

Consultation strategy

1. The consultation strategy in relation to the updated Guidance for Osteopathic Pre-registration Education (GOPRE) and the introduction of specific Standards for Osteopathic Education will follow the [GOsC consultation principles](#). These five principles are set out below, with an explanation as to our approach in relation to this particular consultation.

Principle 1: Formative - *Our consultations should be undertaken at an early stage to ensure the policy or guidance document can be influenced by the stakeholders we are consulting. We will ensure that we undertake initiatives and activities as part of pre-consultation engagement to inform the development of our policy and guidance documents.*

2. The development of updated GOPRE and new Standards for Education has been a collaborative process, as has been reported to the Policy and Education Committee throughout the process. The process has included:
 - Early discussions with individual Osteopathic Educational Institutions to seek feedback on the current GOPRE document, and its application in practice.
 - Discussions with the Institute of Osteopathy in relation to educational outcomes and how these align with broader healthcare outcomes in order to widen the opportunities available to osteopaths as Allied Health Professionals.
 - A Stakeholder Reference Group to provide insight and feedback on developing drafts, with input from the Institute of Osteopathy (iO), The Council of Osteopathic Education Institutions (COEI), The National Council for Osteopathic Research (NCOR), The Osteopathic Alliance (OA), patients, recent graduates, and another healthcare professional body.
 - Focus groups with osteopaths with particular insights and experience in issues around equality, diversity and inclusion within osteopathic education.
 - Reports to and insights and feedback from the Policy and Education Committee.

Principle 2: Authentic *Our consultations should be authentic and be truly seeking views and scrutiny, rather than either simply consulting for the sake of consulting, or to have been seen to have consulted. We will demonstrate there is a purpose to the consultation and ensure that we are asking questions on areas where final decisions have not already been reached.*

3. The consultation document (see draft) will set out clearly the issues upon which we are seeking feedback in relation to the GOPRE review and the new Standards for Education, but also indicate that responses need not be limited to the specific questions raised. We will conduct an analysis of feedback received in whatever form this is provided, and this will be reported to the Policy and Education Committee with a final draft of GOPRE and the Standards for Education for consideration.

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Principle 3: Accessible *Our consultations should be open for any individual to respond. We will ensure that our consultations last for 12 weeks unless there are good reasons not to do so and, in those situations, we will provide a clear explanation as to why that is the case.*

4. In this case, it is proposed that the consultation will be for some ten weeks over the summer of 2021, from approximately 31 May until 9 August. This is in order to ensure that there is sufficient time to analyse responses, adapt the drafts as necessary, seek feedback from the Stakeholder Reference Group, and prepare a report to the Policy and Education Committee at its October 2021 meeting. Our communications will make it clear that anyone can respond, and that a full response to the consultation is not a requirement – we will be happy to receive partial responses and isolated feedback as well as more comprehensive feedback.

Principle 4: Inclusive - *We will ensure our consultations are accessible to all stakeholders and, where necessary, we will take steps to ensure we are able to receive responses in a variety of different formats where that is helpful to respondents.*

5. As mentioned above, we will invite responses from a broad range of stakeholders. The consultation document and information will be available on our website, and links to this communicated to key stakeholders (see table below).

In developing our consultation strategy, we will consider our consultation audiences, and use a targeted approach to reach those with a greater interest in the subject matter and those it may be most relevant to or who will be more directly affected.

6. We will approach key stakeholders and as well as inviting individual responses, will also offer group meetings so that feedback may be gained in a number of ways. This approach is set out in more details within table 1 below, but will include proposed online meetings with current students/recent graduates; patients; educators; Registration assessors/QA visitors.

We will ensure that we have considered equality, diversity and inclusion as part of our consultation strategy development. This will include ensuring our consultations use clear and concise language and are free of jargon. We will ensure that our consultations are not overly long and try to ensure that they are easy to understand.

7. As mentioned above, we have sought feedback during the development of revised GOPRE and Standards for Education from osteopaths with a particular experience and insight of equality and diversity issues. In terms of clarity and accessibility of the consultation documents, we aimed to make these concise and jargon free, and have sought feedback on these from the Stakeholder Reference Group to this end.

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Principle 5: Transparent - *We will publish an analysis of consultation responses and we will demonstrate where and how the consultation feedback has informed our thinking.*

8. We will analyse the consultation findings, and indicate how these have impacted on the final GOPRE document and Standards for Education. These will be shared with the Stakeholder Reference Group, reported to the Policy and Education Committee and Council, and communicated more widely to stakeholders.

Stakeholder plans

9. In table 1 below, we set out in more detail the key stakeholders in relation to this consultation, whether they are represented on the Stakeholder Reference Group, key issues and plans for the consultation. When the current GOPRE document was developed and consulted on in 2014¹, there were 26 responses from a cross section of respondents, including:

- Osteopaths (12)
- Patients (3)
- Osteopathic educational institutions (3)
- Students (3)
- International regulator (1)
- UK Osteopathic organisations (2)
- UK inter professional organisations (1)
- Experts in equality and diversity matters (1).

10. Based on previous experience, therefore, this is not likely to be a consultation that generates a very large number of responses. Our focus is thus on ensuring that the feedback we do receive is meaningful and representative, involves key stakeholders, and that it sufficiently helps to inform decision making and the development of the final updated GOPRE and Standards for Education. This is why we will be offering several focus group type discussions as outlined, in order to provide flexible opportunities for feedback to be provided.

¹ As reported to the Education and Registration Standards Committee in June 2014.

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Timetable for consultation and subsequent activities

11. The proposed timetable is as follows:

Month	Activity
May 20 2021	Report to Council with consultation draft for sign off
May 2021 – August 2021	Consultation
August -September 2021	Analyse consultation outcomes and hold further Stakeholder Reference Group meeting to consider these and any changes
October 2021	Report to PEC with consultation analysis and post-consultation changes for consideration
Nov 2021 or Jan 2022 Council	Report to Council with final documentation for approval
Jan – July 2022	Supporting OEIs with implementation plans
September 2022	Implementation of updated GOPRE

Table 1 – summary of stakeholder engagement plans for consultation

Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
Council of Osteopathic Educational Institutions (COEI)	Yes	COEI comprises all of the educational institutions and is the key stakeholder in terms of implementing the GOPRE outcomes and Standards of Education.	Membership of the Stakeholder Reference Group Initial scoping meetings to gain feedback Meetings between GOsC and COEI during the development process Direct feedback to be sought during consultation process	GOsC/COEI meeting (see below re educators)
Institute of Osteopathy (iO)	Yes	The iO as professional membership body have a keen interest in the development of the profession, and the maximising of career opportunities for osteopaths, including roles within the	Initial scoping meeting to discuss relationship between GOPRE and NHS/HEE frameworks Membership of Stakeholder Reference Group including staff and iO Council representation	The iO will be invited to submit a formal response to the consultation. Also ask that the iO disseminate awareness of the consultation via

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
		NHS as well as the more typical private practice roles	Specific consultation invitation	its own communication channels.
Osteopaths	There are osteopaths on the SRG as representatives of organisations, but not as general registrants	Osteopaths are likely to have views on osteopathic education based on their own education experiences, their views of the profession and their approach to practice, and as actual or potential employers/practice principals	An osteopathic viewpoint has been gained via the Stakeholder Reference Group, through the iO representation, the OA, COEI and recent graduates, but not specifically from osteopaths in private practice with no other interests	The consultation will be communicated to all registrants via our ebuletin, supporting blogs and videos with regional groups across the four nations contacted to inform them specifically of the consultation, and to invite responses.
National Council for Osteopathic Research (NCOR)	Yes	NCOR's mission is: To advance, facilitate and disseminate osteopathic and osteopathic relevant research, in order to promote practice that optimises patient care.	Membership of Stakeholder Reference Group	A formal response to the consultation from NCOR will be invited.

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
The Osteopathic Alliance (OA)	Yes	The OA represent a diverse range of postgraduate training providers and special interest groups, and have an interest in undergraduate outcomes as a preparation for postgraduate development and practice.	Membership of Stakeholder Reference Group	Invitation to provide specific feedback during consultation
Osteopathic students	No	Key stakeholders engaged in osteopathic education currently	Invitation via COEI to Stakeholder Group membership but none came forward	Aim to run an online event for current students from various OEIs during consultation process (alongside recent graduates – see below)
New graduates	Yes	Insights of new graduates would be helpful having recently been through osteopathic education	Representation on Stakeholder Reference Group	Aim to run specific online event for current students and recent graduates (see above)

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
Patients	Yes	Patient involvement is essential to understand the concerns, priorities and opinions of those receiving osteopathic care	There are three patient representatives on the Stakeholder Reference Group	A broader online session with a wider patient group will be planned as part of the formal consultation process
Other healthcare professions	Yes (CSP)	It is helpful to gain insights from comparable healthcare professions to the issues and outcomes covered within GOPRE	Representation on Stakeholder Reference Group (CSP)	We will invite responses from other health and care professional bodies.
Osteopathic Educators	Only via COEI rep	Important to gain insights from those working in osteopathic pre-registration education in direct teaching/clinical roles, rather than just those in SMT positions	COEI are represented on the SRG but this will not include insights, necessarily, from those working in day to day teaching and clinical tuition directly with students.	We will aim to arrange a session with educators from various OEIs as part of the consultation process.
Osteopaths working in NHS settings	Not specifically though recent grad	Although representing a small percentage of those on the register, there are increasing numbers of osteopaths	Insights from two osteopaths working in NHS settings have contributed to the development of the draft	Seek specific feedback from those working in the NHS – if sufficient interest, arrange online

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
	on SRG works in NHS	working in an NHS setting in various roles	updated GOPRE and Standards.	group meeting or individual conversations to gain feedback.
Osteopaths with a particular interest in issues regarding equality, diversity and inclusion	No	There are osteopaths who, because of their particular experience in whatever roles/s they work in have a helpful insight into EDI issues, especially relating to education and the outcomes which students should meet in this respect	During the development of the draft updated GOPRE and Standards of Education, we ran sessions to seek feedback from osteopaths with an interest and experience in EDI issues during the consultation process. This was instrumental in helping us include EDI issues more explicitly within the document.	Those who participated within the focus groups during the development phase will be specifically contacted to make them aware of the consultation, and to invite further feedback if they wish
Regional osteopathic groups	No	There are a number of regional groups who provide both insights into particular aspects of clinical practice, and also a community of practice	No specific feedback from regional groups was sought during the development of updated GOPRE and Standards of Education	Regional group leads will be specifically contacted to draw attention to the consultation process, and to raise awareness amongst their memberships

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
Registration assessors, Assessors of Clinical Practice and QA Visitors	No	Registration assessors consider applications to join the GOSc register from osteopaths who trained abroad. This may include an assessment of clinical practice. Such applications and assessments are considered against the Osteopathic Practice Standards RQ Visitors assess the quality of osteopathic education and training	The GOPRE review was outlined during QA visitor training sessions, but not in detail, and no specific feedback sought	Registration assessors and QA Visitors will be specifically invited to contribute to the consultation process on an individual basis Aim to run specific online feedback session for Assessors/Visitors as part of consultation
Other health and care regulators and professional bodies: General Chiropractic Council General Dental Council General Optical Council General Medical Council General Pharmaceutical Council	No (other than CSP)	Helpful to seek insights from other healthcare regulators on pre-registration outcomes and education standards to ensure that these are broadly consistent with the wider healthcare education sector	Other than CSP representative on SRG, no direct feedback was received during the development phase, though the education standards and outcomes of each regulator were collated and analysed in relation to the developing drafts to ensure that these remained	All will be informed of the consultation process and invited to respond. With other consultations, we have asked one regulator for more specific feedback to ensure that we have heard from at least one

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
<p>Nursing and Midwifery Council Health Professions Council Pharmaceutical Society of Northern Ireland.</p> <p>Professional Standards Authority</p> <p>QAA</p> <p>Centre for the Advancement of Interprofessional Education (CAIPE)</p> <p>Higher Education Academy (HEA)</p>			consistent with the wider sector.	in some detail, and will aim to do this again
<p>Four UK Health Departments</p> <ul style="list-style-type: none"> Department of Health and Social Care, England Scottish Government Health Department 	No	To inform of work undertaken		Inform of updating guidance and development of Standards of Education

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Stakeholder	Reference group representation? Yes/No	Key issues	Method of contacting/seeking feedback	Actions to be taken during consultation
<ul style="list-style-type: none">• Department for Health and Social Services, Wales• Department of Health, Social Services and Public Safety, Northern Ireland				