

**General Chiropractic Council  
Consultation on the GCC's draft Strategic Plan 2009-2014**

**INTRODUCTION**

**About our draft Strategic Plan**

**Background**

Historically, the Council has published a five year Corporate Plan, covering both its strategic and detailed operational objectives. Our Council was newly constituted in February 2009 and it reviewed the Corporate Plan and decided to take a more strategic approach by publishing a five-year Strategic Plan, which stands in its own right. The performance of the executive will be measured against the annual Business Plans designed to deliver our strategic objectives.

**About the GCC**

The GCC is an independent body, accountable to parliament and subject to scrutiny by the Council for Healthcare Regulatory Excellence. Our statutory duties are:

- To set standards of chiropractic education, conduct and practice
- To recognise chiropractic degree programmes that achieve our standards
- To maintain the register of individuals who meet our requirements in respect of character, health, competence and continuing professional development
- To investigate and determine all complaints against our registrants

If you wish to take part in our consultation on our draft Strategic Plan, please complete as much, or as little, of this questionnaire as you wish and return it either by email or by post to:

**Philippa Barton-Hanson  
Executive Officer (Communications)  
General Chiropractic Council  
44 Wicklow Street  
LONDON  
WC1X 9HL**

**E: [communications@gcc-uk.org](mailto:communications@gcc-uk.org)**

**T: 020 7713 5155**

**The deadline for replies is 30 September 2009**

Many thanks for taking the time to contribute to our work. If you have any questions please contact us.

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**Questionnaire**

Your name: Dian Taylor

Organisation (if applicable): General Optical Council

Postal address: 41 Harley Street, London, W1G 8DJ

Email address: dtaylor@optical.org

Telephone number: 0207 307 3458

**How to complete this questionnaire**

Each main section of the GCC's draft Strategic Plan is reproduced in numbered boxes below.

Please indicate whether you agree or disagree with each section of the draft Strategic Plan, or have no comments.

There is also a space for your comments, should you wish to make any.

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The General Optical Council (GOC) welcomes the opportunity to comment on the **GCC's draft Strategic Plan 2009-2014**.

The GOC is one of 13 organisations in the UK known as health and social care regulators. These organisations oversee the health and social care professions by regulating individual professionals. The GOC is the regulator for the optical professions in the UK. The GOC currently registers around 23,500 optometrists, dispensing opticians, student opticians and optical businesses.

The GOC's mission is to protect the public by promoting high standards of education, conduct and performance amongst opticians. Our work is built on a foundation of six core values. These values are based on the Better Regulation Commission's criteria for good regulation: Proportionality; Accountability; Consistency; Transparency; Targeted and Organisational Excellence.

The following is the GOC's responses to the **GCC's draft Strategic Plan 2009-2014**:

<b>1. Our aim</b>		
We aim to safeguard the health and wellbeing of people who use or would benefit from using the services of chiropractors, thereby promoting confidence in the profession.		
<b>Agree: Agree – see additional comment</b>	<b>Disagree:</b>	<b>No comment:</b>
<p>Comments:</p> <p>The GOC supports the aim of safeguarding the health and wellbeing [of the public] as the central objective of the GCC. GOC would urge the GCC to provide an explanation of the terms 'safeguard' and 'wellbeing' so as to minimise debate around their meaning as such debate will deflect the focus of the GCC from achieving its central aim.</p> <p>The GOC would suggest that each of the GCC's strategic objectives (below) should demonstrably achieve its stated aim (above). The GOC would urge the GCC to satisfy itself that each of the activities under the four strategic objectives below do enable it to achieve the aim.</p> <p>The GOC would encourage the GCC to consider whether its aim should also be to gain the public's confidence and trust in it (the GCC) as a regulator.</p> <p style="text-align: right;">continued/.....</p>		

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Having reviewed the GCC website and looked at the GCC Act 1994, [as revised in the period up to and including Feb 2009] it is assumed that the GCC statutorily defined duty remains:

*to develop and regulate the profession of chiropractic*

and that the GCC has not benefitted from more recent revisions to the statute of other regulators (including the GOC) giving a common objective to

*to protect, promote and maintain the health and safety* [of members of the public.]

If our understanding of the current state of the GCC Act 1994 is correct, the GOC would support the GCC any endeavours to seek amendment to the 1994 Act so that the GCC's public centred aim is reflected in statute.

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<b>2. Our values</b>		
<p>In all our processes and decision making we are committed to being:</p> <ul style="list-style-type: none"> <li>• Inclusive</li> <li>• Open and transparent</li> <li>• Fair</li> <li>• Consistent</li> <li>• Proportionate</li> <li>• Focussed on continuous improvement.</li> </ul>		
<b>Agree : - agree see additional comment</b>	<b>Disagree:</b>	<b>No comment:</b>
<p>Comments:</p> <p>The GOC supports these values, which are an update on those listed by the Better Regulation Commission:</p> <ul style="list-style-type: none"> <li>• proportionality,</li> <li>• accountability,</li> <li>• consistency,</li> <li>• transparency, and</li> <li>• targeting</li> </ul> <p>The GOC supports the use of 'inclusiveness' to reflect the need for stakeholder engagement.</p> <p>The GOC suggests that there may be some benefit in giving a brief definition of terms in the Strategic Plan as the meaning may not be understood by all readers, for example:</p> <p><b>Proportionate:</b>          We will identify and target the issues of greatest risk to public safety.          We will remove unnecessary bureaucracy.</p>		

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<b>3. Our strategic objectives</b>		
<b>3.1. Increase awareness of regulation</b> We will do this by: <ol style="list-style-type: none"> <li>a. Providing clear and comprehensive information about ourselves and our work on our website <a href="http://www.gcc-uk.org">www.gcc-uk.org</a></li> <li>b. Keeping the link to our website in the public eye by use of the most effective mechanism</li> <li>c. Identifying and using all possible distribution channels for our publications</li> <li>d. Encouraging publicity of the outcomes of fitness to practise cases that result in removal or suspension from the register</li> <li>e. Participating in relevant collaborative activities with other organisations</li> <li>f. Measuring any change in awareness via repeat MORI surveys.</li> </ol>		
<b>Agree: Agree – see additional comment</b>	<b>Disagree:</b>	<b>No comment:</b>
Comments:  As well as encouraging publicity of outcomes of FTP cases, the GOC would encourage the GCC to emphasise the regulators' role in education of both the public and the chiropractors and CPD for registrants as a means of minimising complaints against chiropractors resulting in FTP referrals. The emphasis given under this objective to FTP cases tends to concentrate the mind on the failings of the profession rather than focussing on the role of the GCC to support registrants through education and other means to improve performance.		

**3. Our strategic objectives**

**3.2. Demonstrate how our work protects the public and supports the development of the profession**

We will do this by:

- a. regular reviews of our Code of Practice and Standard of Proficiency to ensure they set out in plain English the standard of conduct and care that patients are entitled to expect and receive from chiropractors
- b. recognising only those chiropractic degree programmes that deliver all the learning outcomes derived from the requirements of the contemporary Code of Practice and Standard of Proficiency
- c. registering only those individuals who are fit to practise in terms of character, health, competence and continuing professional development
- d. dealing in a timely and effective manner with all complaints against chiropractors, while seeking legislative change that will allow us to move to a more proportionate, targeted approach and thereby reduce the cost of regulation
- e. encouraging the profession to learn from the failings or misjudgement of colleagues
- f. developing and implementing a proportionate, risk-based model of revalidation that complements an appropriate scheme of continuing professional development
- g. exploring the potential value of specialist entries on the register.

**Agree: Agree – see additional comment**

**Disagree:**

**No comment:**

Comments:

The GOC would encourage the GCC to focus on students to provide, at an early stage, an induction to and an understanding of the individual's added responsibilities when entering a regulated profession.

<b>3. Our strategic objectives</b>		
<b>3.3. Maintain and strengthen our working relationships with the profession, patients and the wider public</b>		
We will do this by:		
<ul style="list-style-type: none"> <li>a. enhancing our understanding of the characteristics, aspirations and concerns of the profession</li> <li>b. ensuring that our activities are informed by that understanding</li> <li>c. creating opportunities to engage in dialogue with members of the profession and students as well as their representative organisations</li> <li>d. including patients and members of the public on all our project working groups, as well as our Communications Advisory Group and consultation workshops</li> <li>e. ensuring that our Communication Strategy meets the identified needs of all interested parties</li> <li>f. seeking and acting on feedback on our performance from all interested parties.</li> </ul>		
<b>Agree: Agreed – see additional comment</b>	<b>Disagree:</b>	<b>No comment:</b>
<p>Comments:</p> <p>In the presentation of all its strategic objectives, the GOC would encourage the GCC to put the primary focus on the public and the patient.</p>		

<b>3. Our strategic objectives</b>		
<b>3.4. Influence regulatory systems in the UK, the rest of Europe and internationally</b> We will do this by: <ul style="list-style-type: none"><li>a. responding to all opportunities to contribute to CHRE's advice to government on UK regulatory matters</li><li>b. active participation in national working groups</li><li>c. active participation in European initiatives driven by the regulatory bodies (eg Health Professionals Crossing Borders)</li><li>d. supporting the development of chiropractic regulation in other European member states</li><li>e. collaboration with international chiropractic organisations.</li></ul>		
<b>Agree:</b>	<b>Disagree:</b>	<b>No comment: No comment</b>
Comments:		