# GENERAL OSTEOPATHIC COUNCIL Business Plan April 2015-March 2016

Draft for Council 5 February 2015

#### **GOsC BUSINESS PLAN 2015-2016**

The General Osteopathic Council has agreed a corporate plan for 2013-2016 (<a href="http://www.osteopathy.org.uk/about/our-work/strategic-business-plans">http://www.osteopathy.org.uk/about/our-work/strategic-business-plans</a>) which commits to achieving the 3 strategic objectives set out below, over the 3 year period.

#### **Strategic Objectives**

- 1. To promote public and patient safety through proportionate, targeted and effective regulatory activity
- 2. To encourage and facilitate continuous improvement in the quality of osteopathic healthcare
- 3. To use our resources efficiently and effectively, while adapting and responding to change in the external environment.

This document, the Business Plan 2015-2016, sets out the aims and detailed activities for the period April 2015 to March 2016, in support of each of the strategic objectives.

#### **KEY**

**FR** – activities identified within the GOsC's Francis report action plan

**PSA** – activities relating to best practice identified from the 2012-13 or 2013-14 PSA Performance Reviews

# 1. To promote patient and public safety through proportionate, targeted and effective regulatory activity

1.1 Pre-registration education and training		
Goal: To ensure that initial education and training is of high-quality and is fit for purpose in an evolving	healthcare and hi	gher education
environment.		
Activity	Lead	Timing
Quality assurance		
Complete tender process for quality assurance contract 2015 to 2018, monitor transition to new	Professional	April to
contract and confirm readiness for new contract to commence quality assurance activities.	Standards	September 2015
Continue to monitor quality of course provision, for example by undertaking quality assurance reviews	Professional	All year
and monitoring any course closure plans.	Standards	,
Monitor and review Action Plans and fulfilment of conditions linked to Recognised Qualifications to	Professional	May and
ensure that the necessary action identified by GOsC is being undertaken to maintain the standards of	Standards	September 2015,
graduating students.		January 2016
Agree any changes to the Annual Reports.	Professional	June 2015
	Standards	
Produce and distribute Annual Reports to OEIs requesting information which will allow GOsC to monitor	Professional	October 2015
that standards are maintained and identify any potential problems.	Standards	
Undertake activities to ensure the quality of the education quality assurance process including: annual	Professional	All year
training and appraisal of all Visitors undertaking a quality assurance process and ongoing	Standards	
communications.		
Collate and review Annual Report data; present to Education and Registration Standards Committee	Professional	March 2016
with recommendations for each OEI in terms of whether standards are being met and whether any	Standards	
potential issues have been identified, and disseminate good practice.		
Complete engagement process on quality assurance discussion document, report findings from	Professional	May 2015 to
engagement process and complete development of new proposals and method (in conjunction with	Standards	March 2016
quality assurance partner).		
Undergraduate professionalism		
Continue collecting data for undergraduate professionalism surveys in partnership with the osteopathic	Professional	All year
educational institutions from students, faculty and patients.	Standards	

Continue supporting and facilitating sessions with OEI students and faculty about findings and implications in osteopathic context.	Professional Standards	All year
Report on evaluation of findings including relevance and impact to GOsC activities, engage with stakeholders to discuss findings and identify innovative ways to respond from the sector to these and agree sector response to findings and implementation plan.	Professional Standards	July 2015 to March 2016
Continue review of student fitness to practise and associated guidance taking into account findings of key reports in relation to candour, raising concerns and related issues and evaluation of student fitness to practise guidance including guidance about boundaries and sanctions and use of students as models.	Professional Standards	July 2015
Continue review of guidance about health and disability taking account of key findings and work of other regulators including concerns around mental health <b>(PSA)</b> .	Professional Standards	July 2015
Consult on new Student Fitness to Practise Guidance and associated Guidance about Professionalism (including student and tutor boundaries and students as models) and commence consultation analysis.	Professional Standards	December 2015 to March 2016
Consult on revised Guidance about health and disability and commence consultation analysis.	Professional Standards	December 2015 to March 2016
Work in partnership with OEIs to support identification of good practice in relation to teaching and learning of professional behaviours and support sharing of knowledge about student fitness to practise <b>(FR)</b> .	Professional Standards	All year
Guidance for osteopathic pre-registration education		
Publish <i>Guidance for osteopathic pre-registration education,</i> develop and undertake implementation and awareness strategy.	Professional Standards	All year
Work with partners to enhance methods of implementation of the <i>Osteopathic Practice Standards</i> in pre-registration osteopathic education including, for example, consideration of standards of related to delivery of education and particularly assessment as well as other models for ensuring assessment.	Professional Standards	March 2016
Identify and agree next steps for development of pre-registration osteopathic education.	Professional Standards	March 2016
Osteopathic Practice Standards		
Work with the OEIs to identify ways to support and develop educational faculty to support the delivery of the <i>Osteopathic Practice Standards</i> .	Professional Standards, Communications	All year
Continue to develop patient involvement in the delivery of osteopathic education by working in partnership with the OEIs to support the delivery of the <i>Osteopathic Practice Standards</i> and to share good practice in this area <b>(FR)</b> . Publish report about how patients are involved in osteopathic preregistration education.	Professional Standards, Communications	All year/March 2016

Review approach to engaging with pre-clinical students in OEIs and implement programme of visits.	Professional	June to
	Standards,	December 2015
	Regulation,	
	Communications	

Goal: To increase understanding of the Register and to make it more meaningful to patients and others		
Activity	Lead	Timing
Awareness of the Register		
Encourage and equip osteopaths to promote public awareness of their registered status and the GOsC Register in their publicity material and online patient information.	Communications	All year
Assess level of registrant take-up of registration promotional tools (logos, patient information poster) and address deficiencies – test out in Registrants' survey 2015.	Communications	December 2015
Seek opportunities to work in partnership with the wider healthcare community to increase knowledge and understanding of osteopathic regulation (e.g. NHS Choices, AQP commissioners, CQC, Healthcare Improvement Scotland etc.), and seek to improve information sharing with regulators and others (FR).	Communications	All year
Implement recommendations based on analysis of results of national survey on patient/public perceptions of regulation and attitudes/expectations relating to osteopathic care.	Communications	July 2015 onwards
Breach of title		T
Investigate individuals identified or reported to GOsC as incorrectly describing themselves as osteopaths, write 'cease and desist' letters to them, and prosecute those who ignore such letters.	Regulation	All year
Monitor activity of individuals removed from the Register during 2014-15, identified in accordance with procedures agreed with Registration department (writing 'cease and desist' letters and prosecuting them as necessary, as described above).	Registration, Regulation	All year
Review approach to surveying voluntarily leavers from the Register, implement and analyse results.	Registration	April 2015 and then all year
Registration assessment		
Undertake activities to ensure the quality of registration assessments assessing whether registration applicants meet our standards to ensure patient safety. This will include GOsC registration assessors' and return to practice reviewers' appraisal and training, moderation meeting facilitation and regular communications.	Professional Standards, Registration	All year

Publish initial scoping of registration review.	Professional Standards,	May 2015
	Registration	
Implement review of registration assessments to ensure compliance with revised EU Directive 2005/36.	Professional	Jan 2016
	Standards,	
	Regulation,	
	Registration	
Design evaluation of registration assessments.	Professional	March 2016
	Standards	
Commence planning for major review of registration assessments as part of the review of the	Professional	March 2016
Osteopathic Practice Standards.	Standards	
Continue to undertake registration assessments for international applicants and return to practice	Professional	All year
interviews.	Standards	,
Recognition		
Continue international work towards the development of mutual recognition and information sharing	Registration	All year
with other regulators and competent authorities.	Communications	

1.3 Transition into practice

Goal: To work in partnership with the osteopathic profession to ensure that new osteopaths have access to appropriate support in their transition into practice

transition into practice.		
Activity	Lead	Timing
Publish scoping report outlining options for supporting international registrants as they make the	Professional	By July 2015
transition into practice and commence engagement with stakeholders to inform proposals for	Standards,	
supporting international registrants as they make the transition into practice. (PSA).	Registration	
Develop, pilot and evaluate proposals to support international registrants as they make the transition	Professional	March 2016
into practice including engagement with stakeholders to provide feedback on proposals and support	Standards,	
evaluation. Commence programme of implementation.	Registration	
Continue to work in partnership with key stakeholders in osteopathy, including, the Institute of	Professional	All year
Osteopathy (IO), Council of Osteopathic Educational Institutions (COEI), Osteopathic Alliance and	Standards,	
regional groups to support development of mentorship work.	Chief Executive	
Conduct annual programme of GOsC presentations to final-year osteopathy students at OEIs to embed	Communications,	January to July
understanding of the role of the GOsC and requirements for initial and continued registration	Professional	2015
	Standards,	

Registration,	
Regulation	

#### 1.4 CPD: providing assurance of continuing fitness to practise – see also 2.1 below

**Goal:** To ensure that through an appropriate process, registrants are able to demonstrate their continuing ability to meet the *Osteopathic Practice Standards* (FR).

Activity	Lead	Timing
Continuing professional development (providing assurance of continuing fitness to practise) proposals		
Conduct consultation and engagement on proposals and analyse consultation responses.	Professional Standards, Communications	By October 2015
Develop implementation strategy for new CPD scheme (including specification work for new IT system to support)	Professional Standards, Registration, Communications	June 2015 to March 2016
Current continuing professional development audits		
Audit 20% of CPD Annual Summary Forms each month to support registrants to meet existing standards and to identify areas of good practice and areas for development.	Professional Standards	All year
Audit 2% of CPD Record Folders each year to support registrants to meet existing standards and to identify areas of good practice and areas for development.	Professional Standards	All year

#### 1.5 Fitness to practise

**Goal:** To ensure that the fitness to practise processes protect patients and uphold standards in osteopathy, through firm, fair and timely handling of complaints about osteopaths.

narialing of complaints about ostcopatios		
Activity	Lead	Timing
Implement new fitness to practise Annual Report (FR).	Regulation	July 2015
Continue to monitor Quality Assurance Framework including quality audits/peer review of decision	Regulation	All year
making (PSA).		
Implement new data collection on complainants and registrants (FR).	Regulation	By March 2016
Implement new fuller Bank of Conditions for PCC.	Regulation	By March 2016
Implement Bank of Conditions for HC.	Regulation	Timing TBC
Review the Indicative Sanctions Guidance taking account of new guidance to registrants on the duty of	Regulation	Timing TBC
candour (FR).	_	_

Implement new Practice Note on Admission of Character Evidence.	Regulation	By October 2015
Implement new Practice Note on Acting in the Public Interest.	Regulation	By October 2015
Implement new policy/guidance on Osteopaths with HIV.	Regulation	By October 2015
Implement new guidance for screeners and/or IC in relation to 'threshold criteria'.	Regulation	By June 2015
Arrange training and induction for new legal assessors.	Regulation	By May 2015
Enhance pool of osteopathic experts acting in fitness to practise cases and organise dedicated training for them.	Regulation	December 2015
Provide training as required to fitness to practise panellists, including provision of an annual training day for IC Members and an annual training day for PCC/HC members.	Regulation	By December 2015
Manage the caseload to deal with cases in an efficient, effective, fair and timely way seeking to achieve a target of 12 months for the majority of complaints to reach a hearing <b>(FR)</b> .	Regulation	All year
Communicate case learning points and any fitness to practise bulletins issued by PSA, to fitness to practise panellists (and arrange further training where necessary).	Regulation	As required
Implement any changes to procedures recommended by PSA's initial stages audit, the Performance Review or other source.	Regulation	As required
Engagement with osteopathic organisations (iO and Professional Indemnity Insurers) to review 2014 complaints/claims data; identify trends; agree action, and review/revise data collection and dissemination strategy for 2015.	Regulation, Communications	July 2015
Review best practice across regulators for the support of vulnerable registrants in the fitness to practise process and identify proposals for consideration by OPC <b>(PSA)</b> .	Regulation	October 2015

# 2. To encourage and facilitate continuous improvement in the quality of osteopathic healthcare

2.1 Continuing fitness to practise (CPD) – see also 1.4 above		
<b>Goal</b> : To ensure that through an appropriate process, registrants are continually encouraged to enhance and improve their practice		
Activity	Lead	Timing
Current continuing professional development evaluation		
Share identified areas of good practice and areas of development with registrants using a variety of	Professional	All year
mechanisms including e-learning, engagement with key osteopathic stakeholders and articles in media	Standards	
including <i>The Osteopath.</i>		
Design osteopathic continuing professional development evaluation to feed into report of 'State of	Professional	June 2015
Osteopathic continuing professional development'.	Standards	

Conduct continuing professional development evaluation.	Professional	July to December
	Standards	2015
Prepare report about the 'State of Osteopathic continuing professional development'.	Professional	March 2016
	Standards	

2.2 Osteopathic Practice Standards		
<b>Goal</b> : To embed the role of the <i>Osteopathic Practice Standards</i> as the core principles and values for good standards of professionalism.	d osteopathic pract	ice and high
Activity	Lead	Timing
Develop appropriate case studies and learning materials to support the professional duty of candour <b>(FR).</b>	Regulation, Professional	All year
	Standards, Communications	
Scope review of the Osteopathic Practice Standards including: key reports and their implications; feedback on the Osteopathic Practice Standards; joint work with other regulators; and new methods of engagement <b>(PSA)</b> . Establish an outline project plan and governance mechanisms.	Professional Standards, Communications	March 2016
Working in partnership with stakeholders, develop and implement plan for raising awareness of professional and personal boundary issues, including the potential for producing dedicated learning materials.	Professional Standards, Regulation, Communications	All year
Complete review of implications of effectiveness of regulation research across all policy development and functions and publish report evaluating options for next steps.	Professional Standards, Regulation, Registration, Communications, Chief Executive	September to October 2015 2015
Conduct registrant opinion survey to compare professional attitudes and awareness of standards with findings of 2012 Osteopath Opinion Survey, and implement recommendations based on survey findings.	Communications	October 2015 to March 2016

2.3 Quality and patient care		
Goal: To work in partnership with others to develop high quality, patient-centred osteopathic care.		
Activity	Lead	Timing
Work in partnership with osteopaths and osteopathic organisations to encourage the promotion of patient awareness of osteopathic practice standards.	Communications	All year
Continue to support, through the Osteopathic Development Group and directly, the agreed development projects for the osteopathic professions, namely:  Evidence/data collection/adverse events (FR)  Service standards (FR)  Advanced practice  Regional support and capacity building (see also 1.4 above)  Mentoring (see also 1.3 above)  Leadership (FR)  International collaboration.	Communications Professional Standards Chief Executive	All year
Contribute to the work of the NCOR Management Board and Research Council.	Chief Executive Communications	All year

2.4 Professional standards and values		
<b>Goal:</b> To work in partnership with others to support practice that promotes professional standards and v profession, while reducing practitioner isolation.	values across the os	teopathic
Activity	Lead	Timing
Work in partnership with patients, iO, COEI, Osteopathic Alliance to explore the need for a common statement of osteopathic values to support the review of the next edition of the Osteopathic Practice Standards.	Professional Standards	All year
Consider how any learning from professionalism project (see 1.1 above) can be incorporated into wider osteopathic practice.	Professional Standards, Communications	All year

Ensure the recommendations of the Francis Report and the Government's response continue to inform	Professional	All year
our work including:	Standards,	
Implement the duty of candour	Regulation,	
Support the work of NCOR and the osteopathic profession on adverse event reporting	Communications	
• Implementation of whistle blowing policies in line with Public Interest Disclosure Act requirements		
Continue to improve the efficiency and effectiveness of our fitness to practice processes		
Scope the review of the Osteopathic Practice Standards		
Promoting leadership development with the osteopathic profession.		
Continue to participate actively in the Osteopathic International Alliance to promote high standards of	Chief Executive,	All year
osteopathy world-wide, including the organisation of an annual regulation forum.	Communications	

# 3. To use our resources efficiently and effectively, while adapting and responding to change in the external environment

3.1 Service quality		
<b>Goal</b> : To continue to enhance the quality of service provided by the GOsC to patients and registrants.		
Activity	Lead	Timing
Continue to embed Information Governance Framework a within operational processes.	All Departments	All year
Implement year three of the internal audit programme and report findings to Audit Committee.	Chief Executive,	April 2015 to
	Finance	March 2016
Assess impact of changes made to IT infrastructure, including online registration tools in previous	Registration,	July 2015
business plan year and identify any further improvements in use of IT (including mobile applications)	Regulation,	
(PSA).	Communications	
Continue to identify opportunities for enhancing customer service standards.	Communications	All year
Undertake survey of graduates joining the Register in 2015 to assess quality of registration process	Registration,	November 2015
with a view to making customer service improvements.	Communications	to January 2016

#### 3.2 Engagement

**Goal:** To engage effectively with patients, the public, educators, osteopaths, other health care professionals and other key stakeholders for the delivery of our strategic objectives.

the delivery of our strategic objectives.		
Activity	Lead	Timing
Continue implementation of 2013-16 Communications and Engagement Strategy in support of the	Communications	All year
delivery of the Corporate Plan including identifying targeted approaches to specific stakeholder groups.		,
Develop and publish a consultation protocol which sets out clear requirements and expectations for	Communications	By August 2015
GOsC consultations.		
Support consultation and engagement on policy and operational developments identified in the	Communications	All year
business plan and those required ad hoc, including through the use of the GOsC Patient Partnership		
Group (FR).		
Continue to recruit to the GOsC Patient Partnership Group, keeping members informed and engaged.	Communications	All year
Ensure key areas of policy development are assessed at the outset to ascertain their PPI requirements	Communications	All year
and develop a PPI plan where appropriate <b>(FR)</b> .		
Identify opportunities for partnership working with advocacy organisations, voluntary, community and	Communications	All year
PPI bodies to build links with the wider public.		
Provide GOsC representation at appropriate healthcare conferences/exhibitions across the UK to	Communications	All year
promote awareness of osteopathic regulation, registration and practice standards, and foster		
partnerships.		
Implement communications programme to support profession-wide engagement in the development of	Communications	All year
the profession.		
Support regular engagement activities and events including:	Professional	All year
Two meetings of the Regional Communications Network	Standards,	
Four meetings with the OEIs	Chief Executive,	
The work of the Osteopathic Development Group in the development of the profession	Communications	
A programme of visits to regional osteopathic groups.		

3.3 Governance		
<b>Goal:</b> To ensure that our governance is appropriate and effective.		
Activity	Lead	Timing
Develop, consult and agree a new Corporate Plan for the period 2016-19 including undertaking a review of resource prioritisation with the organisation.	Chief Executive	All year

Provide regular reports to Council on progress against the business plan, and financial, asset and risk management.	Chief Executive	All year
Complete any new appointments to the governance structure using the appointments procedure approved by PSA.	Chief Executive	All year
In conjunction with the Department of Health develop consultation and legislation for the reconstitution of Council from April 2016.	Chief Executive Regulation	May 2015
Organise training day for potential registrant applicants for Council and other non-executive roles.	Chief Executive, HR	October 2015
Review the equality and diversity policy and present to Council, implement new policy.	Chief Executive	May 2015 and all year
Prepare report on performance against PSA Standards of Good Regulation.	Chief Executive	October2015 to March 2016
Take necessary steps to address any issues arising from the annual PSA Performance Review.	Chief Executive	June to December 2015
Prepare an Annual Report on activities undertaken in year and submit to Parliament.	Chief Executive	June to September 2015
Undertake preparations so that the financial statements, and the control framework, are ready for the transition to FRS102 which will take effect from FY2016 and beyond.	Resources	August 2015 to March 2016

3.4 Value for money		
<b>Goal:</b> To continue to improve value for money in everything that we do.		
Activity	Lead	Timing
Continue to review scope for operational cost savings and identify proposals for further cost efficiencies	Chief Executive,	April to December
and savings, and where possible implement in time for FY2016-17.	Resources	2015
Undertake a review of procured services (items to be confirmed) to ensure cost effectiveness and	Resources	All year
efficiency, including how we might increase the use of local suppliers.		
Continue to explore options for charitable status application and efficient use of assets.	Chief Executive,	All year
	Resources	

3.5 Legislative reform		
<b>Goal</b> : To undertake a fundamental review of our rules as part of the transition to a new Act.		
Activity	Lead	Timing
Continue to engage with the, Department of Health and Parliament on proposed changes to legislation.	Chief Executive,	From May 2015

	Regulation	dependent on Queen's Speech
Commence scoping study for transition to new rules (subject to legislation in Queen's Speech 2015).	Chief Executive, Regulation	TBC
Implement new Professional Indemnity Insurance Rules and compliance mechanisms.	Registration, Regulation	May 2015 onwards