

## **GCC Test of Competence**

### **External Examiner's Annual Report**

**Period:** January 2023 – December 2023

### **Results**

<b>Date of TOC</b>	<b>Results</b>
February and March 2 Panels were held Out of 5 candidates, 5 ultimately passed.	Number of candidates: 5 Pass: 3 Fail: 0 Further Evidence Required: 2 Passed after submitting further evidence: 2
April – June 4 Panels were held Out of 8 candidates, 5 have currently passed.	Number of candidates: 8 Pass: 3 Fail: 2 Further Evidence Required: 3 – 2 passed after submitting further evidence
July -September 5 panels were held Out of the 12 candidates who completed the assessment, 6 have currently passed.	Number of candidates: 12 Pass: 2 Fail: 4 Further Evidence Required: 6 Passed after submitting further evidence: 4
October - December 6 panels were held Out of 14 candidates, 8 have currently passed.	Number of candidates: 14 Pass: 8 Fail: 2 Further Evidence Required: 4 Passed after submitting further evidence: None yet

#### **Please provide comment on the results in this period.**

There were 39 assessments (38 candidates) during the period January 2023 -Dec 2023, assessed by 17 panels. The year started slowly with only 2 candidates in the first two months, however this increased over the year. Although the number of assessments are less than last year, when there were 57 assessment, the latter numbers could have been a post Covid increase. Overall, however the numbers are still high and show an increase over the last five years (57 in 2022, 34 in 2021, 25 in

2020, 21 in 2019, 21 in 2018). This demonstrates that overseas chiropractors are still wanting to work and register in the United Kingdom.

From the 39 assessments 16 (41%) passed first time, 8 failed (21%), with a further 15 (38%) required to submit further evidence. Of the latter group, 7 have yet to complete the process, whilst 8 have subsequently passed. The overall total of candidates who are now eligible to apply for registration in the UK is therefore 24 from a cohort of 38 candidates (63%).

Of the 39 assessments, 3 candidates were undertaking the assessment for a second time. One chose to undertake the process twice during 2023 (June and October), whilst the other two had undertaken the process in 2022. Unfortunately, all 3 failed again.

Previous years assessment outcomes have been reviewed to ensure that there are no significant changes in proportional outcome rates. Whilst the numbers are quite small to undertake true comparative review, the proportions of first time passes, fails and further evidence required rates are comparable. These continue to demonstrate that changes over the last five years, including the move to online assessments, and the loss of more experienced assessors does not appear to have affected outcome rates.

In terms of the candidate's country of qualification and failure rates :-

- 18 candidates originally qualified in the USA of which 10 ultimately passed, 3 failed and 5 have not yet completed the process of submitting further evidence.
- 8 candidates originally qualified in South Africa, of which 6 passed and 2 failed (one candidate failed twice in 2023)
- 4 candidates qualified in Spain, of which 2 passed, 1 failed and 1 has not yet completed the process of submitting further evidence.
- 4 candidates qualified in New Zealand, 3 of whom passed and 1 has not yet completed the further evidence process.
- 3 candidates qualified in Australia, all of whom passed.
- 1 candidate qualified in Mexico, who failed the assessment.

21 (55%) of the 38 applicants qualified recently, in the last three years. 13 passed first time, 3 failed, and 5 have yet to complete the further evidence process.

3 candidates qualified more than 20 years ago, all qualified in Australia, and all 3 passed.

Overall, this has been a busy year for the assessors and the registration team at the GCC. Once again the team should be commended for their efforts.

## Analysis of Documentation

Panel Member Recording Sheets  
(TOC Form A, and Assessor/peer feedback forms)

All panel members are currently expected to complete Form A, and the assessor /peer feedback form. Post interview completed forms should then be returned to the registration team.

A sample of TOC Forms (A) were reviewed. These are completed by all assessors, and are used for preparatory purposes, note taking during the interview, and for assessors to

record their observations throughout. Historically the expectations are that assessors complete as much as they can post interview, and forward to the registration team as their individual account of the process taken, the targeted approach with each candidate, discussion and debate that took place, and the overall outcome reached.

Recently whilst all assessors appear to be completing Form A pre interview, and taking notes during the interview, most chairs are now compiling a combined account for the panel after receiving the other assessors' forms. Whilst this combined account is useful, there is still a need for all the TOC Form A's to be held on record by the registration team, should any follow up be needed. Unfortunately, it appears that individual assessor forms are currently not always being returned to the registration teams.

Of the TOC Form A's sampled, due process appears to have been followed, and these demonstrate a good record of the process taken, and (alongside the chairs outcome letters) a rationale for the outcome decision.

The assessor/peer feedback form is used to record views on the process and performance of the team. This is usually referred to and feedback recorded in the individual appraisals. This year this process did not start to happen until November, when they were requested for the appraisal process. Only 10 out of a possible 81 feedback forms were therefore available.

Having lost a lot of experienced panellists and chairs recently, alongside shared responsibilities in the registration team, the feedback recording systems between the assessors/chairs and the registration team are not working as efficiently as previous years. Whilst this has not impacted on the individual candidate assessments / outcomes and their individual feedback, there are some gaps in the overall feedback loops in the TOC system that need to be addressed.

***Recommend – that a discussion takes place between chairs and the registration team, agreeing individual and collective expectations and responsibilities around panel feedback records, and that this is communicated further with other assessors.***

Chairs Reports / TOC Form B and Further Evidence supplied by candidates

All chair assessment feedback forms sent to the candidates were reviewed. This included all pass/fail and further evidence forms. The Chairs reports summarised the process and outcomes well, and comprehensive feedback was provided for those assessed.

A sample of further evidence from a selection of applicants was also reviewed, with additional feedback from chairs. The process appears to work well. All candidates who provided this additional evidence subsequently passed, apart from the 7 who have not yet completed.

The full documentation process was followed for 3 assessments linking the sample Form A, Chairs letter and further evidence. This appears to be a robust process.

Overall, the quality of the chairs record keeping was good, and they continue to commit significant time and energy to the process.

Result Letters from CER
<p>The Chief Executive and Registrar letter is now a standard outcomes letter, advising the candidate as to whether they have passed, are required to provide further evidence, or have failed, and next steps. The attached chairs report (as detailed above) gives the detail around the outcome, and rationale for the decision.</p> <p>The Chief Executive and Registrar letter is clear, and the attached chairs report provides a comprehensive rationale, as discussed above.</p>

### **Assessment Panel Operation**

TOC Pre- Meetings
<p>A September TOC process was observed throughout, over a two-day period. The pre meeting and assessments were online. 2 candidates were assessed. The chair is one of the mentors, and was acting as chair in this instance. He obviously therefore has a lot of experience.</p> <p>The chair and panellists had all prepared well, and advance notes had been pulled together by the chair, to enable an effective pre meeting. A comprehensive discussion around each candidate's application was held. Distribution of questions was agreed, and a plan formulated for the assessment. All assessors worked well together.</p>
TOC Interviews
<p>The interview process went well, due process was followed, and both candidates were treated fairly.</p> <p>This included a candidate who appeared to have significant problems understanding and answering the panels' questions due to language/translation difficulties. All panellists worked really hard to try to accommodate this, and to ensure the candidate was given the opportunity to demonstrate that this was not due to the situation. This meant that the assessment was quite lengthy, during which it became clear that the candidate would not be able to practice competently in the UK.</p> <p>The issue of candidates with communication problems, and the right of chairs to end an assessment due to language difficulties, or obvious lack of competence was discussed further at the TOC review meeting.</p> <p>Overall, this was an excellent panel, who worked well together.</p>

### **Assessor Performance Appraisals**

Confirm whether appraisals have been completed for all TOC Assessors and highlight any overall issues that have arisen.
<p>There were 17 assessors by the end of 2023, 16 took part in the appraisal process. There were also 3 chair mentors, who did not. 1 Chair has not undertaken any assessments this year, due to personal reasons, and asked not to participate in appraisal. One of the 17 wishes to leave, and this became an exit interview process. At this stage there were 4 Male and 13 female assessors remaining in November, with one intending to no longer participate. Of the remaining 16 assessors at the end of 2023 there were 6 remaining chairs, some of whom have been mentored this year, 3 male and 3 female. All 3 chair mentors are male.</p> <p>During 2023, 4 experienced assessors/chairs left due to end of tenure. This followed a significant number in 2022. The introduction of the chair mentor role appears to have supported new chairs, and all have stated the benefits of this. In discussion with one of the</p>

mentors, it is unclear how long the chair mentor programme will continue, as originally it was only planned for last year. As stated in last years' report, after several years of an established assessor/ chair group, this is a transitional period for this less experienced group.

***Recommend – continue the chair mentor system for another year to enable chair development, and maintain some consistency of experience and tacit knowledge, during a transitional period.***

As stated earlier there were limited assessor feedback forms available, so most assessors had no peer feedback. The appraisal process this year was therefore less effective, due to a lack of supporting data.

Issues raised during the TOC appraisals:-

- Administration issues, such as allocation of panels, and timing and receiving of records:-Whilst this has been raised before, the assessor who has chosen to leave stated that her rationale was the late allocation of panels. Others were also still stating this as an issue. This was also discussed at the review meeting and assurance made of improvements next year.

***Recommend – Review at the next review meeting and at the end of 2024, whether timescales in the allocation and receiving of records process has improved.***

- Support issues for assessors: - again this was raised last year, however in discussions it appears that, apart from the chair mentor scheme, no further action has been taken. Assessors state that they are often too tired to reflect on process, panel review and development areas on the assessment day. They would appreciate this happening in some way. The majority discussed the need for a face-to-face workshop /meeting once a year to facilitate team development (by the assessors getting to know each other), process review and enhancement, and some face to face development e.g. unconscious bias training.

***Recommend – Next TOC review meeting , should be face to face ( NB This has been requested and recommended every year since the start of Covid).***

- Use of non-chiropractic notes for assessment process: - some assessors were still uncomfortable with this and discussed further at appraisal. A recent candidate working as a non-registered chiropractor had failed twice. Panel members from both panels expressed concern pre assessment regarding the role of the candidate in clinic. The clinic lead was subsequently asked pre interview for information regarding the role, and supervision arrangements.

***Recommend – all candidates using non- chiropractic notes as TOC evidence whilst working in the UK, be required to submit information from their employer regarding role clarity and confirmation of supervision.***

- Some assessors suggested that face to face assessments should be offered as an option for candidates, particularly for those working in the UK.
- One chair raised an issue regarding the performance of one of the assessors, and also highlighted this in their feedback form. This has been discussed further with the assessor during appraisal and recorded accordingly.

## Candidate and Assessor Feedback

Assessor Feedback Forms
As stated earlier there were only a limited number of assessor feedback forms returned. All of these were reviewed and offered as peer feedback in the assessor appraisals, where available. Any issues noted, were raised, and discussed in appraisals.
Candidate Feedback Forms (E.g. Any significant and/or frequent issues highlighted.)
Only 4 Candidate feedback forms were received and all were reviewed. One candidate appeared to complete 2 different forms, so only 3 candidates responded. One candidate would have preferred a face-to-face interview. The other two seemed happy with the online process. All gave good feedback, however the candidate who would have preferred a face to face interview, raised a number of issues including the following comment :- <i>“The website instructions wasn’t clear enough (list of required document for TOC and later the list of required documents for Registration, especially for overseas or non-British applicants, preparing the documents take much more time than local candidates, we rely heavily on manual response but then the answers took a few responses from a few authority in a few weeks, including generic responses that doesn’t give clarity sometimes, which impacts foreign applicants hugely)”</i> .  This response demonstrates the amount of effort required to complete the TOC, however there is a lack of evidence available from others that this requires any further action at this point.

## Complaints and Appeals

Complaints and Appeals for this period.
One candidate who failed twice, has been in repeated communication with the GCC regarding the outcome of both of their assessments. Whilst the outcomes cannot be challenged within the complaints process, the candidate questioned the TOC process in some of her communication. As the external examiner I was asked to review the process on both occasions. Panel members were interviewed, all documents reviewed, and a report produced. The conclusion was that both panels were diligent and followed due process.

## Review and Evaluation of the Process

Please provide comment on the annual review meeting.
The TOC assessor review meeting was held online in October 2023. The majority of the assessors attended.  Developments in the GCC and TOC process were discussed and noted: - <ul style="list-style-type: none"><li>• The new GCC standards, ongoing implementation and the review of the Code of Conduct.</li><li>• The appointment of a new Education committee chair – Catherine Kelly</li></ul>

- The new mentoring scheme for chairs, this has been a successful process with positive feedback received from those being mentored, and other assessors now applying to join the scheme and become future chairs.
- Minor amendments made to the TOC website pages and TOC form A to align with the new standards.
- The question bank has been reviewed as requested last year.

At this meeting the following issues were raised by assessors: -

- Timeliness of allocation of panels and receiving of candidate records. This has been an ongoing issue. Assessors requested that they are given 6 weeks' notice of panel allocation. The registration team were asked to continue to develop the process.
- Length of online assessments. These are often still taking up to 2 hours. It was agreed that this is stressful, onerous, and a tiring process for both candidates and assessors. It was agreed to aim for 90-minute interviews if possible, and to allow more time between assessments.
- Candidates with language problems. Whilst candidates who qualify on non-English speaking programmes are expected to undertake an assessment of their language skills pre assessment, there had been a candidate recently who failed their TOC assessment, due to an inability to communicate fully, and who struggled to interpret and respond to questions posed. This also raised the issue of when the chair can terminate an interview. It was proposed that there should be the potential for the panel to request an 'offline break' where required. The registration team were asked to consider how this could be built into the process.

### **Summary, Conclusion and Recommendations**

In summary, 2023 was once again a busy year for the TOC assessment team, with 39 assessments undertaken, involving 38 candidates. Of these, 24 are currently eligible to apply for registration, with a further 7 undertaking the further evidence process.

Overall, the TOC assessment process appears to be robust and fair.

Feedback from candidates was limited but mainly positive, apart from some comments from one candidate.

One candidate has been in communication with the GCC regarding outcome of their assessments and questioned some elements of the process. A process review was held, and a report produced. The process on both occasions was found to be robust.

There is still some unease in the system around the assessment of notes from unregistered chiropractors working in the UK. Assessors on panels where UK non-chiropractic notes are being assessed have needed assurance of the context of the candidate's role in clinic, and supervision arrangements. For these candidates it may therefore be prudent in the future to establish submission of supporting evidence of role requirements and supervision arrangements.

Whilst all chairs have returned a collated version of the TOC Form A, there have been some issues this year with the return of individual assessor TOC Form A recording forms. In addition, no panel feedback forms were received pre-November, resulting in limited peer feedback available for appraisals. Both these issues need to be addressed.

16 out of the 17 assessors were appraised, with one issue around performance, which was discussed at appraisal with the individual. A number of generic issues were also raised.

The introduction of the chair mentor scheme has been a success. Feedback from those involved has been positive, and this has led to an increase in the number of assessors who have applied to be future chairs. The current cohort of chairs and assessors is however still less experienced overall than previous years, and the assessors are asking for further development in the form of ongoing reflection of process and performance on individual panels, and a once-a-year face to face development/review day to enable team and process development.

**Recommendations :-**

1. An agreed action plan between chairs, assessors and the registration team , outlining individual and collective expectations and responsibilities around TOC form A's and panel feedback forms. The majority of these to be available next year.
2. All candidates using non- chiropractic UK notes as TOC evidence, be required (as part of their application) to submit a letter from their employer confirming role and supervision arrangements.
3. Continue the chair mentor system for another year to enable chair development, and maintain some consistency of experience and tacit knowledge, during a transitional period.
4. Arrange the next TOC review meeting face to face, to encourage assimilation of new assessors, and ongoing team and process development.
5. Review at the next TOC assessor meeting and at the end of 2024, whether timescales in the allocation of assessors and receiving of candidate records has improved.
6. Continuously recruit, train, and establish new assessors into the team.

Overall, this has been another busy year for the TOC assessment team, with a significant number of panels and assessments. All involved should be commended for their inputs and effort during this time.

Signed



Date: 11/01/2024



## GCC response to the Test of Competence External Examiner's Report

Below are the responses and actions taken in response to the suggestions and recommendations made by the External Examiner.

These responses and actions demonstrate our commitment to maintaining the integrity and effectiveness of the TOC process, ensuring that it remains a robust and reliable assessment mechanism for evaluating the competence of chiropractors. We appreciate the valuable insights and recommendations provided by the External Examiner and remain dedicated to implementing measures that contribute to the ongoing improvement of the TOC process.

Recommendation	Response	Planned Action (if applicable)
<p>An agreed action plan between chairs, assessors, and the registration team, outlining individual and collective expectations and responsibilities around TOC form A's and panel feedback forms. The majority of these to be available next year.</p>	<p>We acknowledge and accept that we had been remiss in reminding assessors and chairs to provide both form A's and complete feedback. However, it is a key part of the process and should be completed automatically at the end of each panel interview by each panel member.</p>	<p>We have made it clear that the GCC's expectation is for panel members to complete the feedback form at the end of the interview day.</p> <p>Additionally, panel chairs should be reminding panel members to complete the feedback as well as ensuring that all Form A's are uploaded to the relevant team folder.</p> <p>To aid chairs in ensuring all paperwork is completed, we will be producing a checklist.</p>
<p>All candidates using non-chiropractic UK notes as TOC evidence, be required (as part of their application) to submit a letter from their employer confirming role and supervision arrangements.</p>	<p>Currently applicants must self-declare the conditions under which they obtain patient records as part of the Evidence of Practice Questionnaire.</p>	<p>This will be passed to the Education Committee as part of this report, who may wish to consider this further.</p>
<p>Continue the chair mentor system for another year to enable chair development, and maintain some consistency of experience and tacit knowledge, during a transitional period.</p>	<p>The chair mentoring programme has been helpful in increasing the number of chairs from our current pool of experienced assessors as well as providing an introduction to those new to the pool.</p>	<p>It is our intention to continue with the chair mentoring programme into the future.</p>
<p>Arrange the next TOC review meeting face to face, to encourage assimilation of new assessors, and ongoing</p>	<p>While we understand there is some appetite for a face-to-face review meeting, the</p>	<p>Having previously reviewed this option, we do not plan to hold this face to face due to logistics and cost.</p>

<p>team and process development.</p>	<p>practicalities and cost of doing so are prohibitive.</p>	<p>However, we will keep the option open.</p>
<p>Review at the next TOC assessor meeting and at the end of 2024, whether timescales in the allocation of assessors and receiving of candidate records has improved.</p>	<p>We are aware that panel members would like to be notified sooner as to whether they have been selected for a panel. We are actively working to ensure this is the case but cannot do so before the deadline for each TOC.</p>	<p>We have reviewed our processes and will attempt to set panels as soon following the application deadline as possible.</p> <p>It has come to our attention that assessors and chairs do not consistently inform us if their availability changes, leading to difficulties in scheduling panels and resulting in delays. We urge panel members to promptly notify us if they become unavailable on any interview day they had previously committed to. This will greatly assist our office in efficiently organizing panels and minimizing disruptions.</p>
<p>Continuously recruit, train, and establish new assessors into the team.</p>	<p>We run an annual recruitment round for new assessors and chairs, which is now embedded within the TOC year.</p>	<p>We will continue to run an annual recruitment round.</p>