General Osteopathic Council (GOsC)

Performance Review – Monitoring year 2022/23



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/be-new/memory-sep-10.20.

This monitoring report covers the period 1 April 2022 to 31 March 2023.

Key findings

- The GOsC published its revised Graduate Outcomes for Osteopathic Pre-registration Education and new Standards for Education and Training, following extensive stakeholder engagement.
- The GOsC has continued to demonstrate its commitment to equality, diversity and inclusion (EDI) through carrying out a pilot EDI survey of registrants, piloting the anonymisation of registrant EDI data at the early stages of its fitness to practise process, and assessing the equality impact of its CPD scheme. However, its plan to collect EDI data from registrants at renewal has been delayed as part of wider IT work. EDI data is important for regulators to be able to identify whether their processes may be affecting people differently on the basis of different protected characteristics. We will continue to monitor the GOsC's progress in this area in the next review period.
- The average time from receipt of a case to Interim Suspension Order decision increased in this review period. This was due to specific factors in a small number of cases, and the overall time taken remains relatively short.
- The GOsC published guidance for registrants on adjunctive therapies, and resources to support shared decision-making between osteopaths and patients.

Standards met 2022/23



General Standards 5 out of 5
Guidance and Standards 2 out of 2
Education and Training 2 out of 2
Registration 4 out of 4
Fitness to Practise 5 out of 5

Total 18 out of 18

GOsC standards met 2020-22

 2021/22
 18

 2020/21
 18



5,437 professionals on the register (as at 31 March 2023)

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.

Accuracy and accessibility of information

The GOsC continues to provide accurate and accessible information about its registrants, regulatory requirements, guidance, processes and decisions. It has started to make improvements to its website. It had planned to carry out an accessibility review of its website this year but decided to postpone the larger IT project of which this would have formed part. We will monitor that work as part of our next review.

Equality, diversity and inclusion (EDI)

Last year we said we would monitor the GOsC's work to improve the EDI data it holds about its registrants The GOsC had planned to incorporate the collection of EDI data into registration and renewal this year. As noted above, it postponed the IT project which would have included the changes to its CRM system necessary for this. Therefore, the collection of registrant EDI data at renewal has not taken place this year. The proportion of EDI registrant data it holds remains similar to last year.

EDI data is important because without it, it is more difficult for regulators to identify where their processes may be affecting people differently on the basis of different protected characteristics. We recognise the reasons why the GOsC has not made the progress it anticipated this year.

The GOsC demonstrated its commitment to EDI in this review period through a range of targeted activity including:

- reporting publicly on progress against its EDI Framework 2021-24
- carrying out a pilot EDI survey and developing recommendations based on the findings
- piloting the anonymisation of registrant EDI data at the screening and investigation stages of its fitness to practise process
- assessing the equality impact of its CPD scheme.

We will report next year on the GOsC's progress.

Stakeholder engagement

The GOsC has engaged with a broad range of stakeholders in this review period. It has a patient engagement strategy and has established a number of initiatives to involve patients in the coproduction, consultation and evaluation of guidance and resources.



"The GOsC takes its position as the profession's regulator very seriously. They are a mature and responsible body acting for the best interests of the public and the preservation of the highly regarded reputation of the osteopathic profession"

Stakeholder feedback

Guidance and Standards

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

The GOsC published a range of guidance for osteopaths in this review period:

- Adjunctive therapies guidance¹ this is new guidance to support
 osteopaths to understand the relationship between the Osteopathic
 Practice Standards and other forms of non-osteopathic care and
 treatment provided, such as acupuncture. We reported on the
 public consultation the GOsC carried out to develop this guidance
 in last year's report.
- Resources² to support shared decision-making between osteopaths and patients, which were developed with the General Dental Council and the Collaborating Centre for Values Based Practice at Oxford University. The resources are aimed at both patients and registrants and include a Patient History form, Patient Goal planner and a Practitioner Reflection form. The resources were launched at an event hosted by the Collaborating Centre at St Catherine's College, and featured involvement from stakeholders including patients, with participants joining in person and online. The GOsC has appointed a researcher to evaluate the effectiveness of these resources and announced a survey as part of that work in April 2023.

Education and Training

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

Education standards

The GOsC published new Standards for Education and Training (SET) and updated the outcomes for osteopathy graduates, Graduate Outcomes,³ in August 2022 after extensive consultation with a range of stakeholders. The Standards and Graduate Outcomes⁴ came into effect on 1 September 2022. The GOsC has revised its risk-based QA process to take them into account and we have received largely positive stakeholder feedback about the revised annual report template and QA process. The GOsC plans to establish a Stakeholder Reference Group to contribute to the development of QA guidance. We will continue to monitor the implementation of the Graduate Outcomes and SET in the next review period.

Boundaries research

The GOsC published an independent review⁵ of professional boundaries in osteopathy in August 2022. The review highlighted areas of good practice within osteopathic educational institutions (OEIs) and beyond and made recommendations for the GOsC to consider. The GOsC has disseminated the research findings to OEIs and has raised awareness about boundary issues with stakeholders through its use of ebulletins and fitness to practise webinars, including one delivered jointly with the General Chiropractic Council. We will continue to monitor the GOsC's actions in delivering learnings from the boundaries research.

Registration

The GOsC met all four Standards for Registration this year.

The Register

We carried out a register check of all the registrants who had been subject to a final fitness to practise hearing between April 2022 and January 2023.⁶ We had no significant concerns following our check of the register.

The GOsC publicly consulted on a revised Fitness to Practise Publication Policy in this review period, and we will monitor the outcome of this.

Time taken to process applications for registration

The GOsC's processing times for UK and international applicants for registration have remained stable at between one and three working days for each quarter this year.

Protection of title

The GOsC conducted a rapid review and refresh of its Section 32 Protection of Title Enforcement Policy⁷ in this review period which included the addition of updates in line with recent legislative amendments and case studies of successfully prosecuted cases.

Continuing Professional Development (CPD)

The GOsC introduced a new CPD scheme in 2018, moving from a single year cycle to one of 3-years. In this review period it continued to evaluate the implementation and impact of the scheme using a range of data sources including its verification and assurance process and telephone interviewing. As a result of its evaluation work the GOsC is satisfied that osteopaths are complying with the scheme but has put actions in place to gather evidence to demonstrate its impact. We will monitor the outcome of this work in the next review period.

Fitness to Practise

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

Time taken to progress cases

The GOsC has a small number of fitness to practise cases, so delays in individual cases can cause fluctuations, particularly in quarterly data. Figure 1 shows that annual timeliness medians have been consistent over the last three years.

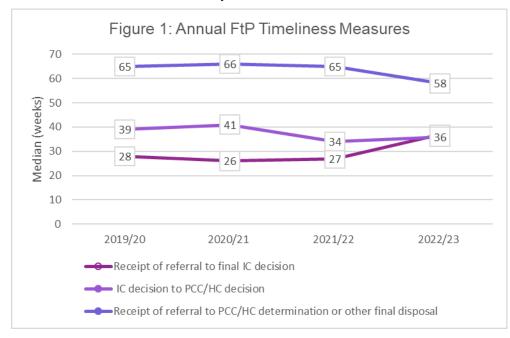
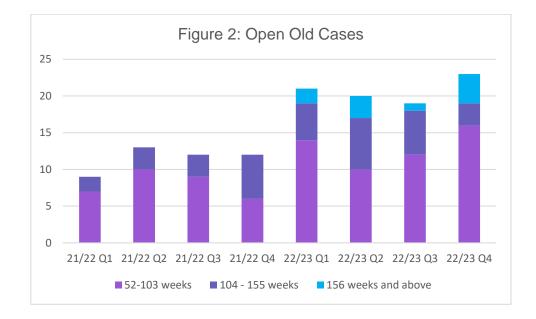


Figure 2 shows a significant increase in the number of old cases in this review period compared to last year. The GOsC said this was largely due to an increase in the number of cases subject to third party investigation delays: 40% of the GOsC's caseload, including all its oldest cases, has been affected by third party investigations, mainly by the police. Overall, we do not have concerns about the timeliness of the GOsC's fitness to practise case progression.



Screeners' decisions and Guidance for Screeners

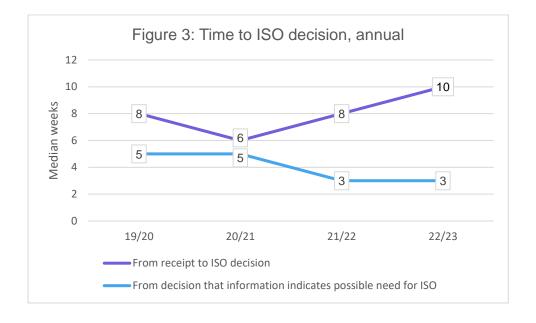
In last year's review we said that we would monitor any impact the introduction of new Guidance for Screeners had on written decisions. This year the GOsC told us that it had carried out an internal review of Screeners' decisions and found that the written reasons for decisions were more detailed than before the introduction of the Guidance and better able to be understood. We have not received any concerns about Screeners' decisions but plan to take a closer look at the quality of the GOsC's early stage decision-making as part of next year's periodic review.

Interim suspension orders (ISO)

There was an increase in the average time from receipt of a case to the GOsC making an ISO decision, as figure 3 shows. This fluctuated through the year, as we would expect of a regulator with a small number of cases: the GOsC's ISO timeliness data is based on just 10 cases over the whole year. Third party delays have affected the

timeliness of the GOsC's ISO decision-making. These delays have a particularly significant effect on the GOsC's measures due to its small caseload.

The annual median time from the decision that an ISO may be necessary was in line with previous years. Overall, the annual median time taken to make interim order decisions remains relatively short. We did not have concerns about how long the GOsC is taking to make ISO decisions, and we will continue to monitor this important area of its work.



Support for parties to the fitness to practise process

The GOsC has held webinars and produced ebulletins for stakeholders in this review period to improve awareness and understanding of its fitness to practise processes. It provides support and guidance to witnesses tailored to their specific needs, including putting in place special measures for vulnerable witnesses. It also has an Independent Support Service available to all osteopaths and other witnesses.



Quick links/find out more

- Find out more about our performance review process
- Read the GOsC's 2021/22 performance review
- Read our Standards of Good Regulation

 $^{^{1}\,\}underline{\text{https://www.osteopathy.org.uk/news-and-resources/document-library/practice-guidance/guidance-on-adjunctive-therapies/}$

² <u>Supporting decision making with patients - General Osteopathic Council (osteopathy.org.uk)</u>

³ Previously Guidance for Osteopathic Pre-registration Education, now Graduate Outcomes for Osteopathic Pre-registration Education.

⁴ <u>Graduate Outcomes and Standards for Education and Training - General Osteopathic Council (osteopathy.org.uk)</u>

⁵ https://www.osteopathy.org.uk/news-and-resources/document-library/research-and-surveys/supporting-professionals-protecting-patients-boundaries/

⁶ Our sample consisted of 15 register entries.

⁷ https://www.osteopathy.org.uk/news-and-resources/document-library/policies-and-procedures/protection-of-title-enforcement-policy/