

**GENERAL OSTEOPATHIC COUNCIL  
Business Plan  
April 2014-March 2015**

**Draft for Council  
January 2014**

### GOsC BUSINESS PLAN 2014-2015

The General Osteopathic Council has agreed a corporate plan for 2013-2016 (<http://www.osteopathy.org.uk/about/our-work/strategic-business-plans>) 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 2014-2015, sets out the aims and detailed activities for the period April 2014 to March 2015, 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 PSA Performance Review

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

<b>1.1 Pre-registration education and training</b>		
<b>Goal:</b> To ensure that initial education and training is of high-quality and is fit for purpose in an evolving healthcare and higher education environment.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
<b>Quality assurance</b>		
Confirm quality assurance contractual arrangements to August 2015	Professional Standards	April 2014
Undertake quality assurance reviews at OEIs, as necessary, to ensure that standards are being maintained for graduating students. Undertake any unscheduled quality assurance reviews as necessary.	Professional Standards	All year
Monitor and review Action Plans and fulfilment of conditions linked to Recognised Qualifications to ensure that the necessary action identified by GOsC is being undertaken to maintain the standards of graduating students.	Professional Standards	May and September 2014, January 2015
Produce and distribute Annual Reports to OEIs requesting information which will allow GOsC to monitor that standards are maintained and identify any potential problems.	Professional Standards	September 2014
In partnership with the Quality Assurance Agency, undertake annual training and appraisal of all Visitors undertaking a quality assurance process.	Professional Standards	September 2014
Collate and review Annual Report data (including information about student fitness to practise); present to Education and Registration Standards Committee with recommendations for each OEI in terms of whether standards are being met and whether any potential issues have been identified, and disseminate good practice.	Professional Standards	February 2015
Agree specification for quality assurance contract from August 2015 to August 2018, issue invitation to tender and let contract.	Professional Standards	May to October 2014
Develop proposed new quality assurance framework, taking into account Law Commission draft Bill, consult and formulate proposals consistent with new legislation	Professional Standards	July 2014 to January 2015
<i>Undergraduate professionalism</i>		
Continue collecting data for undergraduate professionalism surveys in partnership with the osteopathic educational institutions.	Professional Standards	All year
Feedback findings to osteopathic educational institutions either through data analysis or data analysis	Professional	All year

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and feedback seminar in partnership with osteopathic educational institutions.	Standards	
Commence review of student fitness to practise and associated guidance taking into account findings of key reports in relation to candour 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	All year
Commence 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	April 2014
Evaluate outcomes from professionalism in osteopathy project and identify key findings for incorporation into other work streams, including guidance on pre-registration osteopathic education, continuing fitness to practise proposals and related activities.	Professional Standards	By September 2014
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
Develop draft guidance about student and tutor boundaries, consult and publish final guidance	Professional Standards	September 2014 to February 2015
<i>Guidance for osteopathic pre-registration education</i>		
Complete consultation on Guidance for osteopathic pre-registration education, analyse results and consider in the context of the current landscape (e.g. revised Benchmark for Osteopathy, work on values underpinning practice, joint regulatory work on candour), and publish new guidance <b>(FR)</b> .	Professional Standards	April to July 2014
Identify any further steps that need to be taken in relation to Guidance for Osteopathic Pre-registration education	Professional Standards	October 2014 to March 2015
Develop and undertake implementation and awareness strategy.	Professional Standards, Communications	October 2014 to March 2015
<i>Osteopathic Practice Standards</i>		
Work with the OEIs to identify ways to support the enhancement of educational expertise and professional role modelling within the academic and clinical faculty to support the delivery of the <i>Osteopathic Practice Standards</i> .	Professional Standards, Communications	All year
Increase 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> .	Professional Standards, Communications	All year
Review approach to engaging with pre-clinical students in OEIs and implement programme of visits	Professional Standards, Regulation,	June to December 2014

	Communications	
<b>1.2 Confidence in the Register</b>		
<b>Goal:</b> To increase understanding of the Register and to make it more meaningful to patients and others.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
<i>Awareness of the Register</i>		
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.	Communications	August to September 2014
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 <b>(FR)</b> .	Communications	All year
Build on 2013-14 qualitative research by conducting survey of public/patient perceptions of osteopathic regulation and attitudes/expectations relating to osteopathic care. Analyse and develop recommendations.	Communications	April to July 2014
<i>Breach of title</i>		
Consult, agree and implement new enforcement policy.	Regulation	May to October 2014
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
Devise and implement a communications programme to support consultation on GOsC Enforcement policy, encourage registrants to report concerns about unregistered practice and to publicise Section 32 convictions.	Regulation, Communications	May to December 2014
Review approach to surveying voluntarily leavers from the Register, implement and analyse results	Registration	April 2014 and then all year
<i>Registration assessment</i>		
Undertake GOsC registration assessors' and return to practice reviewers appraisal and training to ensure that they are maintaining the skills required to assess whether registration applicants meet our minimum standards to ensure patient safety.	Professional Standards, Registration	November 2014

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Scope a review of our registration assessments to ensure that they are fit for purpose.	Professional Standards , Registration	By March 2015
Offer a return to practice process to all applicants and registrants who have been away from UK practice for two years or more to support their transition back to practise.	Professional Standards	All year
Implement new Registration Appeals Guidelines and Procedure.	Regulation	June 2014
<i>Recognition</i>		
Review obligations under revised European Directive on Recognition of Professional Qualifications and implement any necessary changes to registration procedures.	Professional Standards, Registration, Regulation	Timings to be confirmed
Continue international work towards the development of mutual recognition and information sharing with other regulators and competent authorities.	Communications	All year
Scope out possible induction programme for international applicants (EU and non-EU) <b>(PSA)</b> .	Professional Standards, Registration	October 2014

<b>1.3 Transition into practice</b>		
<b>Goal:</b> To work in partnership with the osteopathic profession to ensure that new osteopaths have access to appropriate support in their transition into practice.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Continue to work in partnership with key stakeholders in osteopathy, including, the BOA, COEI, Osteopathic Alliance and regional groups to support development of mentorship work led by COEI.	Professional Standards, Chief Executive	All year
Conduct annual programme of GOsC presentations to final-year osteopathy students at accredited institutions to embed understanding of the role of the GOsC and requirements for initial and continued registration, including review of content and aims in advance of programme launch.	Communications, Professional Standards, Registration, Regulation	March to July 2014 and January to March 2015

<b>1.4 Continuing fitness to practise (revalidation) – see also 2.1 below</b>		
<b>Goal:</b> To ensure that through an appropriate process, registrants are able to demonstrate their continuing ability to meet the <i>Osteopathic Practice Standards (FR)</i> .		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
<i>Continuing fitness to practise proposals</i>		
Develop operational proposals within which continuing fitness to practice framework could be realised with key osteopathic partners including BOA, COEI, Osteopathic Alliance and regional groups.	Professional Standards	July 2014
Develop continuing fitness to practise consultation document including overarching proposal and more detailed guidance for consultation.	Professional Standards	September 2014
Devise a communication and consultation strategy to encourage a breadth and depth of responses to the continuing fitness to practise consultation, approve and publish proposals for the regulation of continuing fitness to practise, undertake consultation and analyse responses.	Professional Standards, Communications	September 2014 to March 2015
<i>Current continuing professional development audits</i>		
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

<b>1.5 Fitness to practise</b>		
<b>Goal:</b> 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.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Implement new dashboard reporting to Council on activities of the Regulation department and Fitness to Practise Committees and new fitness to practice Annual Report <b>(FR)</b> .	Regulation	January 2014 Council and subsequent Council meetings
Implement and monitor Quality Assurance Framework including quality audits/peer review of decision making <b>(PSA)</b> .	Regulation	From March 2014
Conclude current research into parties' perceptions of fitness to practise processes and review results, making changes to Quality Assurance Framework as necessary <b>(FR)</b> .	Regulation	Report to Council May 2014
Provide training and induction for new medical assessors.	Regulation	By end April 2014
Consult, agree and implement new PCC Practice Note on Undertakings.	Regulation	By June 2014

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Consult, agree and implement new PCC Practice Note on Evidence (including special measures for vulnerable witnesses).	Regulation	By June 2014
Review the Indicative Sanctions Guidance taking account of new guidance to registrants on the duty of candour <b>(FR)</b> .	Regulation	Timing TBC
Develop, consult and implement new policy on whistleblowing <b>(FR)</b> .	Regulation	By October 2014
Develop, consult and implement new guidance for screeners including 'threshold criteria'.	Regulation	By October 2014
Review legal assessor pool, undertake recruitment, and arrange training and induction for new legal assessors.	Regulation	By end November 2014
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 2014
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 (BOA and Professional Indemnity Insurers) to review 2013 complaints/claims data; identify trends; agree action, and review/revise data collection strategy for 2014.	Regulation, Communications	April to July 2014

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

<b>2.1 Continuing fitness to practise (CPD) – see also 1.4 above</b>		
<b>Goal:</b> To ensure that through an appropriate process, registrants are continually encouraged to enhance and improve their practice		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
<i>Current continuing professional development evaluation</i>		
Share identified areas of good practice and areas of development with registrants using a variety of mechanisms including e-learning, engagement with key osteopathic stakeholders and articles in media including <i>The Osteopath</i> .	Professional Standards	All year
Design osteopathic continuing professional development evaluation to feed into report of 'State of Osteopathic continuing professional development'.	Professional Standards	June 2014
Conduct continuing professional development evaluation.	Professional	July to



	Standards	September 2014
Publish report about the 'State of Osteopathic continuing professional development'.	Professional Standards	January 2015

<b>2.2 Osteopathic Practice Standards</b>		
<b>Goal:</b> To embed the role of the <i>Osteopathic Practice Standards</i> as the core principles and values for good osteopathic practice and high standards of professionalism.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Develop and publish new supplementary practical scenarios based guidance relating to patients' capacity to give consent.	Regulation, Professional Standards, Communications	By October 2014
Develop, consult and implement new guidance on osteopaths acting as expert witnesses.	Regulation, Professional Standards, Communications	By August 2014
In conjunction with other healthcare regulators develop new guidance on candour and the reporting of errors <b>(FR)</b>	Regulation, Professional Standards, Communications	Timing TBC
Publish and review findings from the Osteopathic Practice Standards Evaluation and implications for work of GOsC and any other bodies.	Professional Standards	May 2014
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 2015
Working in partnership with stakeholders, develop appropriate CPD resources through our online support pages to assist in embedding the OPS, drawing on the OPS evaluation strategy.	Professional Standards, Communications	All year
Conclude and publish research about the effectiveness of regulatory activities.	Professional Standards	April to January 2014
Publish research about the effectiveness of regulatory activities and review implications of research across all policy development and functions.	Professional Standards, Regulation,	January 2015

	Registration and Resources and Communications, Chief Executive	
Scope registrant opinion survey to compare professional attitudes and awareness of standards with findings of 2012 Osteopath Opinion Survey.	Communications	February 2015

<b>2.3 Quality and patient care</b>		
<b>Goal:</b> To work in partnership with others to develop high quality, patient-centred osteopathic care.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
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: <ul style="list-style-type: none"> <li>• Evidence/data collection/adverse events <b>(FR)</b></li> <li>• Service standards <b>(FR)</b></li> <li>• Advanced practice</li> <li>• Regional support and capacity building (see also 1.4 above)</li> <li>• Mentoring (see also 1.3 above)</li> <li>• Leadership <b>(FR)</b></li> <li>• International collaboration.</li> </ul>	Communications Professional Standards Chief Executive	All year
Contribute to the work of the NCOR Management Board and Research Council, including reviewing funding support from the GOsC.	Chief Executive Communications	All year

<b>2.4 Professional standards and values</b>		
<b>Goal:</b> To work in partnership with others to support practice that promotes professional standards and values across the osteopathic profession, while reducing practitioner isolation.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Work in partnership with patients, BOA, 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 our student professionalism project (see 1.1 above) can be incorporated into wider osteopathic practice.	Professional Standards,	September 2013

	Communications	
Ensure the recommendations of the Francis Report and the Government’s response continue to inform our work including: <ul style="list-style-type: none"> <li>• With other regulators, developing new guidance on candour</li> <li>• Support the work of NCOR and the osteopathic profession on adverse event reporting</li> <li>• Implementation of whistle blowing policies in line with Public Interest Disclosure Act requirements</li> <li>• Continue to improve the efficiency and effectiveness of our fitness to practice processes</li> <li>• Scope the review of the <i>Osteopathic Practice Standards</i></li> <li>• Promoting leadership development with the osteopathic profession.</li> </ul>	Professional Standards, Regulation, Communications	All year
Continue to support the development of pan-European osteopathic standards through working with the European Committee for Standardisation (CEN).	Communications	Completed by February 2015
Continue to participate actively in the Osteopathic International Alliance to promote high standards of osteopathy world-wide, including the organisation of an annual regulation forum.	Chief Executive, Communications	All year

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

<b>3.1 Service quality</b>		
<b>Goal:</b> To continue to enhance the quality of service provided by the GOsC to patients and registrants.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Complete the new Information Governance Framework and embed within operational processes.	All Departments	By December 2014
Implement year 2 of the internal audit programme and report findings to Audit Committee.	Chief Executive, Finance	April 2014-March 2015
Assess impact of changes made to IT infrastructure, including online registration tools in previous business plan year and identify any further improvements in use of IT (including mobile applications) <b>(PSA)</b> .	Registration, Regulation, Communications	December 2014
Identify and implement enhancements to operational processes – particularly around the merger of Registration, Finance and Facilities into one single team.	Registration and Resources	April 2014-March 2015
Continue to identify opportunities for enhancing customer service standards.	Communications	All year
Undertake survey of graduates joining the Register in 2014 to assess quality of registration process with a view to making customer service improvements.	Registration, Communications	November 2014-January 2015

<b>3.2 Engagement</b>		
<b>Goal:</b> To engage effectively with patients, the public, educators, osteopaths, other health care professionals and other key stakeholders for the delivery of our strategic objectives.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Continue implementation of 2013-16 Communications and Engagement Strategy in support of the delivery of the Corporate Plan including identifying targeted approaches to specific stakeholder groups.	Communications	All year
Develop and publish a consultation protocol which sets out clear requirements and expectations for GOsC consultations.	Communications	All year
Support consultation and engagement on policy and operational developments identified in the business plan and those required ad hoc, including through the use of the GOsC Patient Partnership Group <b>(FR)</b> .	Communications	All year
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 and develop a PPI plan where appropriate <b>(FR)</b> .	Communications	All year
Identify opportunities for partnership working with advocacy organisations, voluntary, community and PPI bodies to build links with the wider public.	Communications	All year
Provide GOsC representation at appropriate healthcare conferences/exhibitions across the UK to promote awareness of osteopathic regulation, registration and practice standards, and foster partnerships.	Communications	All year
Implement communications programme to support profession-wide engagement in the development of the profession.	Communications	All year
Support regular engagement activities and events including: <ul style="list-style-type: none"> <li>• Two meetings of the Regional Communications Network</li> <li>• Four meetings with the OEIs</li> <li>• The work of the Osteopathic Development Group in the development of the profession</li> <li>• A programme of visits to regional osteopathic groups.</li> </ul>	Professional Standards, Chief Executive, Communications	All year
<b>3.3 Governance</b>		
<b>Goal:</b> To ensure that our governance is appropriate and effective.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Provide regular reports to Council on progress against the business plan, and financial, asset and risk management.	Chief Executive	All year

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In conjunction with the Audit Committee and Council continue to identify improvements in monitoring, measuring and reporting organisational performance.	Chief Executive	All year
Complete any new appointments to the governance structure using the appointments procedure approved by PSA.	Chief Executive	All year
Scope the work required for the reconstitution of Council including the development of rules and consultation.	Chief Executive Regulation	May 2014
Commence implementation Council's Corporate Social Responsibility policy.	Chief Executive	April-September 2014
Monitor cross-departmental implementation of the GOsC Equality and Diversity Policy and implement any changes needed.	Chief Executive, Regulation	All year
Prepare report on performance against PSA Standards of Good Regulation.	Chief Executive	October-March 2013
Take necessary steps to address any issues arising from the annual PSA Performance Review.	Chief Executive	June-December 2014
Prepare an Annual Report on activities undertaken in year and submit to Parliament.	Chief Executive	June-September 2014

<b>3.4 Value for money</b>		
<b>Goal:</b> To continue to improve value for money in everything that we do.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Continue to review scope for operational cost savings and identify proposals for further cost efficiencies and savings, and where possible implement in time for FY2015-16.	Chief Executive, Resources	April-December 2014
Undertake a review of procured services (items to be confirmed) to ensure cost effectiveness and efficiency, including how we might increase the use of local suppliers	Resources	All year
Continue to explore options for charitable status application and efficient use of assets.	Chief Executive, Resources	All year

<b>3.5 Legislative reform</b>		
<b>Goal:</b> To undertake a fundamental review of our rules as part of the transition to a new Act.		
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>
Continue to engage with the Law Commission, Department of Health and Parliament on proposed changes to legislation.	Chief Executive, Regulation	All year – likely to depend on Law Commission

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Commence scoping study for transition to new rules.	Chief Executive, Regulation	May 2014
Consult on new Professional Indemnity Insurance Rules, and introduce new rules and compliance mechanisms.	Registration, Regulation	May 2014 to September 2014