



**Policy and Education Committee**

**16 June 2022**

**Annual report of the Policy and Education Committee 2021-22**

<b>Classification</b>	Public
<b>Purpose</b>	For decision
<b>Issue</b>	The Annual Report of the Policy and Education Committee which will be presented to Council at its meeting on 14 July 2021.
<b>Recommendation</b>	To agree the Policy and Education Committee Annual Report to Council for 2021-22.
<b>Financial and resourcing implications</b>	An estimate of the cost of the committee and its work is included in the paper.
<b>Equality and diversity implications</b>	The General Osteopathic Council has duties to eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Equality Act 2010; advance equality of opportunity between people who share a protected characteristic and those who do not and foster good relations between people who share a protected characteristic and those who do not. This year the Committee considered equality and diversity implications in relation to a range of projects as outlined in the report.
<b>Communications implications</b>	This report is made to Council to summarise the work of the Committee from April 2021 to March 2022.
<b>Annex</b>	Policy and Education Committee Terms of Reference
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## Annual Report of the Policy and Education Committee 2021-22

### *Introduction*

1. The role of the Policy and Education Committee is to contribute to the development of Council policy across the breadth of its work including in education, professional standards, registration and fitness to practise.
2. The Committee performs the role of the statutory Education Committee under the Osteopaths Act 1993. The Committee has a 'general duty of promoting high standards of education and training in osteopathy and keeping provision made for that training under review'. It also has a key role to give advice to the Council about educational matters including the recognition and withdrawal of 'recognised qualifications' (see Sections 11 to 16 of the [Osteopaths Act 1993](#)).
3. The terms of reference of the Committee can be found at the end of the report at the annex.

### *Membership*

4. The Committee consists of five members of Council and four external appointed members. The members of the Committee are listed at paragraph 49 below.
5. In addition, the key osteopathic sector organisations are invited to send an observer with speaking rights to each meeting. Observers may not take part in any part of the meeting where the business is that reserved to the statutory Education Committee.
6. These members are:
  - the Council of Osteopathic Education Institutions (COEI)
  - the Institute of Osteopathy (iO)
  - the National Council for Osteopathic Research (NCOR)
  - the Osteopathic Alliance (OA)
7. The Policy and Education Committee met on five occasions during the period under review – in June 2021, October 2021, and March 2022 undertaking three public and three private meetings. It also undertook a quality assurance and development day in January 2022. All meetings other than the October meetings were held online in accordance with the relevant restrictions and guidance during the coronavirus pandemic. As a result of ongoing increased business, most public and private meetings were mostly held on different days to facilitate sufficient breaks and proper consideration of both public and private items. The only exception to this was the October blended meeting where the public and private meetings took place on the same day. This report summarises the work of the Committee. Full minutes of all the meetings have already been reported to Council.

8. Whilst specifications for visits, visit reports are considered in public, other matters related to educational institutions are considered in private due to the commercial nature of the osteopathic educational institutions. If, as a result of the information provided, there were issues affecting the Recognised Qualification, we will take steps to put this information in the public domain.  
*Quality assurance of 'recognised qualifications'*
9. During the course of the year, as part of our approach to informing advice to Council about the recognition of qualifications, qualification change notifications and ensuring standards, the Committee considered, in relation to all osteopathic educational institutions (OEIs) the following:

<b>Activity</b>	<b>June 2021</b>	<b>October 2021</b>	<b>March 2022</b>
Agreement to RQ specifications (including new RQs, renewal of RQs and monitoring visits) / appointment of Education Visitors	One OEI	One OEI	Two OEIs
Consideration of Education Visitor RQ report (including new RQs, renewal of RQs and monitoring visits)		One OEI	
RQ change notifications and consideration of reports and evidence submitted in relation to general and specific conditions and in response to specific requests to all OEIs with respect to coronavirus adaptations.	Two OEIs	Two OEIs	
Consideration of annual report analysis (including external examiner reports and internal annual monitoring reports and information about student fitness to practise.)			Eight OEIs
Recommendation of removal of RQ expiry dates to Council or extension of RQ Expiry date	Two OEIs		

*Quality Assurance – Annual Report template 2021-22*

10. In June 2021, the Committee considered extensive work between the executive and the OEIs to propose a pilot of the annual report against the Standards for Education and Training that were being consulted on. The plan for the pilot was in response to feedback on the annual report analysis for 2020/21. The Committee was appreciative of the potential for consistency, and a risk-based approach, the independence of the Committee, the balance between reflection and standardised evidence, and the potential for assurance and enhancement

and noted that the approach was open, constructive and linked to clear standards.

11. The Committee agreed this pilot in principle. Further work was undertaken on the proposed template and also a completed example for agreement by the Committee. The Committee agreed the Annual Report pilot against the draft Standards for Education and Training for completion in December 2021 and consideration of the analysis in March 2022.

#### *Quality Assurance development*

12. In June and October 2021, the Committee noted an update in relation to the risk based model of quality assurance. The Committee noted that the ongoing review of the GOsC approach to QA management aligns with sectoral standards and norms and that further work was being undertaken on the GOsC risk based approach.
13. In January 2022, our quality assurance providers, Mott MacDonald developed and facilitated a development day workshop with the Committee and the executive team to reflect, together, on our approach to quality assurance including its purpose, roles and responsibilities, outcome focussed decision making and reflections from the wider sector.
14. In March 2022, the Committee undertook a further facilitated discussion with the executive team in relation to the risk based approach to quality assurance. The Committee compared its approach to that of two different regulators and reflected on questions including:
  - Are there gaps in our risk-based approach?
  - Is our approach sufficiently proportionate?
  - How might we enhance our objective, consistent external data? Should we be considering a student or staff survey for the sector? Would burdens be outweighed by benefits?
  - Is a cyclical visit cycle still appropriate?
  - Are our risk triggers still relevant and necessary? If so, are they the right ones?
15. The Committee noted that feedback from these workshops would be developed by the Executive and brought back to the Committee later in 2022.

#### *Student role in RQ Visits*

16. The Committee considered a developmental paper exploring the student role in RQ visits. The Committee considered benefits and challenges relating to a student role in relation to visits (either as a full visitor or with a more limited role) and as observers. The Committee also considered other options including Post-graduate students are also contracted as visitors/reviewers including those with recent experience in HE education or those undertaking post-graduate

qualifications and that student visitors/reviewers could have backgrounds in other clinical based courses such as physiotherapy which has a larger pool of students who may be interested in Visitor roles.

17. The Committee concluded that the Executive should 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.

*Public and Patient Involvement (PPI) in education project update*

18. As part of our work on facilitating and sharing of good practice in education, the Committee considered an update of our work on public and patient involvement in education alongside the General Chiropractic Council. The Committee noted the findings from initial interviews with OEIs which revealed that like other areas of the health sector, the pandemic had impacted on the progress of this work. The Committee noted that the interviews and discussions were ongoing and that a further update would be considered in due course.

*The implementation of consent principles in the student environment and the management of concerns policy*

19. In March 2022, the Committee considered and provided feedback on the update on the plans for the implementation of the principles of consent in the student environment. The Committee also noted feedback about the development of thinking about the management of concerns policy.

*The review of the Guidance for Osteopathic Pre-registration Education and Training*

20. In October 2021, the Committee noted the progress made and emerging themes in relation to the consultation on the Guidance for Osteopathic Pre-Registration Education and development of Standards for Education and Training. The Committee noted that the consultation had taken place from 15 June 2022 until 22 September 2022 and that the consultation strategy agreed had been implemented. A limited number of written responses had been received, however, a series of focus groups had been held with Patients; Council of Osteopathic Educational Institutions (COEI); Osteopathic Alliance; Institute of Osteopathy Policy and Standards Committee; Osteopathic Students; Osteopathic Educators; Regional Group Leads; Osteopaths working in NHS roles; Registration assessors.
21. The Committee noted the feedback on a range of issues from the initial high level analysis. This included:

Matters raised in relation to the Guidance for Osteopathic Pre-registration Education included:

- even more emphasis in the applicability of the outcomes for a diverse range of clinical settings and pathways
- more reference to the distinctiveness of an osteopathic approach, and the types of techniques and approaches to treatment that might typically be included within a recognised qualification programme.
- the academic level of some of the outcomes in the consultation draft related to research
- the appropriate level for leadership and management outcomes
- whether there should be more emphasis on outcomes to allow flexibility of delivery or whether clinical hours should be further defined to explain what a clinical hour is
- emphasising principles and outcomes for inclusive practice rather than specific examples which detracted from the principle of inclusion
- specific inclusion of first aid principles and explicit application of these

Matters raised for further consideration post consultation in relation to the Standards for Education and Training included:

- enabling supervision of osteopathic students by other regulated health professionals as well as by osteopaths
- further emphasis on safeguarding for patients

22. The analysis would be finalised in early 2023 to include the feedback from the quality assurance pilot with the Osteopathic Educational institutions and the Committee would recommend the final guidance to Council in early 2022 for implementation in 2022.

#### *Osteopathic Practice Standards (OPS) Implementation and evaluation*

23. In March 2022, the Committee considered an overarching report about the implementation of the Osteopathic Practice Standards across the sector.

24. The Committee noted that the current version of the Osteopathic Practice Standards (OPS) was implemented from 1 September 2019 and since then had been supported with a range of activities and the consideration of future plans. It noted that the CPD evaluation survey suggests it is becoming routine for osteopaths to use the OPS when planning and recording their CPD; that 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; that the NCOR concerns and complaints report shows a reduction in communication concerns, although there is an increase in boundaries concerns and the response of the GOsC to undertake a wide ranging boundaries project including a series of boundaries scenarios have been developed and published in the ebulletins. The scenarios promoted awareness of the types of boundaries issues which might arise in practice.

25. The Committee also noted the plans for continued embedding of the Osteopathic Practice Standards including: 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 and increasing engagement with regional groups.

*Continuing Professional Development (CPD)*

26. During 2021-22, the CPD evaluation focussed on analysis of data from registration renewal and assurance and verification which was considered in detail at Council in November 2021 and January 2022.

*GOSc Position about protection of title and osteopathic practice, and the involvement of osteopaths in osteopathic education and training*

27. In June 2021, the Committee reflected GOSc Position about protection of title and osteopathic practice, and the involvement of osteopaths in osteopathic education and training. They noted that the GOSc had received queries in relation to this but that the information was not published in an accessible way. The Committee raised several questions in relation to retired osteopaths and roles in osteopathic education and training, the use of osteopathic techniques by people who were not registered osteopaths, the wording of the criminal offence outlined in s32 of the Osteopaths Act 1993 and animal osteopathy. The members noted that clarification of legal advice in relation to some of these issues might be helpful. In conclusion, the Committee noted that exploration of standards and how people learn what it is to behave with integrity and honesty and the impact on patients; the issues of ethics, professional identities, trust, honesty and consent and what is understood by the individuals' role from a patient's perspective.
28. In October 2021, the Committee noted that the matter had been considered further and legal advice was being sought on a specific issue with regards to the position of animal osteopathy and protection of title. The matter was also being discussed with the Department of Health and Social Care and a further update would be considered in due course.

*Fitness to Practise: Osteopathic Practice Standards and Adjunctive Therapies*

29. In June 2021, the Committee considered the draft guidance on Adjunctive Therapies. The guidance centred on the protection of patients and supporting other stakeholders in understanding the application of the Osteopathic Practice Standards (OPS) to the breadth of practice undertaken by osteopaths. The Committee agreed the plan to disseminate the draft guidance more widely over the summer, to inform the development of a final draft ahead of consultation.
30. In October 2021, the Committee agreed to recommend 'guidance on the application of the Osteopathic Practice Standards in relation to the application of adjunctive therapies, non-osteopathic treatments or other work undertaken by

osteopaths', to Council for consultation in accordance with the strategy outlined and noted the Equality Impact Assessment prepared on the project.

#### *Fitness to Practise (FtP) Publication Policy*

31. In March 2022, the Committee considered and provided feedback on the options for publication of Interim Suspension Order determinations. The options included publication of the full determination (as now), publication of a summary of the determination (which would need to be drafted by the Committee) and the publication of the fact of the determination only. The Committee noted that the regulators took a number of different approaches on this issue. The Committee considered the benefits and challenges of each of the options and provided and noted that a paper would be developed for formal consultation in due course.

#### *Patients*

32. In June 2021, the Committee noted the progress of the patient involvement activity and plans to further embed the patient voice in policy development and decision making. The Committee noted that Engagement with patients is an ongoing priority and how learning from each activity was used to inform future work. They noted the focus on seeking patient feedback on the draft Equality, Diversity and Inclusion Framework for 2021-24 and the variety of mechanisms offered to patients to enable them to give feedback. The Committee also noted the launch of the Patient Involvement Forum in May 2021 which provided a more formal vehicle for recruiting patients. The Committee also noted that the deeper engagement with patients had revealed the need to develop policies to support a more structured approach to patient engagement.
33. In October 2021, the Committee received a further update about the patient engagement work. It noted the increase of the patient members to 27 (from 3 in 2018) and that the patients had contributed to the development of seven projects as well as overarching policy and strategy. It also noted that structural policies to support ongoing patient engagement has been developed including formalised and inclusive payment and expenses policy a safeguarding policy and safeguarding training had been identified and developed.

#### *National Council of Osteopathic Research Report: Types of concerns and complaints raised about osteopaths and osteopathic services in 2013 to 2020*

34. In October 2021, the Committee considered the National Council of Osteopathic Research Report: Types of concerns and complaints raised about osteopaths and osteopathic services in 2013 to 2020.
35. The updated data collection took place during January to December 2020, and therefore there are some features attributed potentially to the coronavirus pandemic lockdown. Key findings include: Reduced number of concerns overall; Reduced proportion of concerns relating to communication; Increased concerns related to covid 19 issues; Continued high levels of concerns related to sexual impropriety; Professionalism is the dominant theme in relation to concerns.



36. Ahead of further consideration by Council, the Committee considered and provided feedback on our response to key areas for further consideration from the report including: the persisting prevalence of concerns about sexual impropriety and boundaries; the high prevalence of concerns related to bringing the profession into disrepute; the proportion of concerns related to professionalism; concerns related to advertising and also the matter of social media and particularly misinformation about COVID-19.
37. The Committee noted that the NCOR report continues to be used to ensure that there is continuing focus on practise in accordance with the Osteopathic Practice Standards with communications and policy priorities covering the areas of concern outlined in the report.

*Data collection and insight and equality, diversity and inclusion*

38. In June 2021, the Committee considered a proposal for a staged method to the implementation of our longer term approach to data and insight. Due to its pervasive and integrated nature, a survey was proposed to collect equality and diversity data about protected characteristics from registrants. The baseline would enable GOsC to better identify the diversity of the profession (compared to the general UK population that the profession serves) and also any unintended consequences of GOsC's regulatory approaches and interventions for particular groups, which will in turn inform our future strategy.
39. The Committee provided feedback about the proposed survey and the communication messages including issues about response rates, the question of who the survey is for and why it matters, compliance with GDPR, how to enable anonymity and promote trust, the importance of the clarity of the key messages to promote trust and understanding and how to promote learning, and the importance of ongoing development ahead of piloting.

*Boundaries Project*

40. In March 2022, the Committee considered the work being undertaken across the sector to reduce the prevalence of concerns in relation to breaches of boundaries evidence from the NCOR report. The Committee noted the raising of awareness, helping osteopaths and education institutions understand the issues and to help demonstrate the need for the use of professional judgement. They noted the range of activities undertaken in 2021 (case scenarios, video, and blog) and continued plans for 2022 including the boundaries thematic review and work being undertaken by the University College of Osteopathy across the sector and ongoing engagement, presentations and discussions with osteopaths and students.
41. In March 2022, the Committee also considered and provided feedback on the draft Boundaries Thematic Review Report by Julie Stone ahead of further consideration by Council.

*Communications and Engagement Strategy implementation and evaluation*

42. In October 2021, the Committee considered and provided feedback on proposals to support Council to understand the implementation and impact of the new Communications and Engagement Strategy. The proposal in the paper drew on different types of evaluation methods used by other regulators and presented a set of possible KPIs and projects against the aims of the Communication Strategy for feedback from the Committee. The Committee wondered what mechanisms could be put in place to understand the impact on the silent majority and mechanisms for building trust with the registrants (trust being different for different groups), a mix of quantitative and qualitative approaches, matching the methodology to the question.

*Conflict of Interest*

43. In June 2021, the Committee considered a paper outlining approaches to the management of conflicts of interest in the osteopathic sector; the current GOsC conflicts of interest policy; the current approach to the management of the conflicts of interests for Education Visitors who are also Committee or Council members, and the position of other regulators (including context). The Committee considered and reflected on the issues that might arise both for Visitors, the Committee and for external stakeholders.
44. The Committee considered the tensions within the sector including: challenges in recruiting Education Visitors, fairness and the perception of fairness of the decision-making process and asked the Executive to consider the feedback further.

*Horizon scanning: external inquiries, reviews and reports*

45. This year, horizon scanning reports were considered by Council.

*International Registration Assessments*

46. In October 2021, the Committee considered an early policy paper and questions about the development of the international registration assessment process.

*Development of the Profession*

47. This year, informed by discussion at the Committee during 2020-21, matters related to development were considered by Council.

*Observers with speaking rights organisational updates*

48. This year, the Committee welcomed contributions from observers with speaking rights during discussions. These contributions supported the Committee to consider a wider range of perspectives from the sector. This year the Committee also welcomed updates from the observers with speaking rights at every meeting. These updates supported the Committee to gain a wider understanding

of what was important to the sector and to take these matters into account during their deliberations.

### *Membership*

49. During the period April 2021 to March 2022 the Policy and Education Committee membership comprised:

<b>Name</b>	<b>Member details</b>	<b>Meetings attended and QA Development Day</b>
Daniel Bailey	Council registrant member	6/6 and 1
Sarah Botterill	Council lay member	6/6 and 0
Professor Deborah Bowman (Chair)	Council lay member	5/6 and 1
Dr Marvelle Brown	External lay member	5/6 and 1
Bob Davies	External registrant member	6/6 and 1
Elizabeth Elander	Council registrant member	6/6 and 1
Dr Joan Martin	Council lay member	4/6 and 1
Professor Raymond Playford	External lay member	6/6 and 1
Nick Woodhead	External registrant member	5/6 and 1

50. Members' allowances and expenses for the Committee in 2020-21 were £8,982. In 2020-21 members' allowances and expenses were £7,570. The small increase reflects additional online meetings as a consequence of the pandemic.

51. Observers with speaking rights attended public meetings:

<b>Name</b>	<b>Meetings attended</b>
The Council for Osteopathic Education Institutions	3
The Institute of Osteopathy	3
The National Council for Osteopathic Research	3
The Osteopathic Alliance	3

**Recommendation:** to agree the Policy Advisory Committee Annual Report to Council for 2021-2022.

## Terms of reference and membership of the Policy and Education Committee

The role of the Policy and Education Committee is to contribute to the development of Council policy. To do this it will:

- a. Advise Council on all matters of policy including:
  - i. The standards required for initial registration and appropriate means for assessing those standards.
  - ii. On all matters relating to pre-registration education and training of osteopaths, including the standards of osteopathic practice required for registration.
  - iii. Post-registration education and training, including the requirements for ensuring osteopaths remain fit to practise.
  - iv. The management, investigation and adjudication of concerns about the fitness to practise of registrants.
  - v. Matters relating to the exercise of powers under section 32 of the act (protection of title).
  - vi. The development of the osteopathic profession.
  - vii. Measures to encourage research and research dissemination within the osteopathic profession.
  - viii. Any research needs to support the GOsC's work.
- b. Take into account the decisions of fitness to practise committees, information from the PSA and other relevant sources, and external legal or other requirements.
- c. Ensure that policy development has been informed by effective engagement with the full range of the GOsC's stakeholders.
- d. Make an annual report for Council on the work of the Committee.

The Committee will also undertake the statutory functions that are reserved to the Education Committee, which are to:

- a. Advise Council on the recognition of qualifications in accordance with section 14(6) of the Act.
- b. Appoint and manage the performance of visitors to conduct the evaluation of courses under section 12 of the Act.

## Annex to 11

- c. Advise Council on matters relating to the withdrawal of recognition of a qualification in accordance with sections 16(1) and 18(5) of the Act.
- d. Exercise powers to require information from osteopathic educational institutions in connection with its statutory functions in accordance with Section 18 of the Act.

### Meeting Frequency

Three times yearly or more frequently if required. Some business may be conducted out of committee where required.

### Membership

#### *Ordinary members*

- Five members of Council, of whom two shall be osteopaths and three shall be lay members. One of the lay members shall be appointed by Council to be Chair of the Committee.
- Four members who are not members of Council.

#### *Co-opted members*

The Committee may co-opt up to five members in accordance with Rule 3 of the Statutory Committee Rules.

#### *Observers with speaking rights*

The member organisations of the Osteopathic Development Group are invited to send an observer with speaking rights to each meeting.

Observers may not take part in any part of the meeting where the business is that reserved to the Education Committee.

### Quorum

Five, of which:

- at least one must be a lay person and one must be an osteopath.
- at least two must be members of Council and two must be members who are not members of Council.