

**GENERAL OSTEOPATHIC COUNCIL
Business Plan
April 2018 – March 2019**

**Monitoring at 31 March
2019**

GOsC BUSINESS PLAN 2018-2019

The General Osteopathic Council has agreed a corporate plan for 2016-2019 which commits to achieving the three strategic objectives set out below, over the three year period.

Strategic Objectives

1. To promote public and patient safety through patient-centred, 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 Business Plan 2017-2018.

Legend

Status ● **On track** ● **Minor delay** ● **Cancelled/postponed**

Change ↑ **Positive** ↓ **Negative**

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

1.1 Continuing professional development					
Goal: to ensure that osteopaths keep their knowledge and skills up to date, and continually enhance and improve their practice					
Activity	Lead	Timing	Status	Change	Comments
Ensure that Council has appropriate oversight and scrutiny mechanisms of implementation of CPD scheme to provide assurance on effective implementation of the scheme (including monitoring of risk and finance) informed by stakeholder input.	Professional Standards	All year	●		On track. SMT CPD Task Group continues to monitor progress.
Develop strategy for verification, assurance and compliance with CPD scheme including operational processes.	Professional Standards and Registration and Resources	October 2018	●		Strategy complete. Piloting and refining of operational processes will take place in 2019-20.
Review and update equality impact assessment as implementation is ongoing.	Professional Standards	All year	●		Ongoing.
Support and empower osteopaths to undertake aspects of the new CPD scheme through a programme of communication and engagement, and the development of new resources as required.	Professional Standards Communications	All year	●		Ongoing.
Further develop and implement communications strategy for engaging osteopaths, to promote awareness of and help them prepare for the new CPD scheme and preparing CPD providers and other organisations to deliver it.	Professional Standards Communications	Ongoing	●		Ongoing.
Begin first year phased evaluation of those who have commenced the first year of the CPD scheme identifying their progress now that they have started the scheme, what questions they have and (with Communications team) what resources they might need to successfully complete.	Professional Standards	March 2019	●		Evaluation strategy considered by Council, Feb 2019. Current 2019 survey is running until July 2019.
Publish new CPD Rules.	Professional	May 2018	●		Completed.

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	Standards				
Consult on final version of CPD Guidance and PDR Guidance following rules being finalised.	Professional Standards	February 2018	●		Completed.
Publish final version of CPD Guidance and PDR Guidance.	Professional Standards Communications	July 2018	●		CPD Guidance and PDR Guidance published.
Confirm and communicate start date for new CPD scheme for all osteopaths.	Registration and Resources Communications	May 2018 and ongoing	●		Included in renewal of registration documentation and new registrant letters. Guidance on our websites and other owned channels.
Implement interactive, web-based infrastructure and annual registration renewal form and process to support the new CPD scheme ahead of implementation.	Communications Registration and Resources	October 2018	●		Completed.
Complete audit of 20% of CPD Annual Summary Forms and 2% of CPD folders under old scheme to ensure registrants are meeting current standards.	Registration and Resources	All year	●		Completed.

1.2 Education and training					
Goal: to ensure that osteopathic education is of high quality and continues to evolve to reflect changes in education and healthcare					
Activity	Lead	Timing	Status	Change	Comments
Complete analysis and publish new Quality Assurance Guidance and begin implementation of process.	Professional Standards	July 2018	●		Ongoing. New Handbook agreed by PAC March 2019. Working with OEIs on content and format of published action plan.
Publish risk based approach to publication of information following consultation	Professional Standards	July 2018	●		Ongoing. Risk based approach is published in the new Handbook, further work required as outlined in 2019/20 business plan.
Recruit Education Visitors in conjunction with Quality Assurance Agency	Professional Standards	October 2018	●		Completed.
Working with OEIs, support the further development of patient involvement in education and training e.g. curriculum, assessment and governance as well as patient feedback (thematic Review and Annual Report follow up)	Professional Standards	October 2018	●		A thematic review considered by the OEIs & PAC. Survey piloted, work with GCC underway to get a comparative data set from education providers.

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Identify and continue to share areas of good practice in osteopathic education and training.	Professional Standards	All year	●		Annual Reports good practice reported and shared. A seminar about obtaining and recording consent based on a thematic review took place in November 2018 and subsequent workshop with OEI leads in March 2019.
Continue to monitor and enhance the quality of osteopathic education by: ensuring appraisal and training of Education Visitors; undertaking periodic quality assurance reviews (RQ reviews); agreeing changes to Annual Reports; collecting and analysing data and disseminating findings, feedback and good practice to the sector; monitoring action plans, conditions and requirements.	Professional Standards	All year	●		Ongoing.
Further develop and publish proposals for risk based quality and effective approach to quality assurance.	Professional Standards	November 2018	●		Ongoing. See above.
Commence re-tendering QA contract.	Professional Standards	November 2018	●		Council will be asked to consider this further in July 2019.
Work with OEIs and COEI to develop faculty of educators.	Professional Standards	All year	●		COEI / GOsC Society of Educators steering group meeting 18 th March 2019. Work wil continue into next business plan.
Continue to promote professionalism within OEIs, and among students and faculty.	Professional Standards	All year	●		Ongoing.
Conduct annual programme of on-campus GOsC presentations to osteopathic students to support training outcomes, embed understanding of the role of the GOsC, and assist transition into practice.	Professional Standards Communications Registration	Ongoing	●		Completed as planned.
Carry out strategic review of communications and engagement with students.	Communications Registration Professional	October 2018	●		Approach reviewed. Workshops in 2018 and early 2019 explored wider engagement objectives

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	Standards				with each stakeholder, including students.
Identify any external issues relating to education and training that impact on current objectives and amend plans accordingly.	Professional Standards	All year	●		Introduction of code of conduct for Visitors and resulting additions to Handbook.

1.3 Fitness to practise					
Goal: to ensure patient safety by taking effective, timely and proportionate action on complaints about osteopaths					
Activity	Lead	Timing	Status	Change	Comments
Manage the complaints caseload in an efficient, effective, fair and timely way seeking to achieve a target of 12 months for the majority of fitness to practise complaints to reach a hearing.	Regulation	All year	●		Ongoing.
Continue to monitor and further develop, the Quality Assurance Framework, including internal/external audits and peer review of decision making.	Regulation	All year	●		Ongoing.
Continue to hold regular determination review group meetings (with inter regulatory participation) to review final outcomes from PCC decisions.	Regulation	All year	●		A DRG meeting took place on 12 November 2018. A further DRG meeting will be scheduled this quarter
Communicate case learning points, PSA advice, relevant case law and regulatory developments to GOsC Committee members (and arrange training where necessary).	Regulation	All year	●		Ongoing.
Implement any changes to procedures recommended by the PSA's initial stages audit, the Performance Review or other source.	Regulation	All year	●		PSA 2017/18 Performance review report published December 2018. Report reviewed and proposed changes included in 2019-20 business plan.
Develop separate guidance on Professional Indemnity Insurance for use by Fitness to Practise	Regulation	tbc	●		A draft PII guidance document will be considered by the Policy

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Committees					Advisory Committee in June 2019
Conclude consultation on draft Investigating Committee decision making guidance and publish new guidance.	Regulation	May 2018	●		Guidance approved by Council in July 2018.

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Undertake a comprehensive review of existing published fitness to practise KPIs and internal timescales and how we measure them and implement changes in light of the threshold criteria, initial closure procedure and practice note on standard case directions.	Regulation	July 2018	●		The practice note on Standard Case Directions was approved by Council in November. A KPI seminar discussion took place at February Council. A further discussion will take place at May Council.
Expand pool of expert witnesses acting in fitness to practise cases by appointing and training additional osteopaths.	Regulation	October 2018	●		Workshop held March 2019 to explore the types of expert evidence we need in PCC cases involving osteopaths engaged in adjunctive/complementary therapies which centre around the applicability of the OPS to the alleged unprofessional conduct. This assisted in assessing the pool of experts we need to appoint.
Develop and consult on a Rule 19 procedure and Practice Note.	Regulation Communications	July 2018	●		A draft Practice Note is currently out for consultation.
Evaluate the effectiveness of the existing PCC bank of conditions and consult on changes where appropriate.	Regulation	March 2019	●		Preliminary research and a review of the current conditions has been undertaken.
Provide training as required to fitness to practise panellists, including supporting the induction and integration of new members through training in addition to separate annual training days for IC and PCC/HC members.	Regulation	All year	●		Induction training for new PCC members took place on 9 May 2018 and for new PCC and IC members on 28 March 2019. The IC all members training day took place on 28 June 2018. The PCC Annual training day took place on 30 November 2018. Joint chair training with the GOC and GCC took place on

					9 February 2019.
Identify any external issues relating to fitness to practise that impact on current objectives and amend plans accordingly.	Regulation	All year	●		Ongoing.

1.4 Registration					
Goal: to ensure that only those eligible to do so practise as osteopaths in the UK and to increase understanding, awareness and use of the register					
Activity	Lead	Timing	Status	Change	Comments
Identify any significant registration-related issues arising from Brexit and seek to ensure effective working relationships with relevant European bodies through transition period	Chief Executive Registration	All year	●		Discussions are ongoing with the Department of Health and with other regulators on potential changes to recognition requirements.
Ensure compliance with the Osteopaths Act 1993, the underpinning Registration Rules and appropriate EU Directives and identify enhancements to existing registration processes.	Registration and Resources Regulation	All year	●		Ongoing.
Develop policy options in relation to progression of mutual recognition	Professional Standards and Registration and Resources	October 2018	●		Further work will take place on mutual recognition after the registration assessment consultation and once Brexit clarity is achieved.
Engage with registration assessors to explore options for improved, fit for purpose, robust but accessible registration assessment processes for all applicants based on revised Osteopathic Practice Standards	Professional Standards and Registration and Resources	October 2018	●		Training with assessors held in October 2018. Revised assessment materials presented to Policy Advisory Committee.
Conclude consultation on registration assessments fees	Professional Standards and Registration and Resources	May 2018	●		Council approved recommendations at the May 2018 Council meeting.
Develop options for registration assessments and	Professional	October 2018	●		Review timetable agreed by PAC

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return to practice process	Standards and Registration and Resources				in October 2018.
Consult on revised registration assessment and return to practice process	Professional Standards and Registration and Resources	January 2019	●		Council agreed to consultation in February 2019 and the consultation is currently underway.
Ensure the quality of registration assessments, including the training and appraisal of GOsC registration assessors and return to practice reviewers, moderation meeting facilitation and regular communications and evaluation.	Professional Standards, Registration and Resources	All year	●		Registration Assessor training held October 2018. Webinars took place in November 2018 and January 2019. Staff continue to facilitate moderation meetings, collating feedback for continuous improvement.
Seek feedback from those using or applying our registration processes (including registrants, registration applicants and registration assessors) in order to better understand their experiences and improve our registration system.	Registration and Resources, Professional Standards Communications	All year	●		Ongoing.
Continue to establish a network of contacts with peers in other regulatory bodies and similar organisations to share experiences and best practice.	Registration and Resources	All year	●		Director of Registration and Resources has become the lead for the inter-regulatory registration forum.
Continue to encourage osteopaths to promote awareness of their registered status and the GOsC Register – monitoring levels of registrant take-up.	Communications	All year	●		Proactive communication through The Osteopath magazine and the ebulletin, plus improved promotion on the ● zone has led to an increase in demand for the Registration Marks.
Investigate individuals identified or reported to GOsC as incorrectly describing themselves as	Regulation	All year	●		Ongoing.

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osteopaths, write 'cease and desist' letters to them, and prosecute those who ignore such letters.					
Monitor activity of individuals removed from the Register during 2017-18 and 2018-19, 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.
Identify any external issues relating to registration that impact on current objectives and amend plans accordingly.	Professional Standards Registration	All year	●		Brexit -lack of clarity about processes for nationals with European rights. The streamlined route to registration remains unclear after March 2019. We are preparing for two scenarios; if the Directive does not apply; and if it does not.

1.5 Patient involvement and engagement					
Goal: to put patients, patient-centred regulation and patient-centred healthcare at the heart of our work					
Activity	Lead	Timing	Status	Change	Comments
Assess all key GOsC policy development and processes at the outset to ascertain patient and public involvement requirements, and develop/implement an appropriate engagement plan.	Communications	All year	●		Ongoing.
Continue to seek input to policy development and projects from the GOsC Patient Partnership Group, refreshing and promoting membership and keeping members informed and engaged.	Communications	All year	●		Plans are being developed to proactively recruit to this group
Expand opportunity and options for patients, the public and other interested parties to input into GOsC work, including strengthening partnerships with patient representative groups across the UK.	Communications	All year	●		YouGov survey rerun to gather insight into attitudes of patients and the public to help inform policy and communications

Collaborate with other health regulators to increase the quality and scope of GOsC public engagement.	Communications	All year	●		GDC/ GOsC values and boundaries projects.
Promote among osteopathic stakeholders the value of patient involvement in their own work and, encourage use of patient feedback to inform improvements in practice and training (see also CPD and education and training above).	Communications	All year	●		Ongoing.

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

2.1 Standards and professionalism					
Goal: to promote high standards of practice and professionalism in the osteopathic profession					
Activity	Lead	Timing	Status	Change	Comments
Publish Osteopathic Practice Standards (includes promote and distribute)	Professional Standards Communications	June 2018 online. September print.	●		Updated OPS published Sept 2018. Copies included in new registrant packs. Promotion plan in place.

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Publish and launch online digital version of the Osteopathic Practice Standards with a focus on usability	Communications	October 2018	●		Microsite launched on 1 Sept and promotion ongoing.
Develop strategy to implement Osteopathic Practice Standards including analysis, impact and implementation for all regulatory objectives and functions and including key stakeholder organisations	Professional Standards	May 2018	●		Ongoing; considered further by PAC in March 2019.
Develop and implement strategy to raise awareness, understanding and usage of the Osteopathic Practice Standards for osteopaths prior to implementation in October 2019.	Professional Standards Communications	March 2019	●		Activity as outlined in papers for PAC and Council ongoing. Online digital OPS site analytics regularly monitored and reviewed. Further promotion planned in 2019.
Continue to develop work in relation to values of patients and practitioners, using co-production, to support effective decision making to support regulatory objectives.	Professional Standards	All year	●		Ongoing –tools developed ahead of piloting 2019-20. We were invited to present at the European Society of Person Centred Care Conference in March 2019, and submitting a paper to a peer reviewed journal for consideration
Evaluate impact of literature review on boundaries and functions and consider need to commission substantive research questions informed by that.	Professional Standards	July 2018	●		Ongoing. Dissemination seminars took place in London and Huddersfield in March 2019. This work will continue into the next business plan.
Developing learning resources to help support osteopaths to implement the standards in practice	Professional Standards Communications	All year	●		Ongoing. We have published six workbooks for the new CPD scheme and are improving them in line with feedback received.
Update and review equality impact assessment	Professional	All year	●		Ongoing. An equality statement

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through the implementation period.	Standards				has been published in our CPD Guide
Develop and agree strategy for evaluating impact of the OPS implementation	Professional Standards	March 2019	●		Paper considered by PAC in March 2019. This work will continue into the next business plan.

2.2 Capacity building					
Goal: to ensure that the osteopathic profession continues to develop its capacity to improve patient experience and high quality care					
Activity	Lead	Timing	Status	Change	Comments
Provide communications support for the Osteopathic Development Group programme to encourage awareness of and engagement in ODG projects to support the development of the profession.	Communications	All year	●		Ongoing.
Continue to provide support for Osteopathic Development Group projects including: <ul style="list-style-type: none"> • Leadership – support the delivery of the ODG’s leadership development activities. • Service Standards – work with the Institute of Osteopathy on the implementation of the Patient Charter and Service Standards. • Mentoring – support the implementation of a profession-wide mentoring programme for recent graduates. • Accredited practice – support the development and implementation of the ODG’s accredited practice programme for paediatric osteopathy. 	Chief Executive Communications Professional Standards	All year	●		Ongoing.
Develop a strategy for fostering sustainable professional networks and learning communities that support professional development and minimise practitioner isolation.	Professional Standards, Communications	All year	●		Ongoing. Strategy in place.
Continue to work with the Council of Osteopathic Educational Institutions to support their proposals to	Professional Standards	March 2019	●		Waiting on COEI to further develop proposals and recruit

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develop the organisation to better meet the needs of the sector.	Chief Executive				staff member. We are supporting COEI through our GOsC / COEI work and also through the development of the Society of Educators.
Work with Osteopathic Development Group to evaluate progress with its activities to inform future support from the GOsC in the 2019-22 Corporate Strategy.	Chief Executive Professional Standards	October 2018	●		To be explored further by Chief Executive

2.3 Research, practice and regulation					
Goal: to use evidence from data collection, risk analysis and research to inform the development of osteopathic regulation and practice					
Activity	Lead	Timing	Status	Change	Comments
Engage with the Professional Indemnity Insurance Providers and the professional association to review 2016 complaints/claims data; identify trends; agree action, and review/revise data collection and dissemination strategy for 2018.	Regulation Chief Executive	All year	●		Concerns and complaints report for 2017 now published.
Continue to support the National Council of Osteopathic Research and promote its activities as a means to increase research awareness and research activity within the osteopathic profession.	Chief Executive Communications	All year	●		Ongoing. Includes regular features in The Osteopath magazine and updates in the monthly news ebulletin (e.g. NCOR's Snapshot Summaries are popular ebulletin content).
Scope development of research to evaluate impact of research exploring and explaining the dynamics of osteopathic regulation, professionalism and compliance with standards in practice, identifying further lessons to learn as new CPD scheme and other regulatory activities are implemented.	Professional Standards Chief Executive	March 2019	●		Scoping meetings took place in February 2019 with Professor Gerry McGivern and Professor Tina Kiefer from Warwick Business School to discuss and agree the scope of this work. Funding has been secured from Warwick Business School; no direct resource implications

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

3.1 Service quality and engagement					
Goal: to enhance the quality of service that we provide to patients and the public, registrants and our other stakeholders					
Activity	Lead	Timing	Status	Change	Comments
Monitor revisions to the Welsh Language Act and implement existing and potential new requirements as required.	Communications Chief Executive	All year	●		Awaiting updated Welsh language legislation. Statutory Annual Monitoring Report went to WLC in September. It was announced in February that there will not be a Welsh Language Bill this year.
Review feedback arising from GOsC stakeholder surveys in 2017-18, identifying and implementing improvements, and adjusting GOsC communications and engagement mechanisms and strategies.	Communications	All year	●		Insight continues to be gathered through wide variety of methods/channels. Some changes already implemented and improvements continuing. Usability survey launched on ● zone, following which improvements were made. The Osteopath magazine readers' survey ran in February from 24 Jan 2019 to 18 March 2019.
Develop new three-year Communications and Engagement Strategy.	Communications	January 2019	●		This will now be considered as part of the Strategic Plan.
Ensure high quality consultation and engagement on policy and operational developments, including involvement of the GOsC Patient Partnership Group.	Communications	All year	●		Ongoing.
Continue to support regular engagement activities	Communications	All year	●		Ongoing.

<p>and events including:</p> <ul style="list-style-type: none"> • Providing support for regional groups • Meetings with osteopathic educational institutions • Ongoing work with faculty in osteopathic educational institutions • The work of the Osteopathic Development Group • A programme of visits to local osteopathic groups • A programme of visits to advanced practice osteopathic groups and CPD providers • Assisting the development of networks of osteopaths • Meeting with insurance providers and legal defence organisations • Attendance at appropriate healthcare events across the UK to promote awareness of osteopathic regulation, registration and practice standards • Engagement around provision of resources and guidance and professional development 	<p>Chief Executive Professional Standards</p>				
<p>Continue to provide high quality information to support registrants' engagement with the GOsC including through:</p> <ul style="list-style-type: none"> • Publication of The Osteopath magazine • Regular ebulletins and fitness to practise updates • Improving websites and web content • Use of social media. 	<p>Communications Regulation</p>	<p>All year</p>	<p>●</p>		<p>Retender exercise complete. Initial updates and usability work to improve the main website, the ● zone and the OPS and CPD microsites completed. Improvements are ongoing based on user need assessed through user surveys (eg ● zone survey), reviews of analytics and feedback received via website contact forms, email</p>

					and phone queries etc.
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3.2 Economy, efficiency and effectiveness					
Goal: to operate efficient, economic and effective operational systems and processes					
Activity	Lead	Timing	Status	Change	Comments
Implement the activities from the IT Strategy and work plan	Registration and Resources	All year	●		Completed.
Continue to develop the Integra system to increase its functionality and usability across the organisation	Registration and Resources	All year	●		Ongoing.
Continue to identify any opportunities for joint working with other regulators and provide advice to Council on governance of any joint activities	Chief Executive	All year	●		Joint work taking place with GCC and GOC to share best practice particularly in relation to fitness to practise, GDC re values project and GCC re public and patient thematic review, communication and miscommunication in the context of touch and interprofessional working.

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Undertake review of HR policies including reward strategy	Chief Executive	All year	●		Ongoing.
Use insight gathered from engagement activities to support ongoing evaluation of the impact of our activities	Communications	All year	●		Ongoing.

3.3 Governance					
Goal: to operate with high standards of corporate governance and respond effectively to changes in the external environment					
Activity	Lead	Timing	Status	Change	Comments
Provide regular reports to Council on progress against the business plan, and on financial, asset and risk management.	Chief Executive	All year	●		Ongoing.
Support Council in implementing its ongoing development	Chief Executive	All year	●		Ongoing.
Review Scheme of Delegation	Chief Executive	May 2018	●		Reviewed by Council, May 2018. Governance Handbook updated, November 2018.
Develop a new Corporate Strategy for 2019-22.	Chief Executive	January 2019	●		SMT awayday July 2018 to inform Council Strategy day September 2018. Discussion of draft Strategy at Nov & Feb 2018 and March 2019 Council.
Ensure that the GOsC continues to meet its duties under the Equality Act, including reviewing the current Equality and Diversity Policy.	Chief Executive	May 2018 and all year	●		New policy agreed by Council in May 2018.
Ensure readiness for and ongoing compliance with the General Data Protection Regulation.	Chief Executive	All year	●		Action plan developed. Major actions completed by May 2018. Ongoing implementation and reporting to Audit Committee.

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Engage with the PSA Performance Review process, through regular data reporting and acting on issues arising from the performance review process and associated audits.	Chief Executive	All year	●		2017/18 report received. Awaiting 2018/19 report
Complete any new appointments to the governance structure, including where necessary using the appointments procedure approved by PSA.	Chief Executive	All year	●		IC Chair appointed. Council and Audit Committee appointments commenced.
Provide induction and ongoing training for new and existing Council members and other non-executives.	Chief Executive, Regulation	All year	●		IC training day 28 June 2018 PCC training day 30 Nov 2018. IC induction 28 March 2019
Prepare an Annual Report on activities undertaken in year and submit to Parliament.	Chief Executive, Registration and Resources, Communications	June to September 2018	●		Annual Report laid before Parliament September 2018.
Comply with Charity Commission reporting requirements	Chief Executive	All year	●		Annual Report and Return filed October 2018.
Continue to engage with the Department of Health and other regulators on the reform of healthcare professional legislation.	Chief Executive	All year	●		Ongoing.