



Education and Registration Standards Committee

2 October 2014

Registration assessments – maintaining and enhancing our registration processes

Classification	Public
Purpose	For discussion
Issue	Update on training and appraisal and other mechanisms to ensure that we maintain and enhance the effectiveness of our registration processes.
Recommendations	To consider our approach to maintaining the effectiveness registration assessment processes.
Financial and resourcing implications	Actions outlined in this paper are incorporated into our budget for Registration Assessments for 2014-15.
Equality and diversity implications	Equality and diversity training is an important aspect of our registration assessor and return to practice training.
Communications implications	None
Annexes	Annex A – Assessment of Clinical Performance Checklist Annex B – Osteopathic Practice Standards Master Checklist Annex C – Feedback from Training 2013 Annex D – Guidance on appraisal for registration assessors and return to practice reviewers
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Background

1. We maintain the standards of entry to the register in different ways. For UK qualified graduates, we ensure the quality of their education and training through our process of quality assuring osteopathic educational institutions. We ensure that the curricula are mapped to the *Osteopathic Practice Standards*, and we test delivery of these curricula through the quality assurance mechanisms including periodic review, annual reporting and reporting on an as needed basis on any changes that may impact on the delivery of the standards. These qualifications are 'recognised qualifications' under s14 of the Osteopaths Act 1993. Using our quality assurance mechanisms, we ensure that qualifications awarded by these institutions certify that graduates are able to practise in accordance with the *Osteopathic Practice Standards*.
2. S3 of the Osteopaths Act 1993 and the General Osteopathic Council (Recognition of Qualifications) Rules Order of Council 2000 (as amended) provides that, for osteopaths who have obtained a qualification in osteopathy outside the United Kingdom who do not hold a recognised qualification (quality assured by us), they must satisfy the registrar that they meet our *Osteopathic Practice Standards* (there are some other matters to take into account for those with EU rights or qualifications recognised by other EU countries).
3. Therefore, internationally qualified applicants go through a different process to register with us as we not quality assure their qualification directly within an institution. The registration process for internationally qualified applicants comprises:
 - an assessment of the initial osteopathy qualification
http://www.osteopathy.org.uk/uploads/review_of_non_uk_qualifications_guidance.doc
 - completion of the further evidence of practise questionnaire (which assesses certain aspects of the *Osteopathic Practice Standards*)
http://www.osteopathy.org.uk/uploads/further_evidence_of_practice_guidelines_for_assessors_and_applicants.pdf and
http://www.osteopathy.org.uk/uploads/further_evidence_of_practice-questionnaire.doc)
 - completion of an assessment of clinical performance (which also assess certain aspects of the *Osteopath Practice Standards*)
http://www.osteopathy.org.uk/uploads/assessment_of_clinical_performance_guidelines_for_assessors_and_applicants.pdf).

Please also see the ACP checklist attached at Annex A and the Osteopathic Practice Standards checklist attached at Annex B.
4. Our Business Plan 2014 -15 states that we will 'Undertake GOsC registration assessors and return to practice reviewers appraisal and training to ensure that

they are maintaining the skills required to assess whether registration applicants meet our minimum standards to ensure patient safety.’

5. Our Business Plan 2014-15 also states that we will ‘Scope a review of our registration assessments to ensure that they are fit for purpose.’
6. This paper outlines our approach to ensuring that we maintain the integrity of the register by supporting, training and appraising registration assessors and return to practice reviewers. The paper outlines our progress in this area and also plans for scoping a fuller registration review in combination with the revision of the EU Directive and its transposition into UK law.

Discussion

7. Our registration assessors and return to practise reviewers are a key foundation of the work that we do. They help us to maintain the integrity of the register ensuring that only those who are qualified, meeting our requirements, are registered with us. Recruitment, training and appraisal comprise a part of the way that we ensure that those in our assessor pool continue to be qualified and competent to undertake this important work on our behalf. However, discussions during assessments, moderation meetings, informal feedback and responses, are also integral to this process as they support continual enhancement and learning both for assessors but also for ourselves.

The current process

8. It is important to ensure that feedback about our registration processes is explored and actioned to achieve our goal of ensuring an effective process ensuring that only those qualified and entitled to register with us do so.

Appraisals

9. Appraisals are an important component of ensuring that assessors are up to date in their roles. They provide a mechanism for assessors to seek feedback about their performance from third parties, to use their own reflections on their performance – including areas of strength and development – and to develop plans to maintain and enhance their performance in the role.
10. Last year we undertook appraisals for the first time – facilitated by the Chair of the Registration and Education Standards Committee. It was clear from the appraisals that the original pool of registration assessors and appraisers were passionate about the role that they did and the importance of it. They also shared helpful feedback about how the registration processes worked. Some but not all had sought feedback from their colleagues and from GOsC about their performance to inform their own reflections and CPD plans. In part, this was because of the timing of the appraisals and the development of the appraisal documentation.

11. This year, we plan to appraise all 23 assessors and reviewers (this will include the newly appointed assessors last year who therefore did not have an appraisal last year) using the same developmental approach above. We will then seek formal feedback and then will look to adapt and amend the process accordingly. The draft appraisal documentation is attached at Annex D.
12. It is of note that this pilot appraisal process is not meant to be a 'performance review', more, it is designed to support the assessor to reflect about their own performance informed by feedback that they have sought from the GOsC and from their colleague assessors, and to explore appropriate CPD. The reflection process and feedback from others is important to support continuing enhancement of performance.
13. We will also look to Committee members to support the Chair in undertaking appraisals. We think that it is important to ask lay Committee members to participate in the process to ensure that it remains reflective and encourages assessors to seek osteopathic feedback outside of the appraisal process. Members are invited to volunteer to participate in telephone appraisals which are planned to take place during January and February 2015.

Training

14. Feedback from our training last year is attached at Annex C. Key feedback and our response to date is outlined in the table below. However, we can see that there is still a little work to do ahead of appraisal and training.

Feedback	Response
More case studies for each assessment providing worked examples to aid clarity and consistency and support discussion about good practice in assessment.	<p><i>Action to date:</i> We are gradually collating a bank of anonymised worked examples of good, borderline and below standard cases in each of the assessments to support the assessors in their work.</p> <p><i>To do:</i> We will continue to enhance our bank of cases to prepare for training and to continue to support our assessors in spring 2014.</p>
A flow chart of the process	<p><i>Action to date:</i> A flow chart of the process is in development. Alongside this, some alignment of the documentation and the process is taking place to enhance clarity for assessors and applicants.</p> <p><i>To do:</i> We hope to share this flow chart with the assessors shortly for their comments. To complete the review of our documentation to enhance clarity for assessors and applicants. This will take place ahead of training to ensure the effectiveness of the training.</p>

Feedback	Response
Support at assessments	<p><i>Action to date:</i> Briefing sessions are now organised ahead of each return to practice review and each of the registration assessments to ensure that all assessors are fully briefed and clear about their role. Additional written instructions and timetables have been provided for each assessment to support assessors and reviewers to manage the assessment appropriately. These are also sent to the applicant in advance.</p> <p><i>To do:</i> To ensure that timetables are visible for all on the walls on the day of the assessment. To seek feedback from the assessors about the briefing sessions.</p>
Training on moderation	<p><i>Action to date:</i> Moderation meetings have now been introduced for all stages of the registration assessment process. In the assessment of clinical performance, the role of the moderator is more developed. However, this is new role for the assessment of qualification and further evidence of practice assessments. This role is facilitated by the Professional Standards Administrator and the Professional Standards Manager and to support a discussion between the assessors to explore and share the evidence for their initial views and to build consensus, where appropriate, into a final decision and report.</p> <p><i>To do:</i> To enhance training for all who undertake the moderation role and to evaluate its effectiveness. We anticipate that this will take place as an additional session.</p>
Learning from appeals	<p><i>Action to date:</i> We have had one registration appeal this year which was not successful. However, the professional standards team are working on colleagues from registration and regulation to understand whether there are learning points from this appeal, and if so, how best to communicate these to assessors.</p> <p><i>To do:</i> To confirm any learning from the appeal and to share and discuss this with the assessors as part of ongoing communications and through training.</p>
Opportunities for mentoring and enhanced communication between assessors	<p><i>Action to date:</i> In all assessments and reviews, all newly recruited assessors are paired up with a more experienced assessors. Shadowing for all new ACP assessors before they take up the role of assessor was arranged throughout 2015.</p>

Feedback	Response
	<i>To do:</i> We are exploring enhancements to continued communication between assessors between assessments but also between ourselves and assessors. We will work with the assessor pool to develop this further.
Ongoing feedback from assessments to enhance the process	<p><i>Action to date:</i> We currently receive and record informal feedback from assessors and applicants about our processes. Feedback is recorded on our registration assessment log, reviewed and actioned.</p> <p><i>To do:</i> We do not actively seek formal feedback at this time. We are exploring the development of feedback from assessors and those taking part in the assessment process at the conclusion of the assessment process to ensure that we appropriately encourage feedback on our processes. For example, it is often helpful to reflect on an assessment before fully feeding back – both for assessors and indeed for applicants. We hope to develop and test out formal feedback mechanisms with assessors ahead of the training.</p>

Communications

15. Our own reflections on the way that we engage with our registration assessors and how we can improve it are something for us to explore further with assessors. Our Professional Standards Administrators and our Professional Standards Manager have frequent and regular contact with registration assessors individually through assessment. They have built excellent working relationships enabling discussions on a one-to-one level or small assessment team level to be informative and helpful in terms of supporting the enhancements to the process and performance. However, what is less clear is how effectively we share those insights, learning and enhancements with the whole assessor cohort.
16. We are working on a registration assessor newsletter to enhance communications between assessments and also on more formal feedback mechanisms to enable feedback to be documented in the words of the assessors rather than through a third party. But there is likely more that we can do. For example, this could include further work around peer mentoring and review between assessors. We need to work closely with the registration assessors to explore effective options.

Registration Assessment Review

17. Alongside the enhancements to our existing processes, we also have a large scoping exercise to undertake in relation to the review of our whole registration assessment. This is timely, as the new EU Directive 2013/55/EU was adopted at

the end of 2013 and it is currently being transposed into UK law. We will need to fully understand and scope the impact of the revised directive and the way that it is transposed into UK legislation, and develop a project plan for the review, working in partnership with all our stakeholders.

18. Osteopaths are covered under the 'general systems' part of the Directive. The Health and Care Professions Council, which also regulates professions governed under the 'general systems' provisions has provided a helpful summary paper which is available at <http://www.hcpcheck.org/assets/documents/10004647Enc06-Directive201355EUtherevisedrecognitionofprofessionalqualificationsDirective.pdf> outlining some of the implications of the revised directive for their registration processes. Our Head of Regulation, Head of Registration, Communications Manager and Professional Standards Manager are working together to analyse the implications of the Directive and to participate in discussions about its transposition to UK legislation and the implications for our own registration processes. These will include, for example, potential for initial parts of the registration process to take place with home regulators in certain circumstances, the opportunity for common principles and training to be developed, strengthened alert requirements, changes to requirements for temporary registration. All these matters need to be fully explored to understand the impact in our own context – particularly where there are limited numbers of competent authorities in some countries in Europe. In order to participate in wider discussions about transposition, we are currently involved in meetings hosted by the Department of Health, the Alliance of UK Regulators in Europe and the UK Inter-professional Group.
19. It is expected that the legislation transposing the Directive will be prepared during 2014 and it is anticipated that this should be laid before the end of the transposition period in early 2016. We therefore anticipate that our registration processes should be reviewed during 2015.

Next steps

20. This draft timetable outlined below sets out our initial plans to take forward the registration assessment work between now and early 2015. The precise nature of the timetable will rely on a full complement of staff to action and the development of a more detailed project plan to support this work.

Date	Response
September 2014 to November 2014	<p>Organising appraisals for January and February 2015. (All documentation to go out by the end of November to allow time for assessors to seek feedback from GOsC and other assessors).</p> <p>Complete and share flow chart for the registration assessment process with assessors for consideration.</p>

Date	Response
December 2014	Commission team to undertake registration assessor training.
September to March 2015	<p>Enhancements to the registration documentation.</p> <p>Collation of cases to inform training –below standard, borderline and good examples.</p> <p>Develop mechanisms for collecting more formal feedback from participants in the registration assessment process.</p> <p>Explore enhanced communications between GOsC and pools of assessors to share feedback and learning more widely.</p>
February 2015	Registration assessor appraisals completed.
February 2015	Appoint team to undertake registration assessor training.
March 2015	<p>Completion of analysis of directive and review of draft UK legislation to understand impact on current processes of registration assessment.</p> <p>Completion of scoping report for registration assessments.</p>
April 2015	Updated training for return to practice reviews, assessment of qualifications, further evidence of practice questionnaires and also assessments of clinical performance. Additional session on moderation for all those who participate in the moderation sessions.

Recommendation: to consider our approach to maintaining the effectiveness registration assessment processes.