

7b Annex B

General Chiropractor Council Test of Competence process

External examiner's annual report

Period: January 2024 – December 2024

Section A. Results

TOC Panel sitting	No. of Panel assessments	Results
January	4	Pass: 1 Further evidence required: 1 Fail: 2 <i>Passed after submitting further evidence: 1</i>
February	3	Pass: 3 Further evidence required: - Fail: - <i>Passed after submitting further evidence: -</i>
March	6	Pass: 3 Further evidence required: 2 Fail: 1 <i>Passed after submitting further evidence: 2</i>
April	4	Pass: 2 Further evidence required: 2 Fail: - <i>Passed after submitting further evidence: 2</i>
May	1	Pass: 1 Further evidence required: - Fail: - <i>Passed after submitting further evidence: -</i>
June	2	Pass: 1 Further evidence required: 1 Fail: - <i>Passed after submitting further evidence: 1</i>
July	4	Pass: 3 Further evidence required: 1 Fail: - <i>Passed after submitting further evidence: 1</i>
August	6	Pass: 2 Further evidence required: 3 Fail: 1 <i>Passed after submitting further evidence: 2</i>
September	3	Pass: - Further evidence required: 3

		Fail: - <i>Passed after submitting further evidence: 3</i>
October	2	Pass: 1 Further evidence required: - Fail: 1 <i>Passed after submitting further evidence: -</i>
November	4	Pass: 1 Further evidence required: 1 Fail: 2 <i>Passed after submitting further evidence: 1</i>
December	-	-
Total number of assessments	39	Pass: 18 Further evidence required: 14 Fail: 7 <i>Passed after submitting further evidence: 13</i>

Please provide comment on the results in this period

Overview of TOC assessments

1. A total of 39 TOC assessments were conducted during 2024. The assessments involved 36 candidates, with three candidates undertaking a second assessment in 2024 after a 'fail' outcome at their first attempt earlier within the period. It is understood that two other candidates re-took the assessment in 2024 after having previously sat and failed the assessment in a previous period.
2. The overall number of assessments in 2024 were consistent with those for 2023, with the same number of assessments having been conducted during each period. This suggests a settling of the number of candidates presenting for assessment compared with the variation in numbers in before and after the Covid pandemic (ranging from 21 in both 2018 and 2019 to 54 in 2022).
3. The table above indicates the spread of the 39 assessments across eleven months (January to November). It indicates that March and August were the busiest months, with six assessments undertaken in each. The least busy months were May (in which there was one assessment) and June and October (in each of which there were two assessments).
4. The following was the overall breakdown of assessment outcomes in 2024:
 - Pass: 18 (46%)
 - Needing to submit further evidence: 14 (36%)
 - Fail: 7 (18%).
5. For the assessment sessions in most months, there was a spread across the possible assessment outcomes. It was only in February and September in which each assessment outcome was the same (all passes in February; all 'require further evidence' in September). However, the number of assessments in each month was small.

6. There has not been the opportunity to explore whether anything can be inferred from the variation in 2024 outcomes about how the process was conducted. Clearly, a key determining factor would have been the scope for variation in the quality of applications received for individual monthly assessment sessions. To understand the interaction between different factors would require a detailed review of the applications made and the panel records. In line with comments made later in this report, such an exercise may be useful to undertake as part of broader activity to understand the implications of different variables in relation to candidates' applications and performance at interview; panel composition; panel appraisal of the evidence and interview performance; and the formulation of assessment outcomes, including the nature of specific requirements and recommendations attached to the outcome for individual candidates.
7. Of the candidates needing to submit further evidence following their assessment in 2024, all but one achieved a pass based on their subsequent evidence submission. One candidate is recorded as needing to resubmit. It is inferred from this that the chair's review of the candidate's further evidence led to additional evidence being required. For one candidate, neither the deadline for submitting additional evidence nor whether the evidence was received is recorded. However, it is recorded that they subsequently achieved a pass. It can therefore be inferred that this was a recording omission, rather than either the candidate not submitting the required further evidence or the chair's review of their further evidence not leading to a pass.
8. The total number of passes achieved during the period was therefore 31. This forms an overall pass rate of 79% within the total number of assessments during the period. With the total of 31 passes, the balance was as follows:
 - 58% [n=18] of passes were achieved as the initial outcome of the assessment.
 - 42% [n=13] of passes were achieved following the submission of further evidence.
9. From the information supplied, it is understood that 45% [n=14] of the candidates who achieved a pass in 2024 went on to secure admission to the GCC register. However, it is presumed that this figure is now out of date and that the overall translation to registration will now be higher.

Comparison with assessment outcomes in 2023

10. The balance of assessment outcomes broadly aligns with those for the previous period. The proportion of passes as an outcome of the panel assessment was slightly higher than the equivalent proportion 2023, when the pass rate in that period was 41% [n=16]. There was an equivalent proportion of assessments resulting in candidates needing to submit further evidence in 2023, with this having been 38% [n=15] and with those resulting in a fail, with this having been 21% [n=8].
11. The overall pass rate (initial passes, combined with fulfilment of further evidence requirements) was lower in 2023 than for 2024, with it having been 63% [n=24] in 2023. The higher proportion of overall passes in 2024 reflects a higher number of candidates submitting further evidence within the time period set by GCC and with

this resulting in the candidates achieving a pass. In contrast to the high translation rate in 2024, only 8 of the 15 fulfilled the requirements and subsequently passed within 2023, while 7 had yet to complete the process during the period.

12. It is not known from the information supplied whether the 7 candidates set further evidence requirements in 2023 met these in 2024. It would be useful to be able to gain an overview of candidates' progression (or otherwise) when this crosses over individual TOC periods (calendar years). This would help to provide a clearer sense of whether there are any discernible trends in candidates completing or not completing the process successfully over the TOC periods and the translation to successful candidates applying for and securing registration. If there are any discernible trends, it would then be useful to seek to understand these (e.g. if there is candidate attrition, whether this is to do with engagement with specifics of the TOC requirements, or to do with candidates no longer wishing to pursue the opportunity to practise as a chiropractor in the UK).

Specific points relating to the 2024 assessment outcomes

13. The three candidates who retook the assessment after an initial fail in 2024 (i.e. they each sat the assessment twice during the period) achieved the following the second time:

- One passed.
- One was required to submit further evidence and subsequently passed.
- One failed the second time.

14. Each of the candidates who undertook the assessment for a second time during 2024 did so within three months of sitting it the first time. As indicated above, this led to the full range of possible outcomes the second time.

15. The following is a breakdown of the country of qualification of the 37 candidates sitting the 39 assessments:

- USA: 18 (46%)
- South Africa: 9 (23%)
- New Zealand: 6 (15%)
- Spain: 3 (8%)
- Australia: 3 (8%).

16. The 7 assessments resulting in a fail related to candidates who qualified in the USA. Of these assessment outcomes, 4 (57%) were achieved by candidates who qualified from the same US institution.

17. The full breakdown of assessment outcomes relating to the 18 assessments of candidates who qualified in the USA was as follows:

- Passed: 9 (50%)
- Further evidence required: (11%)
- Fail: 7 (39%).

18. The following is a breakdown of the assessment outcomes of candidates who qualified in other countries:

- South Africa: 5 (56%) passed; 4 (44%) were required to submit additional evidence.
- New Zealand: 1 (17%) passed; 6 (83%) were required to submit additional evidence.
- Spain: 1 (33%) passed; 2 (66%) were required to submit additional evidence.
- Australia: 3 passed (100%).

19. These trends in assessment outcomes by candidates' country of qualification broadly align with those for 2023. They indicate the wide variation in initial pass rates (from 100% to 17%) when looked at by country of qualification. However, candidates from individual countries, other than the USA, consistently achieved a pass following their submission of additional evidence. Therefore, the overall assessment outcome for each country, other than the USA, was 100%.

20. For 72% of candidates [n=28], their country of qualification was the same as their indicated nationality. For 28% of candidates [n=11], there was a difference between the two. Of note, 36% of this profile of candidates were of Canadian nationality [n=4] and had qualified either in the USA or South Africa; 18% [n=2] were British; and none of the candidates who had qualified in Spain [n=3] were of Spanish nationality.

21. It is understood from the record provided that all candidates who undertook the assessment during 2024 [n=36] completed the GCC's equality, diversity and inclusion survey. Within the recorded feedback, 25% of candidates [n=9] indicated their specific non-white ethnicity and 75% of candidates [n=27] indicated that their ethnicity was white. One candidate disclosed that they had a disability. It is not clear from the record whether reasonable adjustments were requested by or made for the candidate to enable them to engage with the assessment process.

22. In terms of the assessment outcomes relative to the length of time candidates had been qualified as a chiropractor, there were the following trends:

- 8 (12%) had qualified between 2006 and 2014 (so ten years ago or more); of these, 5 (62%) achieved a pass; 3 (38%) were required to submit further evidence; and none (0%) failed.
- 11 (28%) had qualified between 2015 and 2020 (so qualified between four and nine years ago); of these, 6 (55%) achieved a pass; 2 (18%) were required to submit further evidence; and 3 (27%) failed.
- 20 (51%) had qualified between 2021 and 2024 (so qualified within the last three years); of these, 7 (35%) achieved a pass; 9 (26%) were required to submit further evidence; and 4 (20%) failed.

23. These trends seem broadly to align with those for 2023. It has not been possible to compare them with data from previous periods. Again, it would be useful for this to be considered.

24. The figures suggest a correlation between the length of time candidates had been qualified and whether they achieved a successful outcome. At the same time, it is notable that 51% [n=20] of the assessments related to candidates who had been

qualified for three years or less. Of these assessments, 20% [n=4] resulted in a fail (albeit with two of these relating to the same candidate).

25. Given TOC's purpose is to assess whether candidates meet the GCC's threshold standards for registration in the UK, it may be useful to review TOC outcome trends over time from the perspective of how long candidates had been qualified when they undertook the assessment. It is recognised that a wide range of factors may relate to the apparent correlation in the 2024 figures, including candidates' pre-registration education, post-registration clinical experience, and professional confidence. While a review may not indicate that the TOC process itself creates variation in the assessment outcomes (rather, it may positively reinforce that the process upholds GCC's threshold standards), it would be useful to explore if any points can usefully be distilled and shared. For example, this might be to identify the value of providing additional guidance to prospective TOC candidates or through the GCC engaging with international stakeholders.

26. Overall, the TOC process in 2024 involved a similar volume of activity as in 2023 and led to a similar pattern of assessment outcomes. However, there was a better translation of initial assessment outcomes in 2024 than in 2023, in terms of candidates fulfilling the further evidence requirements that were set. In turn, this led to a higher proportion of candidates gaining eligibility to apply for UK registration. This increased number of candidate progressions through the TOC process can be seen as a positive trend.

See recommendation i.

Section B. Analysis of documentation

Panel member recording sheets (TOC Form A and assessor/peer feedback forms)

TOC Form A

27. A sample of completed TOC Form A templates was supplied for review. These had been completed by assessors, used for preparatory purposes ahead of panel sessions and for assessors' notetaking during panel interviews. It is understood that the practice has continued of panel chairs compiling a combined TOC form A on behalf of their panel after receiving the other two assessors' forms. Of the Form As supplied and reviewed, it appears that the form is being appropriately used, with a good record kept of interview proceedings. This seems appropriate for ensuring that there is a composite record of panel findings.

28. Based on the documentation supplied for review, it is not known if all individual assessor Form As were submitted and stored, in addition to the composite forms completed by chairs. As raised in the previous external examiner's report for 2023, it is important that a full record is compiled and retained. This includes to inform any required activity resulting from a candidate complaint or appeal and for quality assurance and review purposes. Related to this, it may be appropriate to review whether interviews should also be recorded (see **Section C**).

Assessor feedback on one another

29. A spreadsheet was supplied of the feedback that was submitted by assessors on one another after each panel sitting. This formed a valuable source of information to inform assessor appraisals in late 2024/early 2025 (see **Section D**).
30. There appeared to be some gaps in the feedback that had been gained and recorded. This was potentially due a combination of not all assessors providing feedback on their peers and a delay to feedback being entered onto the spreadsheet. This meant that for a small number of assessors, there was not any feedback to inform the appraisal session, while for a few others they were unsure as to whether their feedback on peers had been received and recorded.
31. As covered in **Section D** of this report, it comes through strongly that assessors value both giving and receiving feedback. This is from the perspective of both enhancing how the TOC assessments are conducted and informing one another's professional development. For assessors who are new or less confident in how they perform the assessor role, it is affirming to receive positive feedback on their approach and contribution from their more experienced peers.
32. The importance of all Form As and the assessor feedback form being submitted after each panel sitting was usefully reiterated at the annual meeting for assessors in September 2024. It may be appropriate to continue to relay this message, while recognising the existing high levels of assessor engagement in adhering to the process requirements.

Chairs' reports/TOC Form B

33. A number of chairs' reports (TOC Form B) were supplied for review. These provided a clear account of how the proceedings of candidate interviews had been conducted, key emergent issues, and how the outcome of individual interviews was framed.
34. A consideration of the TOC Form B sample supplied indicated the following:
- Several areas were frequently identified as recommendations, requirements or points of advice and therefore attached to assessment outcomes, depending on whether an outcome was a pass, further evidence required, or a fail (e.g. relating to osteoporosis, age of consent and capacity, ionising radiation guidelines, and first aid).
 - Only a few pass outcomes were not accompanied by some suggestions of areas of focus by the candidate in their preparation for or early practice as a chiropractor in the UK (with these including positive suggestions regarding sources of support areas for ongoing professional development).
 - There generally seemed to be clarity on how each type of assessment outcome had been reached, but there being potential value in considering how the consistency of outcome can be reviewed (within and across assessment periods) and potentially made more transparent through adopting criterion-based decision-making.

35. A review of the supplied TOC Form B sample indicated the potential value of pursuing the following:

- Ensuring that all chairs are using the same version of the form so that they consistently record the same types of information; a small number of the completed forms in the sample did not include the field relating to whether any issues had had a potential effect on how the interview had been conducted (e.g. technical issues that may have hindered candidates' ability to engage with their interview, recognising the potential significance of this in the event of a complaint or appeal).
- Clarity on GCC's requirements for the conditions in which candidates sit the interview; one form indicated the note that the candidate was not alone in the room from which they were undertaking the interview, but this noted as an issue, but not appearing to have significance to the interview continuing (the outcome of which was a fail).
- A review of the detail of assessment outcomes to discern patterns, trends and potential differences within and across TOC assessment periods (e.g. in terms of the most frequently-identified topics on which requirements or recommendations are made; see above).
- Whether and what types of recommendations or caveats are attached to an indication of a pass to ensure due rigour, consistency and fairness.
- Whether and how further evidence requirements are framed, again, to ensure due rigour, consistency and fairness.
- How factors lead to a fail to uphold the public interest and patient safety.
- Whether there is a clear, appropriate sense of gradation between pass, further evidence required and fail outcomes (both in relation to the significance of specific issues and the combination and volume of significant issues) and how this is captured in criteria.
- How the further evidence requirements are defined for candidates to address in their reflective summary submissions.

36. I received a small sample of outcome letters sent to candidates by the GCC. From these, I was assured that the information provided to candidates aligned with their assessment outcome. The communication with candidates supplied useful levels information, in line with the assessment outcome.

See recommendations ii and iii.

Section C. Assessment panel operation

TOC panel pre-interview meetings

37. I attended one panel pre-interview meeting in November 2024 that involved preparation for interviewing two candidates. I then followed the progression of one of the candidates through the process by observing their interview and the panel's post-interview meeting (see below).

38. The three panel members worked very well as a team. This ensured the preparatory meeting was conducted in a clear, structured way and with great

efficiency in preparing for the subsequent candidate interviews. I noted the following as particularly commendable features:

- The panel members' in-depth preparation, enabling them to signpost one another to potentially significant points in a candidate application, triangulate different elements of information, and share their measured, professional appraisal of potentially significant points in the application.
- The efficiency with which panel members collectively identified specific issues to pursue in each candidate interview, ensuring that this adhered to the TOC assessment structure and areas of focus.
- The consideration the panel collectively gave to seeking to ensure that they could pace coverage of all required areas within a 90-minute interview, including by identifying where it was appropriate to deprioritise pursuing particular topics if they could be better covered in other parts of the interview.
- The effective team-working approach demonstrated by both the panel chair and two assessors, with the chair providing appropriate leadership and all members listening to one another and taking account of one another's perspectives.

TOC interviews

39. I attended one interview relating to a candidate for whom I had attended the panel's pre-interview meeting. I was assured by how the interview was conducted. This included by the chair making clear the nature and structure of the interview process to the candidate to explain my joining the meeting as an observer as the scheme's external examiner. A member of the GCC executive team usefully joined the start of the meeting to check that the technical arrangements were working for all parties. All members of the panel actively sought to make the candidate feel as comfortable and able to engage with the process as possible.

40. In putting questions to the candidate, each panel member was adept at seeking to frame questions as clearly as possible, providing further clarity to the candidate where needed, and identifying where planned questions could be skipped or not pursued in depth if the panel had already either secured the information they needed or given the candidate sufficient opportunity to provide it. This approach meant that the interview kept within 90 minutes and that the candidate remained calm and engaged with the process in a scenario that must have been challenging and stressful.

41. It can therefore be inferred that the interview was conducted in a sensitive, considerate way. This gave the candidate full opportunity to perform and seek to demonstrate how they met the TOC assessment requirements and therefore GCC's threshold standards.

42. For future assessment periods, it will be useful to review the value of asking candidates closed questions; i.e. that simply require a 'yes' or 'no' response. While use of such questions was limited in the interview I observed and was deployed to cover specific issues as efficiently as possible, the value of candidates' answers to them is likely to be limited. An affirmative answer to a closed question may simply reflect a candidate's superficial awareness of an

issue or requirement, or their responding to a leading question. It therefore seems inappropriate either to infer that such a response necessarily indicates either a candidate's understanding of the issue or requirement in question, or how they would apply this understanding in their practice.

TOC panel post-interview meetings

43. I attended the post-interview meeting for the candidate whose interview I observed. I was assured by how discussion in the meeting was conducted and by the outcome that the panel reached. Careful consideration was given to the points of strength in the candidate's interview. However, the clear consensus of the panel was that it was not possible to have confidence that the candidate had the professional competence, currency and self-awareness to be ready for practice as a chiropractor in the UK. This aligned with my own observations from the interview (from a lay perspective).

44. The above outcome appeared to affirm that the assessment process is robust and fair. However, it may be useful for the GCC to review the following:

- Its approach to assessing candidates who are newly-qualified and/or have not had the opportunity to practise in their country of qualification.
- Whether any additional guidance can usefully be provided to prospective candidates on what they need to consider and how they need to prepare for undertaking the TOC assessment and their personal readiness for this.
- With whom any additional guidance could usefully be shared (e.g. with regulators and education providers in other countries from which a reasonable number of TOC applications are made).

See recommendations iv to vii.

Section D. Assessor performance appraisals

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

45. I completed annual appraisals with 19 assessors in late 2024/early 2025. I understand that a small number of other assessors were approached by the executive team about engaging with the annual appraisal process, but either did not respond or could not be available to meet with me in the defined time period. It would be useful to ensure there is clarity on whether any implications are attached to this in terms of how assessors are drawn upon for activity in the next assessment period (so in 2025).

46. Each assessor who engaged in the annual appraisal process completed and submitted a self-assessment form in advance. These indicated high levels of reflection on their performance in the TOC process over the year and the identification of ongoing areas of learning need and interest. Assessors' self-assessment forms provided the basis for appraisal meetings, along with assessor feedback on one another (see **Section E**).

47. I found the opportunity to meet individually with most assessors immensely informative and valuable. It provided the following points of assurance:

- Assessors are strongly aware of, and take seriously, the high-stakes nature of the role that they perform, in terms of its forming a key part of how the GCC enacts its regulatory functions, how the public interest and patient safety are upheld, and how chiropractors who qualified in another country are appropriately considered in seeking to pursue the opportunity to practise the profession in the UK.
- Individual assessors, ranging from those new to the role and those who have performed and developed in the role (including to become chairs) over some years, are extremely committed to ensuring the TOC process is robust and fair.
- Assessors and chairs value the opportunity to work with one another in different configurations in line with their individual availability and the executive forming panels for each sitting.
- Assessors and chairs value the mix of professional expertise that peers bring to panels' activity (e.g. significant experience of the TOC, different areas of professional practice expertise, educational expertise and personal experience of having previously gone through the TOC process).
- Individual assessors and chairs value the opportunity to contribute to the GCC's activity and upholding high professional standards and see the benefits of doing so both for their own professional development and for 'giving back' to the profession.

48. I used the appraisal meetings to discuss individual assessors' reflections on their achievements during the year, their focuses for their onward development and their TOC-related objectives for 2025. There were no concerning issues relating to any assessors' performance. I created a record of each meeting in the template supplied for this purpose and shared these in draft with each assessor for any comment. No comments on the content of the draft reports were received.

49. Assessors were generally extremely positive about the support, guidance and clarity that they receive from the GCC executive team to enact their TOC role. Specific points highlighted were that there had been improvements for the 2024 period in the following areas:

- How assessors had been enabled to indicate their availability for monthly panel sessions well in advance.
- The timeliness with which assessors had been advised as to whether they had been appointed to a panel sitting.
- In general, improvements to assessors' receipt of candidate material for review in a timely way, but with some exceptions to this (see below).

50. Specific points raised by assessors on issues of process and areas for further improvement were as follows:

- Being mindful of the time pressures created for panels when three (rather than two) candidates are scheduled for them to interview on the same day.

- Guarding against deadlines being applied overly flexibly for candidates' initial evidence submissions to enable their inclusion in the next panel session, recognising that relaxed deadlines then require assessors to review the material within a tighter timeframe (compounded by competing workload priorities), with this creating the potential to compromise the rigour with which the review can be undertaken and therefore the fairness to candidates.
- Optimising the input of assessors who have progressed through the new chair mentorship scheme by inviting them to chair panel sessions.
- Exploring practical ways in which assessors can access reminders of what they need to in terms of completing and uploading TOC forms; it was acknowledged that this is covered within induction to the role, but highlighted that assessors often only perform their role once or twice a year, meaning that it would be helpful to receive reminders and prompts.
- Exploring practical ways in which assessors can access guidance in using Teams to perform their TOC role, so that they can focus on deploying their professional expertise in fulfilling their responsibilities; this would be particularly useful for assessors who may not use Teams for any other purpose and infrequently as TOC assessors.
- The potential timeliness of reviewing the remuneration levels for assessors and chairs, taking account of the amount of work involved in reviewing candidates' submissions.

51. The appraisal discussions usefully identified assessors who are keen to develop as chairs and to take on additional roles for the GCC. It also identified a range of thoughts and ideas about how the TOC process can continue to be refined to optimise its rigour, proportionality and effectiveness. Key points are summarised below.

- A keenness to have more opportunity to discuss good practice and assessment topics and issues with peers outside the constraints of contributing to time-pressured panel sessions and the annual review meetings.
- The value of reviewing the question bank for use in the assessment process, including to ensure that the material and approach remains fit for purpose, recognising the need for this is now compounded by the GCC's new Code coming into effect from 2026.
- The value of assessors gaining insights into how candidates' submission of further evidence is reviewed by the relevant panel chair and an outcome achieved, even if they are not involved in decision-making on the outcome (i.e. so that they see the assessment process from 'end-to-end' and can use seeing candidates' further evidence to inform how they feed into formulating further evidence requirements for future candidates).
- Clarity on expectations for how assessors should engage with the GCC's online learning platform (e.g. in terms of whether this is ongoing and, if so, the expected frequency and focuses within engagement).
- Clarity on whether and how acting as a TOC assessor (and reflecting on this) can be recognised as contributing to registrants' fulfilment of GCC CPD requirements.

See recommendations viii and ix.

Section E. Candidate and assessor feedback

Assessor feedback forms

52. As indicated in Section B, I had the opportunity to review the spreadsheet of assessor feedback on one another's contribution to TOC panels. The collated feedback indicated a high level of mutual respect for how peers fulfil their respective roles. Specific points made about how assessors contribute to making candidate interviews as focused and smooth as possible was also generally reflected in the candidate feedback that was received during the period (see below).

53. More broadly, assessor feedback on one another indicated the following:

- New assessors felt well-supported by their panel colleagues, particularly panel chairs.
- New assessors were to have made a valuable contribution to the process by their fellow panel members.
- Chairs were seen to provide high-quality leadership across the panel meetings.
- Panel members were generally seen by their peers to contribute well to the process, including in how they drew on their particular areas of professional expertise, sought to put candidates at ease in order to engage with the process, and took a considered approach to framing questions, and working as part of a team.
- Panel members collectively sought to ensure questions remain focused and relevant to the purpose of the exercise, including to contain interviews within the intended 90-minute timeframe.
- Panel members helped to manage the potential impact of technical issues during interviews, with a focus on ensuring that candidates were not disadvantaged.

Candidate feedback forms

54. Feedback forms were received from 5 candidates who went through the TOC process in 2024. This forms 13% of the total number of candidates who underwent assessments during the period, recognising that three candidates did so more than once. All candidates who submitted feedback passed the process, either at interview or after meeting further evidence requirements. Therefore, no feedback was gained from candidates who failed their assessment.

55. The feedback forms received generally indicated candidates' positive feedback on the process, both in terms of the numerical scores they allocated to different aspects and their specific 'free-text' comments. The latter included that they found the generally process straightforward to engage with, received timely responses to any queries they raised about the process, and found the interview process to be appropriately conducted. A small number of comments were made about some challenges with uploading their application to the GCC

platform and gaining assurance that their application had been uploaded successfully.

56. One candidate included several low scores and negative comments about their experience of going through the process. Their feedback primarily related to their concerns about the specific demands of an interview process and their personal ability to perform well within it. The same candidate passed the process, with no recommendations or caveats attached to their pass outcome.

57. Other comments made by candidates included the following:

- Their uncertainty about whether and how the needs of candidates who have additional learning needs or require reasonable adjustments are met within the process (to clarify, this was not framed as a concern that their own needs had not been met).
- The suggestion that time pressures within the interview indicate that it would be appropriate to review the number of questions asked in order to provide sufficient time for candidate responses of appropriate depth.

58. As also indicated in the section relating to discussion points in the annual review meeting (see **Section G**), it seems important to make some modifications to how candidate feedback on the feedback is sought. This includes in relation to the following:

- Separating seeking candidates' feedback on the process from their receiving their assessment outcome.
- Providing assurance that candidate feedback on the process has no bearing on their interview outcome.
- Seeking to gain feedback from candidates when their thoughts and reflections on the process are still live for them.
- Emphasising the importance and value of candidate feedback, including by explaining how the feedback is used by the GCC as part of its continuous improvement processes.

See recommendation x.

Section F. Complaints and appeals

Complaints and appeals for this period

59. It is understood that no complaints or appeals were received during 2024.

Section G. Review and evaluation of the process

Please comment on the annual review meeting

60. Aside from receiving useful induction, guidance and background information, chairing the annual review meeting was the first opportunity I had to engage with the TOC process. It formed a positive experience, in terms of meeting chairs and assessors and gaining a sense of their involvement, insights and reflections on the process as well as their collective commitment to ensuring the process is as robust, valid, reliable and fair as possible.

61. The meeting also provided an opportunity for the GCC executive to provide an update on how emergent issues from the 2023 TOC report and external examiner report had been progressed, as well as to affirm the vital role that chairs and assessors play in upholding high professional standards and therefore the public interest and patient safety.

62. The following were of particular note from the session:

- The importance and value of seeking and gaining feedback from more candidates on their experience of going through the TOC process and seeking to do this by modifying when feedback is sought and emphasising the value that the GCC places on candidate feedback.
- The value of continuing to seek to confine candidate interview to 90 minutes to ensure the proportionality of the process for all parties.
- The value of using future annual meetings to provide more opportunity for interaction and discussion on key topics within the group (e.g. through using online 'breakout' rooms to enable small-group discussion on specific areas relating to the TOC process), recognising this is the only time in the year that all GCC chairs and assessors have the chance to meet together.
- The value of providing reminders to assessors on specific issues relating to the TOC processes, recognising that individuals may only be engaging with the intricacies of the process infrequently within each year.
- The value of creating other opportunities for assessors and chairs to meet to discuss key issues relating to the TOC process and their roles outside the annual meeting and the constraints of time-pressured panel sessions.
- Recognition that previous issues relating to process raised by assessors and chairs have been addressed by the GCC executive team, with the changes made having their intended effect (with this affirmed through the individual appraisal meetings; see **Section D**).

63. The following formed agreed actions from the annual meeting:

- Modifying the approach to seeking candidates' feedback on their experience of going through the TOC process, with a view to achieving a greater number of responses (see **Section E**).
- Providing useful prompts and reminders to assessors and chairs on engaging with the record-keeping requirements of the TOC process, as well as the importance of completing the assessor feedback form (see **Section D**).
- Reviewing the format of the annual meeting in 2025 to optimise the opportunity for interaction and discussion.

See recommendations xi to xiv.

Section H. Summary and recommendations

Summary

64. My review of TOC assessment arrangements in 2024 seems to confirm that the process continues to run effectively and efficiently. This includes to serve its

intended regulatory purpose by upholding the public interest and patient safety, and providing a robust, proportionate and fair route through which overseas-qualified chiropractors can seek eligibility for GCC registration and to practise in the UK. The effectiveness and efficiency of the TOC arrangements is achieved through the combined subject matter expertise of the TOC assessors and chairs and the management of the process by the GCC executive.

65. Refinements made to the TOC arrangements and process over time appear to have had their intended effect, with their identification and enactment indicating a sound approach to continuous improvement. In turn, this approach has provided internal assurance, with TOC assessors affirming that feedback they had previously given on operational points meriting attention had been addressed and resolved by the executive. It is also positive that TOC chair and assessor capacity has been increased in recent years, including through attention being paid to succession-planning and developing new chairs through the mentorship scheme.
66. The number of assessments carried out in 2024 seems to indicate that demand for the TOC currently remains stable. In turn, the number of assessors, including the number of chairs, appears to be in balance with the current level of demand. This includes with there seeming to be sufficient capacity to respond to potential increases in demand, with some assessors and chairs having indicated their availability and keenness to sit on more TOC panels in 2025 than they did in 2024.
67. I have felt well supported in taking on the external examiner role in the second half of the 2024 TOC assessment period. This has included through the induction I received, the steers and information that the executive team has given me, and assessors' openness in engaging in discussions with me.
68. My recommendations are set out below. They are intended to inform a consideration of how continuous improvements can be made to the TOC assessment process, building on existing good practice and refinements that have been made to date.

Recommendations

Section A. Results

- i. Review the assessment outcomes within 2024 and across previous assessment periods to identify any discernible trends and any learning points that could usefully be shared with other parties, with a focus on the potential significance of factors relating to candidates' point of application, relative to when they qualified and their country of qualification.

Section B. Analysis of documentation

- ii. Consider developing the arrangements and paperwork that supports the TOC process to achieve the following:
 - A more formal way of identifying and tracking individual candidates across all stages of the TOC process and to provide a clearer audit trail (e.g. by using unique candidate numbers throughout the process and in all records and paperwork).

- A clearer monitoring of candidate progression and outcomes, including when this spans more than one TOC assessment period.
- A clearer way of gathering and using data to evaluate trends over time in candidate progression and outcomes under review (see i).

iii. Ensure that a consistent approach is taken to how the TOC B Form is used, including through

- All chairs completing the same version of the form (i.e. the one that includes the opportunity to note any factors that may have affected how the interview was conducted, relating to IT issues, etc.).
- Candidates' full name is consistently recorded on the form to ensure clarity on the candidate to whom the form applies (plus see recommendation ii).
- A standardised naming convention is adopted for how TOC B Forms are saved and stored as PDF files in GCC records, including to ensure clarity on to whom they relate (again, see recommendation ii).

Section C. Assessment panel operation

iv. Review the implications of applying flexibility in how deadlines are applied to candidates' submission of their applications, recognising the impact of this can have on assessors needing to review material within a compressed timeframe and this having the potential to reduce the rigour, consistency and fairness of the assessment process for candidates.

v. Explore what practical steps can be taken to provide greater support and guidance to assessors in how they engage with practical aspects of the role, particularly in terms of

- Using Teams, recognising that assessors may be using the platform infrequently and only to undertake their TOC role.
- Completing and submitting the paperwork attached to the TOC process, recognising the particular value of prompts for new assessors, but as a useful, ongoing reminder for all (again, recognising assessors may only sit on a TOC panel once or twice a year).

vi. Review the following in relation to how further evidence requirements are defined:

- Whether 'reflective summary' is the most appropriate term to use if candidates are primarily requested to account for their strengthened knowledge of a specific topic area.
- Conversely, whether it would be useful to extend the focus of further evidence requirements on candidates' production of a reflective statement, including to
 - o Increase the emphasis of the activity on candidates' critical reflection on how their evidenced new learning applies to their own professional practice as a chiropractor and their preparation for registration to practise the profession in the UK.
 - o Avert the risk that candidates' submission of further evidence on a specified topic(s) is generated through their use of AI by making the requirements more personalised.

- Whether the request that candidates submit a 'hypothetical patient record' as part of required further evidence is sufficiently clear and robust to serve its intended purpose.

vii. Ensure timely clarity for assessors and prospective candidates on the changes that will be made to the TOC process from January 2026 to reflect the GCC's new Code.

Section D. Assessor performance appraisals

viii. Provide clarity to assessors on whether, when and how they are expected to engage with the GCC online learning platform.

ix. Explore what additional online opportunities (e.g. 'drop-in' sessions, or scheduled topic- or case-based discussions) can usefully and practically be provided to enable chairs and assessors to engage in discussion to support peer-to-peer learning and share best practice.

Section E. Candidate and assessor feedback

x. Progress the changed approaches to seeking candidate feedback and monitor whether the changes increase the number of candidates who respond and enhance the value of the feedback received for informing GCC's continuous improvement approach.

Section F. Review and evaluation of the process

xi. Consider how trends within and across the annual assessment periods can be kept under active review, including to

- Identify any material issues and their potential significance to how the TOC is run.
- Identify any actions that would further enhance the rigour and consistency of the process.
- Provide strengthened assurance of the consistency of decision-making within and across assessment periods.
- Monitor the future impact of implementing the GCC's new Code within the TOC assessment process.

xii. Review the nature of the following with a view to seeking to ensure full consistency is upheld:

- Whether and what kinds of caveats and recommendations are attached to a 'pass' outcome.
- The nature of specified 'further evidence required' components to optimise their purpose and value.
- The reasons attached to a 'fail' outcome.
- The potential value of applying more criterion-based decision-making in the formulation of assessment outcomes.

xiii. Review whether use of the TOC process for new graduates or other candidates who have not yet practised as a chiropractor is the most appropriate way to consider their fulfilment of GCC's threshold standards,

particularly if they are reliant on historical notes from being a student and/or on the notes of another practitioner.

- xiv. Monitor the volume of applications across 2025, including the possible need to manage an increased number of TOC assessments during the year if more candidates seek to sit the assessment ahead of the adaptation of the assessment requirements in line with the introduction of the new GCC Code in 2026.

Signed



Sally Gosling PhD FCSP(Hon)

Date 21st March 2025