

**Policy and Education Committee****Minutes of the 20<sup>th</sup> Policy and Education Committee held in public on  
Wednesday 9 March 2022, hosted via Go-to-Meeting video conference***Unconfirmed***Chair:** Professor Deborah Bowman**Present:** Daniel Bailey  
Sarah Botterill  
Dr Marvelle Browne  
Bob Davies  
Elizabeth Elander  
Dr Joan Martin  
Professor Raymond Playford**Observers with****speaking rights:** Dr Jerry Draper-Rodi, Director Designate, National Council for  
Osteopathic Research (NCOR)  
Sarah North, Head of Policy, the Institute of Osteopathy (iO)  
Ian Fraser, Council for Osteopathic Education Institutions (COEI)  
Michael Mehta, the Osteopathic Alliance (OA)**In attendance:** Steven Bettles, Policy Manager, Professional Standards  
Fiona Browne, Director of Education, Standards and Development  
Rachel Heatley, Senior Research and Policy Officer  
Kabir Kareem, Quality Assurance Liaison Officer (QALO)  
Sheleen McCormack, Director of Fitness to Practise  
Matthew Redford, Chief Executive and Registrar  
Marcia Scott, Council and Executive Support Officer  
Holly Sheppard, GOsC Project / Operations Manager, Mott  
McDonald**Observer/s:** Dr Bill Gunnyeon, Chair of Council  
Simeon London, Registrant Member of Council**Item 1: Welcome and apologies**

1. The Chair welcomed all to the meeting. Special welcomes were extended to Simeon London, Registrant Member of Council, and Sarah North, Head of Policy, the Institute of Osteopathy, and Holly Sheppard, Mott McDonald.
2. Apologies were also received from Nick Woodhead, Maurice Cheng, Chief Executive, iO.

## **Item 2: Minutes and matters arising**

3. The minutes of the meeting 7 October 2021 were agreed as a correct record.

### **Matters arising**

4. Item 5: GOsC Position about protection of title and osteopathic practice: It was noted that the GOsC Council had received an update at its February 2022 meeting and that plans were in place for the GOsC Prosecution Policy to be updated.

## **Item 3: Osteopathic Practice Standards (OPS) Implementation**

5. The Policy Manager introduced the item which considered the implementation of the Osteopathic Practice Standards.
6. The key messages and following points were highlighted:
  - a. The current version of the Osteopathic Practice Standards (OPS) was implemented from 1 September 2019 and since then has been supported with a range of activities and the consideration of future plans.
  - b. The CPD evaluation survey suggests it is becoming routine for osteopaths to use the OPS when planning and recording their CPD.
  - c. The CPD evaluation and implementation analysis suggests that osteopaths are getting much more confident with the OPS with high percentages of self-declarations across its four themes.
  - d. The NCOR concerns and complaints report shows a reduction in communication concerns, although there is an increase in boundaries concerns. In response, a series of boundaries scenarios have been developed and published in the ebulletins. The scenarios promote awareness of the types of boundaries issues which might arise in practice.
  - e. Presentations will be given to first year undergraduate students at all Osteopathic Education Institutions this year.
  - f. Forward-looking activity includes:
    - continuing to develop and promote resources and/or guidance about professional boundaries.
    - piloting of a range of resources developed to promote and support values-based practice and shared decision making.
    - promoting the use of the OPS and guidance as a framework for informing professional judgement and decision making.
    - increasing engagement with regional groups.

7. In discussion the following points were made and responded to:

- a. Members welcomed the report and noted the progress and positive impact of the OPS. The engagement with regional groups was particularly welcomed.
- b. Members were informed that as well as presentations to first-year students, there are also presentations to students during subsequent years of study. More bespoke presentations are available to the OEIs for second and third-year students dependent their curricula and the specific needs of the institution.
- c. Members were advised that currently questions at the point of registration and registration renewal were only those which are stipulated within the rules relating to character, health, insurance, and CPD. Questions on demonstrating compliance with the Information Commissioner's data protection requirements are currently not part of the registration/registration renewal process and to do so would require the consideration of Council.
- d. It was explained the guidance concerning advertising (OPS D1: Standard on honesty and integrity) says that advertising must comply with the guidance of the Advertising Standards Agency which sets out what osteopaths can claim to treat and includes the treatment of children and babies.
- e. Members were advised that there is a substantial amount of supporting information concerning the OPS as well as CPD located on the public website. It was acknowledged that locating and accessing some of the information might occasionally require some searching, but it was noted that a substantial amount of work goes into promoting the information through ebulletins and other media. Work on improving signposting and making information accessible is ongoing.
- f. It was highlighted that the regional groups are attracting much wider participation via online platforms not only within the UK regions but also with participation from European colleagues which adds to the sense of community building and support.

8. The Chair in summary noted:

- a. The development of the professional, the stages of development and how to link the developmental journey.
- b. the influence and impact within a system and the ways that GOSc might facilitate confidence and capability in relation to standards defined within a system.
- c. How best does the organisation signal priority areas of the OPS?

**Noted: The Committee considered and noted the work undertaken and planned in relation to the implementation of the Osteopathic Practice Standards.**

#### Item 4: Student role in RQ Visits

9. The Policy Manager introduced the item which concerned the role of students in relation to Recognised Qualification (RQ) visits.
10. The key messages and following points were highlighted:
  - a. The paper explored the potential role of external students in Recognised Qualification visits and the potential benefits and challenges of utilising students as visitors or as observers
  - b. The student voice does exist by way of feedback provided through RQ visits, but it is thought there are cases where students might be more actively involved as a visitor.
  - c. The GOsC have never previously used students as visitors on an RQ visit and technically this might be possible. There would need to be careful consideration of the potential benefits and challenges in utilising students as visitors or observers.
11. In considering the potential benefits and challenges the following comments from Mott McDonald were highlighted:
  - A single student Visitor may not be wholly representative or provide a representative voice.
  - At what point does the QA provider accept student visitors during the student journey?
  - The additional costs including: the increased number of visitors that comprise an RQ Visit team, scoping how to include student visitors/observers in the process, making the changes to the RQ Visitor process, and the development and delivery of training.
  - The issue of conflicts of interest for a student and the need for more than one student to be available as a visitor / observer to ensure inclusion in all RQs.
  - The need for the wider involvement of students at RQ visits, not just student representatives or students identified by the OEI to be included in the RQ visit.
12. In discussion the following points were made and responded to:
  - a. Members supported, in principle, the role of Student Visitors / Observers as part of the quality assurance process and as part of the Visitor teams.
  - b. It was agreed that to avoid conflicts of interest a pool of Student Visitors would be required and to ensure this a wide-reaching campaign to recruit and appoint appropriate candidates would have to take place. In the long-term student participation as Visitors or as observers could be positive and lead to wider interest in the work of the GOsC including the roles on Council, and its committees.

- c. It was agreed that the scope of the Student Visitor role should be clearly defined, and the associated responsibilities be clear to those students who might consider these roles.
  - d. It was suggested a student's ability to fully participate as a visitors would be challenging. Students who had completed a number of years study might be better might be better placed to be considered for Visitor roles, but it was also suggested that those in the first year might also be considered while they established themselves during the initial year. It was noted that for all students challenges would remain with the timing of RQ Visits and the requirements of the academic year.
  - e. It was noted that the workload and responsibilities associated with the role of a Visitor would need to be made clear to students who might consider these positions. The impact on combining study with the roles would be challenging and need to be taken into consideration. It was also noted that the frequency in which a student might be able to participate as a Visitor might be limited.
  - f. It was suggested that the role of students as observers was equally important as Visitor roles and might be a preferred approach which would also benefit the RQ process.
  - g. It was pointed out that in comparison to larger institutions a difficulty for the OEIs is that they are small and may not have board level student representation. It was noted that within some higher education (HE) institutions there are Student Union members who hold HE governance roles and, in moving forward, this was an idea to be explored within the osteopathic community as well as developing remunerated student governance roles and developing a pool of student observers/visitors.
  - h. Simeon London provided perspective as an Education Visitor (Mott McDonald), Reviewer (Quality Assurance Agency) highlighting the following:
    - Student representation on reviewing panels is now commonplace.
    - Student reviewers/visitors are constrained to reporting on issues concerning the student experience and student learning process.
    - Post-graduate students are also contracted as visitors/reviewers including those with recent experience in HE education or those undertaking post-graduate qualifications.
    - Student visitors/reviewers can have backgrounds in other clinical based courses such as physiotherapy which has a larger pool of students who may be interested in Visitor roles.
13. The Chair suggested that the Executive develop a proposal for capturing the student voice through Student Visitors, Student Observers, and other methods.

The report and proposal should include options for recommendation to PEC for a decision.

**Noted: The Committee considered and noted the options for increasing the student voice in relation to Recognised Qualification visits.**

**Agreed: The Committee agreed that the Executive will develop a proposal with options for capturing the student voice by way of Student Visitors, Student Observers and/or other methods. The proposal should include recommendations for a decision by the Committee.**

#### **Item 5: NESCOL: Renewal of RQ – RQ Specification and Visitors**

14. The Quality Assurance Liaison Officer (QALO) introduced the item which concerned the approval of the Review Specification for the renewal of the Recognised Qualification (RQ) review at the North East Surrey College of Technology (Nescot).

The item also considered the appointment of the Visitors for Nescot's Recognised Qualification Review.

15. The key messages and following points were highlighted:

- a. The qualifications which Nescot currently provides are due to expire on 31 August 2023. To renew the recognition of the qualifications before they expire, a GOsC Review should commence by October 2022.
- b. Nescot's RQ approval for the Master of Osteopathic Medicine (MOst) and Bachelor of Osteopathic Medicine (BOst) is from 1 November 2018 to 31 October 2023 and has two specific conditions and three general conditions attached.
- c. The visit has been scheduled to take place from Tuesday 18th October - Thursday 20th October 2022 and will explore:
  - Impact of Brexit and the future of the Certified Prior Learning (CPL) pathway to entry.
  - The teach out plans for the current programmes validated by Kingston University.
- d. The proposed Visit Team listed are confirmed as having no conflicts of interest in relation to the institution:

<b>Name</b>	<b>Role</b>	<b>Organisation</b>
Dr Lucy Mackay Tumber	Osteopath	The London School of Osteopathy
Robert Thomas	Osteopath	BCNO Group
Jill Lyttle	Lay visitor	Independent

16. The following points were made and responded to:

- a. It was confirmed that NEScot are aware that they are to be reviewed against the criteria of the new Standards for Education and Training, to be implemented from September 2022.
- b. It was confirmed that NEScot is in the process of changing its validating institution to the Southbank University. The current RQ programme validated by Kingston University is being taught out and there will be no adverse impact to the programme.

**Agreed: The Committee agreed the review specification for Nescot's renewal RQ Review.**

**Agreed: The Committee agreed the appointment of Dr Lucy Mackay Tumber, Robert Thomas, and Jill Lyttle as Visitors for the Master of Osteopathic Medicine (MOst) and the Bachelor of Osteopathic Medicine (BOst) offered by Nescot**

**Item 6: London College of Osteopathic Medicine (LCOM): Renewal of RQ – RQ specification and Visitors**

17. Bob Davies declared an interest and did not participate in this discussion.
18. Holly Shepherd, Mott McDonald, informed the Committee that it had not been possible to schedule RQ Visitors for the LCOM visit planned for the June/July 2022, due to the lack of available Visitors from the pool. Alternative dates are being considered for July 2022 or September 2022, dependent on pool availability. New Visitors are also being recruited. The Committee were given an assurance that the visit would take place within the renewal of specification timeframe.
19. The Director of ES&D informed the Committee that due to a reduction in the Visitor Pool it was necessary to wait for new Visitors to be recruited. In a worst case scenario, it was possible that if the visit did not take place by the end of September 2022 the timetable for the renewal of the RQ would be delayed and would not be met before its expiry date. However, whilst not ideal, even in this case the renewal timetable would be achieved by the time of student graduation which was the relevant point for the purposes of registration.

**Noted: The Committee noted the delay as outlined. The Executive and Mott McDonald will keep the Committee informed of progress.**

**Item 7: Fitness to Practise (FtP) Publication Policy**

20. The Director of Fitness to Practise introduced the item which invited the Committee to consider the discussion paper on the GOsC Fitness to Practise publication policy relating to publishing interim order determinations of the FtP Committees.
21. The key messages and following points were highlighted:

- a. The GOsC Fitness to Practise Publication Policy which has been in place since 2013. The policy focusses on the length of time that notices of decisions should appear on the public website.
- b. The policy provides that ISO decisions made by the Investigating Committee (IC) and the Professional Conduct Committee (PCC) should be published and a note of the suspension should be made against the registrant's entry on the online register.
- c. The policy distinguishes between the two types of ISOs that can be imposed by the Professional Conduct Committee
- d. The publication of FtP decisions will generally be in the public interest but do differ across the health regulators. Publishing decisions enables members of the public, including current and future patients, employers, and colleagues, to know when there has been concern about an osteopath's fitness to practise.
- e. In considering the options the Committee should note the risks in the level of detail which is published:
  - The publication of the determinations could potentially hamper an external investigation by the police or another body.
  - The publication could potentially influence another witness and influence evidence a witness might give.

Conversely, there are victims and patients who, after reading the outcome of ISO hearings, have come forward with their experiences and in turn assisted the police and other investigations.

- f. It should be noted that two interim order decisions have recently been published on the GOsC website and, to date, it is reported that over 300 views of the decisions have been recorded demonstrating that there is interest in the publication of this information.

22. In discussion the following points were made and responded to:

- a. It was noted that ISO determinations could include less detail with the advice that the individual in question was not permitted to practise, but it was recognised the inclusion of details pertaining to the ISO could encourage other potential witnesses to come forward and could also impact on outcomes/views. It was agreed there is a fine balance to be considered in what and how much detail is published.
- b. It was explained that the decisions made in relation to an ISO could either be published as basic information; that an individual has been suspended on an interim basis, or for the FtP Committees to provide a more detailed summary for publication. Whichever the option, the criteria would have to be consistent and transparent.



- c. It was noted that if it is the aim of the policy to primarily benefit patients and the public there should be clear signposting to the relevant information. It was also suggested that having information that was consistent and transparent would be an advantage for patients.
  - d. It was explained that the length of time substantive orders remained on the website had been a decision agreed by Council, but this could be reviewed in due course.
  - e. It was confirmed that the PSA recommendation is that histories relating to fitness to practise proceedings remain published with no expiry date. It was suggested that consideration might be given to the threshold criteria for publication of ftp determinations but there was concern that this could introduce more complex judgements into process which is already complex.
  - f. It was noted that there are clear differences in approaches to the publication of ISOs by the health regulators, but alignment could be useful to enable a view of the proportionality of actions while also recognising the differences in approaches and statutory schemes. Highlighting the schemes of other regulators provides a measure on which to consider the options for a transparent and consistent GOsC publication policy.
  - g. It was agreed that there are a number of complexities requiring careful consideration in reviewing any change to the GOsC FtP Publication Policy. It was noted that a review of the publication policy is required, and the PEC discussion is the beginning of a process to ensure patient/public protection and to ensure and maintain transparency. It was noted that any changes and/or approaches to be taken would in any event require a consultation.
  - h. It was considered that to publish the summary of a determination might mitigate the risk of witnesses and potential witnesses being inadvertently influenced if accessing decisions online. Conversely, summarising could create more issues and questions for patients and have an adverse impact on registrants, therefore seeking proportionality could create further complexity. It was agreed that the publication of an ISO in whatever form would have an impact and raise a number of issues and therefore would require careful consideration on the approaches to be taken if changes are to be implemented.
23. The Director thanked the members for their consideration and comments. The Committee would be kept informed on developments of the publication policy.

**Noted: The Committee considered and noted the FtP Publication Policy.**

### **Item 8: Public and Patient Involvement (PPI) in education project update**

24. Rachel Heatley, Senior Research Officer, introduced the item which gave an update on patient engagement within osteopathic education.
25. The key messages and following points were highlighted:
  - a. Engagement continues with the osteopathic education institutions (OEIs) to develop best practice in patient and public involvement in education.
  - b. Key work to date has included a patient and public involvement (PPI) survey with all nine education providers and a PPI workshop in conjunction with General Chiropractic Council (GCC).
  - c. The GOsC is currently working with individual education providers to understand the barriers and enablers to embedding PPI more widely in their work and what support or resources they might require in overcoming any barriers. Information provided through the annual reporting round has been helpful.
  - d. Of the two interviews with PPI leads to date it is noted that the COVID 19 has have hampered efforts, but it is also noted that the OEIs are at different stages, with diverse patient profiles and differing levels of resource. The aim of the interviews therefore is to understand where there is commonality and where support is required.
26. In discussion the following points were made and responded to:
  - a. Members commended the work undertaken to date.
  - b. The Committee was informed that the patient engagement project currently has a budget of £13,000. This would be reviewed to identify specific needs in next budget round. To date the foremost costs incurred have been the time spent on the project. Once there is a clear sense of the specific issues and solutions required to progress then budget requirements would be identified.
  - c. The culture of the institutions so far has not been an issue for the work concerning PPI. But it was noted that this process was independent of the quality assurance process at this time. Any issues identified have related more to levels of resource. It was noted that a positive outcome of the workshop held in March 2021, was that OEI attendees were able to return to their institutions and adopt the PPI activity which suited the respective OEI. It was added that the profile of patients also has an impact on engagement dependent on the patient demographic and socio-economic background.
  - d. It was noted that although the OEIs have access to their own pool of patients within their clinic's challenges remain in recruiting patients to engagement

projects. The institutions are looking to understand how best to approach and engage their patients in other ways. It is acknowledged that there has been limited discussion about the level of diversity and this would be addressed in future interviews. It was noted that the patient profile is different dependent on the geographic location of the OEIS.

- e. It was noted that COEI supports the work being conducted relating to PPI and would look to collaborate through the pooling of resources and possibly centralise some the functions.

**Noted: The Committee noted the progress and the future plans to support osteopathic education providers to embed patient engagement in their institutions.**

### **Item 9: Boundaries: communications plan and activities**

27. The Policy Manager introduced the item which gave an update on the communication plan, work undertaken and planned, and success measures in relation to boundaries related issues.

28. The key messages and following points were highlighted:

- a. The paper outlined the boundaries communication project plan, with an overview of activities undertaken and planned, to raise awareness of and support professional practice and decision making in this area.
- b. The latest NCOR analysis of concerns and complaints data indicates an increase in boundaries issues although the numbers remain small.
- c. The aims of the boundaries communications project plan include the raising of awareness, helping osteopaths and education institutions understand the issues and to help demonstrate the need for the use of professional judgement.
- d. A range of activities were undertaken in 2021 (case scenarios, video, and blog) and will continue with activities throughout of 2022.

29. In discussion the following points were made and responded to:

- a. It was noted that registrants who have concerns or express uncertainty will, in many cases, reach out and seek advice concerning boundaries issues and the impact of osteopathic techniques in practise.
- b. It was commented that the OEIs are key in the discourse concerning boundaries. It was noted that the OEIs do have well developed professionalism courses and modules which are integrated throughout their programmes, but it was acknowledged there needed to be an awareness that there are sometimes hidden curricula issues that can have an impact on delivery.

- c. In relation to CPD activity although it might not be recognised as such registrants do cover 'professionalism' issues, but this might be identified under the banner of 'communications' and has an impact on all areas in the delivery of osteopathic care.
- d. It was agreed that the patient voice should be included in the discussion on boundaries to better understand the patient perspective, and what they expect from the profession and practitioners. The Committee was informed that the 2018 YouGov survey, 'What gives patients confidence in professional' is included in presentations to give some perspective on expectations. Although there has been progress with patient engagement substantial care would be required if patients were to participate in presentations concerning boundary issues.
- e. It was suggested that the those who might be in most need of training/information concerning boundaries might be the hardest to reach therefore ensuring a breadth of resources available was significant.
- f. The Committee was informed that the University College of Osteopathy has received £10,000 from Knowledge Exchange to support the development of training and resources for Educators and osteopaths concerning the issues boundaries.

**Noted: The Committee considered the content of the paper**

### **Item 10: Updates from Observers**

- 30. The observers with speaking rights were invited to give updates on their respective organisations. The following points were highlighted:

#### **Council of Osteopathic Education Institutions (COEI):**

- a. It was confirmed that Steph Edghill had been appointed to the role of COEI Executive Administrator. She has a background in education and will also bring her commercial experience to the role.
- b. As COEI becomes more active it will be undertaking some legislative housekeeping and will be building a platform to better contribute and collaborate with other stakeholders including the GOsC.
- c. The next meeting of COEI will be held during week commencing 14 March 2022.

#### **Institute of Osteopathy (iO):**

- a. Thanks were offered to all who attended the Evolving Careers Workshop, 2 March. Work will continue with the next steps following on from the event.
- b. Work on the development of the iO Roadshows for 2022 are underway.

- c. The iO are working on an equality, diversity and inclusion (EDI) project for the organisation and members to develop a toolkit for members to ensure they are adhering to requirements.
- d. Work on a review of service standard based on the Care Quality Commission's system of inspection of premises. The GOsC/PEC will be updated on the work as it continues.
- e. A CPD Webinar is planned for 22 March 2022, and will be hosted by Glynis Fox, iO Chair with GOsC representation.
- f. Work continues with Health Education England and the NHS. It was also reported there has been an increase in the number of job vacancies specifically aimed at osteopaths.

### **The Osteopathic Alliance (OA):**

- a. A number of OA members attended a QAA/EDI workshop. The OA is now looking at how to embed and progress the learning from the event.
- b. There is continuing engagement with GOPRE process. The Committee and Executive were thanked for the discussions which had taken place and progress that had been made.
- c. There will be a change of delegates representing the Osteopathic Alliance as the three-year terms of office end including the delegate for the PEC. The Chair on behalf of the PEC thanked Michael for his contributions to the Committee as the OA representative and wished him well future.

### **National Council for Osteopathic Research (NCOR):**

- a. A strategic review meeting was held at the beginning of February 2022. The meeting was well attended and included representatives from HEE, the OEIs, and others. There was consensus for the three-year strategy which is currently being finalised.
- b. A governance review of NCOR has been undertaken and gaps identified which are being addressed.
- c. In January NCOR provided support to the Osteopathic Foundation (OF) for their grant application and review processes. It was the first time NCOR had engaged with OF in this way and beneficial to both organisations.
- d. Projects include:
  - The development of a practise-based research network for clinicians to engage with research. Funding has been secured from the University College of Osteopathy for the pilot.
  - Qualitative research is to be conducted with the faculty at Swansea University to look at the stakeholder's staff base to engage with more academic work.
  - An online seminar is to be delivered summarising recent evidence useful in clinical practise is to be piloted in partnership with London School of Osteopathy (LSO) for staff and students. The project pilot if successful will be offered to other stakeholders.

- With the iO, NCOR is looking at how to promote osteopathy in Scotland and to attain AHP status.
- As Chair of the of the Quality Assurance Agency (QAA) Subject Benchmark Statement Review for Osteopathy due to issues the recruitment of advisory board members it has become necessary to pause the review. Once this is resolved the review process will resume.

### **Item 11: Any other business**

31. The Chair on behalf of the Committee paid tribute to Dr Joan Martin, whose eight-year tenure as a member of Council and of the Policy and Education Committee would end, 31 March 2022. The Chair thanked Joan for her service and support to the GOsC and her colleagues during her eight-year tenure as a member and wished her well for the future.

### **Date of the next meeting:**

Monday 4 April 2022 at 10.00 (Supplemental)

Thursday 16 June 2022 at 10.00