complete to achieve this qualification.
187. The assessment team's judgement is that the courses BCNO provides appropriately reflect the typical credit volumes set out in A.2 of the sector-recognised standards.

### A.3: Qualification descriptors

188. The organisation of learning outcomes across Levels 4 to 7 are determined by the framework provided by BCNO's awarding partners – who check adherence to this framework as part of periodic reviews. BCNO maps the learning outcomes needed for GOsC accreditation across Levels 4 to 7 to ensure coverage of the required learning, to make sure that the qualification awarded is appropriate and accredited. This also ensures that qualification descriptors align to the professional outcomes and attributes expected from GOsC while also aligning with the classification descriptors for bachelors' degrees set out in Table 3 of the sector-recognised standards.
189. Module specifications shared with the assessment team state learning outcomes which mapped to 2019 Osteopathic Practice Standards and therefore require updating. However, the programme and module learning outcomes for Level 4 used words such as 'understand', 'describe' and 'discuss', and therefore are reflective of Level 4 study as expected in paragraphs 14-17 of the sector-recognised standards. Module specifications provided for

Level 5, Level 6 and Level 7 also used language appropriate for the level of study and required minimum levels of learning appropriate to the level of study undertaken.

190. Bachelor degree programme specifications set out the graduate attributes, skills, knowledge, abilities, understanding, professionalism and professional identity required for achieving the award. The learning outcomes and descriptions of the bachelor degrees sampled by the assessment team are appropriate and describe levels of achievement that a student must demonstrate to be eligible for the award. The programme appropriately reflects the first part of the descriptor for a higher education qualification at Level 6, set out in paragraph 25 in section A.3.3 of the sector-recognised standards. These levels and learning outcomes are set by the awarding partners and are presented in the BCNO award titles set out within the programme specifications and on the BCNO website.
191. The learning outcomes for BCNO's validated international courses MSc Osteopathy for Diplomates, BSc (Hons) Osteopathy for Diplomates (one-year academic top-up degree of 120 credits), and PGCert Nutrition and PGCert Osteopathic Sports Care are located at the correct level of study. Each programme's aims follow learning outcomes and are organised into key domains: knowledge and understanding; cognitive and intellectual skills; key and transferable skills; employment-related skills; and practical skills. These domains and learning outcomes are drawn from GOsC requirements and communicated to students in the programme specifications. They also map how domains are achieved across each academic level for multi-level programmes.
192. The learning outcomes of the masters' degrees sampled by the assessment team describe the minimum acceptable level of achievement to receive awards, and there is alignment with the A.3.4 descriptor for a higher education qualification at Level 7. Courses appropriately reflect the first part of the higher education qualification at Level 7, as set out in paragraph 31 in section A.3.4 of the sector-recognised standards. The programmes have clear qualification descriptors and graduate attributes and outcomes within the programme specifications, including knowledge and understandings, skills and abilities, and professionalism and professional identity.
193. The assessment team's view of the BCNO Level 7 Diploma in Osteopathy (International) and the Level 7 Crossfields Institute Diploma in Osteopathy (International), currently in a teach out phase, align with paragraph 31 of the sector-recognised standards. As a Level 7 programme, the learning outcomes indicate that students engage in an advanced understanding of knowledge in the field of osteopathy and a critical awareness of current problems and new insights in the field, aligned with the professional expectations of GOsC. Students also engage in a research module and the learning outcomes presented in the programme handbook suggest that students engage in a comprehensive understanding of techniques applicable to their own research or advanced scholarship, presenting further evidence of alignment to paragraph 31 of the sector-recognised standards.
194. BCNO has plans to run a 60-credit Level 7 Postgraduate Certificate in Osteopathic Education. BCNO submitted the programme specification, which contained the learning outcomes for the programme. The learning outcomes of the Certificate are aligned to the A.3.4 descriptor for a higher education qualification at Level 7.



## Requirement – achievement of students

**Does BCNO demonstrate in a credible manner that the achievement of students on the courses it intends to provide, if it is registered, appropriately reflect applicable sector-recognised standards?**

### Advice to the OfS

195. The assessment team's advice is that BCNO demonstrates in a credible manner that the achievement of students on the courses it intends to provide, if it is registered, appropriately reflects applicable sector-recognised standards.

### Reasoning

#### A.1: Qualifications at each level

196. The titles set out in the programme specification for each BCNO course align to the awards made to those students successful in their studies and BCNO's awarding partners confirm awards as part of their assessment boards.

#### A.2: Typical volumes of credit for qualifications

197. The assessment team reviewed award board documentation and exam board minutes for 2022-23 from both awarding partners. Based on a review of exam board spreadsheets from award boards, the assessment team found that awards are made to students who accumulate the volume of credit necessary for an award at the right levels, as set out in the relevant programme specification and in Table 2 of the sector-recognised standards.
198. Alongside credits, programmes require students to undertake a set number of clinical hours to achieve the award. Therefore, achievement of credits alone is not sufficient for the achievement of the award. BCNO monitors the number of hours each student accrues in a clinical environment (clinic reviews) to track that an appropriate number of clinical hours have been achieved as part of the qualification awarded. BCNO also monitors the type of clinical presentations seen across students.

#### A.3: Qualification descriptors

199. The achievement of students awarded credit at Level 4 appropriately reflects the descriptors for Level 4, set out in paragraphs 13-17 in section A.3.1. BCNO submitted a sample of assessment briefs and module guides for Level 4 modules. This sample of documents outlined appropriate learning outcomes for Level 4 work: for example, appropriate verbs and objectives were used. The learning outcomes of students achieving at this level are demonstrated in appropriate assessment activities and the team reviewed samples of marksheets and students' assessed work as evidence.
200. The achievement of students awarded credit at Level 5 appropriately reflects the descriptors for Level 5, set out in paragraphs 18-23 in section A.3.2. BCNO provided a sample of assessment briefs and module guides for Level 5 modules. These documents outlined the learning objectives, and assessment criteria that BCNO assessors apply to Level 5 assessments. In the sample reviewed, the learning outcomes are set at a level which

appropriately reflects Level 5 descriptors. In addition, a sample of marked students' work was provided to demonstrate the use of these descriptors and that staff can appropriately recognise student achievement at this level.

201. The achievement of students awarded credit at Level 6 appropriately reflects the descriptors for Level 6, set out in paragraphs 24-29 in section A.3.3. BCNO provided marked Level 6 examination scripts with feedback to students, and marksheets of clinical assessment. These marksheets when linked back to assessment briefs with learning outcomes enabled the assessment team to identify that BCNO justifies and awards marks in an appropriate manner. Student achievement at Level 6 is marked and moderated, and then reviewed by an external examiner with expertise in the field. The research project feedback forms provide clear evidence of Level 6 achievement, as student performance and feedback were clearly linked to the achievement of learning outcomes. These assessments clearly show student achievement at Level 6.
202. A range of students' work from core modules at Level 6 were considered by the assessment team. The modules reviewed aligned with the relevant descriptors for a higher education qualification at Level 6, in section A.3.3 (paragraph 24-29). The assessment team considered a sample of students' marked work which included Integrated Structured Clinical Examination (ISCE), written examinations, professional portfolios, continuous clinical assessment, assignments and final clinical competence examinations at Levels 4, 5, 6 and 7. The team also examined a total of four final years' clinical practice portfolios during the visit. The assessment team judged that the programmes are informed by disciplinary knowledge and there is sufficient evidence that students demonstrated relevant knowledge. For example, short answer examinations progressed to a coursework assignment where students applied their knowledge by providing advice for a case patient.
203. The achievement of students awarded credit at Level 7 appropriately reflects the descriptors for Level 7, set out in paragraphs 30-34 in section A.3.4. A sample of Level 7 work included marked Level 7 examination scripts, coursework and marksheets of clinical assessments. These marksheets linked back to assessment briefs which contained the learning outcomes, and the assessment team was able to identify how BCNO justifies and awards marks.
204. Research projects at Level 7 demonstrated reflection, critical evaluation and independent inquiry, as expected for Level 7 work. The assessment team reviewed examples of marked and unmarked Level 7 research projects. In examples of marked work, the brief summary comments did not provide students with clear guidance on the achievement of Level 7 learning; therefore the assessment team could not use its judgement to determine a complete understanding of how marks were awarded. However, as outlined in the B4 section, BCNO has robust moderation processes. Evidence from external examiner reports for the Masters in Osteopathy courses confirmed agreement that awards were in line with sector-recognised standards.

## **B: Classification descriptors for Level 6 bachelors' degrees**

205. BCNO's bachelors' courses with its university awarding bodies are designed to reflect the classification descriptors for bachelors' degrees as set out in Table 3 of the sector-recognised standards. The degree classifications of BCNO's bachelors' degrees align with its awarding partners' regulations.

206. The classification descriptors for the BSc (Hons) in Osteopathy are outlined in the programme specification as:

- first class honours: 70% or above
- second class honours upper division: 60%-69%
- second class honours lower division: 50%-59%
- third class honours: 40%-49%.

This information corresponds with regulations for BCNO's university awarding partners which specify the boundaries of the classification. The regulations also outline how to calculate classifications. The award of classifications to those completing BCNO's bachelor courses sampled by the assessment team are appropriate and in line with the descriptors in Table 3 of the sector-recognised standards because they are clearly communicated, and the boundaries are aligned to thresholds typically expected for a Level 6 degree outcome.

207. The operation of the regulations and the published classifications are presented at exam boards via spreadsheets which outline classifications that students have achieved. The assessment team confirmed the validity of the classifications awarded by a review of the assessments and feedback and the overall module grades awarded to graduating students.

## Annex A: Approach to sampling of evidence

1. As requested by the assessment team, BCNO provided programme specifications and module outlines/handbooks for some of the courses it intends to provide if it is registered. The assessment team considered this an appropriate sample to enable it to advise on whether the standards set for the courses BCNO intends to provide, if it is registered, appropriately reflect any applicable sector-recognised standards.
2. As requested by the assessment team, BCNO provided evidence of student achievement in assessed work, and associated records of this achievement. The sample included courses delivered in the UK and the international campuses. It was a random sample designed to capture the range of BCNO's assessment approaches. The assessment team requested and received student work, the applicable assignment briefs, grades awarded, and feedback given. The assessment team considered the following sample of student work an appropriate sample to enable it to reach a judgment on whether the achievement of students on the courses BCNO intends to provide, if it is registered, appropriately reflects applicable sector-recognised standards:
  - BSc (Hons) Osteopathy (modified attendance):
    - One piece of student work from each module delivered at Levels 4 and 5, reflecting that the course has only run for two academic years.
  - Masters in Osteopathy
    - One piece of student work from each module delivered at Levels 4 and 5, reflecting that the course has only run for two academic years.
  - Masters in Osteopathy (teach out)
    - One piece of student work from each module delivered at Levels 4, 5, 6 and 7
    - All assessed student work for one student who was awarded the degree
    - All assessed student work for one student who was not awarded the degree.
  - MSc Osteopathy for Diplomates
    - One piece of assessed work from three modules.
3. As requested by the assessment team, BCNO provided extracts of final exam and award board documentation for a sample of courses that show credits accumulated, awards granted and classifications, covering the most recent two years. The assessment team considered this an appropriate and comprehensive sample to enable it to assess whether awards made to students reflected the titles in the programme specifications, and whether students accumulated the necessary volume of credit for an award as set out in the relevant programme specification and the sector-recognised standards document.

## Annex B: List of abbreviations

Abbreviation	Meaning
AI	artificial intelligence
BCOM	British College of Osteopathic Medicine
BNU	Buckinghamshire New University
CORC	Change of Registration Category
CEN	Comité Européen de Normalisation
ESO	European School of Osteopathy
GOPRE	Guidance for Osteopathic Pre-registration Education
GOsC	General Osteopathy Council
ISCE	Integrated Structured Clinical Examination
NSS	National Student Survey
OfS	Office for Students
OPS	Osteopathic Practice Standards
OsEAN	European Osteopathic Schools
PGCert	Postgraduate Certificate
SEG	Student Engagement Group
UoP	University of Plymouth
VLE	virtual learning environment



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