

Our performance review process

We have a statutory duty to report annually to Parliament on the performance of the 10 regulators we oversee. We do this by reviewing each regulator's performance against our Standards of Good Regulation and reporting what we find. Our performance reviews are carried out on a three-year cycle; every three years, we carry out a more intensive 'periodic review' and in the other two years we monitor performance and produce shorter monitoring reports. Find out more about our review process [here](#).

This report covers the period 1 January 2021 to 31 March 2022.

Key findings

- The GOsC made progress since last year in relation to collecting EDI data about its registrants. It ran a pilot survey with registrants, with plans to improve the way it collects EDI data at registration and renewal from 2023.
- The GOsC launched an EDI framework and is part of a research project to consider the experiences of student osteopaths from underrepresented groups.
- The GOsC launched a Communications and Engagement Strategy 2021-24 which it says will improve relationships with stakeholders and improve understanding of the GOsC's role.
- The GOsC consulted on its review of the Guidance for Osteopathic Pre-registration Education, as well as the development of a new set of Standards for Education and Training.
- The GOsC continued to evaluate the CPD scheme it launched in 2018 and facilitated several webinars to support osteopaths in completing their CPD.

Standards met 2021/22

General Standards	5/5
Guidance and Standards	2/2
Education and Training	2/2
Registration	4/4
Fitness to Practise	5/5
Total	18/18

GOsC standards met 2019-21

2020/21	18/18
2019/20	18/18



5,471

professionals on the register
(as at 31 March 2022)

General Standards

The GOsC met all five General Standards this year.

These five Standards cover a range of areas including: providing accurate, accessible information; clarity of purpose; equality, diversity and inclusion; reporting on performance and addressing organisational concerns; and consultation and engagement with stakeholders to manage risk to the public.

Accurate and accessible information

The GOsC continues to provide information about different areas of its work on its website. The GOsC is planning a review of the accessibility of information to support participants in hearings, the publication of decisions and to support registrants with appeals against registration decisions.

Equality, diversity and inclusion

Last year we said we would monitor the GOsC's work to improve the equality, diversity and inclusion (EDI) data it holds about its registrants. The GOsC currently collects EDI data from registrants when they join the register. It holds 100% of registrant data about age and sex, and between 24.9% and 98.7% across other protected characteristics. There is room for the GOsC to improve the breadth and depth of data it holds about its registrants across all protected characteristics, in order to better understand the diversity of its registrants.

Since last year, the GOsC has taken steps to improve in this area. After piloting a survey to determine the best way to collect the data, it plans to ask registrants for information about their protected characteristics as part of the registration and renewal processes from February 2023. The GOsC says that improving the EDI data it has about its registrants will help it to ensure that its processes are not

having unintended consequences or discriminating against any particular groups.

This year the GOsC has also:

- identified areas to focus on following an EDI audit
- introduced a new EDI framework, and
- agreed to co-fund research by the University College of Osteopathy about underrepresented groups' experiences in osteopathic training.

The GOsC appointed its first Osteopath Council Associates this year and the GOsC is also considering introducing Patient Council Associates.

We will be reviewing our approach to assessing Standard 3 as part of the Authority's organisational [EDI action plan 2022/23](#).

Learning from external reports

The GOsC considered external reports, such as the Authority's reports on [Learning from Covid](#) and [Ethics in extraordinary times](#), when developing its Communications and Engagement Strategy 2021-24. It also considered the recommendations from the Cumberlege review, and in response highlighted guidance about conflicts of interests to its registrants.

Communication and engagement

The GOsC's Communications and Engagement Strategy 2021-24 aims to:

- improve relationships with stakeholders
- improve understanding of the GOsC's role
- enhance understanding of the benefits of osteopaths being regulated
- enhance the quality of engagement and impact with patients and the public.

In this review period, the GOsC has consulted on:

- Guidance on adjunctive therapies
- Guidance for Osteopathic Pre-registration and Standards for Osteopathic Education and Training
- Draft remote hearings protocol.



“The GOsC serves the public extremely well as our profession’s regulator...they take their role seriously and professionally in every aspect of their remit to protect the public”

Guidance and Standards

The GOsC met both Standards for Guidance and Standards this year.

The GOsC has undertaken activities to help osteopaths understand the fitness to practise process, which should help registrants understand the ‘why’ of the Osteopathic Practice Standards (OPS). The GOsC also regularly reviews its Continuing Professional Development (CPD) scheme to assure itself that osteopaths are practising within the OPS.

This year, the GOsC has published a series of blogs with scenarios about professional boundaries. It has also commissioned a report on professional boundaries in osteopathy. It is positive that the GOsC is responding to areas of risk in its research on professional boundaries.

In January 2022 the GOsC commenced a consultation on guidance about the application of the OPS in providing adjunctive therapies, which includes situations where an osteopath is also a member of another regulated profession and where they provide services other than osteopathy.

Education and Training

The GOsC met both Standards for Education and Training this year.

Standards for Education and Training

Currently, the GOsC does not publish a single set of standards for education and training; its standards are a combination of the Guidance for Osteopathic Pre-registration Education (GOPRE), the OPS and external standards. This year it worked on producing a single set of Standards for Education and Training (SET) and reviewing its GOPRE.¹

The GOsC consulted on the review of the GOPRE and SET together and, while outside of the reporting period, in May 2022 Council approved the updated GOPRE and SET for publication and implementation in September 2022.

Quality Assurance

The GOsC has prepared a final version of its new quality assurance handbook for use in Recognised Qualification renewal visits, but has decided not to issue it until after the GOPRE and SET have been introduced. We think this is a sensible approach. An interim version will be used in the meantime.

Last year we said we would monitor the implementation of the criteria introduced by the GOsC to assign risk profiles for Osteopathic Educational Institutions, which would determine the frequency of monitoring visits. We have not seen any updates about this from the GOsC. We will seek more information about this in our engagement with the GOsC in the coming year, but are not aware of any current concerns in this area.

Registration

The GOsC met all four Standards for Registration this year.

Accuracy of the Register

We carried out a register check of 19 registrants who had been through fitness to practise proceedings between 1 January 2021 and 28 February 2022. We had no significant concerns following our check of the register.

The GOsC is reviewing its fitness to practise publication policy which may affect how sanctions appear on the register. We will continue to monitor this in future reviews.

Processing applications for registration

The processing time for UK and international applicants remained stable this year at two working days and one working day, respectively.

In September 2019 the GOsC introduced new guidelines for assessors and applicants for the assessment of clinical performance (ACP). Very few assessments have taken place since the introduction of the new guidance, but this year the GOsC commissioned external training for ACP assessors. We are satisfied that this is an appropriate step to support the implementation of the new guidance.

Protection of title

The GOsC secured convictions in three protection of title cases in this review period. After receiving enquiries about unregistered osteopaths this year, the GOsC is working to make its position clear about the osteopath title. The GOsC is also planning a rapid review of its enforcement policy in protection of title cases. We acknowledge the positive work the GOsC is doing to provide clarity in this area.

Continuing Professional Development

The GOsC facilitated several webinars to support osteopaths in completing their CPD submissions, as well as developing additional resources for registrants, such as online videos. The GOsC continued to evaluate the CPD scheme launched in October 2018, including conducting verification checks of approximately 10% of registrant submissions per month. The GOsC reported in February 2022 that to date, 20% of those checked had been asked for more information and one osteopath was removed from the register for non-compliance with the scheme.

The GOsC concluded that the CPD scheme is being implemented well, that osteopaths are practising in line with the OPS and that overall, concerns and complaints have reduced.

Fitness to Practise

The GOsC met all five Standards for Fitness to Practise this year

Guidance for Screeners

The GOsC published new guidance for Screeners in July 2021 and introduced a new template for written decisions. The GOsC intends to monitor the impact of the template and review Screeners' decisions. The changes have been in place for a short time, so in future reviews we will look at whether the new guidance and template have led to improvements.

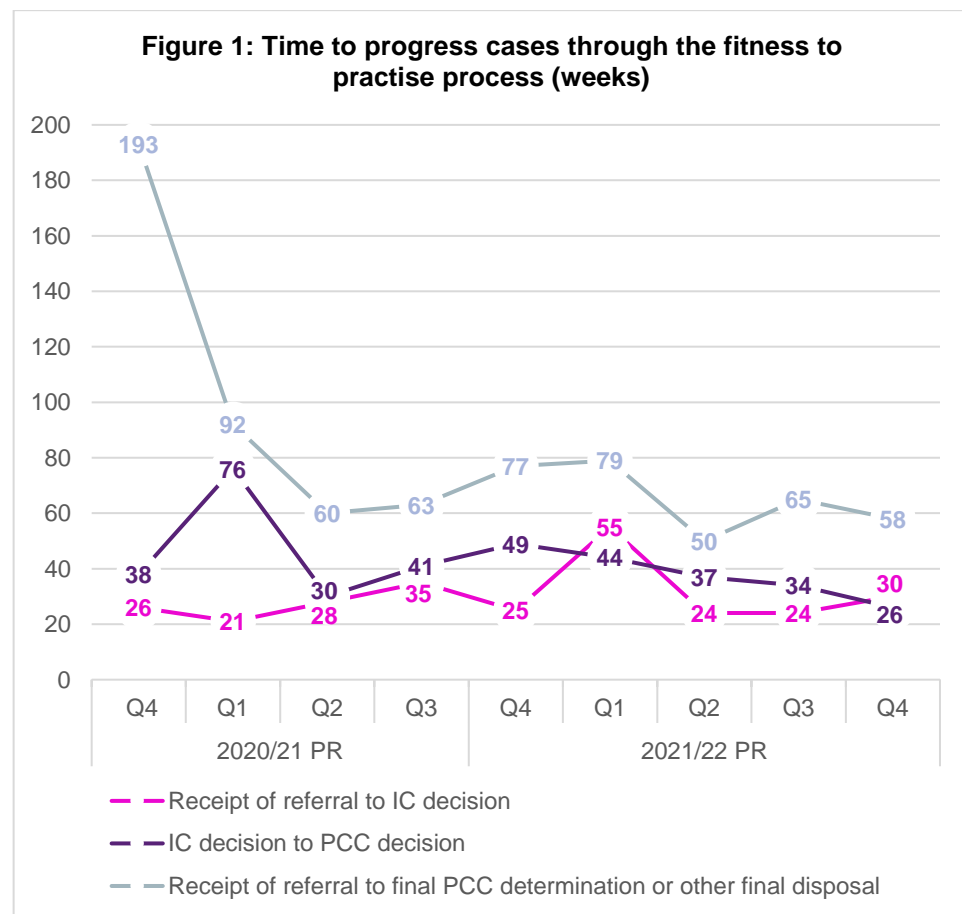
Advertising cases

In April last year the GOsC published a joint statement with the Advertising Standards Authority (ASA) and Committees of Advertising Practice (CAP) highlighting the need for the organisations to

collaborate to ensure that advertising is legal, decent, honest and truthful. Last year we said we would work on guidance for regulators on advertising. We plan to progress this further during 2022/23.

Timeliness

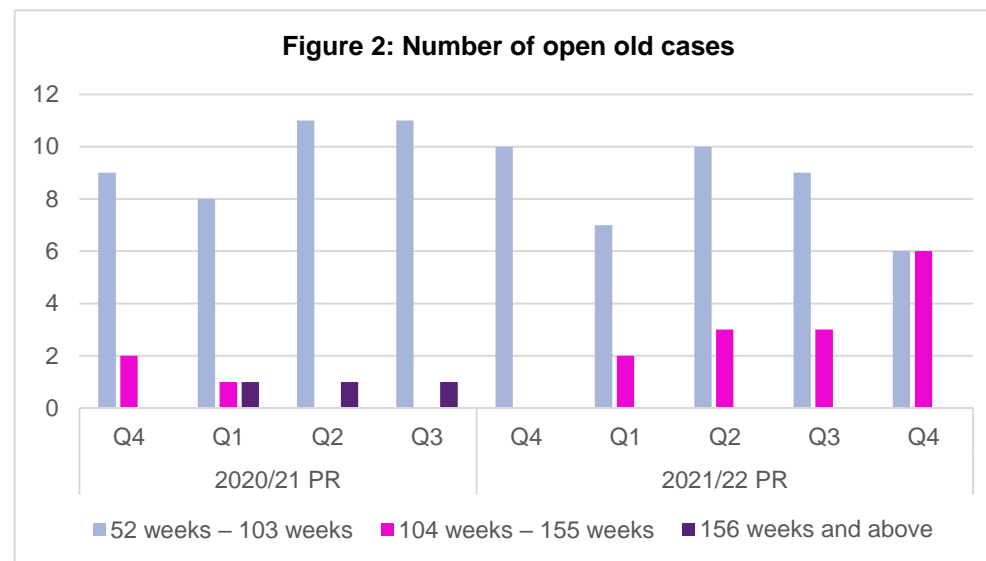
The GOsC's timeliness measures are not dissimilar from last year. Figure 1 shows the time to progress cases through the fitness to practise process.²



There was an increase in time from receipt to Investigating Committee (IC) decision in Q1 last year; three of the four cases considered were subject to third party or pandemic-related delays.

After the GOsC introduced new timeliness measures in January 2020 to frontload its investigations, we might have expected to see a decrease in the end-to-end time. We have not yet seen this trend but the introduction of the new KPIs coincided with the start of the pandemic. Equally, we have not seen a deterioration in timeliness. We therefore do not have concerns about this, but will continue to monitor the possible effect of new KPIs in future reviews.

The GOsC's number of old cases is similar to last year: the number of cases between 104 and 155 weeks has increased slightly, but it no longer has any cases above 156 weeks. The number of cases between 52 and 103 weeks has decreased slightly since last year. The data does not suggest any concerns about timescales.



Last year we noted an increase in the proportion of cases resulting in no further action and a decrease in the proportion of cases referred to a fitness to practise committee. This year's data shows that the

proportions of cases closed and referred to a fitness to practise committee are now comparable to the position two years ago.

This year, the GOsC resolved a case under rule 19 (cancellation of a hearing), which is only the second case resolved under this process since a new practice note was introduced in July 2019. The GOsC told us that the practice note has 'acted as a clear guide to decision makers and staff.' It has not received any feedback from panel Chairs to suggest issues or challenges in using it.

Interim orders

The time from receipt of a concern to interim order decision has remained at eight weeks this year and the time to schedule an interim order hearing has reduced from five to three weeks.

Support for parties to the fitness to practise process

The GOsC started a series of fitness to practise e-bulletins which are intended to demystify the process and also ran webinars about the fitness to practise process. The GOsC hopes to build on this with recordings, podcasts and newsletters. The GOsC met with Victim Support in December 2021 to discuss improvements and increase the accessibility of the service. This includes rebranding it as an Independent Support Service so that it reflects that it is open to all, not just patients.



Quick links/find out more

- ▶ [Find out more about our performance review process](#)
- ▶ [Read the 2020/21 performance review](#)
- ▶ [Read our Standards of Good Regulation](#)

¹ During the review, the name of GOPRE was changed to *Graduate Outcomes for osteopathic Pre-registration Education*.

² The time from receipt of referral to final PCC determination in Q4 last year, 193 weeks, is an outlier and represents one case concluded by the PCC in that quarter.