

**GCC Test of Competence**

**External Examiner's Annual Report**

**Period:** January 2022 – December 2022

**Results**

<b>Date of TOC</b>	<b>Results</b>
<p>January</p> <p>3 Panels were held</p> <p>Out of 6 candidates, 5 ultimately passed.</p>	<p>Number of candidates:6</p> <p>Pass:2</p> <p>Fail:1</p> <p>Further Evidence Required:3</p> <p>Passed after submitting further evidence:3</p>
<p>February</p> <p>3 Panels were held</p> <p>Out of 9 candidates, 5 passed ultimately passed.</p>	<p>Number of candidates:9</p> <p>Pass:4</p> <p>Fail:4</p> <p>Further Evidence Required:1 who passed after submitting further evidence.</p>
<p>March</p> <p>3 panels were held</p> <p>Out of the 7 candidates who completed the assessment, 4 ultimately passed.</p>	<p>Number of candidates:8 , 1 of whom deferred</p> <p>Pass:2</p> <p>Fail:3</p> <p>Further Evidence Required:2</p> <p>Passed after submitting further evidence:2</p>
<p>April</p> <p>2 panels were held</p> <p>Out of 4 candidates, 3 ultimately passed.</p>	<p>Number of candidates:4</p> <p>Pass:2</p> <p>Fail:1</p> <p>Further Evidence Required:1</p> <p>Passed after submitting further evidence :1</p>
<p>May</p> <p>1 panel was held</p> <p>All 3 candidates ultimately passed</p>	<p>Number of candidates:3</p> <p>Pass:1</p> <p>Fail:0</p> <p>Further Evidence Required:2</p> <p>Passed after submitting further evidence :2</p>

<p>June</p> <p>2 panels were held</p> <p>Out of the 6 candidates, 5 ultimately passed.</p>	<p>Number of candidates:6</p> <p>Pass:4</p> <p>Fail:1</p> <p>Further Evidence Required:1</p> <p>Passed after submitting further evidence:1</p>
<p>July</p> <p>1 panel was held</p> <p>Out of 3 candidates, 1 ultimately passed.</p>	<p>Number of candidates:3</p> <p>Pass:0</p> <p>Fail:2</p> <p>Further Evidence Required:1, who passed after submitting further evidence</p>
<p>August</p> <p>2 Panels were held.</p> <p>Out of the 6 candidates 3 ultimately passed</p>	<p>Number of candidates:6</p> <p>Pass:0</p> <p>Fail:3</p> <p>Further Evidence Required:3</p> <p>Passed after submitting further evidence:3</p>
<p>September</p> <p>1 panel assessed 1 candidate who ultimately passed.</p>	<p>Number of candidates:1</p> <p>Pass:0</p> <p>Further Evidence Required:1</p> <p>Passed after submitting further evidence:1</p>
<p>October</p> <p>2 panels</p> <p>Out of 4 candidates, 3 ultimately passed, 1 is awaiting outcome.</p>	<p>Number of candidates:4</p> <p>Pass:2</p> <p>Fail:0</p> <p>Further Evidence Required:2</p> <p>Passed after submitting further evidence:1</p> <p><i>Note the candidate is now shown as passed in 7.a. Annex A - 2022 ToC Annual Report.</i></p>
<p>November</p> <p>One panel met.</p> <p>2 candidates both passed first time.</p>	<p>Number of candidates:2</p> <p>Pass:2</p>
<p>December</p> <p>2 panels met</p> <p>Out of the 4 candidates, 2 have currently passed, 2 are awaiting outcome of further evidence submission.</p>	<p>Number of candidates:6</p> <p>Pass:2</p> <p>Fail:1</p> <p>Further Evidence Required:3</p> <p>Passed after submitting further evidence:1. The other 2 are awaiting outcome of further evidence submission.</p>

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

There were 56 assessments (including one which was deferred) during the period January 2022 -Dec 2023, assessed by 23 panels. The number of assessments has substantially increased, compared with the last 4 years (34 in 2021, 25 in 2020, 21 in 2019, 21 in 2018). This is the highest number of assessments since the TOC process started.

This is a significant achievement, both in terms of the administration of monthly panels, and the TOC assessor panels completing the process. The introduction of online panels, since the COVID pandemic, appears to now offer more flexibility in the process and convenience for candidates and panel members alike, enabling an increased number of assessments to take place. There is no apparent rationale for the increased number of applications this year. There may have been some hesitation in applications during the pandemic, creating some backlog in the numbers applying, hence the rise in 2022. At the start of 2023 however, there are currently few applications, which may result in reduced numbers this year.

From the 55 assessments taken, 20 (36.3%) passed, 15 failed (27.2%), with a further 20 (36.3%) required to submit further evidence. Of the latter group, all but 2 (who are awaiting the outcomes of further evidence submission) have subsequently passed.

Of the 55 assessments taken, 6 candidates have repeated the assessment process after failing the first time. A total of 8 repeat assessments were held, with two candidates undertaking 3 assessments. (one failed on 3 occasions, the other passed on the third attempt). The other 4 repeat assessments all passed on the second assessment (1 first time, the other 3 after submitting further evidence) 47 candidates therefore undertook 57 assessments. Of the 47 candidates 38 (80.8%) have currently passed, and are eligible to apply for registration.

Concerns were noted when the online assessments were introduced as to whether this was impacting on the number of first-time pass rates (FTPR). As per last year, the numbers have been compared with pre pandemic levels and this year's online outcomes broadly reflect pre-pandemic face to face assessment outcomes. The online process therefore appears to be robust, flexible, and convenient for assessors and candidates. The candidates may also be experiencing reduced costs and time, previously incurred in face-to-face meetings. This may however be impacting on the process itself, in that there were a number of candidates repeating the process within short timescales (2-3 months) after failing the first time. Two candidates did this 3 times during the year, 4 candidates did this twice. This may have been more noticeable this year due to the increased number of assessments, however the repetition within the short timeframes may need to be discussed further.

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

- 20 candidates originally qualified in South Africa, of which 3 initially failed. 2 of whom passed on the second attempt.
- 15 candidates originally qualified in the USA of which 6 initially failed. Of the latter 1 failed after 3 attempts. 2 passed on second attempt. 3 have not reattempted. 1 of the 15 is still awaiting outcome.
- 7 from Australia, 1 fail.
- 1 from Turkey, who passed on their third attempt.
- 2 from Malaysia, 2 failed. 1 subsequently passed on the second attempt.
- 1 from New Zealand – awaiting outcome.
- 1 from Denmark, passed.

Whilst the numbers are too small to make reliable assumptions, proportionally the number of fails was still higher from USA candidates, than South African.

27 (57.4%) of applicants qualified recently, between 2019 and 2022. Of these, 9 applicants failed their first TOC process. 5 applicants attempted a second TOC. 3 of these applicants passed, with the remaining 2 taking a third TOC (one passed, one failed). 22 of this group ultimately passed.

5 applicants had qualified more than 20 years ago, all 5 passed after submitting further evidence.

Overall, as stated earlier, there have been a number of candidates resubmitting within a limited time frame. There does not appear to be a minimum time gap in the process for resubmissions.

**The GCC may wish to consider whether an appropriate time frame between resubmissions be introduced, to allow further candidate reflection and learning, after being initially assessed as not yet fit to practice in the UK.**

#### Analysis of Documentation

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

A sample (20) of TOC Forms (A) were reviewed. These are completed by all assessors, and are used as a preparatory checklist, for preparatory purposes, note taking during the interview, and for assessors to record their observations throughout. They are fully completed post interview, and are a useful record of the process taken, targeted individual approach with each candidate, discussion and debate and the overall outcome reached.

Of those sampled, due process appears to have been followed, and although the majority had completed the form, some were still using mainly for the interview preparation process, and not always fully completing their observations on the candidate.

All panel members are currently expected to complete Form A, the checklist and the assessor /peer feedback.

I have only been sent a sample of 3 checklists, which appear to be limited in their usefulness now, and I suspect are not now completed by all assessors. If the Form A is completed properly, then it may not be an essential part of the process.

The assessor/peer feedback form is used to record views on the process and performance of the team. This is referred to and feedback recorded in the individual appraisals. Whilst there as been a significant increase in the numbers returned, there are still many that are not.

**It may be useful to discuss with chairs whether the checklist is still required, followed by once again a reminder at the TOC assessor meeting that all are expected to complete and return the essential TOC documents , as a complete record of the process.**

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

A sample (20) of the chairs assessment feedback forms sent to the candidate were reviewed. This included a sample of pass/fail and further evidence forms. The Chairs reports summarised the process and outcomes well, and comprehensive feedback was provided for applicants.

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 3 who have not yet completed.

The full documentation process was followed for 1 candidate linking the sample Form A, Chairs letter and further evidence. This appears to be a robust process.

Also sampled were 2 of the 3 fail outcome letters sent to a newly qualified American candidate , who ultimately failed 3 times (I did not have access to the third document) . At the first attempt the panel stated a number of reasons why the candidate was not yet considered safe to practice in the UK in great detail and included the following statement.

*“Before considering a further application, the panel recommend that you carry out a widespread review of your current practice and knowledge base and engage in relevant professional development activities.”* This candidate was reassessed two months later, and again after another 4 months.

There were others who failed, who had the same /similar comments, who went on to pass within a short time.

This highlights that there may be a gap in the process, hence the earlier recommendation that the GCC may wish to consider a minimum time for resubmissions.

Overall, the quality of the chairs record keeping was excellent, and they should be commended for the time and energy committed to the process.

#### Result Letters from CER

The Chief Executive and Registrar letter is now usually 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.

The Chief Executive and Registrar letter is clear, and the attached chairs report provides a comprehensive rationale, as discussed above.

### Assessment Panel Operation

#### TOC Pre- Meetings

The June TOC process was observed throughout. The pre meeting and assessments were online. 3 candidates were assessed.

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.

The panel stated that they were uncomfortable about the use of patient notes provided by one candidate. These were notes where the applicant is currently working in the UK as an osteomyologist, whilst applying to become a registered UK chiropractor. The chair had checked with the GCC whether these notes were acceptable, who agreed the process. The panel however

whilst accepting the rationale for a pragmatic approach, still claimed to be uncomfortable about the assessment based on 'non-chiropractic' notes, and members went on to raise this issue (alongside others) at the TOC review meeting and individual appraisal discussions.

#### TOC Interviews

The interview process went well, due process was followed and all candidates were treated fairly. The chairs introductory template, prepared recently within the TOC team works well, candidates were put at their ease, the interview process was seamless with good links made between the different sections. Overall, this was an excellent panel, who worked well together.

### Assessor Performance Appraisals

Confirm whether appraisals have been completed for all TOC Assessors and highlight any overall issues that have arisen.

There were 19 assessors by the end of 2022, all of these took part in the appraisal process. There were 7 Male and 12 female assessors remaining in November. Of these there were 5 remaining chairs, 3 male and 2 female.

A number of these are coming to the end of their tenure during 2023. These include 2 male chairs (one of whom is taking on the role of mentor for new chairs), and 3 male assessors. Which would only leave 14 assessors, including 2 female and 1 male chair. The GCC are however taking a proactive approach to this matter, and are currently recruiting assessors, encouraging current assessors to apply for chair roles, and are introducing a chairs mentoring programme. 2 experienced previous chairs have been appointed to take up the mentor role.

As stated in last years' report, after several years of an established assessor/ chair group, this is a transitional time for the group. Several issues raised during the appraisals, may reflect this, particularly around support needs.

Issues raised during the TOC appraisals:-

- Administration issues, such as allocation of panels, and timing and receiving of records.
- Support issues for assessors – such as the reintroduction of a reflection period at the end of the interview days to reflect on process, panel effectiveness and any development areas; face to face meetings/ training sessions e.g. TOC review meetings, unconscious bias training; shared lists of TOC assessor names to enable familiarisation.
- Process issues- TOC question bank – the questions are not always articulated well.
- Use of non-chiropractic notes for assessment process- several assessors were still uncomfortable with this. Whilst recognising this may need to be a pragmatic approach there may be a need to continue to review this (as agreed at the TOC review meeting), and to review the current wording of the TOC application process to ensure that the process reflects this change in approach.

Post appraisal, all of the above issues have been raised with the GCC , to enable any further action required. It is understood that the following has been agreed to date:-

- **Osteomyologist /non chiropractic notes – continue to review the numbers applying. Review the current TOC application process online to assure that this reflects this new approach. May need further discussion with TOC chairs/assessors.**
- **Question bank – review and update questions.**

**Other issues to be discussed at the next TOC review meeting, if possible in a face to face meeting day.**

### **Candidate and Assessor Feedback**

#### **Assessor Feedback Forms**

All assessor feedback forms were reviewed, and peer feedback used as part of the assessor appraisals. Any issues noted, were raised, and discussed in appraisals. As stated earlier, whilst the return rates from assessors has significantly improved, several feedback forms were still missing.

#### **Candidate Feedback Forms**

(E.g. Any significant and/or frequent issues highlighted.)

All 15 Candidate feedback forms were reviewed. As with many online feedback requests, the response rate is fairly low (26%).

Of those received, the majority were complimentary about the process, and the effectiveness of the panel, and felt that the panel put them at ease. There were less comments around navigating the online process this year, with a few simple suggestions offered to improve the communication process.

Some stated that they found the scrutiny during the interview quite hard, however the majority were positive, or offered no comment. One candidate, who sat the process twice, related how the emphasis on sections of the process, was different on the two occasions.

Whilst there were some very positive comments regarding the process, one candidate appeared to be quite dissatisfied, giving low feedback scores throughout, alongside some very negative comments. The candidate was newly qualified, and felt that allowances should be made for this. He also made some derogatory comments about the interview process itself. This candidate passed first time.

Only 4 out of the 15 would have preferred a face-to-face interview. The majority stating convenience, time and cost as their rationale. A couple of the candidates stated they would have liked the interview to be longer, around 2 hours, as this would give them more time to reflect and answer questions. The majority were happy with the time allocated.

One candidate was very complimentary around the work of the GCC, congratulating the organisation on the Code and on the wealth of knowledge available onsite for candidates and UK practitioners.

### **Complaints and Appeals**

Complaints and Appeals for this period.

There were no complaints or appeals during this period.

### **Review and Evaluation of the Process**

Please provide comment on the annual review meeting.

The TOC assessor review meeting was held online in September 2022. The majority of the assessors attended.

Developments in the TOC process were discussed and noted: -

- Development of the new mentoring scheme for chairs.

- Significant increases in candidate applications and number of panels.
- The review of the GCC standards.

At this meeting the following issues were raised: -

- Balanced process- it was recognised that some panels may be placing too much time /emphasis on section A. It was agreed that a more balanced approach should be taken if possible.
- Time allocation- the online process appears to be taking longer, with less time available between assessments. It was agreed to aim for 90-minute interviews if possible, and more time between assessments.
- Chair recruitment – previously chairs have been expected to be educationalists, which has restricted the pool of applicants. This was discussed here, and at the education committee, where it was agreed that the requirements be focussed on skills/knowledge of applicants rather than role experience.
- Post interview documentation- whilst return rates have improved significantly, there are still some gaps. All were reminded of the need to return feedback forms and TOCA forms post interview.
- Osteomyologist roles/Submission of non-chiropractic records- an in-depth discussion took place. Some recognised the need for a pragmatic approach, others voiced their concerns over the use of non-chiropractic records in the TOC process. Whilst it was agreed at this stage to continue to accept the records as evidence, and review the numbers applying, there are still several assessors who do not believe that this issue has been resolved. As stated earlier, this was raised during their appraisals, and is under review.

### Summary, Conclusion and Recommendations

In summary, 2022 was a busy year for the TOC assessment team, with 57 assessments undertaken, involving 49 candidates. The highest number of applicants since the TOC process began. Of these, 38 were ultimately eligible to apply for registration.

The review of documentation and observation of the process showed that due process was being followed, and the process is robust and effective.

The online process appears to be working well, and appears to now be accepted as an effective, ongoing process.

All 19 assessors were appraised, with no issues around individual performance, although several issues around the process, were raised as discussed earlier.

Recruitment of assessors and chairs is ongoing, and the introduction of the chair mentoring scheme is to be commended. Due to the number of new assessors, there may be some ongoing support requirements, such as the reintroduction of the post interview reflection process, and an annual face to face meeting.

Feedback from candidates was mainly positive, apart from one candidate.

The main issues noted during the assessments this year, were the acceptance of non-chiropractic notes in the EPQ form, and the short timescales between resubmissions.



**Recommendations :-**

1. The GCC may wish to consider whether an appropriate time frame between resubmissions be introduced.
2. Continue to review the acceptance of non-chiropractic notes in the EPQ, by ensuring that the TOC application process online reflects this. The GCC may also need to consider further discussion with TOC chairs/assessors.
3. Review remaining issues raised from the assessor appraisals and documentation review, at the next TOC review meeting.
4. Continuously recruit, train, and establish new assessors, particularly chairs. Encourage assessors to apply for chair positions.
5. If possible, arrange the next TOC review meeting face to face, to encourage assimilation of new assessors, and ongoing team development.

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

Signed



Date: 03/03/2022

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

Below is the response and actions to the suggestions and recommendations made by the External Examiner in her 2022 annual report.

Recommendation	Response	Planned Action (if applicable)
<p>The GCC may wish to consider whether an appropriate time frame between resubmissions be introduced.</p>	<p>There have been cases where candidates have failed the TOC on more than one occasion. We have never restricted access to the TOC based on a recent fail.</p> <p>Guidance is provided to candidates failing the TOC so they may better prepare next time. However, it would not be appropriate for the GCC to set down a timeframe within which they cannot apply, as some candidates need more revision than others and it is therefore up to the candidate to determine when they are ready to resit.</p> <p>Additionally, there is nothing with our rules allowing us to do so, and it would not be politic to be seen to restrict access to the register.</p>	<p>We will review the website wording to ensure it is clear to those failing the TOC that we expect them to review the feedback provided before applying again to sit the TOC.</p>
<p>Continue to review the acceptance of non-chiropractic notes in the EPQ, by ensuring that the TOC application process online reflects this. The GCC may also need to consider further discussion with TOC chairs/assessors.</p>	<p>This matter was discussed at the 2022 TOC Review Meeting. While we accept there is strong feeling by panel members for accepting non-chiropractic notes as part of the TOC assessment, where the applicant is involved in treatment comparable with chiropractic treatment, it would be inappropriate to put barriers to the profession simply because someone is making a living using their chiropractic skills but before they have been able to pass the TOC.</p>	<p>A new policy on anonymised patient notes has been developed. This has been drafted in consultation with TOC chairs/assessors.</p>
<p>Review remaining issues raised from the assessor</p>	<p>We will carefully review the issues raised and use these</p>	<p>Where issues require further discussion, we will raise</p>

appraisals and documentation review, at the next TOC review meeting.	to inform the agenda of TOC review meetings.	those at the TOC review meeting, unless urgent, in which case it will be in advance of the meeting.
Continuously recruit, train, and establish new assessors, particularly chairs. Encourage assessors to apply for chair positions.	We have set up a mentoring programme for all those wishing to move into the role of panel chair.  Additionally, we continue to run an annual recruitment drive for TOC assessors and chairs.	Conduct a further recruitment drive in late 2023/ early 2024.
If possible, arrange the next TOC review meeting face to face, to encourage assimilation of new assessors, and ongoing team development.	This will depend on a multitude of factors and cannot be guaranteed. However, we will bear it in mind when it comes to planning the next TOC review meeting.	Consider the option of holding the 2022 TOC review meeting in person.