

**GENERAL OSTEOPATHIC COUNCIL  
Business Plan  
April 2019-March 2020**

**Monitoring to 31 October  
2019**

# Annex A to 6

## GOsC BUSINESS PLAN 2019-20 Themes

1. Assuring the quality of osteopathic education and training.
2. Registering qualified professionals and assuring their continuing fitness to practise.
3. Setting, maintaining and promoting high standards of practice and conduct.
4. Protecting patients and the public through transparent and proportionate fitness to practise processes that reflect best practice.
5. Supporting the ongoing development of the osteopathic profession.
6. Maintaining high standards of governance and regulatory practice.

This document, the Business Plan 2019-20, sets out the aims and detailed activities for the period April 2019 to March 2020, in support of each of the themes.

### Legend

**Status**      ● **On track**      ● **Minor delay**      ● **Cancelled/postponed**  
**Change**      ↑ **Positive**      ↓ **Negative**

<b>Theme one: Assuring the quality of osteopathic education and training</b>				
<b>Core Goal: Working with our quality assurance partner and UK osteopathic educational providers to ensure that recognised qualifications are only awarded to students who are able to practise in accordance with the Osteopathic Practice Standards (OPS).</b>				
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>	<b>Status</b>	<b>Comments</b>
Agree business case and procurement strategy for quality assurance for 2020 to 2025.	Professional Standards, Registration and Resources, Chief Executive	July 2019	●	Complete.
Complete quality assurance procurement and appoint contractor.	Professional Standards, Registration and Resources, Chief Executive	March 2020	●	Tender finalised and advertised on 30 October 2019.
Publication of updated Visit Handbook.	Professional Standards	June 2019	●	Handbook published April 2019.
Removal of RQ dates and publication of conditions and action plans for eligible osteopathic education providers.	Professional Standards	July 2019	●	Two RQs without expiry dates to be considered by Council in November 2019.
Review current levels of assurance provided by existing quality assurance method including strengths and weaknesses and explore mechanisms for enhancing assurance and informing QA activities.	Professional Standards	June 2019	●	External examiner thematic review findings considered by OEIs and PAC on 12 June 2019.
Review and update risk-based approach to quality assurance including visit and monitoring strategy 2020 to 2025.	Professional Standards	March 2020	●	Ongoing.
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	Professional Standards	Ongoing	●	Conditions and requirements and action plans considered by the PAC in March, June and October 2019. February 2019

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and disseminating findings, feedback and good practice to the sector; monitoring action plans, conditions and requirements.				RQ considered at PAC 12 June 2019. Training took place in September 2019 and appraisals ongoing.
Embed OPS (2018) (including promoting professionalism and raising understanding and awareness of regulation) within educational provision and quality assurance framework (including update report to PAC about mechanisms for implementation, engagement with students, staff and providers, visitor training, and ongoing monitoring ahead of RQ visits)	Professional Standards	Ongoing	●	PAC considered implementation and evaluation of OPS report in March 2019. Presentations to faculty and students, iO Roadshows, Convention and regional groups and webinars ongoing. Ongoing articles and resources published. Implementation of CPD scheme ongoing.
Commence review of the Guidance for Osteopathic Pre-registration Education.	Professional Standards	March 2020	●	Terms of reference for GOPRE and standards for education and training considered by PAC in October 2019.
Identify and continue to share areas of good practice in osteopathic education and training.	Professional Standards	Ongoing	●	Good practice has been identified from the 2018 annual reports has been circulated.
Work with educational providers to understand and develop best practice for the involvement of patients in osteopathic education (working in partnership with the General Chiropractic Council).	Professional Standards	October 2019	●	The GOsC and GCC survey feedback has been analysed and a draft report has been prepared for sharing with the GCC and educational institutions.
Work with the Council of Osteopathic Educational Institutions and educational providers to support the development of osteopathic educators.	Professional Standards	March 2020	●	The first meeting of the COEI Society/Group of Educators Steering Group took place in March 2019 and plan has been developed. COEI and GOsC are

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				facilitating a workshop for educators and the iO Convention on 1 November 2019.
Work with patients and osteopathic education providers to continue to support the further development of patient participation 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 2019	●	A seminar disseminating the findings from our public and patient involvement in osteopathic and chiropractic education with educators and patients, identifying and sharing good practice is planned for early 2020.
Identify any external issues relating to education and training that impact on current objectives and review plans accordingly.	Professional Standards	All year	●	Additional questions have been agreed in the 2019 Annual Report from the osteopathic educational institutions in relation to: areas of development updates; quality assurance and governance processes; implementing the new OPS; educators' data; equality and diversity data and student protection plans. These have arisen in response to matters discussed by PAC over the past year.

<b>Theme two: Registering qualified professionals and assuring their continuing fitness to practise</b>				
<b>Core goals: Maintaining an accurate and up to date Register, including processes for recognition of international applicants. Completing the roll-out of the new CPD system across the whole profession.</b>				
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>	<b>Status</b>	<b>Comments</b>
Introduce a tool for Primary Source Verification of qualifications which can be used by GOsC Registration and by osteopathic educational providers.	Registration	July 2019	●	Paper about primary source verification considered by the GOsC/OEI meeting on 29 April 2019. Online platform rolled out to OEIs.
Continue to review the international registration application pathways to ensure compliance with relevant legislation post the UK's EU-Exit (if necessary).	Registration, Professional Standards	All year	●	
Ensure compliance with the Osteopaths Act 1993 and the underpinning Registration Rules and identify enhancements to existing registration processes, including through the use of IT.	Registration	All year	●	
Ensure the quality of registration assessments, including engagement, training and appraisal of GOsC registration assessors and return to practice reviewers, moderation meeting facilitation and regular communications and evaluation.	Professional Standards, Registration	All year reporting to June PAC	●	Appraisals completed with feedback helping to inform future training.
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, including reviewing and improving registration guidance.	Registration, Professional Standards, Communications	All year	●	Ongoing. Feedback has been used to update our registration assessment guidance and this was recently subject to public consultation.
Conclude, analyse and report on registration assessment consultation for internationally qualified applicants and engagement with stakeholders.	Professional Standards, Registration and Resources	June 2019	●	The consultation was published in April 2019 and considered by Council in July 2019 ahead of the updated OPS coming into force in September 2019.

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Finalise updated registration assessments for internationally qualified applicants so that from 1 September 2019, the assessments incorporate the Osteopathic Practice Standards (2018) (including transition and implementation arrangements).	Professional Standards, Registration and Resources	July 2019	●	As above.
Chair and lead the inter-regulatory Registration Group to share experiences and best practice.	Registration and Resources	All year	●	Meeting held in October 2019. Possibly joint meeting with AURE group for March 2020.
Monitor activity of individuals removed from the Register during 2018-19 and 2019-20, 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	●	
Work with patients, registrants and others to promote awareness, accessibility and usability of the Register, and to provide assurance about the Register and our registration processes.	Communications, Registration and Resources	March 2020		
Analyse and report on the ongoing implementation and evaluation of the CPD scheme using various data sources including: CPD Evaluation Survey; digital statistics; feedback from osteopaths during engagement events and activities; queries received; and feedback from patients and the public.	Professional Standards, Registration and Resources, Communications	October 2019 and March 2020	●	Paper considered by PAC in October and to be presented to Council in November. The CPD Evaluation Survey was launched in March 2019 and closed in July 2019.
Ensure registrants experience a seamless transition from the one-year CPD scheme to the new three-year cycle, including clear and reassuring communications about the requirements, and the availability of online resources/further information.	Registration, Communications	By October 2019	●	All registrants have been sent a mailing confirming that they are now on the new scheme together with a highly designed informative/accessible booklet.  This is supported by regular features on transitioning to the scheme in the monthly news eBulletin and The Osteopath magazine.

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Ensure registrants in the first year of their three-year cycle experience a seamless transition into year two of the cycle, including clear and reassuring communications about the requirements, and the availability of online resources/further information.	Registration, Communications	From October 2019	●	
Collect, analyse and report on data about activities undertaken by registrants in year one of their CPD cycle and provide feedback to registrants and update materials/advice as necessary.	Registration, Professional Standards, Communications	From December 2019	●	
Support and empower osteopaths to undertake the new CPD scheme through a programme of ongoing supportive communication and engagement, updating of existing resources and development of new resources, available in a range of accessible formats, based on feedback from scheme participants.	Professional Standards, Communications	Ongoing	●	Ongoing materials and activities on the CPD website and in The Osteopath magazine supported by a programme of face to face and online engagement including iO Workshops and Convention.
Support new graduates making the transition into practice through better understanding of the barriers and enablers to building communities and consideration of next steps.	Professional Standards, Registration and Resources, Communications	March 2020	●	An online focus group will be held in early 2020 with new graduates who have been practising for less than 12-18 months.
Continue to work with stakeholder organisations (including CPD providers) to help osteopaths prepare for and undertake new CPD scheme (including peer discussion review).	Professional Standards, Communications	March 2020	●	Ongoing.
Finalise and implement verification and assurance strategy for completion of CPD year 1 verification and assurance activity.	Professional Standards, Registration	December 2019	●	A verification and assurance workshop has taken place and forms for undertaking the various verification activities are under development. This work is being overseen by the CPD SMT Task Group. See CPD Council paper to November 2019 Council.



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Begin verification and assurance activity for osteopaths who have completed year 1 of their first CPD cycle.	Registration	January 2020	●	
Work with patients to promote among osteopathic stakeholders the value of patient involvement in their own work and, encourage use of patient feedback to inform improvements in practice.	Communications, Professional Standards	All year	●	Patient feedback was the focus of the May/June issue of The Osteopath magazine including for example a case study feature and a practical workbook. Patient feedback content was also promoted in the news ebulletin and via social media. Patients have also been involved in workshops and focus groups.
Update and review CPD equality impact assessment through the implementation period.	Professional Standards	All year	●	
Conclude audit activity of CPD Annual Summary Forms under the old one-year scheme.	Registration	By December 2019	●	
Conduct student presentations and obtain feedback. Continue to review and improve final year student presentations in response to feedback.	Registration, Communications	From January 2020	●	

### Theme three: Setting, maintaining and promoting high standards of practice and conduct

#### Core goal: Promoting the Osteopathic Practice Standards and ensuring that guidance for osteopaths is kept up to date and remains relevant.

Activity	Lead	Timing	Status	Comments
Collaborating with professional indemnity insurance providers, the Institute of Osteopathy and the National Council for Osteopathic	Chief Executive, Professional Standards, Regulation	All year and June 2019	●	Draft report considered by PAC in October 2019. A dissemination workshop with

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Research to understand and report on the prevalence of concerns about osteopaths and practice.				stakeholders is being planned for early 2020 and this will include both response to findings as well as mechanisms to strengthen method.
Deliver communications and engagement plan in run up to OPS coming fully into force including the embedding of OPS into all our communications.	Communications	By September 2019	●	Activity delivered around and including updated OPS coming into force.
Undertake ongoing communications and engagement with all stakeholders to support embodiment of the OPS.	Professional Standards Communications	Ongoing	●	Ongoing face to face and online engagement with stakeholders.
Develop and implement evaluation strategy for the OPS on how osteopaths can embody the OPS as part of good practice including thinking, feeling and behaving in accordance with the OPS.	Professional Standards, Communications	October 2019	●	PAC considered this strategy in March 2019. Ongoing.
Report on evaluation strategy for implementation of the OPS.	Professional Standards, Communications	March 2020	●	PAC considered the implementation and evaluation strategy in March 2019. Ongoing reports and updates will be considered through the year.
Pilot tools to explore effective decision making and whether the values tools provide ways of embedding of standards in practice, helping patients to have positive consultations and make explicit what it important to them in consultations using co-production for shared decision making.	Professional Standards	All year	●	Draft research protocol to progress this research has been commissioned and completed. This will be considered for commissioning research into piloting earlier in 2020. Article recording work to date has been published in the Journal of Evaluation in Clinical Practice.
Disseminate literature review on Communication in the Context of Touch with stakeholders and review and develop next steps to	Professional Standards	October 2019	●	Boundaries workshops held jointly with GCC and GOsC in

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support reduction in concerns in communication and consent and boundaries. Consider response and agree next steps.				Huddersfield and London in March 2019. The findings will be considered and developed into a discussion paper for further consideration of issues and next steps for consideration by PAC.
Work with patients, interprofessional organisations, and other regulators to identify, review and translate examples of osteopaths and other health professionals working with patients to inform interprofessional working and learning in the osteopathic sector and more widely.	Professional Standards	March 2020	●	We are working with the Centre for the Advancement in Interprofessional Education and the GCC to create a call for case studies from Summer 2019 supported by the Comms team.
Continue to develop learning resources and translation of these into a range of diverse and accessible formats to help support osteopaths to raise awareness, understanding and usage of the Osteopathic Practice Standards for osteopaths.	Professional Standards, Communications	All year	●	Ongoing
Update and review OPS equality impact assessment through the implementation period.	Professional Standards	All year	●	
Commission 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	June 2019	●	The research team have conducted initial interviews and are using this to update the survey questions. It is planned that these will be finalised in 2019 and the survey will be launched in 2020. The findings will help to inform the continuing implementation of the OPS and the CPD scheme.

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Collect, analyse and report on generic learning points from fitness to practise hearings to registrants and consider implications and next steps with other stakeholders including patients.	Professional Standards, Regulation	Ongoing	●	A review of fitness to practise determinations has been commissioned and was delivered in May 2019.
Explore need for guidance or resources to support osteopaths engaged in adjunctive/complementary therapies and other stakeholders to understand the application of the Osteopathic Practice Standards.	Regulation, Professional Standards	October 2019	●	Paper considered by PAC in October 2019.
Continue to improve, modernise and promote coherence across our communications channels and products to ensure that they are accessible and engaging, both to reflect and to support our desire to be a forward looking and innovative regulator.	Communications	All year	●	Ongoing.

<b>Theme four: Protecting the public through transparent and proportionate fitness to practise processes that reflect best practice.</b>				
<b>Core goal: Investigating and adjudicating allegations made against osteopaths fairly and proportionately, and in a timely manner.</b>				
<b>Activity</b>	<b>Lead</b>	<b>Timing</b>	<b>Status</b>	<b>Comments</b>
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	●	
Review visibility of information to support participants in hearings and publication of decisions.	Regulation, Communications	All year	●	
Update all fitness to practise guidance documents to reflect changes when updated Osteopathic Practice Standards come into force (including transition and implementation arrangements).	Regulation, Professional Standards, Communications	September 2019	●	Key documents updated.
Update and develop expert witness competences and eligible pool of expert witnesses (working with other relevant bodies and stakeholders).	Regulation, Professional Standards	Ongoing	●	Review of the competences in guidance is currently underway (e.g. review of Academy of Medical Royal College guidance). Paper considered by PAC in October 2019.

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Communicate case learning points, PSA advice, relevant case law and regulatory developments to GOsC Committee members (and arrange training).	Regulation	All year	●	
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 was provided to new IC in October 2019. Training for the PCC is scheduled for 18 November 2019.
Collect and evaluate feedback from fitness to practise hearings, including an evaluation of witness feedback from hearings and the effectiveness of the Rule 8 procedure.	Regulation, Professional Standards	March 2020	●	
Evaluate the effectiveness of the existing PCC bank of conditions and consult on changes where appropriate.	Regulation	September 2019	●	This review has commenced
Develop guidance on drafting allegations for fitness to practise investigations and hearings	Regulation	January 2020	●	
Conclude consultation on draft Rule 19 Practice Note and publish new practice note.	Regulation	July 2019	●	Rule 19 consultation has taken place and outcomes presented to Council in July. Practice note published in September 2019.
Conclude consultation on draft Restoration Guidance for Council approval and publication	Regulation	July 2019	●	The Restoration Guidance consultation concluded on 20 June 2019. The amended draft guidance and consultation responses are due to be presented to Council in November.
Work in partnership with other regulators, Department of Health and Social Care and other stakeholders to implement planned reforms to fitness to practise legislation.	Regulation, Professional Standards	All year	●	We are working with the DHSC and other regulators on instructions for legislation.
Identify any external issues relating to fitness to practise that impact on current objectives and amend plans accordingly.	Regulation	All year	●	From feedback we received from outcomes at hearings, we

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				have identified that updates and amendments need to be made to 2 of our practice notes: the duty to act in public interest and the admission of good character evidence.
Reflect upon and implement, where required, any changes to procedures recommended by the PSA's initial stages audit, the Performance Review or other source.	Regulation	September 2019	●	Work has already commenced on the recommendations from the external audit of our FtP initial stages processes in relation to consolidating guidance to Screeners and arranging training to IC members on providing written reasons which will take place in January/February 2020.

### Theme five: Supporting the ongoing development of the osteopathic profession

**Core goal: Providing leadership and input to the work of the Osteopathic Development Group and the National Council for Osteopathic Research and continuing to support capacity building across the sector in the achievement of patient safety, the enhancement of quality of care and the reduction of concerns and complaints.**

Activity	Lead	Timing	Status	Comments
Contributing to the work of the Osteopathic Development Group, through current projects and supporting the development of new collaborative initiatives that enhance patient safety and/or quality of patient care and the involvement of patients.	Chief Executive	All year	●	Ongoing. The last meeting was 17 September 2019 and the next meeting is 3 December 2019. Key focusses are around resourcing and implementation of key projects so that they become 'business as usual'.

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Continuing to support the National Council for Osteopathic Research and promoting its activities as a means to increase research awareness and research activity within the osteopathic profession.	Chief Executive, Professional Standards, Communications	All year	●	Ongoing.
Promoting the work of the Osteopathic Development Group through the ODG Communications Group in conjunction with the Institute of Osteopathy.	Communications	All year	●	Ongoing. GOsC has hosted all the meetings to date, the last one was on 18 June 2019. Next meeting is 7 November.
Continue to foster sustainable professional networks and learning communities that support professional development and minimise practitioner isolation.	Professional Standards, Communications	All year	●	Ongoing engagement and support for osteopaths to develop links and learning communities via all our channels.
Continue to work with the Council of Osteopathic Educational Institutions to support their proposals to develop the organisation to better meet the needs of the sector.	Professional Standards	All year	●	Ongoing work with COEI and the GOsC/OEI group to support capacity building
Continue to support CPD providers and other osteopathic stakeholders to support osteopaths to undertake the CPD scheme including peer discussion review.	Professional Standards, Communications	All year	●	Ongoing.

### Theme six: Maintaining high standards of governance and regulatory practice

#### Core goals:

- Meeting the PSA's standards of good governance, and complying with PSA, Privy Council, DH and Charity Commission requirements
- Ensuring that the work of the GOsC is undertaken effectively and efficiently

Activity	Lead	Timing	Status	Comments
Provide regular reports to Council on progress against the business plan, and on financial, asset and risk management.	Chief Executive	All year	●	Ongoing

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Review and improve correspondence with registrants to ensure materials being sent from the GOsC are consistent, accessible, clear and professional, with an appropriate tone of voice.	Registration, Communications	All year	●	Ongoing
Support Council in implementing its ongoing development.	Chief Executive	All year	●	Ongoing
Ensure that the GOsC continues to meet its duties under the Equality Act, including reviewing the current Equality and Diversity Policy.	Chief Executive	May 2019 and all year	●	Equality and Diversity Report on July agenda. Ongoing
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	●	Participated in pilot of new PSA standards and evidence framework in the summer.
Complete any new appointments to the governance structure, including where necessary using the appointments procedure approved by PSA.	Chief Executive	All year	●	Ongoing.
Provide induction and ongoing training for new and existing Council members and other non-executives.	Chief Executive, Regulation, Professional Standards	All year	●	Training for Education Visitors took place on 24 and 25 September 2019. Training for registration assessors will take place in Spring 2020.
Prepare an Annual Report on activities undertaken in year and submit to Parliament and publish, plus inform registrants about the contents of the report e.g. how the fee is spent to ensure openness and transparency.	Chief Executive, Registration and Resources, Communications	June to September 2019	●	Annual Report published and laid in Parliament in September. Article due to be published in Nov/Dec The Osteopath magazine
Monitor revisions to the Welsh Language Act and implement existing and potential new requirements as required.	Communications, Chief Executive	All year	●	Paper presented to Council July 2019 to note. Regulators due to meet end Oct/mid Nov to discuss response to new draft standards if they are received end Oct (but this is tbc). Current very tentative



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				timetable has new Standards being implemented in Summer 2020.
Comply with Charity Commission reporting requirements.	Chief Executive	All year	●	Ongoing
Continue to engage with the Department of Health and Social Care and other regulators on the reform of healthcare professional legislation.	Chief Executive	All year	●	We are meeting with and working with DHSC and other health regulators to discuss the reforms to different aspects of regulatory reform including fitness to practise, governance and registration.
Involving patients and the public in our work to ensure a patient centred and co-production approach to regulation.	Chief Executive, Professional Standards, Communications	All year	●	<p>Patients participated in our touch workshops on 25 and 26 March, our fitness to practise workshop on 19 March 2019, and our registration assessment focus groups on 22 May 2019.</p> <p>We are developing an overarching patient engagement plan for implementation in 2020. The aim is to encourage patients to take part in GOsC engagement events, consultations and surveys so that we can better understand the patient perspective. For example, patients will be invited to the NCOR Concerns and Complaints workshop scheduled for March 2020.</p>