

Government Advisory

Report D -Information Specification for the Evaluation and Impact Assessment of the GOsC Revalidation Pilot

July 2011

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1 Introduction

1.1 Introduction and Context

This Report has been commissioned to support the General Osteopathic Council (GOsC) in the evaluation, assessment and impact of their draft revalidation scheme to provide anticipated costs, benefits, financial and regulatory risks as envisaged at pre-pilot development along with a detailed specification of the information to be collected during the Pilot to update anticipated costs, benefits and risks analysis. Evaluation and impact assessment is typically used to understand the costs and benefits of regulatory intervention on the private sector, the third sector, and public services.

In this instance it will help GOsC's response to the overarching policy challenge initially presented in the Department of Health's Guidance '*Principles for revalidation: report of the Working Group for Non-Medical Revalidation'*. In particular whether the draft scheme appears proportionate to the risk associated with Osteopathic practice, and whether the pilots present a feasible mechanism for rolling out revalidation at a national level. It also supports the more recent recommendations from the Secretary of State in the Command Paper, Enabling Excellence, to 'continue to develop the evidence base that will inform their proposals for revalidation over the next year' and will consider whether there is 'evidence to suggest significant added value in terms of increased safety or quality of care for users of health care.'¹

Report D is the detailed specification of information that is to be gathered to complete the evaluation of the Revalidation Pilot. The report also details the output from focus groups on the costs, benefits and risks that have been envisaged at the pre-pilot development stage. Report D has also been informed by:

- Report A How do Osteopaths Practise? produced by KPMG summarised some of the potential risks associated with clinical practice (including risks arising from the environment). These were informed by the 2007 White Paper, Trust, Assurance and Safety and also the integration of some of the findings from the draft CONDOR complaint report on claims and complaints about osteopaths² and the Standardised Data Collection Project.³
- Report B Reviewing the work undertaken by other regulators to outline costs, benefits, financial and regulatory risks, identified how other health regulators were addressing revalidation, in particular the costs, benefits and risks of introduction.
- Report C The methods used to identify costs, benefits, financial and regulatory risks outlines a methodology which will help measure the impact of the Revalidation Pilots. It sets out the approach which will be followed during the KPMG Evaluation and Impact Assessment.

³ http://www.osteopathy.org.uk/uploads/standardised_data_collection_finalreport_24062010.pdf



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¹ <u>http://www.official-documents.gov.uk/document/cm80/8008/8008.pdf</u>

² Unpublished report March 2011: Complaints and claims against osteopaths: a baseline study of the frequency of complaints 2004-2008 and a qualitative exploration of patients' complaints (CONDOR)

Report D will be succeeded by Report E and Report F which will conclude our evaluation work and will contain our assessment of whether the revalidation scheme appears proportionate to the risk associated with osteopathic practice, and whether the pilots present a feasible model for rolling out revalidation at a national level, providing GOsC with the information to decide next steps around revalidation.

1.2 Confidentiality and Disclaimer

This Report has been prepared on the basis set out in our Engagement Letter addressed to Fiona Browne of the General Osteopathic Council (the "Client") dated 15 March 2010 (the "Services Contract"). We have not verified the reliability or accuracy of any information obtained in the course of our work, other than in the limited circumstances set out in the Services Contract. This Report is for the benefit of the Client only.

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2 Determining the Evaluation/ Impact Specification

2.1 Our Approach

As part of the pre-pilot development stage consultation has been carried out to date with 47 stakeholders as well at the GOsC Senior Management Team. The purpose of the consultation has been to gather information on the costs, benefits and risks that are envisaged at the pre pilot development stage to inform the specification for the evaluation of the Revalidation Pilot.

In some cases the stakeholder consultation was also used as an opportunity to review the evaluation tools that have been developed. The feedback received from participants has been incorporated into the final versions of the tools.

The consultation was conducted with osteopaths but also a wider group of stakeholders as represented by the following organisations:

- Osteopathic Educational Institutions
- Regional Communications Network (RCN)
- Sheffield Osteopathic Association
- British Osteopathic Association
- Special Interest Groups
- The GOsC Senior Management Team

We have also conducted a mapping exercise to ensure that all of the evaluation and impact criteria are covered sufficiently within the pre pilot, pilot and post pilot phases. For further information and detailed specification mapping please see Appendix 1. These are indicative at pre pilot stage and due to the nature of the pilot process it is inevitable these may evolve and will be reported in full in reports E and F.

2.2 Stakeholder Consultation

2.2.1 Summary of Findings

We conducted semi structured interviews/focus groups with the stakeholders' as indicated above. We have detailed below a summary of our findings from the stakeholder consultation that has been carried out at the pre-pilot development stage. The envisaged pre pilot costs, benefits and risks identified by stakeholders will be tested during later stages of the Revalidation Pilot evaluation to see if these have been realised and to see if others have emerged during the pilot process.

In summary some general findings from the stakeholder consultation have been summarised below.

- The depth of awareness and knowledge of the Revalidation Pilot across registrant stakeholder groups was found to be relatively low. The majority of whom were not clear on the content and requirements of revalidation.
- There was some concern from osteopaths that the Revalidation Pilot will be another 'PPP' which was not a positive experience for a number of those consulted.
- There were mixed views in terms of whether osteopathy needs revalidation because practice is seen by the participants as low risk. It was noted by osteopaths that revalidation could be perceived as a 'waste of time' across the sector.
- Some stakeholders expressed the view that the pilot may be 'skewed' by 'keen' participants seeking to improve their practice. This may mean that the Revalidation Pilot evaluation outcome is not reflective of the whole profession of Osteopathy.

2.2.2 Anticipated Benefits

The stakeholders consulted as part of the pre pilot stage were asked to consider the benefits for osteopaths engaging with the Revalidation Pilot. A summary of the benefits that were envisaged at the pre-pilot development stage is presented below:

- All stakeholders noted that revalidation could enhance osteopath practice. Examples of how this could be achieved were cited by osteopaths and included 'becoming a more reflective practitioner' and 'improving communication with patients'.
- The majority of stakeholders welcomed the opportunity to engage with a broader range of CPD opportunities.
- A further theme that emerged was a benefit for patients and the fact that they would probably view the Revalidation Pilot in a positive way. The benefits for patients could include 'safer treatment' and the 'selection of the best treatment for patients'.

Some of the specific benefits referenced by osteopaths included the following:

- The Revalidation Pilot will provide reassurance that you are doing a good job and could also help to identify shortcomings in your existing practice that can be identified and tackled.
- Getting more involved in revalidation and CPD means osteopaths can use these wider skills to support other osteopaths e.g. 'Teach CPD'.
- A number of the osteopaths consulted noted that the Revalidation Pilot may have a positive impact on how osteopathy is viewed by the rest of the sector (e.g. General Practitioners).
- One Osteopath noted that 'If osteopaths make good use of the audit tools available then the resultant data could contribute to the evidence base for osteopathic practise'.
- It was also noted that participation in the Revalidation Pilot may make osteopaths read the Code of Practice which is a good thing.

The aim of our work is to evaluate the impact and the benefits of the pilot and to present these to the GOsC. These benefits can then be used by the GOsC to conduct a full benefit realisation study post pilot, so that they can determine whether these benefits are realised.

2.2.3 Anticipated Costs and Risks

The stakeholders consulted were also asked to consider the costs and risks for osteopaths engaging with the Revalidation Pilot. A summary of the costs and risks that were envisaged at the pre-pilot development stage is presented below:

- One issue to emerge consistently was that if the Revalidation Pilot (and revalidation more widely) is overly bureaucratic and takes a lot of time then the sector will not engage.
- A number of stakeholders also noted that there is a risk if revalidation is not well received then it may lead osteopaths to voluntarily come off the register. This creates a *regulatory risk* in that the GOsC may not have sufficient income to perform its regulatory function. It would also create a potential *clinical risk* with osteopaths treating patients with no obligation to adhere to the Code of Practice.
- Revalidation needs to be commensurate with the cost, osteopaths are considered a low cost 'private' service. Will revalidation add to the cost?

Some of the specific costs and risks referenced by osteopaths included the following:

- Their biggest worry with regards to revalidation was failing the required standard (this fear was largely based on a poor experience of PPP).
- One osteopath noted a further worry was getting penalised for practising in some areas of the Profession that they considered to be a bit 'edgy' and thought to be 'frowned upon'. Others considered that they would not reflect on these treatments in any revalidation paperwork.
- It was noted that there was a risk that with such an 'arms length' method the Assessor ends up assessing the quality of the osteopath's paperwork, not the quality of care.
- One osteopath noted that 'it feels like osteopaths are going through revalidation as a guinea pig' for the rest of the health sector.
- Some osteopaths felt that the focus on keeping up with the 'Code of Practice' was 'odd' as most experienced professionals were way ahead of this in a number of areas. This raises a risk that if it is too basic osteopaths will not engage.
- There was concern noted by one osteopath that in a similar way to existing CPD, it would be hard to find Revalidation Pilot activities that will provide opportunity for 'stretch' for experienced osteopaths.

2.3 Patient and Public Involvement

As presented in Report C the evaluation of patient and general public feedback will come from several sources and will focus on:

- The costs to patients of revalidation where these can be quantified;
- The potential benefits of revalidation such as higher quality provision, reduced suboptimal outcomes and reduced complaints; and

Clinical risks to patients as discussed in the Investigating Osteopathic Patients'⁴
 Expectations of care: the OPEn project⁴ and the CONDOR adverse events data report data ⁵

National Voices, commissioned by the General Medical Council in 2010 ran two roundtable events with service users to explore patient and public opinion of Medical Revalidation⁶. Whilst there are clearly differences between the revalidation model proposed for osteopathy and for doctors there are some interesting findings which the GOsC might like to consider.

Service users reported that revalidation would lead to an increase in confidence in the professionalism of doctors. They believe that they can, and should provide feedback on both the clinical care that they receive, and also the professionalism of the doctor. This feedback should not be used in isolation and should form part of a doctor's appraisal process. We reported in Report B that some non-medical regulators were considering how to implement appraisal as one of the potential tools for revalidation. We recognise that this is harder for osteopathy, largely as a result of the environment in which they practice, whereby there is a high incidence of solo-practice, as opposed to medical environments where practice often takes place in teams.

Likewise the recent Command Paper 'Enabling Excellence'⁷, detailed the Department of Health's desire to see a higher level of local accountability of local employers as well as professionals. As osteopathic practice is predominantly outside of the NHS and large group practices this will be harder to implement and incorporate in any revalidation scheme. KPMG will reflect on some of the issues of patient and public involvement in the evaluation and in reports E and F.

As part of our evaluation of the costs and benefits for patients we are conducting a focus group with Insurers to gather their views on the impact of revalidation. We will also review data from Insurers on claims and complaints against osteopaths to further inform our review of impact.

⁴: Investigating Osteopathic Patients' Expectations of care: the OPEn project (University of Brighton)

http://www.osteopathy.org.uk/resources/research/Osteopathic-Patient-Expectations-OPEn-study/

⁵ Unpublished report March 2011: Complaints and claims against osteopaths: a baseline study of the frequency of complaints 2004-2008 and a qualitative exploration of patients' complaints (CONDOR)

⁶ http://www.nationalvoices.org.uk/checks-on-doctors-0

⁷ <u>http://www.official-documents.gov.uk/document/cm80/8008/8008.pdf.</u>

3 Evaluation Tools

We have summarised in the table below the tools that are to be used to gather the information specification required as part of the Pilot Revalidation evaluation. Further detail on each tool is included in Annex 2.

3.1.1 Evaluation Tool Descriptions

ΤοοΙ	Description	Timeframe
The cost model	A cost model to assess the estimated cost of the pilot and the cost of scaling up the pilot to a population wide model.	Set up stage and throughout pilot
Equality Impact Assessment - Initial Screening	An Equality Impact Assessment (EIA) initial screening has been carried out to ensure that GOsC carefully consider the Revalidation Pilot and its likely impact of their work on different communities or groups.	Final version in KPMG evaluation of pilot report F
Characteristics Form - Pilot Participant Information	Pilot Participant enrolment information required to inform the evaluation. It includes practice details and equality and diversity information. A hard copy will be completed by the applicant at the enrolment stage.	Complete at the enrolment stage.
Pilot Participant Form A (PPA)	Each Pilot Participant will complete an evaluation form every three months. This is the first evaluation form and therefore includes relevant indicators for this stage of the Pilot such as the evaluation of recruitment and training. Pilot Participants will have the option to complete the PPA form electronically or in hard copy.	Completed early December 2011
Pilot Participant Form B (PPB)	This is the Pilot Participant form to be used twice to gather data in April and July 2012. The questions have been developed so they are relevant to the interim stage of the evaluation. Participants can complete electronically or in hard copy.	Completed April 2012 and July 2012
Pilot Participant Form C (PPC)	This is the final participant evaluation form to be used at the end of the Revalidation Pilot. It includes further questions such as overall impact of the pilot. Pilot Participants can complete electronically or in hard copy.	Completed October 2012
Early Leaver Feedback	To gather further feedback on those participants that leave the pilot early	When a participant is confirmed as leaving.
Assessor Perspective (October 2011)	To gather initial feedback from Assessors engaged on the Revalidation Pilot on areas such as training and support.	October 2011
Assessor Perspective (October 2012)	To gather final feedback from Assessors at the end of the Revalidation Pilot on a wider range of areas including impact.	October 2012
Time log	To gather indicative costs of the GOsC staff time that can be extrapolated to full roll out	Set up stage and throughout pilot

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4 Anticipated Cost Model

In order to assess the estimated cost of the pilot and the cost of scaling up the model to a population wide model (approximately 4,000 osteopaths) it is necessary to identify all costs at: pilot initiation and set up; pilot operation; and post pilot review so that it is easy to identify which costs are likely to be one off costs or recurring into future periods.

It is also important to identify which party bears the cost and whether these costs are full costs, or are likely to be offset, for example, through participation in other activities. For example, part of pilot participant costs will be for their time in completing the portfolio. However, we understand that part of the portfolio may historically have been completed in order to meet their continuing practice CPD requirements. Therefore, the true cost is the opportunity cost of completing the revalidation portfolio only.

In addition, when the pilot is evaluated we will look to quantify the costs incurred and group into three areas: pilot initiation and set up; pilot operation; and post pilot review.

4.1 Anticipated Pilot Initiation and Set up Costs

We understand that third party external pilot initiation and set up costs are already being actively collected by the GOsC finance team and account for costs such as:

- Research & Risk Assessment;
- Assessment processes;
- Communication tools;
- IT Development;
- Recruitment & Training assessors;
- Development of pilot materials;
- Equality & Diversity guidance;
- Pilot costs;
- Pilot information materials;
- Advertisement for pilots; and
- Pilot implementation workshops.

These are all third party costs that the GOsC has specifically commissioned in order to facilitate the set up of the pilot. The GOsC is not intending to and has not put systems in place to capture any staff time or RSAG/Council time/resource costs incurred pre pilot as it feels that these costs have been met through the GOsC's business as usual operational structure and that it has not employed any additional staff to manage the pilot processes.

The development of guidance literature, engagement with stakeholders, development of policy and research in this area has also all been absorbed into the business as usual budget. To date we have identified through discussions with officers that this has not impacted on the operational remit of the GOsC, as revalidation is an intrinsic element of the GOsC's business and operational plan.

4.2 Anticipated Costs of Pilot Operation

However, going forward the GOsC needs to be able to quantify those additional costs borne in relation to the running of revalidation. These costs are numerous and include, but are not limited to: GOsC staff time, training costs, Council time, external support and external assessors. We will differentiate those costs that are one off and related to the pilot only, and those that will need to be included in the scaled up 'roll out' costs.

The GOsC also need to be able to draw a view on the financial cost borne by the registrant and so it will be necessary for them to consult with registrants on the additional burdens borne by the registrant both in terms of time and resources. In addition, as part of our analysis we are asking osteopaths to provide us with their average hourly charge out rate. This will enable us to accurately estimate the average cost per hour that registrants charge for their services so that we can accurately calculate the time cost of the Revalidation Pilot and the consequential cost of full roll out of revalidation.

This data is required as it is necessary for the GOsC to satisfy itself and other stakeholders that the revalidation model proposed is proportionate and will not unfairly discriminate against those registrants who, for example, are on low incomes.

In order to be able to capture GOsC staff time we have developed a timesheet for all staff to complete over the pilot period so that an accurate picture can be drawn. We envisage that likely activities may range from answering calls by phone or email, liaising with assessors, arranging consultation events, drafting council papers, project and risk management, managing demarcation of revalidation expenditure. This is contained in the section on evaluation tools.

In terms of other costs, we have listed in the table below the likely costs we anticipate being occurred during the course of the pilot:

- Staff time
- Training for staff
- Training for assessors and refresher training
- Travel costs (Assessors and the GOsC)

- Assessor review of the portfolio costs
- Facilities and support
- Additional printing and stationery
- Room hire
- Evaluation of findings
- Printing and publications

4.3 Anticipated Costs Post Pilot Review

Once the pilot has been finalised, there are activities that will be required so that the GOsC can consider the evaluation of the pilot and determine whether it's proportionate and non discriminative. This will involve considerable liaison with KPMG and with wider groups. In the main this will be GOsC staff time and KPMG time and resources. These will be estimated and reported in report F.



5 Equality and Diversity Impact Assessment

5.1 Overview

An initial screening of the Equality Impact Assessment (EIA) has been carried out to ensure that GOsC carefully consider the Revalidation Pilot and its likely impact of their work on different communities or groups. It involves anticipating the consequences of the Revalidation Pilot on different communities and making sure that any negative consequences are eliminated or minimised and opportunities for promoting equality and equity are maximised.

An EIA consists of two main parts:

- An initial screening process.
- A full assessment, if the initial screening has identified a possible adverse/negative impact.

EIA is not a one-off exercise. Any potential impact will only materialise when the Revalidation Pilot has been put into practice, therefore the EIA will be reviewed in Report E and Report F. The initial screening is presented overleaf.

5.2 Initial Screening

5.2.1 Overview

Area	Summary
Short description of proposals	The purpose of the pilot is to collect information about the proportionality and feasibility of the draft osteopathic revalidation scheme. This will include a view about the costs, benefits, risk and impact of the scheme for osteopaths, their patients and the GOsC, and an indication of whether it could contribute to the improvement of patient safety and the quality of osteopathic practice. The pilot is a way of delivering the Department of Health's requirements for non medical revalidation as recently set out in the Command Paper, Enabling Excellence, published on 16 February 2011 ⁸ .
Overall intent	The Revalidation Scheme should be proportionate and not unfairly discriminate against specific groups of individuals. The pilot aims are:
	 To explore the impact of the Pilot, in terms of equality and diversity, on particular groups of osteopaths' as an explicit aim. To explore benefits of implementing Stage 1 of the Revalidation Scheme from the perspectives of patients and the public, osteopaths and the GOSC. This should include views about whether the scheme contributes to quality improvement or patient safety. To test the impact of the stage 1 on all groups of osteopaths – including those identified in the Revalidation Consultation to ensure that there no unfair discrimination. To explore and calculate additional costs of learning how to use the revalidation tools and associated guidelines. To explore and calculate additional costs of some tools in practice over a five year period. To explore and calculate additional costs of completing the self-assessment form over a five year period. To explore and calculate the cost of delivery of stage 1 of the revalidation scheme if it was to be rolled out to the profession over a five year period. To gather feedback about the utility of the revalidation guidelines and tools from osteopaths and from other stakeholders. To gather feedback about the support required standards using the tools available. To gather feedback about the support required by participants during the pilot, the support available and to make recommendations. (This should include information about the use of the FAQs, online discussion forum, use of the podcasts, videos, and the number and types of telephone/email enquiries during the pilot.)

⁸ <u>http://www.official-documents.gov.uk/document/cm80/8008/8008.pdf</u>

Area	Summary
	 To consider the implications, potential numbers and discussions with osteopaths who do not provide all the required information on first submission to inform the development of Stage 2 of the revalidation process. (Any sample is unlikely to be representative because the pilot will all be volunteers and it has been suggested that the pilot volunteers are less likely to be practising with lower than the required standards).
ldentified stakeholders	These are the identified stakeholders:
	 Osteopaths Pilot participants representing the characteristics of practice outlined in
	Appendix A to KPMG Report C. Pilot Assessors recruited in open competition against published
	 Pilot Assessors recruited in open competition against published competencies.
	KPMG – Evaluation and Impact Assessment
	Caitrian Guthrie and Revalidation Assessment Team.
	 GOsC staff – impact on all staff of pilot. DH – Guidelines produced by the Department of Health may influence the course of the pilot.
	Osteopathic patients
	CHRE
	Insurance companiesOsteopathic groups

5.2.2 How could the policy have a significant impact on equality in relation to each area?

Area	Summary
Age	None identified
Disability	None identified
	See general comments
Ethnicity	None identified
Gender (including trans-gendered people)	None identified
Religion or belief	None identified
Sexual orientation	None identified
Socio-economic	None identified
groups	
Will the pilot create	None identified
any problems of	
barriers to any	See general comments
community of group?	
Will any group be excluded because of	No to both
the pilot? and	See general comments below.
will the pilot have a	
negative impact on	
community	
relations?	
Will the policy have a	We conclude the policies considered in this screening do not contravene the Human



Area	Summary
negative impact on human rights?	Rights Act 1998 and are compatible with all domestic and European legislation.
Will the policy have a negative impact on the equality to all groups?	See general comments below
General Comments	As part of the pre pilot work KPMG hosted a series of stakeholder consultations and feedback sessions. These sessions were designed to capture their views on revalidation and the impact that it will have on the profession, as well as asking them to review and 'test' the tools KPMG had developed to consider if they were useable.
	At these meeting several registrants expressed views that specific types of individuals may find the requirements of revalidation more onerous than others, the characteristics identified included:
	 Those osteopaths who practise alone; Non practising part time practising osteopaths; Those registrants who are already working to full capacity may not have time to meet the requirements of revalidation; and Those osteopaths who are less able to use ICT to complete the self assessment form/tools.
	In addition, KPMG held a meeting with osteopaths, which the GOsC classify as 'special interest groups', representation on this group included, for example, Osteopathic Pelvic, Respiratory & Abdominal Association and the Foundation for Paediatric Osteopathy. Through discussion with representatives from these groups, we were able to determine that they do not see themselves as 'specialist' and that primarily they are all 'osteopaths.' Therefore, it is evident that these groups do not view themselves as a distinct group with different needs and demands.
	Report A - How do Osteopaths Practise? produced by KPMG summarised some of the potential risks associated with clinical practice (including risks arising from the environment). These were informed by the 2007 White Paper, Trust, Assurance and Safety and also the integration of some of the findings from the draft CONDOR complaint report on claims and complaints about osteopaths ⁹ and the Standardised Data Collection Project. ¹⁰
	 The KPMG report found: More than half of osteopaths normally practise alone, meaning they are frequently alone with patients, possibly in the osteopath's own home. The unsupervised nature of osteopathy also means that responsibility for patient safety rests firmly with individual osteopaths. Formal performance appraisal is rare, and we have found that very little documented reflection on performance or feedback from patients exists. 15% regularly practise in managed environments such as hospitals or clinics which may be subject to NHS standards of clinical governance. Around two thirds of osteopaths appear to use one or more adjunct therapy

⁹ Unpublished report March 2011: Complaints and claims against osteopaths: a baseline study of the frequency of complaints 2004-2008 and a qualitative exploration of patients' complaints (CONDOR)

¹⁰ http://www.osteopathy.org.uk/uploads/standardised_data_collection_finalreport_24062010.pdf

Area	Summary
	 (29% use dry needling, 18% electrotherapy, 13% nutrition therapy and 12% acupuncture). 22% of survey respondents appear to undertake examinations of intimate areas, although the majority of these habitually offer chaperones when so doing. Around 10-15% of the 22% of osteopaths never offer chaperones when undertaking such examinations. 3% of all respondents to Report A reported some sort of disability such as autistic spectrum disorders, ME, visual impairment, colour blindness. During the pre pilot consultation no stakeholders identified that disability might be a barrier to completion of the GOsC Revalidation Pilot however, the GOsC should consider how any potential requests might be dealt with.
	 The findings from the GOsC 2009 consultation on revalidation¹¹ suggested that there could be an unfair impact for particular groups and so the pilot aims to practically test some of these findings: 90% of respondents thought the overall purpose of the revalidation proposals was clearly described; 72% concluded that the proposals seemed fair; 83% reported that the proposals were unlikely to unfairly discriminate against osteopaths because of their gender, race, age, disability, religion, belief or sexual orientation; 68% said the proposals were unlikely to unfairly discriminate against osteopaths because of practice e.g. educator, researcher etc; 75% agreed that the proposals were unlikely to unfairly discriminate against osteopaths if they are on more than one professional register e.g. GOSC and General Medical Council; and 73% thought that the proposals were unlikely to unfairly discriminate against osteopaths because they work part-time.
Promote equal opportunities	No impact
Get rid of discrimination	No impact
Get rid of harassment	No impact
Promote good community relations	Potential positive impact
Promote positive attitudes towards disabled people	No impact
Encourage participation by disabled people	No impact
Consider more favourable treatment of disabled people	No impact
Promote and protect human rights	No impact
What is the evidence for your answers to	KPMG has undertaken a review into the demographic of the Osteopathic population as well as the strides undertaken by other healthcare regulators in respect of

 $^{11}\ http://www.osteopathy.org.uk/uploads/revalidation_consultation_report.pdf$

Area	Summary
the above questions?	revalidation:
	'Report A - How do Osteopaths Practise?' produced by KPMG summarised some of the potential risks associated with clinical practice based as defined in the 2007 White Paper - Trust, Assurance and Safety Report A also summarised some of the key attributes of the profession which are detailed in the previous section 'General Comments.
	'Report B – A report on the review of the work undertaken by other regulators to outline, costs, benefits, financial and regulatory risks' identified how other health regulators were addressing revalidation, in particular the costs, benefits and risks.
	Through the course of this work KPMG has worked extensively with the full spectrum of stakeholders and has worked with the GOsC to identify how the evaluation of the pilot specification could be altered and how it can be rigorously tested to ensure that the specification is proportionate to the risk of practising osteopathy.
	The tools within the GOsC pilot participant pack include tools that encourage group and peer working. Therefore, this may have a positive impact upon relationships within the Osteopathic community. In addition, the introduction and promotion of revalidation may have a positive impact upon the public's perspective of the profession and may encourage more general practitioners to refer patients to osteopaths and more people to consider independently approaching an Osteopath for treatment.
What does available research say?	The National Council for Osteopathic Research 'Standardised Data Collection Project. Standardised data collection within osteopathic practice in the UK: development and first use of a tool to profile osteopathic care in 2009' ¹²
	The overall aim of this project was to develop and pilot a "Standardised Data Collection" tool (SDC) for the collection of patient-based data within osteopathic private practice in the UK. The project provided baseline pilot data for comparison with future snapshot surveys, as well as providing information about a number of important issues relevant to professional practice, policy, regulation, and future research. This review found that referrals to an osteopath by a practitioner were found to be relatively low, with a total of 13% of patients referred by their osteopath to another practitioner. The osteopaths had considerable interaction with the patients' GPs. Almost half the patients (48%) had visited their GP prior to visiting the osteopath. In contrast, only 6% had been referred to the osteopath by their GP.
Have you thought about commissioning new data or research?	The need for further evidence to support an analysis of the impact of proposals in 'Enabling Excellence' will be considered as part of the evaluation of the pilot and the development of an associated impact assessment.

 $^{^{12}\} http://www.osteopathy.org.uk/uploads/standardised_data_collection_final report_24062010.pdf$

6 Appendices

- 6.1 Appendix 1 Pilot evaluation specification
- 6.2 Appendix 2 Pilot evaluation tools



Appendix 1

Evaluation Specification

Detailed evaluation specification

The evaluation criteria as specified pre pilot have been developed as a result of the pilot specification data, consultation and discussions with the GOsC and other stakeholders but are not necessarily exhaustive. We have set out below an indicative schedule of how and when we will use them to evaluate the pilot and contribute to the impact assessment.

	KPMG Tools					Meetings/focus groups										
Pilot Specification criteria to test	Assessor Form 1	Assessor Form 2	Pilot Participant Form A (PPA)	Pilot Participant Form B (PPB)	Pilot Participant Form C (PPC)	GOsC Time log	Early leaver form	Pilot participant focus groups			BOA	GOsC project team	Assessor Support	RCN	OEls	Specialist Interest groups
Benefits																
Benefits of implementing Stage 1 of the Revalidation Scheme from the perspectives								1								
of: patients public osteopaths other stakeholders		\checkmark	\checkmark	\checkmark	\checkmark		\checkmark	~	V	~	\checkmark			~	\checkmark	\checkmark
Positive impacts generated for the GOsC e.g. more streamlined delivery of regulatory functions or improved perception with other stakeholders.		\checkmark			\checkmark			\checkmark	\checkmark \checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark	\checkmark
The benefits of engaging with the revalidation pilot will be explored and could include enhanced Continued Professional Development. The evaluation will include actual and perceived benefits.	~	\checkmark	\checkmark					\checkmark			\checkmark		\checkmark	\checkmark		
Improvement of own practice through peer observation of other osteopaths		\checkmark	\checkmark	\checkmark	\checkmark			✓		\checkmark		\checkmark	\checkmark			
Higher quality provision and reduced sub-optimal outcomes and reduced complaints.								~	\checkmark			\checkmark				
If osteopaths make good use of the audit tool the resultant data could contribute to the evidence base for osteopathic practise.	×	\checkmark	\checkmark	\checkmark	\checkmark			\checkmark		\checkmark	\checkmark		\checkmark	\checkmark	\checkmark	\checkmark
Lower onward referral (therefore lower treatment costs overall).								~		\checkmark						
Costs																
To explore and calculate additional costs (using time taken as a proxy for an hourly rate costing) of learning how to use the revalidation tools and associated guidelines.			\checkmark	\checkmark	\checkmark	\checkmark						\checkmark	\checkmark			
To explore and calculate additional costs (using time taken as a proxy for an hourly rate costing) of actually using the revalidation guidelines and tools over a five year period.			\checkmark	\checkmark	\checkmark	\checkmark						\checkmark	\checkmark		\checkmark	
Costs will be explored for assessors. An example potential cost could be the time taken engaging with revalidation (training etc) is not financially viable with reference to the volume of work undertaken.	√ √	\checkmark								\checkmark		\checkmark	\checkmark			
To explore costs (using time taken as a proxy for an hourly rate costing) of completing the self assessment form over a five year period.	9				\checkmark	\checkmark						\checkmark	\checkmark			
Financial Risks																
Extent pilot imposes new or additional costs upon the GOSC e.g. greater administrative costs or increase in non value adding activity.						\checkmark						\checkmark				
Reputational Risks																
Does osteopathy need revalidation? Practice is seen by the registrants as low risk. It could be perceived as a waste of time.	\checkmark	~	\checkmark	\checkmark	\checkmark					\checkmark	~			~		
Clinical Risks																
A high percentage of osteopaths fail to reach the required standard		\checkmark						~		\checkmark						
The extent to which patients are more willing to utilise osteopaths.				\checkmark	\checkmark			\checkmark	\checkmark		\checkmark					

Detailed evaluation specification (cont.)

		KPMG Tools						Meetings/focus groups									
Pilot Specification criteria to test	Assessor Form 1	Assessor Form 2	Pilot Participant Form A (PPA)	Pilot Participant Form B (PPB)	Pilot Participant Form C (PPC)	GOsC Time log	Early leaver form	Pilot participant focus groups	Insurers	PPI Group	Assessors	BOA	GOsC project team	Assesso Support	^r RCN	OEIs	Specialist Interest groups
Regulatory Risks																	
Potential costs to the wider health sector will be evaluated with information collated through stakeholder consultation. These could include additional regulatory costs, which may require regulators to rebalance internal budgets to account for this.									\checkmark	√		~	\checkmark		\checkmark	\checkmark	
Environmental Risks																	
To gather feedback about the utility of the revalidation guidelines and tools from osteopaths and from other stakeholders and impact on practice.		\checkmark	\checkmark	\checkmark	\checkmark		\checkmark	\checkmark		\checkmark	\checkmark			\checkmark	\checkmark	\checkmark	\checkmark
To gather feedback about the revalidation assessment criteria from osteopaths and from other stakeholders and impact on practice.		\checkmark	\checkmark	\checkmark	\checkmark		\checkmark	\checkmark			\checkmark	\checkmark		\checkmark	\checkmark	\checkmark	\checkmark
Overarching issues																	
To gather feedback about the support required by participants during the pilots and the support available and to make recommendations. (This should include information about the use of the FAQs, online discussion forum, use of the podcasts, videos, and the number and types of telephone calls during the pilots.)	~	~	\checkmark	~	\checkmark	\checkmark	~	~			\checkmark	\checkmark	~	~	~	~	~
To consider the implications, potential numbers and discussions with osteopaths who do not provide all the required information on first submission. (Any sample is not likely to provide a representative sample because pilots will all be volunteered and it has been suggested that the pilot volunteers are less likely to be practicing with lower than the required standards.		\checkmark					\checkmark	V			\checkmark		~	~			



Appendix 2

Proposed data collection tools

Tool	Page number
Characteristics Form - Pilot Participant Information	23 - 27
Pilot Participant Form A (PPA)	28 - 35
Pilot Participant Form B (PPB)	36 - 42
Pilot Participant Form C (PPC)	43 - 51
Revalidation Pilot Early Leaver Feedback	52
Assessor Perspective on the Revalidation Pilot (October 2011)	53 - 56
Assessor Perspective on the Revalidation Pilot (October 2012)	57 - 63
Time log sample for completion by the GOsC	64



This information will be used to monitor the impact of the Pilot on osteopaths. Your response will be confidential and will be summarised and reported back to GOsC in a way that does not allow individual responses to be identified. **Please complete this form fully.** Please return to KPMG in the SAE included.

Q1	General identification details					
Name?					_	
What is you digit code>	r unique pilot participant number (PPN) <this 5<="" a="" be="" should="" td=""><td></td><td></td><td></td><td></td></this>					
What is you	Ir GOsC registration number?					
Are you registered to practice outside of the UK?			Yes 🗆	No 🗆		
Are you registered to practice on a temporary basis in the UK?			Yes 🗆	No 🗆		
What is you	ır email address?					

Q2	Are you currently? Please tick all that apply.		
Practising	as an osteopath?	Yes 🗆	No 🗆
Doing aca	demic work, teaching or studying in osteopathy?	Yes 🗆	No 🗆
Providing other health services? If yes, please give detail:		Yes 🗆	No 🗆
Working i	n an unrelated field?	Yes 🗆	No 🗆
Doing oth	er clinical work related to osteopathy or otherwise? (please state)		

Q3	Where do you currently practise? Please tick all that apply.			
England				
Northern Ireland				
Republic o	Republic of Ireland			
Wales				
Scotland				
Other UK				
Non UK				

Q4	Are you currently registered with another health regulator? Please tick all that apply.					
GMC						
HPC (e.g. physiotherapist)						
Other (pleas	se specify)					



Q6

Characteristics Form (Pilot Participant Information)

Q5	How many hours a week are you currently spending:	
Performin	g osteopathic clinical practice?	hours
Supervisi	ng osteopathic clinical practice?	hours
Teaching	osteopathic clinical practice?	hours
Practice n	nanagement/administration?	hours
Other plea	ase specify	hours
Total wor	rking week	hours
what is yo	our average hourly charge out rate for your osteopathic services?	£

How long have you been practising as an osteopath (Note: Please include time before the statutory register was created and exclude any prolonged breaks e.g. sabbaticals, pregnancy)?

____ years_____ months

Q7	What percentage of your time do you currently spend on different osteopathic methods or therapies in a normal week?							
		More than 90%	50-90%	10-50%	0-10%		None	
Cranial oste	opathy							
Structural o	steopathy							
Visceral ost	eopathy							
Others (plea	ase state)							
As part of y	our work, do you practise	e or incorporate o	ther therapeu	tic methods?	Please tick as	many	as apply	
Acupunctur	e							
Dry needling	g							
Applied or c	linical kinesiology							
Electrothera	ару							
Herbal med	icine							
Homeopath	у							
Nutrition the	erapy							
Prescription of medications								
Injections								
Other, please specify								
None								



Q8	In the examination or treatment process, do you undertake examination of intimate areas?				
Yes					
No					

Q9 What proportion of your time in a normal week do you spend practising in:								
		More than 90%	50-90%	10-50%	0-10%	None		
Your own I	nome – room set aside as clinic							
Your own H domestic u	nome – room for clinical & Ise							
Patients' h	omes							
Your own s	sole practice							
A group pr	actice							
A Hospital								
A Surgery								
A non-NHS	S employer's address e.g. office							
Others (ple	ease state)							

Q10	What proportion of your time in a normal week (assume 35 hours) do you spend practising:						
		More than 90%	50-90%	10-50%	0-10%	None	
On your ov	vn						
With other	healthcare practitioners (NHS)						
With other	non-healthcare staff (NHS)						
With other NHS)	With other healthcare practitioners (non-NHS)						
With other	With other osteopaths						
With other	non-healthcare staff (non-NHS)						
Others (please state)							



Q11	Q11 In what ways do you practise with other osteopaths? (tick all that apply)								
		Never	Seldom	Sometimes	Often	Usually	Always		
As a princi	oal of a practice with other osteopaths								
Working in employee of	a practice as an associate or osteopath								
Working as an osteopath in a practice with other osteopaths									
	Working as an osteopath in a practice with other health professionals								
As a locum	osteopath								
In more that	an one practice								
Alone									
Others (ple	ase state)								

Q12	only. It helj	sity and Ethnicity. os us to ensure tha se circle each of the	t we do not discrin	ninate against grou		aluation purposes
Your gende	er:	Male	Female	Other	Prefer not to say	
Your age:		18 - 25	26 - 30	31 - 40	41 - 50	51 – 60
		61-65	65+	Prefer not to say		
Your ethnic	city:	White	Mixed	Asian or Asian British	Black or Black British	Chinese
		Other	Prefer not to say			
Your sexua	ality:	Heterosexual	Homosexual	Bisexual	Transsexual	Other
		Prefer not to say				
Your religio	on:	Christian	Muslim	Hindu	Buddhist	Sikh
		Jewish	Other	None	Prefer not to say	
Your marita status:	al	Married	Civil partnership	Single, never married	Separated/ divorced	Widowed
		Other	Prefer not to say			
Any disabil	ity:	No	Yes		Prefer not to say	
lf yes what your disabi						

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Q13	How IT literate are you?				
How literate are you in using the following items of interactive equipment and internet based programmes:		Expert	Intermediate	Beginner	Never used
Internet bas	ed search engines				
Email					
Microsoft Ex	Microsoft Excel				
Microsoft W	ord				
Microsoft Po	owerPoint				
Video came	ra				
Teleconfere	ncing				
Online forun	ns				
Other. Pleas	se specify.				

Q14	Evaluation	
complete a	t the Pilot KPMG will be contacting participants every three months to n evaluation questionnaire. Could you please indicate your preferred method naire completion (choose one option only)	Preferred Method
I would pre	fer to complete an online questionnaire	
I would pre	fer to complete a hard copy questionnaire and return this in the post	

Q15	The general information request is designed to capture data on the characteristics of the pilot participant groups so that we can review whether specific characteristics impact upon a registrants ability to successfully complete the pilot. If there is any other information you feel is relevant, but was not captured, please indicate in the space below:							



KPMG Data Survey – Pilot Participant Form A (PPA) – January 2012

Please complete and return this form which gathers information on your current engagement with the Pilot. The information that you supply will inform an independent evaluation of the Pilot. Your response will be confidential and will be summarised and reported back to GOsC in a way that does not allow individual responses to be identified. Details of how you can return this form to the KPMG Evaluation Team can be found on page 8.

Your feedback will be very useful to us to inform our evaluation of the Pilot.

Q1	What is your unique ID number?

Q2	Recruitment to be a pilot partic Why did you elect to be a pilot					
	Please read the following state		the appropria	te box which a	applies to you.	
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Ensure that my views are taken on board						
To assist the of revalidation of revalidation of the other section of th	he profession in the development tion					
Revalidation is important and will significantly affect the profession						
I want to improve my practice						
CPD hours	3					
	o find out how revalidation will n the future					
I am intere profession	sted in developments within the					
Other(s) P	lease specify					

KPMG Data Survey – Pilot Participant Form A (PPA)

Q3	How did you find the whole recruitment experience? Are the materials provided easy to use and comprehensible? How was the training provided? Please read the following statements and tick the appropriate box which applies to you.						
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	
Recruitme	nt						
	provided me with all the support I part of the recruitment process						
Training							
	g GOsC provided me with was preparation I needed						
The duration me with wa	on of the training GOsC provided is just right						
Materials							
	als that the GOsC has provided ve been fully explained and are						
	It I need to do to satisfy the ts needed to complete my						
	e completed the templates v training from the GOsC						
relation to r	ve any further comments in recruitment, training and materials een made available?						



KPMG data survey – Pilot Participant Form A (PPA)

Q4		s have you completed over the last three months and which themes did ave not completed any tools then please leave blank)					
		Theme 1 Communication and Patient Partnership	Theme 2 Knowledge, Skills and Performance	Theme 3 Safety and Quality in Practice	Theme 4 Professionalism		
Practice Doc	umentation						
Patient Reco	rds						
Case Presen	tations						
Case Based	Discussions						
Clinical Refle	ctions						
Personal Dev	elopment Needs Analysis						
Action Plans							
Peer Review							
Multisource F	eedback						
Management	and Treatment Plans						
Significant Ev	vent Analyses						
Audits							
Other (please specify)							
Patient Feed	lback						
Please specif patient feedb	fy tool or method used for ack						
How long did complete?	it take the patient to						
What was yo	ur patients reaction to completing	g this?					
How have yo	u used this patient feedback in y	our practice?					



KPMG data survey – Pilot Participant Form A (PPA)

Q5a	For each tool completed please complete as appropriate.							
Name of tool								
Time in hours it took to a	complete the tool	hours						
Reason(s) why you deci	ided to use this tool: (please tick all that apply)							
Easy to under								
Quick to com								
Something I a								
 Interesting an 	 Interesting and rewarding to complete 							
Required no I	Required no IT equipment							
Allowed me to	Allowed me to work with others							
Other (please								
Has completion of the to	Has completion of the tool helped you reflect on your current clinical practice?							
Has completion of the to	ool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆						



KPMG Data Survey – Pilot Participant Form A (PPA)

Q5b	For each tool completed please complete as appropriate.			
Name of tool				
Time in hours it took to	o complete the tool	hours		
Reason(s) why you de	ecided to use this tool: (please tick all that apply)			
 Easy to und 				
Quick to co				
 Something 				
 Interesting 	 Interesting and rewarding to complete 			
Required no	o IT equipment			
 Allowed me 	to work with others			
• Other (plea	se specify)			
Has completion of the	tool helped you reflect on your current clinical practice?	Yes 🗆 No 🗆 Maybe 🗆		
Has completion of the	tool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆		

Q5c	For each tool completed please complete as appropriate.							
Name of tool								
Time in hours it took to a	Time in hours it took to complete the toolhours							
Reason(s) why you deci	Reason(s) why you decided to use this tool: (please tick all that apply)							
Easy to under								
Quick to com								
Something I a								
 Interesting an 	 Interesting and rewarding to complete 							
 Required no I 	Required no IT equipment							
 Allowed me to 								
Other (please	e specify)							
Has completion of the to	ool helped you reflect on your current clinical practice?	Yes 🗆 No 🗆 Maybe 🗆						
Has completion of the to	ool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆						



Q8

KPMG Data Survey – Pilot Participant Form A (PPA)

Q6	If you have not completed any tools in the last three months then please provide a return selection below.	eason from			
I have not had time to complete any of the tools					
I am working towards completing one or more of the tools but I have not yet completed it					
I have decided to leave the pilot early (please complete the early leavers form)					
I am not clear on what I need to do to complete the tools					
I am awaiting guidance from the GOsC on how to complete the tools					
Other (pleas	e specify)				

Q7 How many hours in total has revalidation taken to complete in the last 3 months?

How many hours in total over the last three months have you dedicated to revalidation?	hours
How many hours (out of the total hours you have spent) have you spent reading, and learning to use the guidance over the last 3 months	hours
If you were not taking part in the Pilot, how many hours do you estimate that you would have dedicated to CPD activities?	hours

How has the pilot impacted on you? Please read the following statements and tick the appropriate box which applies to you

					•• •	
Participation months ha	on in the pilot over the last 3 s:	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Improved th	ne standard of care I provide					
Made me m practice	ore aware of the standards of					
Meant I hav patients	re less time to provide care to					
Duplicated produce	documentation that I already					
	re worked more closely than other osteopaths					
Meant I hav	re reflected more on areas of my tice					
Been an ad	ministrative burden					
	positive impact on the feedback om my patients					
Benefited n	ny patients					
Other (plea	se specify)					



KPMG Data Survey – Pilot Participant Form A (PPA)

Q9 Your views on revalidation Please read the following state	ments and tick	the appropria	te box which a	applies to you	
	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Revalidation will positively impact upon the whole of the osteopathic profession					
The benefits of revalidation outweigh any associated costs					
Revalidation is well thought out and planned					
The GOsC is providing the profession with sufficient information on the requirements of revalidation					
The model of revalidation developed by the GOsC is fit for purpose					
Revalidation will be onerous and place undue strain on all osteopaths					
There is little point in revalidation, osteopathy is low risk clinically					
There is little point in revalidation, osteopathy is provided in low risk environments					
The quality of patient care will improve if Osteopaths engage with the Pilot?					
Revalidation will have a positive impact upon patient safety?					
Revalidation will have a positive impact for osteopathy in the eyes of:					
Osteopaths;					
Patients; the NHS;					
other healthcare					
professionals.					
parents/carers					
Do you have any further comments in relation to the benefits and costs for pilot participants? (please state)					



KPMG Data Survey – Pilot Participant Form A (PPA)

Q10	Please detail below if you think that there is anything that may assist the KPMG team in their evaluation of the Pilot.	

Please return this form to: Emma Stewart KPMG LLP (UK) One Snow Hill B4 6GH

Thank you for taking the time to complete and return this form



KPMG Data Survey – Pilot Participant Form B (PPB) – April 2012 & July 2012

Please complete and return this form which gathers information on your current participation in the Pilot. The information that you supply will inform an independent evaluation of the Pilot. Your response will be confidential and will be summarised and reported back to GOsC in a way that does not allow individual responses to be identified. Details of how you can return this form to the KPMG Evaluation Team can be found on page 7.

Your feedback will be very useful to us to inform our evaluation of the Pilot.

Q1	What is your unique ID number?						
Q2	Support or guidance from the GOsC for the Pilot during the last three months. Please read the following statements and tick the appropriate box which applies to you. If you have not used any of the guidance then please leave part 2b blank.						
Have you re	ead the guidance provided by the G	GOsC?			Yes 🗌	No 🗌	
If no, why	If no, why not?						
	sked for, or received any additiona at three months?	l support or guid	ance from the	GOsC	Yes 🗌	No 🗌	
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	
Q 2b Support and guidance							
The GOsC has provided me with all the support I have needed							
I have not needed any support as the guidance provided to me at the beginning of the pilot was clear							
I have not needed any support as I have not yet started completing any of the templates provided							
Training							
	g GOsC provided me with was preparation I needed						
in? If you o	ort have you been provided with commented that you lacked supp se detail below.						

Q3	Please indicate below whether you have received any of the following types of support from the GOsC and how useful this has been to you. Please read the following statements and tick the appropriate box which applies to you.						
Very good Good Satisfactory Poor Very Poor Not u						Not used	
Online for	um						
Telephone call							
Email							
Letter	Letter						
Other (ple	ase specify)						



Q4	Which of the following tools you use them for? (If you have				which themes did
		Theme 1 Communication and Patient Partnership	Theme 2 Knowledge, Skills and Performance	Theme 3 Safety and Quality in Practice	Theme 4 Professionalism
Practice Documentation Patient Records					
Patient Records					
Case Present	tations				
Case Based I	Discussions				
Clinical Refle	ctions				
Personal Development Needs Analysis					
Action Plans					
Peer Review					
Multisource F	eedback				
Management	and Treatment Plans				
Significant Ev	vent Analyses				
Audits					
Other (please					
Patient Feed	back				
Please specif patient feedba	y tool or method used for ack				
How long did	it take the patient to complete?				
What was you	ur patients reaction to completing	g this?			
How have you	u used this patient feedback in y	our practice?			



Q5a	For each tool completed please complete as appropriate.			
Name of tool				
Time in hours it took to	complete the tool	hours		
Reason(s) why you dec	ided to use this tool: (please tick all that apply)			
Easy to unde	rstand			
Quick to com				
Something I a	Something I already do anyway			
 Interesting ar 	 Interesting and rewarding to complete 			
Required no	IT equipment			
Allowed me to	o work with others			
Other (please	e specify)			
Has completion of the to	ool helped you reflect on your current clinical practice?	Yes 🗆 No 🗆 Maybe 🗆		
Has completion of the to	ool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆		



Q5b	For each tool completed please complete as appropriate	
Name of tool		
Time in hours it took to	complete the tool	hours
Reason(s) why you dee	cided to use this tool: (please tick all that apply)	
Easy to unde	erstand	
Quick to com	nplete	
Something I	already do anyway	
 Interesting a 	nd rewarding to complete	
Required no	IT equipment	
Allowed me	to work with others	
Other (pleas	e specify)	
Has completion of the t	ool helped you reflect on your current clinical practice?	Yes 🗆 No 🗆 Maybe 🗆
Has completion of the t	ool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆

Q5c	For each tool completed please complete as appropriate.			
Name of tool	·			
Time in hours it took to a	complete the tool	hours		
Reason(s) why you deci	ded to use this tool: (please tick all that apply)			
 Easy to under 	rstand			
Quick to comp	plete			
Something I a	Something I already do anyway			
 Interesting an 	d rewarding to complete			
Required no I	T equipment			
Allowed me to	o work with others			
Other (please	specify)			
Has completion of the to	ool helped you reflect on your current clinical practice?	Yes 🗆 No 🗆 Maybe 🗆		
Has completion of the to	ool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆		



Q6	If you have not completed any tools in the last three months then please provide a return the selection below.	eason from			
I have not had time to complete any of the tools					
I am working towards completing one or more of the tools but I have not yet completed it					
I have decided to leave the pilot early (please complete the early leavers form)					
I am not clear on what I need to do to complete the tools					
I am awaiting guidance from the GOsC on how to complete the tools					
Other (please specify)					
Q7 How many hours in total has revalidation taken to complete in the last 3 months					

Q/	How many hours in total has revailedation taken to complete in th	e last 3 months
How many hour dedicated to rev	s in total have you spent over the last three months have you validation?	hours
,	taking part in the Pilot, how many hours do you estimate that you icated to CPD activities?	hours



Q8	Please detail evaluation of	below if you think that there is anything that may assist the KPMG team in their the Pilot.
		-

Please return this form to: **Emma Stewart** KPMG LLP (UK) One Snow Hill B4 6GH

Thank you for taking the time to complete and return this form



Please complete and return this form which gathers information on your total engagement with the Revalidation Pilot. The information that you supply will inform an independent evaluation of the Revalidation Pilot. Your response will be confidential and will be summarised and reported back to GOsC in a way that does not allow individual responses to be identified. Details of how you can return this form to the KPMG Evaluation Team can be found on page 9.

Your feedback will be very useful to us to inform our evaluation of the Revalidation Pilot.

Q1 What is your unique ID number	What is your unique ID number?						
Q2 Support or guidance from the Please read the following state not used any of the guidance	ements and tick	the appropria					
Have you asked for or received any support of three months?	or guidance from t	the GOsC ove	r the last	Yes	No 🗌		
	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree		
Support and guidance							
The GOsC has provided me with all the support I have needed							
I have not needed any support as the guidance provided to me at the beginning of the pilot was clear							
I have not needed any support as I have not as yet started completing any of the templates provided							
Training							
The training GOsC provided me with was exactly the preparation I needed							
What support have you been provided wit in? If you commented that you lacked sup this? Please detail below.							



Q3	Please indicate below whether you have received any of the following forms of support from the GOsC and how useful this has been to you. Please read the following statements and tick the appropriate box which applies to you.						
		Very good	Good	Satisfactory	Poor	Very Poor	Not used
Online fo	rum						
Telephon	ne call						
Email							
Letter							
Other (ple	ease specify)						



	Themes 1 Communication and Patient Partnership	Themes 2 Knowledge, Skills and Performance	Themes 3 Safety and Quality in Practice	Themes 4 Professionalism
Practice Documentation				
Patient Records				
Case Presentations				
Case Based Discussions				
Clinical Reflections				
Personal Development Needs Analysis				
Action Plans				
Peer Review				
Multisource Feedback				
Management and Treatment Plans				
Significant Event Analyses				
Audits				
Other (please specify)				
Patient Feedback				
Please specify tool or method used for patient feedback				
How long did it take the patient to complete?				
What was your patients reaction to completing				
	our practice?			



Q5a	For each tool completed please complete as appropriate.				
Name of tool	Name of tool				
Time in hours it took to a	Time in hours it took to complete the toolhours				
Reason(s) why you deci	ided to use this tool: (please tick all that apply)				
Easy to under	rstand				
Quick to com					
Something I a					
 Interesting an 					
Required no I	T equipment				
Allowed me to	o work with others				
Other (please	e specify)				
Has completion of the to	Yes 🗆 No 🗆 Maybe 🗆				
Has completion of the to	ool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆			



Q5b	For each tool completed please complete as appropriate.		
			Tick as apply
Name of tool			
Time in hours it tool	to complete the tool		hours
Reason(s) why you	decided to use this tool: (please tick all that apply)		
 Easy to u 	nderstand		
Quick to	complete		
 Somethin 	g I already do anyway		
 Interestin 	g and rewarding to complete		
Required	no IT equipment		
 Allowed r 	ne to work with others		
• Other (ple	ease specify)	-	
Has completion of the	ne tool helped you reflect on your current clinical practice?	Yes 🗆	🗅 No 🗆 Maybe 🕻
Has completion of th	ne tool changed the way in which you will practise in the future?	Yes 🗆	No 🗆 Maybe 🕻

Q5c	For each tool completed please complete as appropriate.	
		Tick as apply
Name of tool		
Time in hours it took t	o complete the tool	hours
Reason(s) why you de	ecided to use this tool: (please tick all that apply)	
 Easy to und 	derstand	
 Quick to co 	mplete	
 Something 	I already do anyway	
 Interesting 	and rewarding to complete	
 Required n 	o IT equipment	
 Allowed me 	e to work with others	
• Other (plea	se specify)	
Has completion of the	tool helped you reflect on your current clinical practice?	Yes 🗆 No 🗆 Maybe 🗆
Has completion of the	tool changed the way in which you will practise in the future?	Yes 🗆 No 🗆 Maybe 🗆



Q6	If you have not completed any tools in the last three months then please provide a re the selection below.	eason from
I have not ha	ad time to complete any of the tools	
I am working towards completing one or more of the tools but I have not yet completed it		
I have decided to leave the pilot early (please complete the early leavers form)		
I am not clear on what I need to do to complete the tools		
I am awaiting guidance from the GOsC on how to complete the tools		
Other (please specify)		

Q7 How many hours in total has revalidation taken to complete in the last 3 months

 Time in hours to complete the self assessment form
 ______hours

 Total time in hours over the last three months
 ______hours

How has the pilot impacted on you over the last 12 months? Q8 Please read the following statements and tick the appropriate box which applies to you. Neither Participation in the pilot over the last 12 Strongly Strongly agree nor Disagree Agree months has: agree disagree disagree Improved the standard of care I provide Made me more aware of the standards of practice Duplicated documentation that I already \Box \Box produce Meant I have worked more closely than \square \square \square before with other osteopaths Meant I have reflected more on areas of my clinical practice Has had a positive impact on the feedback \square \square \square \square \square received from my patients Benefited my patients Been an administrative burden \square \square \square Meant I have less time to provide care to patients Other (please specify)_ Do you have any further comments in relation to the impact of the pilot? (please state)



Q9	Think about your completion of the revalidation tools over the last year and answer the following					
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Completion of 1 tool in each of the 3 month periods was about right						
Over the entire year I probably spent too long completing all the tools						
How could the guidance be amended for future use?						
Please indicate in hours the total time it has taken you to complete the self assessment form			_ hours			



Q10	Your views on Revalidation as informed Please read the following statements and					ilot.
	Please read the rollowing statements and	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
	n will positively impact upon the whole of thic profession					
The benefits costs	s of Revalidation outweigh any associated					
Revalidation	n is well thought out and planned					
	s providing the profession with sufficient on the requirements of Revalidation					
The model of for purpose	of revalidation developed by the GOsC is fit					
Revalidation all osteopat	n will be onerous and place undue strain on hs					
	ent engaging with the Revalidation Pilot educed time with patients (and therefore ome)					
There is littlering to the terminal strength of te	e point in Revalidation, osteopathy is low y					
	e point in Revalidation, osteopathy is low risk environments					
Revalidation would positively contribute to the quality of osteopathic practice?						
	of patient care will improve if osteopaths Revalidation?					
Revalidation safety?	n will have a positive impact upon patient					
Revalidation	n will have a positive impact for osteopathy of: Osteopaths;					
	Patients;		\Box			
	the NHS;					
	other healthcare					
	professionals.					
	parents/carers					
statements	gly agree or disagree with any of the above could you please provide more as to why you feel this way?					
	e any further comments in relation to the costs for pilot participants? (please state)					



Q11	Please detail to evaluation of the second se	pelow if you think that there is anything that may assist the KPMG team in their the revalidation pilot.
	_	

Please return this form to: Emma Stewart or <u>osteopathy@kpmg.co.uk</u> KPMG LLP (UK) One Snow Hill B4 6GH

Thank you for taking the time to complete and return this form



KPMG Data Survey Revalidation Pilot Early Leaver Feedback

Please complete and return this form if you no longer wish to participate in the Pilot. Your feedback will be very useful to us to inform our evaluation of the Pilot.

Q1	Background	
Your unique identification number		
Can you please confirm that you have withdrawn from participating in the Pilot		Yes No
Date of withdrawal from the Pilot.		DD/MM/YYYY
		$\Box \Box I \Box \Box I \Box \Box \Box \Box$
Q2	Reasons for leaving the Pilot	
Q Z		

Please state your reasons for not completing the Pilot.

Q3	Pilot Feedback	
From you	r experience?	
What didn	't work in the pilot?	
How could	the pilot be improved?	
	ve any other feedback that want to share?	

	bu happy for the GOsC to contact you so that they can understand further the reason why you ad to discontinue your participation in the Pilot?
Your response	Yes No
What would be your preferred method of contact?	telephone email post Please could you provide your contact details – (email or telephone number)

Please return this form to: **Emma Stewart** or KPMG LLP (UK) One Snow Hill B4 6GH

osteopathy@kpmg.co.uk

Thank you for taking the time to complete and return this form



Please complete and return this form which gathers information on your current perspective of the Pilot. The information that you supply will inform an independent evaluation of the Pilot. Your response will be confidential and will be summarised and reported back to GOsC in a way that does not allow individuals to be identified. Details of how you can return this form to the KPMG Evaluation Team can be found on page 4.

Your feedback will be very useful to us to inform our evaluation of the Pilot.

Q1	Background	
Name		
Please state whether you are also a pilot participant		Yes 🗆 No 🗆

Q2	Recruitment to be a Pilot Assessor. Why did you elect to be an Assessor? Please tick all that apply.	
Assist the p	ofession in the development of revalidation	
Revalidation	is important and will significantly affect the profession	
Interested in	developments within the profession	
The remune	ration involved.	
Other(s) Please specify		



Q3a	Training and Support. Please read the following state	ments and tick	the appropria	te box which a	applies to you	
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Training a	nd Materials					
	g received has prepared me to carry out the assessor role.					
I understar GOsC Pilo	nd my role as an assessor on the t.					
	nd what is expected of me as an n the GOsC Pilot.					
l understar model.	nd the four stage revalidation					
l understar framework	nd the revalidation assessment					
l understar requiremer	nd the revalidation evidence hts.					
l understar	nd the revalidation guidelines					
	lation guidelines will help me to ne assessor role effectively.					
revalidation	nd the tools available to support n (e.g. case based discussion, event analysis).					
	lation tools available will help me t the assessor role effectively.					
relation to and materi available?	ve any further comments in the training received or the tools als that have been made For example are there any ents that could be made? (please					



Q3b	Support. Please read the following statements and tick the appropriate box which applies to you.							
Support								
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree		
forums, FA	ort available (online discussion AQ etc) will help me carry out the role effectively.							
with any q	ort available has effectively dealt ueries I have had to date with to the Pilot.							
relation to example a	ve any further comments in the support available ? For ire there any improvements that nade? (please state)							

	Perceived benefits and costs (your views on benefits and costs for both pilot participants and assessors). Please read the following statements and tick the appropriate box which applies to you.							
	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree			
Benefits and costs for Pilot Participants								
The benefits for osteopaths engaging with the Pilot outweigh any associated costs (e., The time to carry out revalidation activity)	g. 🗆							
The Pilot will positively contribute to the quality of osteopathic practice.								
The quality of patient care will improve if osteopaths engage with the Pilot.								
Osteopaths will find the Pilot process burdensome and may not wish to participate.								
Revalidation will have a positive impact for osteopathy in the eyes of:								
Osteopaths;								
Patients								
the NHS;								
other healthcare professionals.								
parents/carers								
Do you have any further comments in relation to the benefits and costs for pilot participants? (please state)								



Q4b	Benefits and costs (your v assessors).	views on benefit	ts and costs	for both pilot pa	articipants and	i			
	Please read the following	statements and	tick the app	ropriate box wh	ich applies to	you.			
Benefits and c	Benefits and costs for Assessors								
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree			
The Pilot will positively contribute to improving my own practice (e.g. through observation of pilot participant portfolios)									
What are the key benefits for assessors participating in the Pilot?		2							
Are there any p participating in t	otential costs for assessors he Pilot?	3 1 2 3							
Do you have any further comments in relation to the benefits and costs for assessors? (please state)									
Q5 ev	ease detail below if you thin aluation of the revalidation proved?								

mproved		
Please return this form to: Emma Ste	wart or osteonathy@kpmg.c	ouk

Please return this form to: Emma Stewart KPMG LLP (UK) One Snow Hill B4 6GH or osteopathy@kpmg.co.uk

Thank you for taking the time to complete and return this form



Please complete and return this form which gathers information on your current perspective of the Pilot. The information that you supply will inform an independent evaluation of the Pilot. Your response will be confidential and will be summarised and reported back to GOsC in a way that does not allow individuals to be identified. Details of how you can return this form to the KPMG Evaluation Team can be found on page 7.

Your feedback will be very useful to us to inform our evaluation of the Pilot.

Q1	Background.	
Name		
Please state	e whether you are also a Pilot participant.	Yes No

Q2	Activity Completed. Please read the following state	ments and tick the appropriate box which applies to you.
How many undertaken	portfolio assessments have you to date?	portfolios
	mate the total hours that you conducting the portfolio ts?	hours
	ely what is the average number ent on each portfolio assessment ?	hours
(No. Asses	sments / Total Hours)	
undertaking all activity e Assessme	te the number of hours spent any additional Pilot activity (i.e. excluding carrying out nts such as training, familiarising h support materials, ion etc).	hours



	Activity Completed.					
Q3a	Based upon the self asses statements and tick the approp		you have con	npleted to date	e, please read	the following
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
Activity Co	ompleted					
assessmer	ent that overall the self at are being completed honestly by pilot participants.					
	the self assessment forms has /ely straight forward.					
assess at th	Pilot participants have been able to self assess at the required standards using the tools that are available.					
forms only,	n the completed self assessment the majority of the pilot s reviewed to date would achieve n.					
assessmer	experience of reviewing the self nts as part of the Pilot is there at worked particularly well?					
assessmer	experience of reviewing the self nts as part of the Pilot is there at could be improved? If so					
relation to t	re any further comments in he self assessments that you leted to date?					



Activity Completed.

KPMG data survey – Assessor Perspective on the revalidation pilot (October 2012)

Based upon the portfolio assessments that you have completed to date, please read the following statements and tick the appropriate box.							
Agree	Neither agree nor disagree	Disagree	Strongly disagree				
·			·				



Q4	Support and Materials. Please read the following statements and tick the appropriate box which applies to you.								
Have you asked or received any support or guidance from the GOsC over the course of the Pilot?			Y	es 🗌 No 🗌					
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree			
Support an	d Materials								
	ation guidelines enabled me to e assessor role effectively.								
	ation tools available enabled me the assessor role effectively.								
The revalidation for purpose	ation assessment framework is fit								
The revalidation fit for purpo	ation evidence requirements are se.								
	has provided me with all of the uired to carry out the assessor ely.								
	materials provided have ne to carry out the assessor role								
portfolios w	nt I received for completing the as appropriate given the amount training required.								
relation to the	e any further comments in ne support and materials that provided ? (please state)								

	Please indicate below whether you have received any of the following forms of support from the GOsC and how useful this has been to you.								
	Very good	Good	Satisfactory	Poor	Very Poor	Not used			
Online forum.									
Telephone call.									
Email.									
Letter.									
Other (please specify).									



	Benefits and costs (your views on benefits and costs for Pilot Participants).						
Q6a	Based upon the portfolio as following statements and tick the statements and				o date, please	read the	
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	
Benefits a	nd costs for Pilot Participants						
The benefits for osteopaths engaging with revalidation as piloted outweigh any associated costs (e.g. time taken to carry out revalidation activity).							
Revalidation as piloted will positively contribute to the quality of osteopathic practice.							
	of patient care will improve if engage with revalidation as						
	s will find revalidation as piloted le and may not wish to						
	n will have a positive impact for in the eyes of:						
	Osteopaths; Patients;						
	the NHS;						
	other healthcare professionals;						
	parents /carers.						
relation to t	re any further comments in he benefits and costs for pilots? (please state)		1	1			



Q6b	Benefits and costs (your views on benefits and costs for Assessors) Based upon the portfolio assessments that you have completed to date, please read the following statements and tick the appropriate box which applies to you.											
		Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree						
Benefits a	and costs for Assessors											
The Pilot will positively contribute to improving my own practice (e.g. through observation of other pilot participant portfolios).												
If you agre	e please specify with examples?											
	the key benefits for you as an participating in the Pilot?	1 2 3										
	any other potential costs for you essor participating in the Pilot?	1 2 3										
, ,	ve any further comment in relation efits and costs for assessors? ate)											



Q7	Please detail below if you think that there is anything that may assist the KPMG team in their evaluation of the Pilot. For example are there any ways in which revalidation could be improved?									

Please return this form to: **Emma Stewart** KPMG LLP (UK) One Snow Hill B4 6GH

or

osteopathy@kpmg.co.uk

Thank you for taking the time to complete and return this form



Revalidation Pilot timesheet for GOsC staff

A screen shot of the GOsC Revalidation Pilot timesheet is presented below. This has been produced to gather information on the time spent by GOsC staff undertaking Pilot Revalidation activity.

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7					Risk Managemer										
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1	Supporting Pilot Participants														
2				Other											
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