



Council
22 November 2023
Assessment of GOsC Performance: progress against recommendations

Classification	Private
Purpose	For noting
Issue	<p>A collaboration between Executives and Non-Executives in 2021, to review the performance of the General Osteopathic Council, produced a report (agreed in 2022), with a set of 30 recommendations.</p> <p>This paper provides an update of progress against those recommendations.</p>
Recommendation	To note the content of the paper.
Financial and resourcing implications	These are set out in the paper.
Equality and diversity implications	There were specific Equality, Diversity and Inclusion recommendations. Progress against these are positive and are contained in the paper and annex.
Communications implications	Audit Committee considered the content of this report at its meeting in October 2023.
Annex	A. Progress against recommendations
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Key messages from the paper:

- In 2021, Audit Committee commissioned a review which assessed the performance of the General Osteopathic Council, so that we could identify any areas of enhancement needed beyond the annual assessment by the Professional Standards Authority (PSA).
- The assessment of performance was a collaborative exercise between Executive and Non-Executive members.
- A report was produced and agreed in 2022. This report, which was presented to both Audit Committee and Council, contained a set of 30 recommendations across a number of areas being:
 - Organisational performance and enhancement
 - Future strategic direction
 - Engagement and collaboration
 - Values and culture
 - Equality, diversity and inclusion
 - People and organisational capacity
 - Governance and risk
 - Environmental Social Governance
- This paper represents a progress report against those recommendations.
- In summary, over 75% of recommendations can be considered either met or well underway to being met. Headlines include:
 - New strategic direction set (under consultation), which includes innovation, inclusivity and continuous improvement, and which is underpinned by organisational values.
 - Launching a registrant perceptions survey so we can collect and analyse feedback on the GOsC, regulation and trust so we can develop a benchmark against which we can assess our impact over time.
 - Ensuring EDI is pervasive throughout all that the GOsC does and that we ensure we provide regular training to staff and non-executives.
- Recommendations which are outstanding include:
 - Horizon-scanning to be embedded across all GOsC Committees.
 - Consideration of the benefits of benchmarking our performance against other organisations - for the Audit Committee in 2024.
 - Consideration of staff succession plans, recognising the challenge in a small organisation with specialised roles - for the People Committee in 2024.

Background

1. In 2021, Audit Committee considered how best the performance of the General Osteopathic Council (GOsC) might be reviewed to ensure that the organisation maintained its standards and focus on continuous improvement.
2. Audit Committee agreed with a proposal for a collaborative review of performance which was conducted between Executive and Non-Executive members.
3. A series of six workshops were established, across a six month period, which considered the GOsC performance against the Professional Standards Authority (PSA) Standards of Good Regulation, as well as looking ahead and thinking about those activities we felt we wanted to commence, continue or enhance.
4. A report was produced and agreed by the individuals who attended the workshop. The report, which was presented to both Audit Committee and Council, looked across a range of areas being:
 - Organisational performance and enhancement
 - Future strategic direction
 - Engagement and collaboration
 - Values and culture
 - Equality, diversity and inclusion
 - People and organisational capacity
 - Governance and risk
 - Environmental Social Governance
5. A total of 30 recommendations were identified. The recommendations fell into one of three categories:

Enhancement to existing activity	Some activity is already underway however the review has concluded that GOsC could do more or do it better/differently
Ongoing activity	Activity is already underway and the review endorses current plans
New activity	New activity to consider commencing

Discussion

6. The purpose of this paper is to provide assurance to Audit Committee that the recommendations arising from the review of performance report have been, and are being, actioned.

7. Annexed to the paper are the recommendations from the report, allocated within each section, with observations/evidence from the Chief Executive as to their current status.
8. In summary, over 75% of the recommendations can be considered either met or well underway to being met. Headlines include:
 - New strategic direction set (under consultation), which includes innovation, inclusivity and continuous improvement, and which is underpinned by organisational values.
 - Launching a registrant perceptions survey so we can collect and analyse feedback on the GOsC, regulation and trust so we can develop a benchmark against which we can assess our impact over time.
 - Ensuring EDI is pervasive throughout all that the GOsC does and that we ensure we provide regular training to staff and non-executives.
9. Recommendations which are outstanding include, but are not limited to:
 - Horizon-scanning to be embedded across all GOsC Committees.
 - Consideration of the benefits of benchmarking our performance against other organisations – to be reviewed by Audit Committee in 2024.
 - Consideration of staff succession plans, recognising the challenge in a small organisation with specialised roles – to be reviewed by People Committee in 2024.
10. Audit Committee received the report at its meeting in October 2023 and were pleased to see the progress that had been made against the significant majority of the recommendations. There was discussion around those recommendations which were to be actioned, noting that plans existed for their review in 2024, such as benchmarking performance to be considered by Audit Committee in the summer of next year.
11. Audit Committee were content for the report to be presented to Council in its current form so that Council has oversight and assurance that the recommendations of the Assessment of GOsC Performance Report are being implemented.

Recommendations: To note the content of the paper.

Assessment of GOsC performance - Progress against recommendations – October 2023

Organisational performance and enhancement:

Recommendation	Chief Executive observations / evidence
<p>1. The current organisational performance should be set as the benchmark below which GOsC will not fall.</p>	<ul style="list-style-type: none"> • GOsC performance maintained. • Business Plan activities delivered. • PSA Standards passed for 13th year in succession - GOsC news story: PSA standards met.
<p>2. The GOsC should continue to foster a culture of continuous improvement taking account of the constantly changing context that it works within and proactively encouraging and supporting positive change both within the organisation, and the wider osteopathic community.</p>	<ul style="list-style-type: none"> • New Strategic Plan direction includes activities which relate to continuous improvement - Draft Strategy Plan, towards 2030, for consultation. • GOsC response to AAPA Order highlighted wider environmental / system issues relating to osteopathy - GOsC AAPA Order news story and response. • Ongoing stakeholder engagement, although recognise existing tensions with education sector (graduate and post graduate training providers).
<p>3. The GOsC should systemise horizon-scanning - the bringing of the outside inside - across the organisation (by Executive and Non-Executive members), so that it becomes a norm and not an exception.</p>	<ul style="list-style-type: none"> • Approach to systematic horizon-scanning not yet embedded across all GOsC committees. • Question to consider: do we allow sufficient space on agenda's for horizon scanning to happen, and how do we empower members of the governance structure to horizon scan and influence future agendas?

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Recommendation	Chief Executive observations / evidence
<p>4. The Council should consider the extent to which innovation is pervasive within the GOsC regulatory approach (at staff and non-executive level), and if absent from any area, whether this is problematic.</p>	<ul style="list-style-type: none"> Considered as part of strategic plan development with a specific key priority area being, Pursuing Innovation - Draft Strategy Plan, towards 2030, for consultation.
<p>5. The GOsC should ensure the benefits and learning arising from how it responded to the COVID-19 pandemic are captured and different ways of operating normalised within the GOsC.</p>	<ul style="list-style-type: none"> Hybrid working model, Executive and Non-Executive, in operation. GOsC learning from the pandemic captured, including reports published in external publications such as by Nockolds Solicitors - briefing paper published.
<p>6. The GOsC should consider the benefits of benchmarking its activity (financial and non-financial performance) against regulators/organisations in different sectors to healthcare with a view to identifying meaningful insights that can enhance its own work.</p>	<ul style="list-style-type: none"> This is a subject not yet explored through Audit Committee discussion with the focus during the previous 12 months on other matters, such as the IT project and appointment of new auditors. Question to consider: when should the discussion around the benefits of benchmarking activity (financial and non-financial performance) happen at Audit Committee? The People Committee have a track record of benchmarking its activities against other organisations, i.e. salary benchmarking, pay/allowances for non-executive positions, although it might be argued that these activities lend themselves better to external benchmarking data.

Future strategic direction:

Recommendation	Chief Executive observations / evidence
<p>1. Council should consider its approach to, and timeline for, developing a new Strategic Plan beyond 2024 which ensures meaningful, appropriate engagement with registrants, patients and the public and other key stakeholders.</p>	<ul style="list-style-type: none"> • Council has published a Draft Strategic Plan, towards 2030, for public consultation - Draft Strategy Plan, towards 2030, for consultation. • Consultation open for three months and plans being implemented for stakeholder engagement throughout consultation period.
<p>2. Council should explore the relationship between regulators and regulated professionals; how this may impact on trust, and on patient safety, and apply learning to future strategy development and operational implementation.</p>	<ul style="list-style-type: none"> • Specifically referenced as an activity within the Draft Strategic Plan, towards 2030 - Draft Strategy Plan, towards 2030, for consultation.
<p>3. Council should ensure its future strategy is underpinned by a clear set of values and value-statements (see recommendations contained within Values and culture) that inform what we do, and how we do it.</p>	<ul style="list-style-type: none"> • Values developed and approved by Council. The strapline being: We work Collaboratively to be an Influential and Respectful regulator, with an Evidence Informed approach. • Values will be included in the final Strategic Plan when launched in 2024.

Engagement and collaboration:

Recommendation	Chief Executive observations / evidence
<p>1. The GOsC should, in partnership with others in the sector, continue to identify ongoing and future opportunities to partner, collaborate with, and invest in, other organisations in order to further its own duties around public protection and development of the profession.</p>	<ul style="list-style-type: none"> • Ongoing activity, with examples including our joint-funding of the research into Under-Graduate Experiences of Osteopathic Education and Training; the work with the Collaborating Centre for Values Based Research and our commitment to participating in the 2023 Convention marking 30 years of recognition. • Recommendation aligns with new GOsC Values.
<p>2. The GOsC should work in partnership with the profession, patients, educators and other stakeholders to model the values and behaviours expected of healthcare professionals.</p>	<ul style="list-style-type: none"> • New GOsC values to be lived, articulated clearly and demonstrated to stakeholders. • Values included in Council discussion at Strategy Day and were referenced within a presentation at the Institute of Osteopathy International Convention in 2023 to which GOsC has made a financial contribution.
<p>3. The GOsC should develop, undertake and assess the results of a periodic registrants and stakeholders survey to understand views of the regulator, and of regulation, so that we can measure the impact of our activities over time.</p>	<ul style="list-style-type: none"> • Registrants and Stakeholder survey tender document issued, with survey and results expected early 2024 - News Article, tender launch • Marks the start of regular registrant and stakeholder surveys. This will ensure we are consistent with how we engage and collect feedback from members of the public/patients (YouGov tracker surveys) and now registrants and stakeholders.

Values and culture:

Recommendation	Chief Executive observations / evidence
1. The GOsC should develop explicit values and value-statements which describe how it works and how it treats those it interacts with, in partnership with Council and staff.	<ul style="list-style-type: none"> • Values developed and approved by Council. • Chief Executive has discussed agreed Values with each team directly with an all staff training session held, facilitated by an external speaker. • Values shared with every member of GOsC Governance structure, with focus turning to implementation / embodiment. Council discussion on Values based decision making at September 2023 Strategy Day.
2. Council should consider the extent to which values-based decision making exists in the GOsC Governance structure, and what steps may be required to enhance its presence further.	<ul style="list-style-type: none"> • Focus has turned to implementation / embodiment of the values. Council discussion on Values based decision making at September 2023 Strategy Day.
3. The GOsC should consider how explicit the role of values and behaviours should be within recruitment campaigns for Executive and Non-Executives.	<ul style="list-style-type: none"> • Discussion at People Committee referenced need to ensure recruitment campaigns (Executive and Non-Executive) feature new Values. • Non-Executive recruitment campaigns launched in latter part of 2023 have included questions around Values. Future staff recruitment campaigns will also include Values.
4. The Council should ensure a continued focus is maintained on organisational culture and seek periodic assurance on the same.	<ul style="list-style-type: none"> • People Committee oversee regular staff surveys and Key Performance Indicators, such as sickness and absence rates. • Reports made to Council.

Equality, Diversity and Inclusion:

Recommendation	Chief Executive observations / evidence
<p>1. The Council should ensure Equality, Diversity and Inclusion is pervasive throughout everything the GOsC undertakes.</p>	<ul style="list-style-type: none"> • EDI discussions have been significantly enhanced over previous four years by Executive and Non-Executives, including EDI Framework development. • Clear evidence that approach to EDI is changing the diversity of the applications we receive for our governance roles. • EDI not a 'tick-box' and is pervasive in our regulatory approach - EDI Annual Report to Council, July 2023.
<p>2. The GOsC should ensure regular and relevant training exists for Executive and Non-Executives on matters relating to Equality, Diversity and Inclusion and that the impact of such training is monitored and reviewed for effectiveness.</p>	<ul style="list-style-type: none"> • Training provided for all new joiners. • Refresher training periodically undertaken. • EDI training for selection panels – yearly.
<p>3. The GOsC should ensure that it holds sufficient monitoring data across the range of its activities, which is analysed and assessed, so it can be confident its processes and policies do not discriminate against any individual with a protected characteristic.</p>	<ul style="list-style-type: none"> • Data held, but needs to be refreshed for Executive and Non-Executive teams. Plans in place to complete this within 2023-24 business year. • Limited data held on registrants – enhancement to this delayed due to the CRM upgrade challenges, and therefore, recommendation remains open.

People and organisational capacity:

Recommendation	Chief Executive observations / evidence
<p>1. The GOsC should ensure there are structures in place to develop the staff team to further build on the breadth and depth of the talent pool.</p>	<ul style="list-style-type: none"> • Staff training available when requested. Development needs considered as part of annual performance development review process. • Question to be considered: do we have a systemic approach to developing talent across the organisation? It is suggested that this question be put to the People Committee for consideration.
<p>2. The GOsC should consider its organisational capacity around areas connected to:</p> <ul style="list-style-type: none"> a. outcome, evaluation and measurement; b. data, insight and learning; c. Equality, Diversity and Inclusion; d. IT integration and data security; e. Communications; f. Governance. 	<ul style="list-style-type: none"> • As above, organisational capacity and talent development requires further consideration and discussion.
<p>3. As a small organisation reliant on its Executive and Non-Executives, the GOsC should ensure, succession plans exist.</p>	<ul style="list-style-type: none"> • Outstanding. We do not have clear succession plans in place within the Executive team. Succession planning is easier for Non-Executive positions; however, we should review this to ensure we are doing all we can in this area. • This recommendation should be taken to the People Committee for their input and considerations.

Governance and risk:

Recommendation	Chief Executive observations / evidence
<p>1. The GOsC should develop the system of support for those within the Governance structure to ensure they have the tools to fulfil their roles, particularly Council members who are also Trustees.</p>	<ul style="list-style-type: none"> • Training/support needs considered as part of annual appraisal reviews. • Activity ongoing and will become more relevant with a new Council in 2024.
<p>2. The Council should increase its evidence base to evaluate the impact of the effectiveness of the governance structure including undertaking an effectiveness survey of its own performance; undertaking a skills audit and developing an action plan to address any matters arising.</p>	<ul style="list-style-type: none"> • Skills audit undertaken and results used to inform governance recruitment. • Assessment of Council performance not formally undertaken, but regular Council 'team time' post meetings to discuss issues and feedback. Issues identified acted upon by Chair of Council and Chief Executive. • Question to consider: what is the need for a formal board effectiveness review? To be revisited with a new Council in 2024 and may require joint work between the Audit Committee and People Committee.
<p>3. The Council should satisfy itself that the way it, and its committees, conducts their business is aligned to the 7 Principles of Public Life.</p>	<ul style="list-style-type: none"> • Not yet undertaken – suggested that this is considered by the new Council in 2024.
<p>4. The GOsC should continue to seek opportunities to bring through a new generation of registrants and lay members into governance roles.</p>	<ul style="list-style-type: none"> • Council Associate Programme in operation and proving to be successful – evaluation undertaken by People Committee.

Annex A to 15

Recommendation	Chief Executive observations / evidence
	<ul style="list-style-type: none"> • Diversity of applicants to governance roles increasing.
<p>5. GOsC should continue to encourage attendance at Council by osteopaths and patients to demonstrate the transparency and openness around its work.</p>	<ul style="list-style-type: none"> • Invitations contained in registrant ebulletins. • Small, but regular attendance by observers at Council.
<p>6. The Executive should develop organisational knowledge and ownership of risk management so to de-centralise and establish a 'bottom-up' risk management model.</p>	<ul style="list-style-type: none"> • Not yet commenced. Will action once Council has agreed the new Risk Appetite Framework and Three-Lines of Defence Model.

Environmental Social Governance:

Recommendation	Chief Executive observations / evidence
<p>1. The GOsC should develop a structured approach to Environmental Social Governance (ESG) (which includes Corporate Social Responsibility) and which considers the local community and the four-country dimension aspects of its work.</p>	<ul style="list-style-type: none"> • Specific reference in the draft Strategic Plan, towards 2030, to ESG - Draft Strategy Plan, towards 2030, for consultation.
<p>2. The Council, as Trustees of the GOsC charity, should ensure the approach to Environment Social Governance is reviewed regularly and that it becomes integrated within discussions at Board level.</p>	<ul style="list-style-type: none"> • Specific reference in the draft Strategic Plan, towards 2030 - Draft Strategy Plan, towards 2030, for consultation. • New Council will engage with ESG as part of implementation of new strategy.