

**GENERAL OSTEOPATHIC COUNCIL
Business Plan
April 2015-March 2016**

**Monitoring at end of April
2015**

GOsC BUSINESS PLAN 2015-2016

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 sets out progress against the detailed activities contained in the Business Plan 2015-2016 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 and 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 higher education environment.					
Activity	Lead	Timing	Status	Change	Comments
Quality assurance					
Complete tender process for quality assurance contract 2015 to 2018, monitor transition to new contract and confirm readiness for new contract to commence quality assurance activities.	Professional Standards	April to September 2015	●		Tender process completed and contract finalisation underway.
Agree any changes to the Annual Report template.	Professional Standards	June 2015	●		
Distribute Annual Report templates to OEIs requesting information which will allow GOsC to monitor that standards are maintained and identify any potential problems.	Professional Standards	October 2015	●		
Collate and review Annual Report data; present to ERSC 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	March 2016	●		
Continue to monitor quality of course provision, for example by undertaking quality assurance reviews and monitoring any course closure plans.	Professional Standards	All year	●		Finalised course closure process agreed by ERSC March 2015. Monitoring ongoing.
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 2015, January 2016	●		

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Undertake activities to ensure the quality of the education quality assurance process including: annual training and appraisal of all Visitors undertaking a quality assurance process and ongoing communications.	Professional Standards	All year	●		
Complete engagement process on quality assurance discussion document, report findings from engagement process and complete development of new proposals and method (in conjunction with quality assurance partner).	Professional Standards	May 2015 to March 2016	●		Ongoing. Milestone plan noted by ERSC March 2015.
<i>Undergraduate professionalism</i>					
Continue collecting data for undergraduate professionalism surveys in partnership with the osteopathic educational institutions from students, faculty and patients.	Professional Standards	All year	●		
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	●		

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Continue review of guidance about health and disability taking account of key findings and work of other regulators including concerns around mental health (PSA) .	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 (FR) .	Professional Standards	All year	●		
<i>Guidance for osteopathic pre-registration education</i>					
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	●		

<i>Osteopathic Practice Standards</i>					
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 (FR) . Publish report about how patients are involved in osteopathic pre-registration education.	Professional Standards, Communications	All year/March 2016	●		
Review approach to engaging with pre-clinical students in OEIs and implement programme of visits.	Professional Standards, Regulation, Communications	June to December 2015	●		

1.2 Confidence in the Register					
Goal: To increase understanding of the Register and to make it more meaningful to patients and others.					
Activity	Lead	Timing	Status	Change	Comments
<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 – test out in Registrants' survey 2015.	Communications	December 2015	●		

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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	●		Discussion continuing on information sharing with system regulators. Discussions commenced with NHS Choices and NHS England on osteopathic services.
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					
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	●		Ongoing
Review approach to surveying voluntary leavers from the Register, implement and analyse results.	Registration	April 2015 and then all year	●		Leaving the Register form now in operation and completed by all registrants who leave voluntarily.

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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	●		Registration assessor and reviewer training (day 1) took place on 18 April 2015.
Publish initial scoping for a review of registration assessments to ensure compliance with revised EU Directive 2005/36 on the recognition of professional qualifications.	Professional Standards, Registration	May 2015	●		Initial scoping report noted by ERSC March 2015.
Complete review and implementation of revised registration assessments	Professional Standards, Regulation, Registration	By Jan 2016	●		
Design evaluation of revised registration assessments.	Professional Standards	March 2016	●		
Commence planning for major review of registration assessments as part of the review of the <i>Osteopathic Practice Standards</i> .	Professional Standards	March 2016	●		
Continue to undertake registration assessments for international applicants and return to practice interviews.	Professional Standards	All year	●		Ongoing
Recognition					
Continue international work towards the development of mutual recognition and information sharing with other regulators and competent authorities.	Registration Communications	All year	●		CEN standard has now been approved by CEN members.

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.					
Activity	Lead	Timing	Status	Change	Comments
Publish scoping report outlining options for supporting international registrants as they make the transition into practice and commence engagement with stakeholders to inform proposals for supporting international registrants as they make the transition into practice. (PSA) .	Professional Standards, Registration	By July 2015	●		Initial scoping report considered by ERSC March 2015. Workshop with registration assessors took place on 18 April 2015 to inform proposals.
Develop, pilot and evaluate proposals to support international registrants as they make the transition into practice including engagement with stakeholders to provide feedback on proposals and support evaluation. Commence programme of implementation.	Professional Standards, Registration	March 2016	●		
Continue to work in partnership with key stakeholders in osteopathy, including, the Institute of Osteopathy (IO), Council of Osteopathic Educational Institutions (COEI), Osteopathic Alliance and regional groups to support development of mentorship work.	Professional Standards, Chief Executive	All year	●		
Conduct annual programme of GOsC presentations to final-year osteopathy students at OEIs to embed understanding of the role of the GOsC and requirements for initial and continued registration.	Professional Standards, Registration, Regulation, Communications	January to July 2015	●		Presentations have taken place at 10 institutions to 305 final-year students.

1.4 Continuing fitness to practise (revalidation) – see also 2.1 below					
Goal: To ensure that through an appropriate process, registrants are able to demonstrate their continuing ability to meet the <i>Osteopathic Practice Standards (FR)</i> .					
Activity	Lead	Timing	Status	Change	Comments
<i>Continuing professional development (providing assurance of continuing fitness to practise) proposals</i>					
Conduct consultation and engagement on proposals and analyse consultation responses.	Professional Standards, Communications	By October 2015	●		Fifteen engagement events have taken place since the launch of the consultation. 78 consultation responses received to date. 4,485 website views, 1,497 document downloads and 551 video downloads.
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	●		
<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	●		

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.					
Activity	Lead	Timing	Status	Change	Comments
Develop new format for the Fitness to Practise Annual Report and publish.	Regulation	July 2015	●		
Continue to monitor Quality Assurance Framework including quality audits/peer review of decision making (PSA) .	Regulation	All year	●		
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	●		Due to be considered by Council 14 May 2015.
Review the Indicative Sanctions Guidance taking account of new guidance to registrants on the duty of candour (FR) .	Regulation	Timing TBC	●		
Implement new Practice Note on Admission of Character Evidence.	Regulation	By October 2015	●		Due to be considered by Council 14 May 2015.
Implement new Practice Note on Acting in the Public Interest.	Regulation	By October 2015	●		Due to be considered by Council 14 May 2015.
Implement new policy/guidance on Osteopaths with HIV.	Regulation	By October 2015	●		Initial discussion at OPC in March 2015
Implement new guidance for screeners and/or IC in relation to 'threshold criteria'.	Regulation	By June 2015	●		Screeners and IC members to be trained on use of Threshold Criteria on 18 May 2015
Seek to enhance the pool of osteopathic expert witnesses acting in fitness to practise cases and organise dedicated training for them.	Regulation	December 2015	●		

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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	●		IC Training Day to be held on 18 May 2015. Agenda includes outcomes of IC Audit, Presentation from PSA; Data Protection; and a workshop on Duty of Candour.
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 (FR) .	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	●		New Guidance for PCC on Drafting Determinations (which incorporates PSA learning points) to be considered at Council in May 2015
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	●		Data collection for 2014 is being collated/reviewed by NCOR and participating organisations.
Review best practice across regulators for the support of vulnerable registrants in the fitness to practise process and identify proposals for consideration by OPC (PSA) .	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					
Goal: To ensure that through an appropriate process, registrants are continually encouraged to enhance and improve their practice					
Activity	Lead	Timing	Status	Change	Comments
<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	●		Ongoing.
Design osteopathic continuing professional development evaluation to feed into report of 'State of Osteopathic continuing professional development'.	Professional Standards	June 2015	●		Initial scoping considered by OPC March 2015.
Conduct continuing professional development evaluation (see above) and prepare report about the 'State of Osteopathic continuing professional development'.	Professional Standards	July 2015 to March 2016	●		
2.2 Osteopathic Practice Standards					
Goal: 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.					
Activity	Lead	Timing	Status	Change	Comments
Develop appropriate case studies and learning materials to support the professional duty of candour (FR) .	Regulation, Professional Standards, Communications	All year	●		Initial case studies developed and due to be considered at IC Training Day on 18 May and osteopath workshop on 3 June.

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Scope review of the Osteopathic Practice Standards including: key reports and their implications (including the Francis report and the duty of candour, and best practice on whistleblowing); feedback on the Osteopathic Practice Standards; joint work with other regulators; the effectiveness of regulation research; values based practice activity; and new methods of engagement (PSA) . 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	●		
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	Status	Change	Comments
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"> • 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	●		<ul style="list-style-type: none"> • Advanced Clinical Practice and Mentoring projects in research phase. • Leadership programme in development and due to commence July 2015. • Service standards and international projects – next steps due to be discussed at May ODG Board. • Evidence (PROMs) project in pilot phase. • New regional support material in development.
Contribute to the work of the NCOR Management Board and Research Council.	Chief Executive Communications	All year	●		New NCOR contract with QMUL agreed.

2.4 Professional standards and values					
Goal: To work in partnership with others to support practice that promotes professional standards and values across the osteopathic profession, while reducing practitioner isolation.					
Activity	Lead	Timing	Status	Change	Comments
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 <i>Osteopathic Practice Standards</i> .	Professional Standards	May 2015 (seminar) and all year (follow-up)	●		Follow up seminar taking place on 20 May.
Consider how any learning from professionalism project (see 1.1 above) can be incorporated into wider osteopathic practice, e.g. in the revision process for the OPS and communications activities.	Professional Standards, Communications	All year	●		
Work with the Osteopathic Development Group to develop and implement a programme for leadership development with the osteopathic profession.	Chief Executive	All year	●		Leadership programme in development and due to commence July 2015. Contract signed with Open University and recruitment has commenced.
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	●		Ongoing

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

3.1 Service quality					
Goal: To continue to enhance the quality of service provided by the GOsC to patients and registrants.					
Activity	Lead	Timing	Status	Change	Comments
Continue to embed Information Governance Framework within operational processes.	All Departments	All year	●		Ongoing
Implement year three of the internal audit programme and report findings to Audit Committee, including audit activity around: 1. Return to practice process audit 2. Performance against customer service standards.	Chief Executive, Finance	April 2015 to March 2016	●		
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) to be incorporated into 2016-19 Corporate Plan (PSA) .	Registration, Regulation, Communications	July 2015	●		
Continue to identify opportunities for enhancing customer service standards and implement.	Communications	All year	●		
Undertake survey of graduates joining the Register in 2015 to assess quality of registration process with a view to making customer service improvements.	Registration, Communications	November 2015 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.					
Activity	Lead	Timing	Status	Change	Comments
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	●		Ongoing
Develop and publish a consultation protocol which sets out clear requirements and expectations for GOsC consultations (to be informed by discussion on common approaches with other regulators).	Communications	By August 2015	●		
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 (FR) .	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 (FR) .	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	●		

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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	●		Northern Ireland Assembly Reception, Belfast, scheduled for 2 June. Planning for 2015 Scottish Government Conference underway.
Implement communications programme to support profession-wide engagement in the development of the profession.	Communications	All year	●		Work underway with iO on a joint communications strategy to increase awareness of development work.
Support regular engagement activities and events including: <ul style="list-style-type: none"> • Two meetings of the Regional Communications Network • Four meetings with the OEIs • The work of the Osteopathic Development Group in the development of the profession • A programme of visits to regional osteopathic groups. 	Professional Standards, Chief Executive, Communications	All year	●		

3.3 Governance

Goal: To ensure that our governance is appropriate and effective.

Activity	Lead	Timing	Status	Change	Comments
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	●		Initial discussions commenced at April 2015 Council strategy day.
Provide regular reports to Council on progress against the business plan, and financial, asset and risk management.	Chief Executive	All year	●		Ongoing

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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	●		Initial documentation submitted to Department of Health.
Organise training day for potential registrant applicants for Council and other non-executive roles.	Chief Executive, HR	October 2015	●		Event planned for September 2015.
Review the equality and diversity policy and present to Council, implement new policy.	Chief Executive	May 2015 and all year	●		Draft revised plan due to be considered by Council 14 May 2015.
Prepare report on performance against PSA Standards of Good Regulation.	Chief Executive	October 2015 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	●		Discussions planned for Audit Committee and Council in summer of 2015.

3.4 Value for money

Goal: To continue to improve value for money in everything that we do.

Activity	Lead	Timing	Status	Change	Comments
Continue to review scope for operational cost savings and identify proposals for further cost efficiencies and savings, and where possible implement in time for FY2016-17.	Chief Executive, Resources	April to December 2015	●		

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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	●		Legal advice commissioned.

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