

Response to General Osteopathic Council consultation on revised registration assessment process for internationally qualified applicants

June 2019

1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and registration of people working in health and care. We are an independent body, accountable to the UK Parliament. More information about our work and the approach we take is available at www.professionalstandards.org.uk
- 1.2 As part of our work we:
- Oversee the nine health and care professional regulators and report annually to Parliament on their performance
 - Accredit registers of healthcare practitioners working in occupations not regulated by law through the Accredited Registers programme
 - Conduct research and advise the four UK governments on improvements in regulation
 - Promote right-touch regulation and publish papers on regulatory policy and practice.

2. General comments

- 2.1 We welcome the opportunity to respond to the General Osteopathic Council consultation on the updated process for assessment of internationally qualified applicants.
- 2.2 We note the work carried out by the GOsC to ensure that the process aligns with the changes made to the Osteopathic Practice Standards (OPS). This is also to address the issues identified by registrants and assessors during the previous consultation in 2018, including ensuring sufficient focus on demonstration of clinical reasoning, effective communication and gaining of informed consent from patients.
- 2.3 Broadly the process appears clear and the guidance for assessors and relevant forms are clearly laid out and easy to understand.
- 2.4 However, we are concerned about some of the OPS which the GOsC has identified remain outside of the assessment process, in particular the following standards:
- A7 - You must make sure your beliefs and values do not prejudice your patients' care.

- D3 - You must be open and honest with patients, fulfilling your duty of candour.
 - D5 - You must respect your patients' rights to privacy and confidentiality and maintain and protect patient information effectively.
 - D6 - You must treat patients fairly and recognise diversity and individual values. You must comply with equality and anti-discrimination law.
- 2.5 We recognise the challenges of ensuring that some of these areas are meaningfully assessed. However, some of the above standards may have relevance for internationally qualified applicants: the professional duty of candour is specific to health professional practice in the UK; the others may be interpreted differently within the cultural norms of the country of qualification.
- 2.6 We note that the GOsC has suggested a preferred option for candidates to sign a self-declaration to confirm that they have read and understood all the standards and considered them in the context of their own practice. The consultation document also notes that other options for incorporating the standards more fully into the assessment process may have significant cost implications.
- 2.7 We do not believe that decisions should be made primarily based on cost, but on a full consideration of the patient safety risks to be managed. If the GOsC believe that patient safety would be more appropriately assured by any of the alternative options outlined, then this should be the primary driver behind which option is ultimately selected.
- 2.8 If the GOsC chooses not to cover these aspects of the OPS in their assessments, we suggest that they may want to consider alternative mechanisms to mitigate any risks arising. This could be achieved, for example, through their process for ensuring continuing fitness to practise, or through training or information for internationally qualified applicants, to improve their understanding of the context and specific requirements for health professionals in the UK.

3. Further information

- 3.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact us at:

Professional Standards Authority for Health and Social Care
157-197 Buckingham Palace Road
London SW1W 9SP

Email: daisy.blench@professionalstandards.org.uk
Website: www.professionalstandards.org.uk
Telephone: 020 7389 8030