## OPEN AGENDA

**Declarations of interest:** members are reminded that they are required to declare any direct or indirect pecuniary interest, or any non-pecuniary interest, in relation to any matters dealt with at this meeting. In accordance with Standing Orders, the Chair will rule on whether an interest is such as to prevent the member participating in the discussion or determination of the matter. Items marked with an asterisk are supported by a Paper or other documents. All other items are dealt with orally.

<table>
<thead>
<tr>
<th>Item</th>
<th>Action</th>
<th>Timing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Apologies and declarations of interest</td>
<td>To note</td>
<td>11am</td>
</tr>
<tr>
<td>C-031215-1 Draft minutes of meeting of 30 September 2015</td>
<td>To approve</td>
<td>11.00-11.05</td>
</tr>
<tr>
<td>C-031215-2 Matters arising and action log</td>
<td>To note</td>
<td>11.05-11.15</td>
</tr>
</tbody>
</table>
| C-031215-3 Chair’s Report  
  - Appraisals | to note | 11.15-11.25 |
| C-031215-4 Chief Executive’s Report  
  - update on Guidance notes  
  - use of the title ‘Dr’ | to note | 11.25-11.45 |
| C-031215-5 Review of Strategic Aims and Business Plan* | to decide | 11.45-12.00 |
| C-031215-6 Education Committee annual report* | to note | 12.00-12.15 |
| C-031215-7 Communications Plan* | to decide | 12.15-12.30 |
| C-031215-8 Remuneration Committee report | to note | 12.30-12.45 |
| **LUNCH** | | 12.45-13.30 |
| C-031215-9 Presentation from Cazenove on investment | to note | 13.30-14.10 |
| C-031215-10 Investment Strategy review* | to decide | 14.10-14.30 |
| C-031215-11 Budget 2016* | to decide | 14.30-14.45 |
| C-031215-12 Financial options and Reserves policy* | to decide | 14.45-15.05 |
| C-031215-13 Performance Report | to note | 15.05-15.15 |
| C-031215-14 Report from the Audit Committee  
  - Strategic Risk Register – any items over 15 | to note | 15.15-15.30 |
| C-031215-15 Procedures for dealing with complaints against GCC Council members* | | 15.30-15.45 |
| C-031215-15 Draft 2016 work plan | to note | 15.45-15.50 |
| C-031215-16 AOB | to decide | 15.50-16.00 |

**Date of next meeting – 10 March 2016**
MINUTES OF THE MEETING
OF THE GENERAL CHIROPRACTIC COUNCIL
HELD ON 30 SEPTEMBER 2015
44 WICKLOW STREET, LONDON WC1X 9HL

OPEN SESSION

Present:
Suzanne McCarthy, Chair
Sophia Adams Bhatti
Roger Creedon
Roger Dunshea
Tom Greenway
Gareth Lloyd
Julie McKay
Grahame Pope
Liz Qua
Julia Sayers
Carl Stychin
Gay Swait
Phil Yalden

Apologies:
Marie Cashley

In attendance:
David Howell, Chief Executive and Registrar
Penny Bance, Director of Education, Registration and Standards
Paul Ghuman, Deputy Chief Executive (Director Resources & Regulation)
Neil Johnson, Policy and Communications Manager
Amanda Greenlees, Executive PA

Apologies and declarations of interest
Apologies were received from Marie Cashley. No declarations of interest were made.

Draft minutes of the meeting of 18 June 2015
The minutes were agreed as a correct record of the meeting of June 18th.

Matters arising and action log
Guidance notes
The Director of Education, Regulation and Standards, Penny Bance, reported that the supplementary Guidance notes which would accompany the Code were still in preparation. The GCC was working closely with a legal expert on the notes and planned to consult more widely with stakeholders later this year. The GCC was also in discussion with other regulators who were developing similar
A consultation was expected to begin around October/November and the notes were expected to be published early 2016. Council agreed that Council members would be given the opportunity to review the draft Guidance before it went out for consultation.

CCEI
The Director of Education, Registration and Standards also reported that the CCEI (Councils on Chiropractic Education International) was still working on the document regarding chiropractic standards worldwide. A further update would be provided to the Education Committee and this would then feed into the review that the Committee was undertaking on Degree Recognition Criteria.

Governance manual
The Chief Executive (CE) advised Council that the Governance manual was not yet completed as there had been further work that needed to be done on the Equality and Diversity section. He confirmed that the manual would be sent to Council for its review and approval on its completion.

Action: Draft Guidance notes to be sent to Council when available. A progress report to be provided at the December Council meeting.

Action: Governance manual to be sent to Council members for comment and approval.

Chair’s report
Council appointment
The Chair explained the process for the appointment of the new lay Council member. She said that she would be joined on the appointments panel by Julia Sayers and Liz Qua as well as an independent person, Chris Dearsley. Katrina Paget of GatenbySanderson would again be acting as the executive recruiter for this appointment. The panel would be discussing the candidate information pack and application form following the Council meeting. That material would then be circulated to Council members for their approval, in accordance with PSA requirements.

Council discussed areas of expertise a new Council lay member might bring that may be beneficial to the Council. There was a general view that someone who had a patient perspective or customer relations background might be useful. However, it was also felt that it was important not to narrow the field too much.

Council re-appointments
The Chair asked Council for its agreement to the establishment of a re-appointment committee in the terms circulated to them. This was agreed.

The Chair said that Julie McKay and Grahame Pope, who were both coming to the end of their second term, had expressed their willingness to serve for a further year. Their applications would be considered by the re-appointments committee in accordance with PSA requirements. The final decision would be taken by the Privy Council in due course.

Council appraisals
The Chair asked Council to agree the revised Council appraisal form. Council agreed the document. It was noted that Council Member appraisals would be conducted by the Chair during the first quarter of 2016 and finished before
Council’s March 2016 meeting.

It was noted that the form did not contain information regarding appealing an appraisal. The CE advised that the process for appeals would be contained in the Governance manual and referenced in the appraisal form.

**Action: Council appraisals to be diarised between January-February 2016**

**Healthcare Regulators Chairs’ meeting**

The Chair reported on the Healthcare Regulators Chairs’ meeting which she attended. She said that some concern had been raised regarding the introduction of the Healthcare Bill. Having reported this to the CE after the meeting, he had contacted the Department of Health which had confirmed that work was still progressing on the Bill. Other topics discussed at the meeting included research and the PSA consultation.

**BCA conference**

The Chair reported on the BCA conference which she and the CE had attended and had spoken at the conference about the profession both internally and within the wider world. The Chair also discussed the presentation made at the conference on obtaining the patient’s perspective and suggested that it might be helpful for the Executive to obtain the slides of that presentation for distribution to Council members.

**Action: Executive to obtain the slides from the BCA on the presentation on obtaining the patient’s perspective and to circulate these to Council members.**

**Council dinner December 2015**

The Chair updated Council on preparations being made for the Council dinner at the Athenaeum. She said that acceptances had been received from the Professional associations and also from Nick Clarke at the Department of Health and Richard Brown, Secretary-General of the World Federation of Chiropractic.

**Chief Executive’s Report**

The CE commenced his report by speaking about the fall in complaints and noted that the GCC’s finances were vastly improved.

**Communication Report and Plan**

The Policy and Communications Manager introduced the Communications Report and Communications Plan. He updated Council on the work that had so far been done, which included quarterly publication of the GCC newsletter. He said this was an important way to update the profession and to reposition the GCC not only as a regulator, but as a body which supported registrants. He confirmed that he had received positive registrant feedback about the new approach and tone of the GCC’s communications.

He continued by saying that the GCC had been using social media such as LinkedIn and Twitter to communicate with stakeholders both within and outside the profession. The GCC also continued to publicise complaints, where appropriate, as part of its public protection role.

The GCC was also working closely with stakeholders, such as the Professional Associations and was also working to forge links with patient groups. The first
GCC webinar was planned for October on the subject of CPD.

Council discussed possible ways that the GCC might further engage with registrants including possible use of Facebook. The Communication Manager also discussed links with other regulators, with whom he met every few months to discuss issues of mutual interest.

In considering the proposed 2016 Communication Plan, Council considered the importance of understanding what additional research into the chiropractic community would cover and how the information produced might be used. Council also discussed the need to understand where registrants were going to find information and what information was being accessed by them.

The Policy and Communications Manager discussed communications options for 2016 such as a more frequent newsletter, webcasts and podcasts and improving navigation on the GCC website. Council discussed the possibility of having webcasts or podcasts that might count as CPD.

Council felt it would be useful to cross reference the Communications Plan with the key messages previously agreed and also thought it might be helpful to think more about what the key focus of the Communications Plan should be.

Welsh Language Scheme
The Policy and Communications manager explained that following an earlier consultation, the Welsh Language Commissioner’s Standards Imposition Team had confirmed that the majority of the 157 proposed standards should apply to the GCC and to the other healthcare regulators. It was expected that a draft Compliance Notice would be served on the GCC in mid 2016. This would provide the GCC with the first indication as to what the GCC would be required to implement in 2017.

The GCC was in discussion with the other regulators and the PSA (who would also be subject to the requirements) regarding this obligation. If matters remained as currently stated there would be a significant financial and operational impact on all regulators including the GCC.

Advertising
The CE reminded Council of the agreed new policy on advertising in relation to Fitness to Practice (FtP) complaints. He said that the Executive team had met with the Committee on Advertising Practice (CAP) which is responsible for the production of guidance on advertising. The result of the meeting was that the CAP would revise their guidance on chiropractic advertising which would be shared with the GCC. The GCC was waiting for this material before deciding the next steps, if any, should be taken. Council felt that it would be useful for any feedback, once received, to be disseminated to the profession and agreed that the newsletter should include an update on the position on advertising.

Use of the title ‘Dr’ by chiropractors
The CE reported that the ASA intended to issue a statement on the use of the title ‘Dr’ by chiropractors. It was clarified that the ASA would not be determining whether chiropractors could use the term ‘Dr’, but rather in what way the term should be used so that it was clear to the public that chiropractors were not medically qualified doctors (when they were not). Council noted that this subject had also been on the agenda at the last joint GCC/RCC/Professional Associations meeting.
### Update on Section 60/Healthcare Bill
The CE provided Council with an update by explaining that Ministers would be discussing the Bill’s introduction in Cabinet, but there was uncertainty as to when this would happen. He said that the Department of Health was putting considerable effort into the Bill and that a Section 60 would only be considered if it was decided that the Healthcare Bill should not be introduced.

### Update on Equality and Diversity
The CE reported that the GCC was currently in the process of developing a more comprehensive Equality and Diversity policy and had engaged an expert to review the GCC’s current policy.

### Registration Appeals
The CE discussed the new Registration Appeals committee. He said that there had never been a registration appeal submitted. Further work was being done on the draft committee document and on completion of that work the document would be circulated to Council for comments and approval.

**Action:** Registration Appeals Committee document to be sent to Council for comments and approval

### Review Strategic Aims
The Chair noted that the Strategic Aims had been discussed at the previous day’s seminar and that, further to that discussion, the Executive would review the Aims based on feedback from that session for further consideration at the December meeting.

**Action:** Revised Strategic Aims to be brought to December Council meeting

### Draft Business Plan 2016
The Deputy Chief Executive (DCE) introduced the draft Business Plan, explaining that some of the listed activities covered more than one strategic aim. These activities had been discussed at the previous day’s seminar and the Executive would reflect on the comments made at the seminar in the context of the Plan’s next draft. The Council thought that that it would be useful for the Plan, as a public document, to be more outwardly focused and written in a way that would be clearly understandable to all readers. It was also suggested that the document would benefit from having a stronger narrative in the document.

Council agreed that the draft Business Plan should be circulated to Council members in early November for comment prior to it being considered further at the December Council meeting.

**Action:** The next draft of the 2016 Business Plan to be circulated to Council in early November for comment before being considered for adoption at the December Council meeting

### Draft budget 2016
**Income and expenditure**
The (DCE) introduced the draft budget for 2016. He explained that the proposed budget predicted an income of £2,549k and a predicted spend of £2,541k, leaving a projected surplus of £7k. He said that 93% of the GCC’s income is derived from registration fees. As before, investment income had been calculated for the purposes of the draft budget on the basis of a 4% return, although this had not been achieved. He confirmed that the investment strategy would be reviewed in December.

He went on to say that initial registration fees had been revised in view of the fact that there were fewer student numbers and more overseas graduates who were not expected, on graduating, to register with the GCC. The draft budget also contained an increase in staff costs due to the creation of two new posts and the forecasted 3% staff pay rise, which was a provisional percentage, as the actual figure would be decided by the Remuneration Committee in November. Accommodation costs had risen by £6k, including a proportion charge for the lift and there would be costs in connection with the building’s fire escape in 2016. There would also be costs associated with the expected two appointment processes in the year for both Council members and FtP members. 110 hearing days were scheduled for 2016, as compared to 120 scheduled for 2015.

He said that the Degree Recognition Criteria project was a piece of work that was being carried over from 2015 into 2016 and 2017. He also said the GCC was considering an IT strategy review to look at better systems integration, in order to extract and collect data more efficiently. These costs were expected to arise in 2017. It was mentioned that the depreciation budget should include any agreement of the capital plan for 2016.

The final proposed 2016 budget would be considered, with the accompanying Business Plan, by Council at its December meeting.

**Action:** Investment Strategy review to be added to December work plan

---

**Performance report**

The DCE introduced the Performance report.

**KPIs**

He noted that the only KPI still showing a red status was that of listing PCC hearings within nine months of referral. He explained that there were now no cases listed for 2016 that were over 12 months.

**Business Plan**

He reported that most of the activities which were due to be delivered by the end of Quarter 3 were progressing as planned. Key activities included approval of the Code of Practise, a reduction in hearing room costs and the appointment of legally qualified chairs to the Investigating and Professional Conduct Committees. Staff training had been delayed because of Equality Impact assessments but was now scheduled for October 2015.

**Financial Summary**

The income to-date was £2,387, £12k less than the expected income of £2,399k. He explained that this difference was due mainly to the investment income being lower than expected (by £10k) and, to a lesser degree, registration income. The Investment Manager was currently forecasting approximately 2.9 percent income to be achieved on the portfolio for 2015. This was due to stock market turbulence.
causing the portfolio valuation to drop in recent weeks.

As at the end of August, the GCC had spent £1,346k, £66k less than forecast.

Report from Cazenove
Council discussed the report from Cazenove’s Chief Investment Manager. It was noted that a representative of Cazenove would be attending the Council’s December meeting.

<table>
<thead>
<tr>
<th>C-030915-9</th>
<th>Report from the Education Committee</th>
</tr>
</thead>
<tbody>
<tr>
<td>Grahame Pope, Chair of the Education Committee, provided Council with a report on the Committee’s work. He said that when the Committee had met in July it had welcomed two new non-council members, Mike Barber, a registrant member and Aaron Porter, a non-registrant member.</td>
<td></td>
</tr>
<tr>
<td>He said that the Committee had received the recognition visit report from the AECC and had been given an update on the CPD review, which was linked to continuing Fitness to Practise. He reported that Rob Finch of the Royal College of Chiropractic (RCC) had given a presentation at that meeting, discussing the ways the RCC was looking to change their CPD programme and work with the GCC in a quality assurance role.</td>
<td></td>
</tr>
<tr>
<td>The Chair provided an update on the Degree Recognition Criteria and associated quality assurance processes. He said that Pye Tait had been commissioned to review the Degree Recognition Criteria and that this would be developed in line with what other healthcare regulators were doing in relation to their education standards.</td>
<td></td>
</tr>
<tr>
<td>He mentioned the correspondence on the ToC received from the Alliance of UK Chiropractors (AUKC) of which the Council was already aware and confirmed that a separate response from the Education Committee had been sent to the AUKC, in addition to that sent by the GCC’s CE.</td>
<td></td>
</tr>
<tr>
<td>Council thanked the Chair of the Education Committee for his report which it found very useful, particularly those Council members who were not on the Committee. Council agreed that it would be useful to have an update from the Education Committee in June, in addition to the annual report in December.</td>
<td></td>
</tr>
<tr>
<td>Action: Education Committee update in June to be added to the 2016 work plan</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C-300915-10</th>
<th>Strategic Risk Register – any items over 15</th>
</tr>
</thead>
<tbody>
<tr>
<td>Council noted that there were no items on the Risk Register which were currently rated as being over 15.</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>C-300915-11</th>
<th>AOB</th>
</tr>
</thead>
<tbody>
<tr>
<td>Work plan</td>
<td></td>
</tr>
<tr>
<td>Council agreed that the draft work plan for 2016 would be presented with the draft Business Plan and Budget to the December Council meeting. The Communications Plan would be added to the December 2015 work plan.</td>
<td></td>
</tr>
</tbody>
</table>
2016 Council dates
Council agreed the following Council meeting dates for 2016:

- March 10th, with a seminar on the afternoon of March 9th;
- June 16th;
- September 29th, with a seminar on the afternoon of September 28th; and
- December 5th.

Newsletter
In addition to the agreed update on advertising, other items to be considered for inclusion in the next newsletter were:

- Insurance
- Healthcare Bill
- Test of Competence
- Survey on communications

Date of next meeting: 3rd December 2015
### ACTIONS ARISING FROM THE COUNCIL MEETING ON 30 SEPTEMBER 2015

<table>
<thead>
<tr>
<th>ITEM</th>
<th>ACTION</th>
<th>WHO</th>
<th>STATUS</th>
</tr>
</thead>
<tbody>
<tr>
<td>2.1</td>
<td>Draft Guidance notes to be sent to Council when available. A progress report to be provided at the December Council meeting.</td>
<td>Executive</td>
<td>completed</td>
</tr>
<tr>
<td>2.2</td>
<td>Governance manual to be sent to Council Members for comment and approval.</td>
<td>Executive</td>
<td>in process</td>
</tr>
<tr>
<td>3.1</td>
<td>Council appraisals to be diarised between January-February 2016</td>
<td>Executive</td>
<td>in process</td>
</tr>
<tr>
<td>3.2</td>
<td>Executive to obtain the slides from the BCA on the presentation on obtaining the patient’s perspective and to circulate these to Council Members</td>
<td>Executive</td>
<td>in process</td>
</tr>
<tr>
<td>4.1</td>
<td>Registration Appeals Committee document to be sent to Council for comments and approval.</td>
<td>Executive</td>
<td>completed</td>
</tr>
<tr>
<td>5.1</td>
<td>Revised Strategic Aims to be brought to December Council meeting</td>
<td>SEB</td>
<td>on agenda</td>
</tr>
<tr>
<td>6.1</td>
<td>The next draft of the 2016 Business Plan to be circulated to Council in early November for comment before being considered for adoption at the December Council meeting.</td>
<td>Executive</td>
<td>completed</td>
</tr>
<tr>
<td>7.1</td>
<td>Investment Strategy review to be added to December work plan</td>
<td>Executive</td>
<td>completed</td>
</tr>
<tr>
<td>9.1</td>
<td>Education Committee update in June to be added to the 2016 work plan</td>
<td>Executive</td>
<td>completed</td>
</tr>
</tbody>
</table>
Business Plan 2016

Our Role

The General Chiropractic Council (GCC) regulates all chiropractors in the UK to ensure the safety of patients undergoing chiropractic treatment.

The GCC is an independent statutory body established by Parliament to regulate the chiropractic profession. We protect the health and safety of the public by ensuring high standards of practice in the chiropractic profession.

Our strategic aims

The Strategic Statement 2015-17 sets out our strategic aims being:

- to protect patients and the public
- to uphold and improve professional standards
- to engage effectively and have constructive dialogue with our stakeholders
- to improve our effectiveness, ensuring our systems are cost effective and fit for purpose.

Our plan for 2016

Our work this year is designed to continue to achieve the strategic aims as set out in our Strategic Statement.

Our continuing statutory core work requires us to:

- deal efficiently and appropriately with concerns raised about a chiropractor’s fitness to practice
- ensure that chiropractic education and training meet our standards
- ensure that only those individuals who meet our standards are registered to practice as chiropractors
- ensure that chiropractors keep their knowledge and skills up-to-date

The activities set out in this Business Plan are the main pieces of work which we will undertake in 2016 to help us achieve our strategic aims. These activities are in addition to carrying out our statutory core work to a high standard and seek to allow us to enhance and expand on our core work. We will endeavour to ensure that equality, diversity and inclusion remain integral in all that we do. Furthermore, we will seek to ensure that our communications and engagement strategy supports the activities contained in this Business Plan.

A more detailed operational plan underpins the activities in this Business Plan.

Strategic aim 1: Protect Patients and the Public

We will work to protect patients and the public by continuing to seek improvements in our legislative framework. Those changes would allow us to carry out our functions both more effectively and help us to maintain the public’s confidence in our work. In 2016 we will:

- identify those changes we wish to see incorporated into any new legislative framework for the GCC and thereby have legislation which is “fit for purpose”; and
• Continue our review of our CPD scheme by working with the profession and with other stakeholders on the proposed revised scheme and its new components including the proposed introduction of mandatory subjects, peer discussion and the use of objective activities.

**Strategic aim 2: Uphold and improve professional standards**

We will work with chiropractors to ensure that they have the tools they need to achieve high standards of professionalism.

In 2016 we will:

- embed the new Code of Practice as the core principles and values for good chiropractic practice and high standards of professionalism. We will seek to raise awareness of the Code before and after it becomes effective in June 2016. We will also develop new, complementary guidance on a range of topics including consent and confidentiality; and
- review the Degree Recognition Criteria and quality assurance processes including the underlying procedures and associated paperwork.

**Strategic aim 3: Engage effectively and have constructive dialogue with our stakeholders**

We will build on our work with the profession, patients and other stakeholders to share information and best practice, gaining greater benefit from the feedback and to understand what information they need from the regulator.

In 2016 we will:

- continue the implementation of the communications and engagement strategy;
- work with the education providers to explore and promote high standards of professional behaviour at an undergraduate level;
- implement, as appropriate, the Welsh language standards requirements; and
- continue to maintain a constructive dialogue with our domestic and international stakeholders and identify targeted approaches to specific stakeholder groups.

**Strategic aim 4: Improve our effectiveness, ensuring our systems are cost effective and fit for purpose**

We will build on our work in improving the skills level of all staff and seek to provide them with systems and data which will allow them to carry out their work more productively.

In 2016 we will:

- review our IT strategy to ensure that all our systems improve decision-making;
- carry out research projects which aim to capture relevant fitness to practise (FTP) data in order to assist in providing appropriate information for both registrants and complainants; and
- enhance our quality assurance and training systems for FTP committees.
Strategic Statement 2015-17

Who we are

The General Chiropractic Council (GCC) regulates the chiropractic profession in Great Britain and Northern Ireland. It is an independent organisation set up by Parliament.

Our Vision

- We aim to deliver effective regulation for the protection of patients and the public and to do so in a fair, proportionate and objective manner.

What we do

The Chiropractors Act 1994 requires the GCC to carry out the following main functions:

- setting the standards of the profession;
- promoting high standards of education and training in Chiropractic;
- maintaining a register of those Chiropractors who are fit to practise;
- take action against anyone using the title of chiropractor who is not registered with the GCC;
- investigating and deciding complaints about fitness to practise.

Strategic Aims

We aim to:

- protect patients and the public;
- uphold and improve professional standards;
- engage effectively and have constructive dialogue with our stakeholders;
- improve our effectiveness, ensuring our systems are cost effective and fit for purpose.

26/11/2015
To: The General Chiropractic Council  
From: The Education Committee  
Subject: The Annual Report of the Education Committee  
Date: 3rd December 2015

Purpose

This paper informs and updates Council on the work that has been undertaken by the Education Committee during 2015.

Background

1. The Education Committee is currently one of the four statutory advisory committees of the GCC stipulated in the Chiropractor’s Act 1994. The box below shows the function of the Education Committee as stated in the Act.

The Chiropractors Act 1994 states the function of the Education Committee as:

- having the general duty of promoting high standards of education and training in chiropractic and keeping the provision made for that education and training under review. (11.1)
- providing, or arranging for the provision of, education or training where it considers it to be necessary in connection with the discharge of its general duty (11.2)
- being consulted by the Council on matters relating to education, training, examinations or tests of competence (11.3)
- giving advice to the General Council on education, training, examinations or tests of competence matters at the request of Council or proactively (11.4)
- appointing persons to visit any place / institution which is proposing a relevant course of study, holding any examination with any such course, or holding any test of competence connected with a course or for any other purpose of the Act (12)
- the Council has the power to withdraw qualifications as a result of Visitor’s report or on the basis of other information acquired by the Committee (e.g. through annual monitoring) (16).

Summary of Activities

2. The Education Committee met three times in 2015 (April, July and November) and in addition held a workshop in January 2015 on the Code of Practice and Standard of Proficiency and the review of CPD. This report summarises the work of the Committee and decisions taken and actions recommended and progress on work overseen by the Committee. Full minutes of all the meetings have been reported to Council.
Quality Assurance of ‘recognised qualifications’

3. During 2015 the Education Committee advised Council that the following qualifications should be recognised or re-recognised based on Visit panel reports and recommendations:


4. The visiting panel comprised non Council members of the Education Committee and visited the AECC for 2 days in July 2015 following detailed analysis of the submission and discussion with the Committee. The panel’s report and findings were considered by the Education Committee following the visit.

Annual monitoring

5. In April 2015 the Committee met with the education providers separately and collectively to discuss issues arising from the annual monitoring returns for 2013/14 and share good practice. The general discussion focused on support for students, future plans, patient/public involvement and inter-disciplinary learning.

Work of the GCC Education Committee 2015

6. The Education Committee has been responsible for the following projects:
   - The re-development of the Test of Competence (TOC);
   - The review of the GCC’s Continuing Professional Development (CPD) Scheme - and how this can be an aspect of assuring the continuing fitness to practise of registrants;
   - The review of the Code of Practice and Standard of Proficiency (CoP and SoP);
   - The review of the Degree Recognition Criteria and Quality Assurance System;
   - Pre-registrant professionalism research.

The Test of Competence

7. Until September 2014 the University of South Wales held the contract for administering the Test of Competence (TOC) which is the system for assessing applicants to the Chiropractic register from overseas. The Education Committee worked with the Executive on developing the new system that has replaced the previous TOC and agreed the proposals for the new system that were taken to Council in June 2014.

8. During 2015 the Committee has continued to oversee the development and implementation of the new system, recruited and trained new TOC assessors, an External Examiner and agreed the scope of the Year 1 evaluation. The Chair of the Education Committee chaired a review meeting with assessors and the External Examiner in October. A further 6 assessors have been recruited and trained, bringing the complement to 13 including four panel chairs. The first sitting of the new TOC was in January 2016 and since that time there have been three further sittings with a total
of 24 applicants. Of these, 17 have passed, 3 have been asked to provide more evidence and 4 have failed and will need to sit the full TOC again if they still have a wish to practise in the UK.

Assuring Continuing Fitness to Practise and CPD

9. Following Council’s agreement to the Education Committee’s recommendations for developing the CPD scheme the Committee has overseen the progress being made in taking forward the agreed work programme. New CPD guidance for 2015/16 has been issued; guidance on checking CPD returns for 2014/15 and auditing has been published and the GCC is working with the RCC to pilot an external quality assurance of CPD processes. Assuring quality in the administration of the GCC’s statutory CPD scheme is paramount in maintaining its integrity, as perceived by all stakeholders.

10. Following open recruitment for volunteers three development groups of chiropractors have been set up in Bristol, London and on-line (chiropractors from Scotland and the NE) to meet with the GCC three times during October, November and February 2016. The purpose of the groups is to work with the GCC on the development of CPD guidance for the current scheme and to develop the elements of a new CPD scheme that will assure the continuing fitness to practise of chiropractors:
   i. an objective activity (e.g. a case based discussion, peer observation and feedback, patient feedback or clinical audit)
   ii. a CPD activity in an area identified by the GCC as of importance to the profession as a whole. This might change over time (e.g. from persistent issues in fitness to practise cases or where, for example, new legislation has been introduced).
   iii. a peer discussion to demonstrate engagement with learning and development and reflective practice.

Review of the Code of Practice and Standard of Proficiency

11. The Education Committee held a workshop in January 2015 to discuss in detail the draft Code, post consultation, with Pye Tait Consulting.

Review of the Degree Recognition Criteria and Quality Assurance System

12. The Committee began the review of the Degree Recognition Criteria and Quality Assurance system in autumn 2015 by appointing a contractor. Research is underway and visiting panel members will be actively involved. A workshop on this topic took place with the Education Committee at its meeting on 11th November 2015.

Pre-registrant Professionalism

13. The Committee discussed and agreed the implementation in the autumn of 2015 of a research project measuring the professionalism at undergraduate level of chiropractic students. The proposals were discussed with the educational institutions and it was agreed that this would be a useful tool to identify lapses of professional behaviour in students and enable students to calibrate their own views about lapses with those of their cohort, chiropractic and medical students in general. Following ethics permissions being received by each institution the surveys were agreed, tested and launched. Data is being collected via surveys of students and
their tutors at each education institution. Results will be analysed and shared with the institutions and the Education Committee in 2016 and papers prepared for publication.

**Membership**

14. During 2015 the Education Committee membership comprised:

<table>
<thead>
<tr>
<th>Name</th>
<th>Member details</th>
<th>Dates of membership</th>
<th>Meetings attended 2015</th>
</tr>
</thead>
<tbody>
<tr>
<td>Graham Pope (Chair)</td>
<td>Council lay member</td>
<td>All year</td>
<td>3 of 3</td>
</tr>
<tr>
<td>Mike Barber</td>
<td>External registrant member</td>
<td>From July 2015</td>
<td>1 of 2</td>
</tr>
<tr>
<td>Phil Bunnell</td>
<td>External lay member</td>
<td>All year</td>
<td>2 of 3</td>
</tr>
<tr>
<td>Marie Cashley</td>
<td>Council registrant member</td>
<td>All year</td>
<td>3 of 3</td>
</tr>
<tr>
<td>Christina Cunliffe</td>
<td>Council registrant member</td>
<td>Until June 2015</td>
<td>1 of 1</td>
</tr>
<tr>
<td>Cliff Hancock</td>
<td>Co-optee Quality Assurance advisor</td>
<td>All year</td>
<td>3 of 3</td>
</tr>
<tr>
<td>Barry Mitchell</td>
<td>External lay member</td>
<td>All year</td>
<td>3 of 3</td>
</tr>
<tr>
<td>Aaron Porter</td>
<td>External lay member</td>
<td>From July 2015</td>
<td>1 of 2</td>
</tr>
<tr>
<td>Liz Qua</td>
<td>Council lay member</td>
<td>All year</td>
<td>3 of 3</td>
</tr>
<tr>
<td>Carl Stychin</td>
<td>Council lay member</td>
<td>From July 2015</td>
<td>2 of 2</td>
</tr>
<tr>
<td>Gay Swait</td>
<td>Council registrant member</td>
<td>All year</td>
<td>2 of 3</td>
</tr>
<tr>
<td>Mark Webster</td>
<td>External registrant member</td>
<td>All year</td>
<td>3 of 3</td>
</tr>
<tr>
<td>Phil Yalden</td>
<td>External registrant member</td>
<td>Until June 2015</td>
<td>1 of 1</td>
</tr>
</tbody>
</table>

15. A new registrant member was recruited following Phil Yalden’s appointment to Council and a new lay member was recruited following Carl Stychin’s appointment to Council. Carl re-joined the Committee as a Council lay member.

16. An induction session was held for Mike Barber and Aaron Porter in July 2015.
To: The Council, General Chiropractic Council  
From: Neil Johnson, Communications and Policy Manager  
Subject: Narrative Messages 2016  
Date: 3 December 2015

Background

1. Council agreed a 2015 Communication and Engagement Plan for the GCC. The plan was underpinned by a series of agreed narrative messages that we have been using throughout the year.

2. This paper briefly reviews the communication and engagement plans for 2016 and seeks Council’s approval for the narrative messages that we will be using in 2016.

Communications

3. At its September 2015 meeting, the Council discussed the delivery of the 2015 Communications plan, and noted that, with the exception of the webinars, everything had been delivered.

4. Since that meeting, two webinars have taken place in support of our continuing fitness to practise workshops. They have demonstrated both the effectiveness and practicality of the webinar format by allowing chiropractors unable to attend the workshops the opportunity to participate and the ease of use of the technology.

5. Following implementation of the 2015 Plan, the GCC now has at its disposal a wide range of communication techniques including the Newsletter, website, social media and webinars.

6. As discussed at the September Council meeting, over 2016 we plan to continue to develop new ways of communicating with registrants and other stakeholders. In particular, we plan to look at how techniques such as webinars, video and podcasts can be used to improve our engagement with those who do not wish or cannot easily attend meetings or respond formally to consultations.

Engagement

7. Links with external stakeholders have been developed further over 2015.

8. We have continued to meet regularly with the Professional Associations and the Royal College of Chiropractic. The Chair and CER have also spoken at several annual
conferences and other events organised by the associations. In addition, we have
started to meet with the associations individually to discuss our communications with
them, an approach that has been well received and that will be continued.

9. We have maintained our links with groups representing patients. As well as our regular
links with the Chiropractic Patients Association and the Royal College’s patient group,
we have developed a productive relationship with the Private Patients Forum. Over
2016, as well as developing these relationships further, we also plan to engage with the
charities and patient groups that cover the conditions treated by chiropractors to allow
them the opportunity to contribute to our work.

10. Our links with governments in the UK also remain important. We put in a considerable
amount of work with officials from the Department of Health, Professional Standards
Authority and other public bodies. This covers both responding to questions and
consultations and advising on new legislation, not least the Bill containing the Law
Commissions proposals, and we will be working closely with the Government to bring
about its introduction and implementation.

Communication and Engagement during 2016

11. 2016 represents an important opportunity for the GCC to consolidate our communication
and engagement work and to develop it further. This is possible because we now have
the infrastructure in place that is necessary to effectively communicate with registrants,
patients and other stakeholders.

12. 2016 is also a particularly important year for the GCC, as the new Code of Practice will
become effective in June. Promoting awareness of the new Code will form an important
part of our activity over the year.

13. The Code, although important, is not the only thing that the Council will be doing in
2016. When it met in September 2015, the Council discussed a number of specific
communication and engagement activities for 2016 that will enhance our work further,
and allow us to ensure that our stakeholders fully understand our messages and
activities. This includes more frequent publication of the Newsletter, webinars, improving
navigation on the website, continuing engagement with stakeholders and meeting the
Welsh Language Standard requirements.

14. However, communication and engagement work does not stand on its own. It must
support the GCC to deliver our Business Plan for 2016. The Business Plan will set out
specific activities that the GCC will be carrying out over the year. A Communications
Plan will be prepared for each one of those activities that the Council endorses, setting
out the specific activities that we will be carrying out to raise awareness of that activity
and engage with relevant stakeholders.

Key Messages

15. At its meeting in December 2014, the Council agreed a set of three key narrative
messages that the Council would use. They were1:-

---

1 Note that the word ‘proportionate’ has been added to the second message
we aim to deliver effective regulation for the protection of patients and the public, and to do so in a fair, proportionate and objective manner;
we wish to work proactively with the profession to improve professional standards, but those who contravene our requirements can expect us to take proportionate action against them;
implementation of the recommendations of the proposed Healthcare Bill would allow us to reflect the needs of both registrants and patients more effectively.

16. These messages continue to form the basis of the communication and engagement work that we are currently doing.

Action Required

17. Council agreed at its December 2014 meeting that the key narrative messages should be regularly reviewed to ensure that they reflect the GCC’s current activities. Council is therefore asked to consider and agree the key narrative messages.

Financial implications

18. There may be small financial implications arising from changes to the GCC website. They are currently being discussed with the web developers. There are also likely to be costs associated with the Welsh Language Standards that will become clear in the summer of 2016.

Legal Implications

19. There are no legal implications arising from this paper

Risk Implications

20. There are no risk implications arising from this paper

Equality Implications

21. There are no equality implications arising from this paper
To: General Chiropractic Council
From: Paul Ghuman, Director of Resources and Regulation
Subject: Investment Policy Review
Date: 3 December 2015

1. Purpose

Council is asked to review the investment policy.

2. Background

Investment policy

At its meeting in August 2013, Council agreed an investment policy. This policy sets out the Council’s requirements in relation to investment returns that it is seeking from its portfolio. It also identifies particular requirements which are placed upon the portfolio and which are to be followed by the investment manager in both setting up the portfolio and in maintaining the portfolio. The current investment policy agreed in 2013 is attached as Annex A.

There was an initial cash deposit made by the GCC of £4 million following the sale of the freehold premises at 44 Wicklow Street. This cash was prudently invested by the investment manager into a portfolio following the instructions of Council according to the investment policy.

3. Portfolio valuation data

From an initial cash investment of £4 million made in late 2013, the portfolio showed steady growth in value until the recent market turmoil in August 2015. The table below shows the portfolio valuations from January 2014 to October 2015.

<table>
<thead>
<tr>
<th>Date</th>
<th>Valuations</th>
</tr>
</thead>
<tbody>
<tr>
<td>31 March 2014</td>
<td>4,121,731</td>
</tr>
<tr>
<td>30 June 2014</td>
<td>4,147,000</td>
</tr>
<tr>
<td>30 September 2014</td>
<td>4,102,935</td>
</tr>
<tr>
<td>31 December 2014</td>
<td>4,209,797</td>
</tr>
<tr>
<td>31 March 2015</td>
<td>4,383,472</td>
</tr>
<tr>
<td>30 June 2015</td>
<td>4,303,757</td>
</tr>
<tr>
<td>31 July 2015</td>
<td>4,353,997</td>
</tr>
<tr>
<td>31 August 2015</td>
<td>4,222,368</td>
</tr>
<tr>
<td>30 September 2015</td>
<td>4,109,102</td>
</tr>
<tr>
<td>30 October 2015</td>
<td>4,253,493</td>
</tr>
</tbody>
</table>
4. Investment income

In 2014, the investment income return was £119,763. In 2015, the expected investment income return is again likely to be close to £120K. The actual return is closer to 3% of the portfolio valuation. The target for the investment manager is currently 4%, but that any shortfall can be made up from capital growth of the portfolio.

5. Proposals

Council is asked to review its investment policy in order to ensure that it reflects the needs of the GCC and that any constraints on investment are justified and do not adversely affect the level of income and/or return required.

Furthermore, Council is asked to confirm its continued agreement with the policy.

6. Financial implications

The financial implications have been highlighted in the paper.

7. Legal Implications

There are no legal implications arising from this paper.

8. Risk Implications

The portfolio as stated above is subject to stock market fluctuations and therefore may be subject to a reduction in valuation during adverse periods.

9. Equality Implications

There are no equality implications arising from this paper.
General Chiropractic Council

Investment Policy

1. Introduction

The General Chiropractic Council (GCC) is a body established by parliament to regulate and develop the chiropractic profession. It is a statutory body with regulatory powers, established by the Chiropractors Act 1994.

The financial objective of the Council is to maintain the real value of the assets whilst generating a stable and sustainable distribution.

The GCC has approximately £4m of investment assets from the sale of a freehold property.

2. Investment objectives

The primary objective is to distribute 4% per annum (after fees), generated mainly from income (capital can also be used however).

The secondary objective is to maintain the real value of the capital after the distribution.

3. Risk

a. Attitude to risk

The GCC relies on the distribution to help maintain a surplus position on an annual basis. This reliance informs its attitude to risk.

The Council would like to adopt a balanced approach to risk overall and to minimise volatility wherever possible over the long term.

However the Council can tolerate short term capital volatility if necessary and accepts that a higher attitude to risk may be necessary to deliver on the returns required by the GCC.

b. Assets

The GCC's assets are to be invested widely and should be diversified by asset class and by security. Asset classes could include cash, bonds, equities, property, private equity, commodities and any other asset that is deemed suitable for the GCC.
However, the exception is that the Council does not want to invest in hedge funds at the current time.

The RMC is charged with agreeing a suitable asset allocation strategy and ranges with the investment managers, which is set so as to achieve the overall investment objective.

c. Currency

The base currency of the investment portfolio is Sterling but investment may be made in non-Sterling assets.

Hedging is permitted for currency purposes.

d. Credit

The GCC’s cash balances will be deposited with highly rated counterparties in client money bank accounts or in a diversified money market fund. Deposits will be spread between institutions and limit setting and monitoring regularly reviewed by the RMC.

Bond exposure should be focused on investment grade issuers.

4. Liquidity Requirements

The Council would like to ensure a reasonable level of liquidity in the portfolio to ensure that any possible operating requirements can be met. A high proportion of the portfolio will be held in investments with an active secondary or resale market.

5. Time Horizon

The GCC is expected to exist in perpetuity and investments should be managed to meet the investment objective.

The GCC, at present, wishes to adopt a long term investment time horizon.

6. Ethical Investment Policy

There should be no direct investment in armaments or tobacco production companies.

The GCC assets should also be invested in line with its aims and individual investments may be excluded if perceived to conflict with the GCC’s purpose.

7. Management, Reporting and Monitoring

The GCC has appointed a professional investment management firm to manage the assets on a discretionary basis in line with this policy. The Investment manager will provide for the custody of assets. The Investment manager is required to produce a valuation and performance report monthly and to provide for on line access to the portfolio status at any time. The GCC has nominated a list of authorised signatories, which are required to sign instructions to the investment manager.
RMC has the responsibility for monitoring the investment assets. They meet quarterly to review the portfolio, including an analysis of return, risk and asset allocation. Performance will be monitored against agreed market benchmarks and the investment objectives over the long term.

8. Approval and Review

This Investment Policy Statement has been prepared by the GCC to provide a framework for the management of its investment assets. It will be reviewed on an annual basis to ensure continuing appropriateness.

Approved by Council

Signed

Dated
To: The Council, General Chiropractic Council
From: Paul Ghuman, Director of Resources and Regulation
Subject: Draft Budget 2016
Date: 3 December 2015

Background

1. The Council considered a draft 2016 budget at its last meeting in September. There have been minor revisions primarily in relation to income which are highlighted in paragraphs 6 to 9.

2. Annex A shows in tabular form the 2015 budget, a year end management forecast for 2015 as well as the proposed budget for 2016. A financial forecast for 2016-2018 is set out in the same format at Annex B.

3. Since 2011, the GCC has implemented a series of efficiency measures which have sought to reduce the expenditure of the organisation, particularly on our Fitness to Practise (FtP) function.

4. The expenditure profile of the organisation has reduced by over 17% since 2010 when the expenditure for the year was £2,971K compared to a proposed budget for 2016 of £2,544k.

5. FtP costs have also reduced substantially since 2010 when Professional Conduct and Investigating Committee costs were £1,062k compared to a proposed budget for 2016 of £540K, a reduction of almost 50%. This reduction has also taken place during a period when the level of complaints rose six-fold.

Changes to budget since draft presented in September 2015.

6. Initial registration figure has been reduced as the percentage number of graduates actually registering with the GCC has declined. This adjusted figure has also been applied to the forecasts for 2017 and 2018.

7. As a result of lower initial registration figures, the forecast for the number of individuals retaining on the register has also been reduced and this also affects the forecasts for future years.

8. Investment income has been reduced to £120k which is the actual figure achieved in 2014 and forecast for 2015. No increase in this figure has been applied for future years.

9. As a result of these changes, income has been reduced to £2,461k.

10. Following agreement of the capital plan for 2016, the depreciation figure has been adjusted upwards by £3K.
11. For the 2016 budget we are now forecasting a deficit position of £84K which will need to be funded from current reserves.

12. The income reduction since the last forecast for 2017 is £114K and now results in a deficit forecast of £7K. The main changes are a reduction of £64K on investment income and a reduction in retention income of £41K.

13. The income reduction since the last forecast for 2018 is £106K and results in a reduced surplus of £15K. The main changes are again a reduction of £64K on investment income and a reduction in retention income of £51K.

Key assumptions

- The key assumptions are as quoted in the draft budget presented in September which is attached as Annex C. The Remuneration Committee has put forward a staff pay award of 2% for 2016 and this is implemented in the adjusted figure for staffing.

Summary of 2016 budget

- The proposed 2016 budget predicts an income of £2,461k against the 2015 budget figure of £2,494k. This is a decrease of 1.3% (£34k).
- The budget predicts an expenditure spend of £2,544k against the 2015 budget of £2,534k, an increase of 0.4% (£10k).
- The projected deficit is £84K for 2015.

Action Required

14. Council is asked to agree the draft budget for 2016.

Paul Ghuman
Email: p.ghuman@gcc-uk.org
Telephone: 020 7713 5155
## Annex A

### Budget 2016 Summary

#### Forecast

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Registration</td>
<td>137,250</td>
<td>125,050</td>
<td>111,000</td>
</tr>
<tr>
<td>Retention - Practising</td>
<td>2,143,200</td>
<td>2,129,600</td>
<td>2,184,000</td>
</tr>
<tr>
<td>Retention - Non Practising</td>
<td>30,300</td>
<td>30,000</td>
<td>30,300</td>
</tr>
<tr>
<td>Non practising to practising</td>
<td>8,000</td>
<td>12,800</td>
<td>8,000</td>
</tr>
<tr>
<td>Restoration</td>
<td>7,500</td>
<td>16,800</td>
<td>7,500</td>
</tr>
<tr>
<td>Investment Income</td>
<td>168,000</td>
<td>120,000</td>
<td>120,000</td>
</tr>
<tr>
<td>Other</td>
<td>0</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td><strong>Total Income (A)</strong></td>
<td><strong>2,494,250</strong></td>
<td><strong>2,434,250</strong></td>
<td><strong>2,460,800</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff Costs</td>
<td>1,044,114</td>
<td>1,084,000</td>
<td>1,119,000</td>
</tr>
<tr>
<td>IT costs</td>
<td>80,000</td>
<td>76,000</td>
<td>58,000</td>
</tr>
<tr>
<td>Office Costs</td>
<td>168,500</td>
<td>149,715</td>
<td>137,000</td>
</tr>
<tr>
<td>Accommodation costs</td>
<td>228,200</td>
<td>230,600</td>
<td>244,000</td>
</tr>
<tr>
<td>Finance costs</td>
<td>21,465</td>
<td>21,765</td>
<td>22,100</td>
</tr>
<tr>
<td>Professional fees</td>
<td>157,500</td>
<td>121,500</td>
<td>157,500</td>
</tr>
<tr>
<td>Council costs</td>
<td>166,800</td>
<td>176,000</td>
<td>197,000</td>
</tr>
<tr>
<td>Communications</td>
<td>18,000</td>
<td>10,500</td>
<td>14,000</td>
</tr>
<tr>
<td>Registrations</td>
<td>7,000</td>
<td>9,000</td>
<td>7,750</td>
</tr>
<tr>
<td>Education</td>
<td>25,130</td>
<td>21,600</td>
<td>18,000</td>
</tr>
<tr>
<td>Fitness to Practice</td>
<td>617,000</td>
<td>615,500</td>
<td>570,000</td>
</tr>
<tr>
<td><strong>Expenditure (B)</strong></td>
<td><strong>2,533,709</strong></td>
<td><strong>2,516,180</strong></td>
<td><strong>2,544,350</strong></td>
</tr>
</tbody>
</table>

| Surplus / (Deficit) sub total (A-B)| (39,459) | (81,930) | (83,550) |
Annex B

Financial Forecast Summary 2016-2018

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Income</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initial Registration</td>
<td>111,000</td>
<td>103,500</td>
<td>117,750</td>
</tr>
<tr>
<td>Retention - Practising</td>
<td>2,184,000</td>
<td>2,222,400</td>
<td>2,252,800</td>
</tr>
<tr>
<td>Retention - Non Practising</td>
<td>30,300</td>
<td>30,300</td>
<td>30,300</td>
</tr>
<tr>
<td>Non practising to practising</td>
<td>8,000</td>
<td>8,000</td>
<td>8,000</td>
</tr>
<tr>
<td>Restoration</td>
<td>7,500</td>
<td>7,500</td>
<td>7,500</td>
</tr>
<tr>
<td>Investment Income</td>
<td>120,000</td>
<td>120,000</td>
<td>120,000</td>
</tr>
<tr>
<td><strong>Total Income (A)</strong></td>
<td><strong>2,460,800</strong></td>
<td><strong>2,491,700</strong></td>
<td><strong>2,536,350</strong></td>
</tr>
<tr>
<td><strong>Expenditure</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Staff Costs</td>
<td>1,119,000</td>
<td>1,149,296</td>
<td>1,183,298</td>
</tr>
<tr>
<td>IT costs</td>
<td>58,000</td>
<td>57,500</td>
<td>57,500</td>
</tr>
<tr>
<td>Office Costs</td>
<td>137,000</td>
<td>139,790</td>
<td>143,984</td>
</tr>
<tr>
<td>Accommodation costs</td>
<td>244,000</td>
<td>230,000</td>
<td>237,100</td>
</tr>
<tr>
<td>Finance costs</td>
<td>22,100</td>
<td>22,763</td>
<td>23,446</td>
</tr>
<tr>
<td>Professional fees</td>
<td>157,500</td>
<td>137,665</td>
<td>139,835</td>
</tr>
<tr>
<td>Council costs</td>
<td>197,000</td>
<td>182,750</td>
<td>183,523</td>
</tr>
<tr>
<td>Communications</td>
<td>14,000</td>
<td>14,420</td>
<td>14,853</td>
</tr>
<tr>
<td>Registrations</td>
<td>7,750</td>
<td>8,000</td>
<td>8,000</td>
</tr>
<tr>
<td>Education</td>
<td>18,000</td>
<td>17,000</td>
<td>29,510</td>
</tr>
<tr>
<td>Fitness to Practice</td>
<td>570,000</td>
<td>540,000</td>
<td>500,000</td>
</tr>
<tr>
<td><strong>Expenditure (B)</strong></td>
<td><strong>2,544,350</strong></td>
<td><strong>2,499,184</strong></td>
<td><strong>2,521,048</strong></td>
</tr>
<tr>
<td><strong>Surplus / (Deficit) sub total (A-B)</strong></td>
<td><strong>(83,550)</strong></td>
<td><strong>(7,484)</strong></td>
<td><strong>15,302</strong></td>
</tr>
</tbody>
</table>
To: The Council, General Chiropractic Council
From: Paul Ghuman, Director of Resources and Regulation
Subject: Draft Budget 2016
Date: 30 September 2015

Background

15. The Council work plan requests that a draft budget for 2016 be considered at its meeting in September with the final budget being agreed at the December meeting.

16. Annex A shows in tabular form the 2015 budget, a year end management forecast for 2015, as well as, the proposed budget for 2016. A financial forecast for 2016-2018 is set out in the same form at Annex B.

17. Since 2011, the GCC has implemented a series of efficiency measures which have sought to reduce expenditure of the organisation, particularly on our Fitness to Practise (FtP) function.

18. The expenditure profile of the organisation has reduced by over 17% since 2010 when the expenditure for the year was £2,971K compared to a proposed budget for 2016 of £2,541k.

19. FtP costs have also reduced substantially since 2010 when Professional Conduct and Investigating Committee costs were £1,062k compared to a proposed budget for 2016 of £530K, a reduction of 50%. This reduction has also taken place during a period when the level of complaints rose six-fold.

20. For the 2016 budget we are forecasting a small surplus of £7k in 2016. The financial forecast shows steadily rising surpluses of £103k in 2017 and £117k in 2018.

Key assumptions

- The budget has been prepared on the basis of the current strategic aims and the business plan 2016, which are subject to review and agreement by Council.

- The budget for 2016 assumes no increase in the Annual Retention Fee paid by registrants during the period.

- There is no allowance for continuing fitness to practise (formerly known as revalidation) costs as these costs are to be met from the DH grant fund.

- There is a current provision for an increase of 3% staff pay award. The actual salary increase will be determined by the Remuneration Committee on 9 November and clearly has not been reflected in this paper.

- The figures in relation to Test of Competence fees and expenses will be included in the final draft budget.
Summary of 2016 budget

- The proposed 2016 budget predicts an income of £2,549k against the 2015 budget figure of £2,494k. This is an increase of 2% (£55k).
- The budget predicts an expenditure spend of £2,541k against the 2015 budget of £2,534k, an increase of 0.3% (£7k).
- The projected surplus is maintained at just over £7k from a deficit of £40k in 2015.

Income

21. The GCC is reliant on registrant fee income to fund the proposed expenditure programme with over 93% of the income coming from some form of registration fee.
22. Initial registration figures have been revised following lower conversion rate of graduates who actually go on to register with the GCC. This is a trend that is likely to continue as some educational establishments now attract a larger proportion of students from outside the UK.
23. Retention fee income increases from actual receipt in 2015 of £2,156k to a proposed 2016 budget of £2,240k, an increase of just under 4%.
24. Investment income has been calculated on the basis of a 4% return (as per investment strategy) on the current portfolio valuation of £4.2M. The portfolio valuation has been subject to market fluctuation in recent weeks and a paper is attached to the performance report (Agenda Item 8) from the Chief Investment Officer at Schroders.

Expenditure

25. There is an increase in staff costs from £1,044K in 2015 to £1,119K in 2016. This is as a result of the full year effects for two posts recruited in 2015 and also includes a 3% pay award for staff which is subject to consideration by the Remuneration Committee in November.
26. Accommodation costs increase by £6k and this is mainly as a result of a charge from the landlord for installation of a new fire escape. The proportional cost to the GCC of this expenditure is £10k.
27. Council costs have increased by £31k as a result of an appointment process for FtP Committee members.
28. All other costs areas are showing a reduction from the 2015 budget.
29. FtP costs are reduced by £82k from £617k to £570k. This is reduction of 8% and follows reductions in previous years despite an increase in complaints over the same period. The backlog cases will have been determined by the end of 2015 and the number of hearing days for 2016 has been reduced to 110. There were 120 hearing days in 2015.

Action Required

30. Council is asked to consider the first draft budget for 2016.
Annex A (Sept 2015)

Budget 2016 Summary

<table>
<thead>
<tr>
<th></th>
<th>2015 budget</th>
<th>2015 forecast</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Income</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Initial Registration</td>
<td>137,250</td>
<td>137,250</td>
<td>125,250</td>
</tr>
<tr>
<td>Retention - Practising</td>
<td>2,143,200</td>
<td>2,127,200</td>
<td>2,209,600</td>
</tr>
<tr>
<td>Retention - Non Practising</td>
<td>30,300</td>
<td>29,500</td>
<td>30,300</td>
</tr>
<tr>
<td>Non practising to practising</td>
<td>8,000</td>
<td>11,200</td>
<td>8,000</td>
</tr>
<tr>
<td>Restoration</td>
<td>7,500</td>
<td>14,550</td>
<td>7,500</td>
</tr>
<tr>
<td>Investment Income</td>
<td>168,000</td>
<td>168,000</td>
<td>168,000</td>
</tr>
<tr>
<td><strong>Total Income (A)</strong></td>
<td>2,494,250</td>
<td>2,487,700</td>
<td>2,548,650</td>
</tr>
</tbody>
</table>

| **Expenditure**      |             |               |          |
| Staff Costs          | 1,044,114   | 1,053,000     | 1,119,000 |
| IT costs             | 80,000      | 71,500        | 58,000   |
| Office Costs         | 168,500     | 143,000       | 134,000  |
| Accommodation costs  | 228,200     | 229,600       | 244,000  |
| Finance costs        | 21,465      | 21,765        | 22,100   |
| Professional fees    | 157,500     | 124,500       | 157,500  |
| Council costs        | 166,800     | 176,000       | 197,000  |
| Communication        | 18,000      | 12,000        | 14,000   |
| Registrations        | 7,000       | 9,000         | 7,750    |
| Education            | 25,130      | 21,600        | 18,000   |
| Fitness to Practice  | 617,000     | 626,000       | 570,000  |
| **Expenditure (B)**  | 2,533,709   | 2,487,965     | 2,541,350 |

**Surplus / (Deficit) sub total (A-B)**

(39,459) (265) 7,300
## Financial Forecast Summary 2016-2018

### Income

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Registration</td>
<td>125,250</td>
<td>113,250</td>
<td>108,750</td>
</tr>
<tr>
<td>Retention - Practising</td>
<td>2,209,600</td>
<td>2,263,200</td>
<td>2,304,000</td>
</tr>
<tr>
<td>Retention - Non Practising</td>
<td>30,300</td>
<td>30,300</td>
<td>30,300</td>
</tr>
<tr>
<td>Non practising to practising</td>
<td>8,000</td>
<td>8,000</td>
<td>8,000</td>
</tr>
<tr>
<td>Restoration</td>
<td>7,500</td>
<td>7,500</td>
<td>7,500</td>
</tr>
<tr>
<td>Investment Income</td>
<td>168,000</td>
<td>184,000</td>
<td>184,000</td>
</tr>
<tr>
<td><strong>Total Income (A)</strong></td>
<td><strong>2,548,650</strong></td>
<td><strong>2,606,250</strong></td>
<td><strong>2,642,550</strong></td>
</tr>
</tbody>
</table>

### Expenditure

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>Staff Costs</td>
<td>1,119,000</td>
<td>1,153,266</td>
<td>1,187,387</td>
</tr>
<tr>
<td>IT costs</td>
<td>58,000</td>
<td>57,500</td>
<td>57,500</td>
</tr>
<tr>
<td>Office Costs</td>
<td>134,000</td>
<td>139,790</td>
<td>143,984</td>
</tr>
<tr>
<td>Accommodation costs</td>
<td>244,000</td>
<td>230,000</td>
<td>237,100</td>
</tr>
<tr>
<td>Finance costs</td>
<td>22,100</td>
<td>22,763</td>
<td>23,446</td>
</tr>
<tr>
<td>Professional fees</td>
<td>157,500</td>
<td>137,665</td>
<td>139,835</td>
</tr>
<tr>
<td>Council costs</td>
<td>197,000</td>
<td>182,750</td>
<td>183,523</td>
</tr>
<tr>
<td>Communication</td>
<td>14,000</td>
<td>14,420</td>
<td>14,853</td>
</tr>
<tr>
<td>Registrations</td>
<td>7,750</td>
<td>8,000</td>
<td>8,000</td>
</tr>
<tr>
<td>Education</td>
<td>18,000</td>
<td>17,000</td>
<td>29,510</td>
</tr>
<tr>
<td>Fitness to Practice</td>
<td>570,000</td>
<td>540,000</td>
<td>500,000</td>
</tr>
<tr>
<td><strong>Expenditure (B)</strong></td>
<td><strong>2,541,350</strong></td>
<td><strong>2,503,154</strong></td>
<td><strong>2,525,136</strong></td>
</tr>
</tbody>
</table>

### Surplus / (Deficit) sub total (A-B)

<table>
<thead>
<tr>
<th></th>
<th>2016</th>
<th>2017</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>7,300</strong></td>
<td><strong>103,096</strong></td>
<td><strong>117,414</strong></td>
<td></td>
</tr>
</tbody>
</table>
Budget details

Income

1. The draft income budget is:

<table>
<thead>
<tr>
<th></th>
<th>2015 budget</th>
<th>2015 Year End Forecast</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Registration</td>
<td>137,250</td>
<td>137,250</td>
<td>125,250</td>
</tr>
<tr>
<td>Retention - Practising</td>
<td>2,143,200</td>
<td>2,127,200</td>
<td>2,209,600</td>
</tr>
<tr>
<td>Retention - Non Practising</td>
<td>30,300</td>
<td>29,500</td>
<td>30,300</td>
</tr>
<tr>
<td>Non practising to practising</td>
<td>8,000</td>
<td>11,200</td>
<td>8,000</td>
</tr>
<tr>
<td>Restoration</td>
<td>7,500</td>
<td>14,550</td>
<td>7,500</td>
</tr>
<tr>
<td>Investment Income</td>
<td>168,000</td>
<td>168,000</td>
<td>168,000</td>
</tr>
</tbody>
</table>

**Total Income**

|                      | 2,494,250   | 2,487,700              | 2,548,650|

2. The overall income position is that there is an increase of £54k on the 2015 budget. The important factors are an increase of £66k on retention fees but also a reduction of £12k on Initial Registrations. This is as a result of a reduction of graduates actually registering with the GCC and an increase in the percentage of students from outside the UK at Educational Establishments. This is a trend that is likely to continue over the next few years.

3. Investment income has been budgeted at a 4% return on the current portfolio valuation of £4.2M

Staffing

4. The staff expenditure budget is:

<table>
<thead>
<tr>
<th></th>
<th>2015 budget</th>
<th>2015 Year End Forecast</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Salaries</td>
<td>983,114</td>
<td>925,000</td>
<td>1,057,000</td>
</tr>
<tr>
<td>Temporary Staff</td>
<td>18,000</td>
<td>75,000</td>
<td>18,000</td>
</tr>
<tr>
<td>Staff Recruitment</td>
<td>15,000</td>
<td>25,000</td>
<td>15,000</td>
</tr>
<tr>
<td>Staff Development</td>
<td>10,500</td>
<td>10,500</td>
<td>11,000</td>
</tr>
<tr>
<td>Staff Costs</td>
<td>17,500</td>
<td>17,500</td>
<td>18,000</td>
</tr>
</tbody>
</table>

**Staff Cost Total**

|                      | 1,044,114   | 1,053,000              | 1,119,000|

5. Staff salaries increase as a result of full-year effect of two new posts recruited during 2015. The staff costs budget also includes a 3% increase in the pay award (subject to review and agreement by Remuneration Committee). These changes will lead to an increase in salaries of £74k.

6. Temporary staff costs have been higher than expected over the past few years as we sought to deal with the increase in complaints and also covering staff vacancies. We will have a full complement of staff at the end of this year and are confident that the need for temporary staff to support the effective functioning of the office in peak periods will not exceed £18k.
7. Staff Development is budgeted at approximately £700 per employee.

**IT costs**

<table>
<thead>
<tr>
<th>IT Costs</th>
<th>2015 budget</th>
<th>2015 Year End Forecast</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Computers</td>
<td>48,000</td>
<td>37,500</td>
<td>40,000</td>
</tr>
<tr>
<td>Website</td>
<td>10,000</td>
<td>6,000</td>
<td>3,000</td>
</tr>
<tr>
<td>Database Support &amp; Design</td>
<td>22,000</td>
<td>28,000</td>
<td>15,000</td>
</tr>
<tr>
<td><strong>IT Cost Total</strong></td>
<td><strong>80,000</strong></td>
<td><strong>71,500</strong></td>
<td><strong>58,000</strong></td>
</tr>
</tbody>
</table>

8. The budget for 2016 is £58k.
9. Computer costs are reduced to £40K in 2016.
10. The website updates are to take place later this year and the planned development of the system for CPD and Case management changes will take place this year.
11. There will be an IT strategy review which may lead to a number of system changes for the 2017. As such, there will be limited development work on current systems in the meantime.

**Office costs**

12. In total, office costs reduce in 2016 by £34k. This follows a proportional charge from the landlord in 2015 for lift replacement.

**Accommodation**

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Office Rental</td>
<td>101,000</td>
<td>101,000</td>
<td>101,000</td>
</tr>
<tr>
<td>Service Cost -TBC</td>
<td>37,600</td>
<td>37,600</td>
<td>50,000</td>
</tr>
<tr>
<td>Hearing Venue Costs</td>
<td>89,600</td>
<td>91,000</td>
<td>93,000</td>
</tr>
<tr>
<td><strong>Accommodation Costs</strong></td>
<td><strong>228,200</strong></td>
<td><strong>229,600</strong></td>
<td><strong>244,000</strong></td>
</tr>
</tbody>
</table>

13. Accommodation costs include rent for the full year at £101K per annum.
14. The service cost for 2016 has been increased to include the GCC’s proportion for the installation of a new fire escape for the building.
15. Hearing venue costs have increased slightly as we will need to re-negotiate applicable rates for March to December 2016.
Professional fees

16. The budget for professional fees has remained steady at £157k.

<table>
<thead>
<tr>
<th>Professional Fees</th>
<th>2015 budget</th>
<th>2015 Year End</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>PSA levy</td>
<td>6,000</td>
<td>6,000</td>
<td>10,000</td>
</tr>
<tr>
<td>Legal Fees</td>
<td>51,500</td>
<td>50,000</td>
<td>50,000</td>
</tr>
<tr>
<td>Project and Consultancy fees</td>
<td>95,000</td>
<td>64,000</td>
<td>92,000</td>
</tr>
<tr>
<td>Human Resources</td>
<td>5,000</td>
<td>4,500</td>
<td>5,500</td>
</tr>
<tr>
<td><strong>Professional Fees Total</strong></td>
<td><strong>157,500</strong></td>
<td><strong>124,500</strong></td>
<td><strong>157,500</strong></td>
</tr>
</tbody>
</table>

17. A levy to the PSA has been included for the full year at a predicted amount of £10k.

18. Legal fees have been budgeted at £50k for 2016.

19. Project and consultancy fees include the key audits and external costs in delivering the activities in the business plan. The total for 2016 is £92k. This is made up of:

<table>
<thead>
<tr>
<th>Professional consultancy fees</th>
<th>£</th>
</tr>
</thead>
<tbody>
<tr>
<td>Review of FtP decisions</td>
<td>4,000</td>
</tr>
<tr>
<td>Audit of case files- BB</td>
<td>30,000</td>
</tr>
<tr>
<td>Feedback system from FtP case</td>
<td>2,000</td>
</tr>
<tr>
<td>Welsh Language scheme translation</td>
<td>5,000</td>
</tr>
<tr>
<td>Degree Recognition Criteria</td>
<td>20,000</td>
</tr>
<tr>
<td>Guidance notes</td>
<td>9,000</td>
</tr>
<tr>
<td>IT Strategy Review</td>
<td>5,000</td>
</tr>
<tr>
<td>Professionalism research</td>
<td>6,000</td>
</tr>
<tr>
<td>Preparedness of Chiro students into practise</td>
<td>11,000</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>92,000</strong></td>
</tr>
</tbody>
</table>

20. There is a slight increase in the Human resources budget to £5.5k in 2016.

Council costs

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>Council Expenses</td>
<td>23,000</td>
<td>25,000</td>
<td>25,000</td>
</tr>
<tr>
<td>Council Allowances</td>
<td>108,800</td>
<td>111,000</td>
<td>112,000</td>
</tr>
<tr>
<td>Council Development</td>
<td>5,000</td>
<td>5,000</td>
<td>10,000</td>
</tr>
<tr>
<td>Council &amp; Committee Appointment Costs</td>
<td>30,000</td>
<td>35,000</td>
<td>50,000</td>
</tr>
<tr>
<td><strong>Council Cost Total</strong></td>
<td><strong>166,800</strong></td>
<td><strong>176,000</strong></td>
<td><strong>197,000</strong></td>
</tr>
</tbody>
</table>

21. In total, Council costs increase from £168k in 2015 to £197k in 2016, an increase of £29K. In both 2015 and 2016, there is a requirement for an appointment of Council member(s). In addition, a number of FtP members come to the end of their term of office and a budget of £25K for this appointment process has been included.
Fitness to Practice

<table>
<thead>
<tr>
<th>Fitness to Practice</th>
<th>2015 budget</th>
<th>2015 Year End Forecast</th>
<th>2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>Investigating Committee</td>
<td>70,000</td>
<td>45,000</td>
<td>50,000</td>
</tr>
<tr>
<td>Section 32 (Protection of title)</td>
<td>6,000</td>
<td>5,000</td>
<td>5,000</td>
</tr>
<tr>
<td>Health &amp; Professional Conduct Committee</td>
<td>510,000</td>
<td>560,000</td>
<td>480,000</td>
</tr>
<tr>
<td>Appeals &amp; Judicial Review</td>
<td>22,500</td>
<td>7,500</td>
<td>26,500</td>
</tr>
<tr>
<td>Data Protection Act and Freedom of Information</td>
<td>8,500</td>
<td>8,500</td>
<td>8,500</td>
</tr>
<tr>
<td><strong>Fitness to Practice cost total</strong></td>
<td><strong>617,000</strong></td>
<td><strong>626,000</strong></td>
<td><strong>570,000</strong></td>
</tr>
</tbody>
</table>

**Investigating Committee**

22. The budget assumes that the Investigating Committee (IC) will sit on 12 days in the year with six cases on average considered at each IC meeting. There will be four members at each meeting. The quorum is three members. The cost of each meeting increases with the introduction of legally qualified Chairs.

23. It is assumed that the workload will reduce in 2016, following the fall in complaints received in 2014 and the projected reduction in complaints in 2015.

**Professional Conduct Committee**

24. We have assumed 110 hearing days for 2016. This figure is slightly lower than the number of hearing days in 2015 (120 days) and 2014 (131 days).

25. The reduction in costs is due to our expectation that the number of hearing days will be reduced.

26. We will be able to list cases in a timelier manner once the backlog of cases at the PCC has been determined by the end of the year. We are now listing cases which were received in 2015 and not from any prior year.

27. It must always be borne in mind that a number of other factors in this area cannot be accurately predicted. For example, the relative complexity of cases and the exact number of complaints received. We will monitor these factors as we progress towards the end of this year and also during 2016.

**Capital Plan**

28. The plan for 2016 is for new chairs in the office at a total cost of £12K and also replacement of some workstations at a cost of £3k. We will also be upgrading some of other software licenses at a total cost of £7.5k The total planned expenditure spend is £22.5k

**Public protection implications**

29. The current level of hearing days seeks to ensure that cases are dealt with in a timely manner and we are thereby improving public protection.

**Policy and Communications implications**

30. Policy projects planned are described in the Business Plan 2016.

**Legal implications**
31. None arising from this paper.

Equality and Diversity implications
32. None arising from this paper.

Resource implications
33. These are highlighted in the paper.

Recommendations
34. The Council is asked to consider the proposed 2016 Budget and the 2016 Capital plan
To: General Chiropractic Council
From: Paul Ghuman, Director of Resources and Regulation
Subject: Reserves Policy
Date: 3 December 2015

Purpose

1. The purpose of the paper is for the Council to agree its current reserves policy or amend it as it feels appropriate.

Executive Summary

2. It is extremely difficult to predict reserves accurately as risk and associated costs cannot always be foreseen and quantified. It is therefore a matter of judgement as to what level of reserves is appropriate. The calculations below suggest reserves of £2.9M are prudent for the organisation. General reserves as at 31 December 2014 were £3.6M, standing at just over 17 months of 2014 operating spend.

3. In general, other regulators have a reserves policy which relates to approximately six months of operating spend. However, a cautionary approach to the level reserves required means that they should also be considered in light of the fact that as a small regulator, we are unable to absorb fluctuations in the same manner as a large regulator can.

Background

4. A reserves policy is designed to ensure that the GCC has sufficient funds in order that it can continue to maintain its statutory functions. It is good practice for an organisation’s reserves policy to be regularly reviewed.

5. Total reserves are calculated as the difference between total assets less total liabilities. It is not a simple calculation of cash and investments available.

6. This leads to the next question of “just how much of the reserves are actually free reserves”. Free reserves are defined as those which are liquid (such as cash) or can be quickly converted into liquid reserves (such as investments). The GCC is extremely fortunate in that we currently have a large percentage of our reserves available as cash or can quickly sell of part of the investment portfolio to produce cash, if required.

Why have reserves?

7. The reason for having a reserve level is to protect the GCC from significant events which may have a substantial effect. In reality, these are likely to be any major loss of revenue or any sudden major increase in expenditure.

8. As the GCC’s revenue comes mainly from registration fees, any major loss of revenues would be due to a reduction in the number of registrants. The Executive consider that the risk of this happening is low. A small reserve level of £0.2M is allocated to this risk.
9. The balance of the GCC’s revenue comes from its investment income from the portfolio and therefore is subject to some degree of negative fluctuation when trading conditions are difficult resulting in corporate companies reducing or even declining to declare a dividend. The risk of fluctuation in investment income is reasonably high, and in most circumstances also unforeseeable. A small reserve level of £0.2M is allocated to this risk.

10. The GCC’s expenditure is liable to greater fluctuations than income. This is largely due to the fact that we have no control on the number of Fitness to Practice (FTP) complaints we may receive in any given period and the complexity of each complaint. As mentioned previously, as the GCC deals with a relatively few number of cases per annum, any substantial increase in complaint numbers or their complexity would have a disproportionate effect on the financial position of the organisation. It is considered that in these circumstances a reserve level of £1M is allocated to this risk. This is based on prior experience when a large number of complaints were received.

11. It should be appreciated that other factors such as legal claims, refurbishment of new premises, other non-recurrent expenditure in year and the possible impact of IT strategy review may lead to losses or agreeing deficit budgets over the next few years. This would lead to a reduction in the reserves level. It is considered that this reserve should be allocated £0.5M.

12. The organisation will have a degree of costs which are termed as Contingent events but are incurred at the closure of the business such as discharging contract and lease liabilities as well as staffing obligations. It is considered that a reserve level of £1.0M should be allocated for this purpose.

<table>
<thead>
<tr>
<th>Reserve</th>
<th>Reserve level</th>
</tr>
</thead>
<tbody>
<tr>
<td>Registration income</td>
<td>0.2M</td>
</tr>
<tr>
<td>Investment income</td>
<td>0.2M</td>
</tr>
<tr>
<td>Regulatory costs</td>
<td>1.0M</td>
</tr>
<tr>
<td>Income and Expenditure</td>
<td>0.5M</td>
</tr>
<tr>
<td>Contingency</td>
<td>1.0M</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>2.9M</strong></td>
</tr>
</tbody>
</table>

Proposal

13. Considering the above, Council is asked to agree reducing the current reserves level from £3.6M to a lower level of £2.9M.

Financial implications

14. The financial implications are that the reduction in the reserves level by £700k can be carried out in a number of ways and over a defined period of time. The Executive will put forward proposals to reduce the reserves level. Financial options put forward by Council are considered in a separate paper.

Legal Implications

15. There are no legal implications in reducing the level of reserves cover in place.

Risk Implications

16. There are no risk implications. Any risks that have been identified have been covered by an appropriate level of reserves cover.
Equality Implications

17. There are no equality implications.

Communications policy

18. If there is a decision to reduce reserves, that will be communicated to the profession by way of newsletter and to other stakeholders in the Annual Report.
1. Purpose

The purpose of this paper is to present to Council the Performance Report covering the period up to the end of October 2015.

2. Executive Summary

The adverse position in relation to the KPI exception will not improve appreciably by the end of the year. However, following our decision to increase hearing days over recent years, the pipeline of PCC cases in 2015 has now dropped significantly by over 50%. This will now allow the team to deal with current cases only and ensure that this KPI is met in 2016.

Business plan activities scheduled for 2015 were ambitious, but have been achieved to a large degree by the end of Quarter 3. There were some knock-on effects of the Code of Practice being approved later in the year than originally anticipated. These will mean that the guidance work will be completed in 2016 and that the majority of the work in relation to the Degree Recognition will be completed in 2016.

The financial summary shows the position as at the end of October 2015 as being a surplus to date of £7k as detailed further in this report.

However, I would like to concentrate on the estimated year end figures. Income is likely to be below forecast by just over 2%. This will lead to a difference of £60k. The major problem is that the 4% forecast investment income is likely to be closer to an actual return of 3%, leading to a shortfall of approximately £40k.

The final year end position is likely to be closer to a deficit of £82k rather than a deficit of £40k.
2. Summary

Key Performance indicators

The only indicator that is showing a red status (where we are not meeting our target), is “listing PCC hearings within 9 months of referral of case from the IC”. The current position is that 60% of cases have been listed within nine months in 2015.

There have been improvements throughout the year in determining old cases, and this is exemplified by the pipeline of cases reducing from 22 to 10 at the end of October. This is a reduction of over 50%.

However, as these are old cases, the KPI percentage has not improved to any appreciable degree as the cases determined were referred some time ago. This will now change with the large percentage of old cases having now been determined.

Business Plan

Most activities due to be delivered by the end of Quarter 3 have progressed as planned. Key activities which have been delivered during the year are a reduction in hearing room costs, the approving of the Code of Practise and Standard of Proficiency and the recent appointment of legally Qualified Chairs of the Fitness to Practise Committees.

The report highlights that training in relation to Equality Impact assessments has now been scheduled for December, and that we have started work in relation to producing guidance to support the approval of the Code of Practice. That work will continue into 2016.

As a result of the late approval of the Code, work in revising the Degree Recognition Criteria will now commence and be developed in 2016.

Research into student preparedness to practice will now also commence in 2016.

Financial Summary

Income

At the end of October, the income to date was £2,428k and the expected income was £2,459k. This leads to a difference of £30k on what we expected to receive. This is primarily as a result of investment income showing a difference of £25k against that forecast. The investment income forecast will be closer to 3% than the forecast of 4%.

The difference on registration income is £5k. We will look further into the reasons for the difference in new registration income as this is below the forecast figure.

Expenditure

At the end of October we have spent £1,857k. We expected to spend £1,894k. Thus, we have spent £37k less than forecast.
There is a slight negative difference of £11k on FtP costs. The costs in relation to FtP can be extremely variable. This level of variance is fairly minimal and has been closely monitored throughout the year.

There are positive differences on accommodation, IT costs and office costs of £36k in total.

The surplus for the period is £571k, in comparison to a forecast surplus of £564k, leading to a positive difference of £7k.

The grant balance from the Department of Health for work on Continuing Fitness to Practice was £70k at the end of October 2015.

Portfolio

Stock markets have been in some turmoil in recent months and the portfolio valuation at 31 October was £4,253k.

3. Action required

Council is asked to note the Performance Report.

Paul Ghuman
Email: p.ghuman@gcc-uk.org
Telephone: 020 7713 5155
Performance Management and monitoring of the operational action plan

October 2015
<table>
<thead>
<tr>
<th>Overview</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Major Events</strong></td>
</tr>
<tr>
<td><strong>Professional Associations</strong></td>
</tr>
</tbody>
</table>
The Chief Executive and Registrar (CER) and Chair attended the BCA’s conference, while the CER also attended the SCA’s and UCA’s Annual General Meeting. |

| **PSA** |
The PSA has confirmed that it will be requesting information from us on our policies, practices and procedures ahead of the Performance Review 2015/16. The deadline for this has been extended to mid-December. |

| **Guidance** |
Drafts of the Guidance that will be supporting the new Code have been completed and will be going out to consultation during November. |

| **Test of Competence** |
The final interview panel for 2015 has taken place. A further six assessors have been successfully recruited. |

| **Department of Health** |
A new mandatory reporting duty for chiropractors to report female genital mutilation (FGM) cases to the police came into effect from 31 October. |

| **Business Plan delivery** |
Council agreed that the GCC’s Executive should report on any activity that was not proceeding as planned. There is one activity that has been delayed and three activities that are now planned to start in 2016. These are highlighted on page 6. |

| **Key Performance Indicators** |
We are not hitting our target to list 90% (actual 60%) of PCC hearings within nine months of referral. This is explained on Page 5. |

| **Financial** |
The net difference on retention income is £5k at the end of October 2015. |
The investment portfolio income is currently £115K. This is £25K less than expected. The year end income forecast for the portfolio is 3% (£120K). The target given to the investment manager is 4%. The balance will be made up from capital as agreed in the investment strategy. The profit on our investment portfolio has increased since last month to £253k. There has been a recent recovery following adverse fluctuations over the past few months. Cazenove will be present at the next Council meeting. |
Expenditure to date is below that planned by £37K. |
The overall surplus to date is £7K. |
The financial summary is on page 3 and 4. |
## Financial Summary – As at 31st October 2015

<table>
<thead>
<tr>
<th></th>
<th>Actual</th>
<th>Budget</th>
<th>Difference</th>
<th>2015 Budget</th>
<th>Note</th>
<th>Year End estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Initial Registration</td>
<td>125,050</td>
<td>130,000</td>
<td>-4,950</td>
<td>137,250</td>
<td>1</td>
<td>125,050</td>
</tr>
<tr>
<td>Non practising to practising</td>
<td>12,800</td>
<td>8,000</td>
<td>4,800</td>
<td>8,000</td>
<td>1</td>
<td>12,800</td>
</tr>
<tr>
<td>Restoration</td>
<td>16,800</td>
<td>7,500</td>
<td>9,300</td>
<td>7,500</td>
<td>1</td>
<td>16,800</td>
</tr>
<tr>
<td>Retention - Practising</td>
<td>2,129,600</td>
<td>2,143,200</td>
<td>-13,600</td>
<td>2,143,200</td>
<td>1</td>
<td>2,129,600</td>
</tr>
<tr>
<td>Retention - Non Practising</td>
<td>30,000</td>
<td>30,300</td>
<td>-300</td>
<td>30,300</td>
<td>1</td>
<td>30,000</td>
</tr>
<tr>
<td>Investment Income</td>
<td>114,662</td>
<td>140,000</td>
<td>-25,338</td>
<td>168,000</td>
<td>2</td>
<td>120,000</td>
</tr>
<tr>
<td><strong>Income (A)</strong></td>
<td>2,428,912</td>
<td>2,459,000</td>
<td>-30,088</td>
<td>2,494,250</td>
<td></td>
<td>2,434,250</td>
</tr>
<tr>
<td><strong>Expenditure</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Staff Costs</td>
<td>845,628</td>
<td>833,428</td>
<td>-12,199</td>
<td>1,044,114</td>
<td></td>
<td>1,084,000</td>
</tr>
<tr>
<td>IT costs</td>
<td>42,148</td>
<td>58,333</td>
<td>16,186</td>
<td>80,000</td>
<td>3</td>
<td>76,000</td>
</tr>
<tr>
<td>Office Costs</td>
<td>100,334</td>
<td>115,417</td>
<td>15,083</td>
<td>168,500</td>
<td>4</td>
<td>149,715</td>
</tr>
<tr>
<td>Accommodation Costs</td>
<td>185,367</td>
<td>190,167</td>
<td>4,800</td>
<td>228,200</td>
<td></td>
<td>230,600</td>
</tr>
<tr>
<td>Finance costs</td>
<td>5,712</td>
<td>4,583</td>
<td>-1,128</td>
<td>21,465</td>
<td></td>
<td>21,765</td>
</tr>
<tr>
<td>Professional fees</td>
<td>87,446</td>
<td>98,083</td>
<td>10,637</td>
<td>157,500</td>
<td>5</td>
<td>121,500</td>
</tr>
<tr>
<td>Council costs</td>
<td>129,943</td>
<td>134,833</td>
<td>4,890</td>
<td>166,800</td>
<td></td>
<td>176,000</td>
</tr>
<tr>
<td>Communication</td>
<td>5,186</td>
<td>11,000</td>
<td>5,814</td>
<td>18,000</td>
<td></td>
<td>10,500</td>
</tr>
<tr>
<td>Registrations</td>
<td>5,924</td>
<td>2,500</td>
<td>-3,424</td>
<td>7,000</td>
<td></td>
<td>9,000</td>
</tr>
<tr>
<td>Education</td>
<td>14,108</td>
<td>21,525</td>
<td>7,417</td>
<td>25,130</td>
<td></td>
<td>21,600</td>
</tr>
<tr>
<td>FtP</td>
<td>435,710</td>
<td>424,732</td>
<td>-10,977</td>
<td>617,000</td>
<td>6</td>
<td>615,500</td>
</tr>
<tr>
<td><strong>Expenditure (B)</strong></td>
<td>1,857,505</td>
<td>1,894,602</td>
<td>37,098</td>
<td>2,533,709</td>
<td></td>
<td>2,516,180</td>
</tr>
<tr>
<td><strong>Surplus / (Deficit)</strong></td>
<td>571,408</td>
<td>564,398</td>
<td>7,010</td>
<td>-39,459</td>
<td>-81,930</td>
<td></td>
</tr>
</tbody>
</table>

### Grant Funding - Earmarked for Revalidation

<table>
<thead>
<tr>
<th></th>
<th>Balance b/f</th>
<th>Income</th>
<th>Expenditure</th>
<th>Balance c/f</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>76,818</td>
<td>0</td>
<td>6,203</td>
<td>70,615</td>
</tr>
</tbody>
</table>
October 2015 Performance report

Note 1:
Initial registration fees remain £5k lower than expected. At this point in time in the year we are not expecting this figure to increase to any large degree as the retention process has begun. We are currently monitoring this and will be analysing these figures in detail.

Note 2:
The current income performance on the investment portfolio has fallen behind that expected by £25k. The actual income return is likely to be closer to 3% which leads to a year end forecast of £120K. The balance up to the 4% budget will be made up from capital.

Note 3:
The costs for IT are lower than forecast at this point in the year by £15K. This is as a result of website development being slower than anticipated and also some IT costs now being deferred to quarter 4.

Note 4
Variable office costs such as stationary, copying and postage are below that anticipated following the reduction in the number of open FtP cases.

Note 5
Professional fees are lower than expected as a result of the Degree Recognition Criteria project start date being delayed as the Code was only approved in June 2015. The large proportion of this work will now fall in to 2016 and possibly finalise in 2017.

Note 6
FtP cost remain difficult to predict and are showing a slight negative variance of £11K to date. The executive will continue to monitor these costs over the next few months. The variance may increase as we instruct legal counsel in some cases due to a lawyer advocate being unwell.

Portfolio Valuation
The portfolio valuation is £4,253,493 as at 31 October 2015. The investment manager will be at the Council meeting on 3 December to present the performance details for the portfolio.
## Key Performance Indicators

<table>
<thead>
<tr>
<th>Fitness to Practise</th>
<th>Status</th>
<th>Exception Information</th>
</tr>
</thead>
<tbody>
<tr>
<td>To list 90% of PCC hearings within nine months of referral</td>
<td></td>
<td><strong>Actual rate</strong>&lt;br&gt;60% of cases so far listed in 2015 were within nine months of referral. A small number of old cases are listed for the remainder of the year. It is likely that this percentage rate will remain steady at this rate for 2015 but show a marked improvement in 2016.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Reason</strong>&lt;br&gt;The reason for this failure to meet our target is because of the increased number of referrals to the PCC following determination of the backlog of cases by the IC at the end of 2012 and during 2013. There have, of course, been the referrals from normal complaints in the following years as well.</td>
</tr>
<tr>
<td></td>
<td></td>
<td><strong>Action</strong>&lt;br&gt;To cope with this the number of hearing days allocated in 2015 remains high.</td>
</tr>
<tr>
<td></td>
<td></td>
<td>It is also important to note that the pipeline of PCC cases has dropped from 22 at the start of the year to 10 at the end of October. This is a really good achievement and now allows the FtP system to investigate relatively recent cases.</td>
</tr>
</tbody>
</table>

During the first ten months of 2015, the GCC has received 44 complaints which are currently being investigated for determination by the Investigating Committee. During the first ten months of 2014 we had received 60 complaints.
Operational plan progress – by strategic aim and activity

The majority of activities due for completion by the third quarter of 2015 have been achieved including agreeing the Code of Practice and Standard of Proficiency and appointing legal qualified chairs for the FtP Committees.

The activity which is currently delayed is the staff training in carrying out Equality Impact assessments and this has now been scheduled for December 2015.

The activities which will now be carried out in 2016 and have been included in the Business Plan for 2016 are:

- Review of Criteria for recognition of Degrees and associated activities
- Guidance to support the Code of Practice (initial work has started in 2015 to be completed in 2016)
- Research into Student Fitness to Practise and Pre-registrant professionalism
PROCEDURE FOR DEALING WITH COMPLAINTS AGAINST MEMBERS OF THE COUNCIL OF THE GCC

3A: General principles

3.1 This procedure is intended to deal with any complaints raised against any Council Member(s) ("the Relevant Member"), whether by any other Member(s), any employee(s) or officer(s) of the GCC, or any third party or parties. It is designed to establish the facts promptly and to deal consistently with complaints that may arise.

3.2 Time limits stated in this procedure are for guidance only and may be extended if the person leading the relevant stage (such as informal resolution, formal investigation, formal hearing or appeal) considers it appropriate to do so.

3.3 In this section 3, Council** means the Council without the Relevant Member, any Accompanying Member and any Appeal Accompanying Member.

3.4 A Relevant Member must take all reasonable steps to attend any meetings to which they are invited under this procedure.

3.5 Any complaints and details of any informal resolutions should be placed on file along with a record of any decisions taken, any appeal notice, the outcome of any appeal, and any relevant notes or other documents compiled during the complaint process. These will be kept and processed in accordance with our Data Protection Policy, but subject to:

(a) any legal or regulatory requirements, and/or

(b) the Chair of the Audit Committee, the Chair of Council or the Council** reasonably considering that any details should be disclosed to one or more third parties.

3.6 In the event of any formal hearing and/or any appeal hearing under this procedure, these will normally be held in private unless determined otherwise (acting reasonably) by whoever is leading that particular aspect of the process (namely the Investigator or whoever is hearing the appeal).

3B: Receipt of a complaint against a Member

3.7 Any complaint against a Member should be made in writing to the Chair of Council. If a complaint is received by another Member, or an officer or employee of the GCC, it should be forwarded to the Chair of Council as soon as reasonably practicable.

3.8 Alternatively, if the complaint is about the Chair of Council, it should be addressed or forwarded to the Chair of the Audit Committee.

3.9 If an oral complaint is received, the complainant should be asked to put this in writing. If the complainant is unable or unwilling to do so, the person receiving the complaint should note it as best they can, and this will be taken forward as the written complaint.

3C: Passing to the Chair of the Audit Committee

3.10 Upon receiving a written complaint about a Member, the Chair of Council will pass it to the Chair of the Audit Committee.
3.11 Alternatively, if the complaint is about the Chair of the Audit Committee, the Chair of Council will pass it to another Member chosen by the Chair of Council. If this occurs, the references (below) to "the Chair of Audit Committee" which are marked * shall be taken to refer to that alternative Member.

**3D: Approach to complaint**

3.12 The Chair of the Audit Committee* will pursue whichever of the following approaches they consider, at their discretion, to be appropriate:

(a) adopt the formal process set out in section 3E onwards, below;

(b) dismiss the complaint;

(c) take whatever steps he/she considers appropriate, to seek to resolve the complaint informally; or

(d) nominate another Member, a GCC employee, or an external person to seek an informal resolution of the complaint.

3.13 In choosing between options (a) - (d), the Chair of the Audit Committee* may seek further information from the complainant and/or the Relevant Member.

3.14 The Chair of the Audit Committee* will notify the Chair of Council, the Relevant Member, and the complainant of the chosen course of action.

3.15 If options (c) or (d) are pursued, and are unsuccessful, the Chair of the Audit Committee* will choose again from options (a) and (b).

3.16 Discussions to reach an informal resolution would normally be held in private.

3.17 If an informal resolution is reached, the Relevant Member, the complainant and the Chair of Council will be informed in writing.

3.18 Ordinarily details of an informal resolution will not be reported to Council unless the Chair of Council considers it necessary in the circumstances.

3.19 In what he/she reasonably considers to be exceptional circumstances, the Chair of the Audit Committee* may vary this section 3D as appropriate to a particular case, in relation to matters over which they have responsibility.

**3E: Formal investigation**

3.20 The Chair of the Audit Committee* will investigate the complaint, or will appoint an external Investigator to do so. In either case, the person investigating is referred to below as "the Investigator".

3.21 The Investigator may, at his or her discretion, appoint others to assist the investigation, such as another Member, an employee or officer of the GCC, or a third party.

3.22 The purpose of an investigation is to establish a fair and balanced view of the facts relating to the complaint. This may involve reviewing any relevant documents and emails, interviewing the relevant individuals, taking witness statements, and such other enquiries as the Investigator considers appropriate. The nature and extent of the investigation will depend on
the nature of the allegations and will vary from case to case. It is likely to include a meeting with the Relevant Member. It may also include meeting or speaking with the complainant.

3.23 The Relevant Member must co-operate fully and promptly with any investigation. This will include informing the Investigator of the names of any witnesses, disclosing any relevant documents, and attending investigative meetings if requested to do so by the Investigator.

3.24 In what he/she reasonably considers to be exceptional circumstances, the Investigator may vary this section 3E as appropriate to a particular case.

3F: Formal hearing

3.25 The Investigator will conduct a formal hearing. The purpose of the formal hearing is to review the evidence and enable the Relevant Member to respond formally to the allegations. The Investigator will also discuss other relevant aspects of the investigation, and the evidence this has produced, to the extent that the Investigator considers it appropriate to do so.

3.26 In advance of the formal hearing, the Investigator shall formally notify the Relevant Member in writing of the allegations and the basis for those allegations. This may include, at the Investigator's discretion, such material as:

(a) a summary of relevant information gathered during the investigation;
(b) documents which will be relied on at the formal hearing; and/or
(c) witness statements which will be used at the formal hearing, except where the Investigator considers it appropriate to keep the witness's identity confidential (in which case the Investigator will give the Relevant Member as much information as possible while maintaining that confidentiality).

3.27 The Investigator will give the Relevant Member written notice of the date, time and location of the formal hearing. The Relevant Member will be given no less than five working days to prepare their case, based on the information which the Investigator has provided.

3.28 The Investigator may decide to ask any other relevant person whom they consider appropriate to attend the formal hearing, and the Investigator may question them and discuss the complaint with them. The Member may advise the Investigator of issues to raise with others, and the Investigator may, at his/her discretion, do so.

3.29 If the Relevant Member would like particular people to attend the formal hearing, he/she can propose this to the Investigator, but must do so sufficiently in advance of the formal hearing, and their attendance will be at the discretion of the Investigator.

3.30 The Relevant Member will have a right to be accompanied at the formal hearing by another Member who has not been involved in the complaint or process to date ("an Accompanying Member"). The Accompanying Member will not act as an advocate nor speak on the Relevant Member's behalf.

3.31 The Investigator may adjourn the formal hearing at any time, for example if the Investigator considers it appropriate to carry out further investigation in the light of points that have arisen.

3.32 If there is an adjournment of the formal hearing, and further investigation, the Relevant Member will be given such details of that investigation as the Investigator considers appropriate and necessary for the satisfactory completion of the formal hearing process. The
Relevant Member will also be given a reasonable amount of time, usually not less than five working days, to prepare their case based on that further information, before the formal hearing reconvenes.

3.33 In what he/she reasonably considers to be exceptional circumstances, the Chair of the Audit Committee* or the Investigator may vary this section 3F as appropriate to a particular case.

3G: Finding

3.34 The Investigator will reach a provisional decision about the complaint, and will do so on the balance of probabilities. The Investigator will record this decision in a draft report.

3.35 If the draft report upholds all or any aspects of the complaint, it will also specify a proposed sanction to be applied, from the list of sanctions (a)-(f) in clause 3.40 below.

3.36 A copy of the draft report will be sent to the Chair of Council, the Relevant Member and (if the Investigator considers it appropriate, due to exceptional circumstances) the complainant. If the Investigator is not the Chair of the Audit Committee*, a copy will also be sent to the Chair of the Audit Committee*.

3.37 The complainant (if he/she is sent a copy) and the Relevant Member will be given five working days in which to make written comments or representations to the Investigator about the contents of the draft report.

3.38 The Investigator will consider any such comments or representations received from those to whom the draft report has been given, and finalise his/her decision, the report and the proposed sanction(s) (if any), and send it to the Chair of Council and (if the Investigator is not the Chair of the Audit Committee*) to the Chair of the Audit Committee*.

3.39 In what he/she reasonably considers to be exceptional circumstances, the Chair of the Audit Committee* may (for example, upon a request by the Investigator) vary this section 3G as appropriate to a particular case.

3H: Sanctions

3.40 If the Investigator finds that a Relevant Member has breached the GCC’s Code of Conduct or their conduct otherwise falls below the standards expected of a Member, the available sanctions are:

(a) instructions or advice to the Relevant Member regarding their future conduct ("Sanction (a)");

(b) a caution to the Relevant Member, short of recommending suspension or removal as a Member ("Sanction (b)");

(c) a recommendation to the Privy Council that the Relevant Member shall be removed from membership of the Council ("Sanction (c)");

(d) informal resolution, as referred to in 3.12(c) or 3.12(d), above;

(e) any other sanction which the Investigator (or, if the Investigator is not a Member, the Chair of the Audit Committee*) considers appropriate in the circumstances ("Sanction (e)"); or

(f) no sanction.
3.41 In what they reasonably consider to be exceptional circumstances, the Chair of the Audit Committee* or the Council** may vary this section 3H as appropriate to a particular case.

3I: Right of appeal

3.42 If the Relevant Member is dissatisfied with the findings of the report and/or the sanction(s), the Relevant Member may appeal in writing within five working days after he/she has received both the report and notification of the sanction(s). In doing so, the Relevant Member should detail the reason(s) for the appeal.

3.43 For the avoidance of doubt, the complainant has no right of appeal. However, if they are a GCC employee, they have access to the GCC grievance procedure.

3.44 In what he/she reasonably considers to be exceptional circumstances (for example, reasonable grounds for delay by the Relevant Member in lodging an appeal), the Chair of Council may vary this section 3I as appropriate to a particular case.

3J: Appeal process

3.45 Subject to paragraph 3.46 below, the appeal will be heard by the Chair of Council. He/she may decide instead that the appeal will be heard by an appeal panel, consisting of another Member (who has not been materially involved in the complaint) and an external third party, both of whom shall be chosen by the Chair of Council.

3.46 If the complaint is against the Chair of Council, the appeal will be heard by a three-person panel consisting of the longest serving Member (ignoring the Chair of Council, the Chair of Audit and any Member who has been materially involved in the complaint), and that Member's chosen other Member (who has not been materially involved in the complaint) and chosen external third party.

3.47 Whoever is hearing the appeal will decide what form the appeal hearing will take, such as a re-hearing, a paper consideration, or otherwise. Generally an appeal will at least entail a meeting with the Relevant Member, although this is not essential. In exercising their discretion on format, whoever is hearing the appeal will take note of the grounds of the appeal, the circumstances of the case and any new information that has come to light since the original decision.

3.48 Whoever is hearing the appeal may choose to take further evidence from whoever they wish and consider any other evidence which they consider appropriate.

3.49 The Relevant Member will have a right to be accompanied at the appeal hearing, by "an Appeal Accompanying Member", who can be the Accompanying Member or another Member who has not been involved in the complaint or process to date. The Appeal Accompanying Member will not act as an advocate nor speak on the Relevant Member's behalf.

3.50 Whoever hears the appeal can:

(a) confirm the original decision and sanction(s);
(b) increase the sanction(s);
(c) reduce the sanction(s);
(d) reverse the finding against the Relevant Member, in whole or part;
(e) make detail corrections to the original decision, such as correcting dates or other obvious factual errors, without altering the outcome or sanction;

(f) send the matter back to the Investigator for further or fresh consideration;

(g) or decide such other outcome as whoever hears the appeal considers appropriate.

3.51 Unless there are exceptional circumstances such as an appeal process which reveals a need for further extensive investigations by those deciding the appeal, the Relevant Member will be informed in writing of the decision of the appeal hearing within ten working days of the appeal hearing. However, this timescale is indicative only.

3.52 The written decision of the appeal is final, and no further appeal may be made. The only exception to this principle is if the appeal decision was to send the matter back for further consideration by the Investigator: in those circumstances, any revised decision by the Investigator will be subject to a fresh right of appeal under this section 3J.

3.53 In what they reasonably consider to be exceptional circumstances, the Council** may vary this section 3J as appropriate to a particular case.

3K: Implementation of any penalty against a Relevant Member

3.54 If the Investigator is the Chair of the Audit Committee* and he/she decides upon Sanction (a), Sanction (b) or Sanction (e), he/she will impose this sanction once the deadline for an appeal has passed without any appeal being received.

3.55 If the Investigator is not the Chair of the Audit Committee* and he/she decides upon Sanction (a), Sanction (b) or Sanction (e), the Chair of the Audit Committee* will impose this sanction once the deadline for an appeal has passed without any appeal being received.

3.56 If an appeal hearer decides to impose or approve Sanction (a), Sanction (b) or Sanction (e), he/she will impose this sanction once the appeal process is complete.

3.57 If the Investigator is the Chair of the Audit Committee* and he/she decides upon Sanction (c), then once the deadline for an appeal has passed without any appeal being received he/she will notify the Chair who will ask the Privy Council to remove the Relevant Member from the Council.

3.58 If the Investigator is not the Chair of the Audit Committee* and he/she decides upon Sanction (c), then once the deadline for an appeal has passed without any appeal being received, the Chair of the Audit Committee* (unless he/she considers there to be exceptional circumstances warranting informal resolution or a different Sanction, in which case he/she will attempt that informal resolution, impose that different Sanction or notify the Relevant Member that he/she is unilaterally granting an extension to the deadline for appealing) will notify the Chair who will ask the Privy Council to remove the Relevant Member from the Council.

3.59 If an appeal hearer decides to impose or approve Sanction (c), then once the appeal process is complete he/she will notify the Chair who will ask the Privy Council to remove the Relevant Member from the Council.

3.60 In what they reasonably consider to be exceptional circumstances, the Chair of the Audit Committee* or the Council** may vary this section 3K as appropriate to a particular case.
<table>
<thead>
<tr>
<th>Council work plan for 2016</th>
</tr>
</thead>
<tbody>
<tr>
<td>10th March</td>
</tr>
<tr>
<td>Action log</td>
</tr>
<tr>
<td>Update report from the Audit Committee</td>
</tr>
<tr>
<td>Review of Strategic Risk Register</td>
</tr>
<tr>
<td>Guidance notes</td>
</tr>
<tr>
<td>Management letter and letter of representation</td>
</tr>
<tr>
<td>Financial Statements</td>
</tr>
<tr>
<td>Annual report and accounts</td>
</tr>
<tr>
<td>Poss Education Standards</td>
</tr>
</tbody>
</table>

**ITEMS TO NOTE**

*Performance Report emailed monthly (last week of each month)*

<table>
<thead>
<tr>
<th>March</th>
<th>June</th>
<th>September</th>
<th>December</th>
</tr>
</thead>
<tbody>
<tr>
<td>Minutes from Audit Ctte</td>
<td>Minutes from Audit Ctte</td>
<td>Minutes from Education Ctte</td>
<td>Minutes from REmCo</td>
</tr>
<tr>
<td>Minutes from Education Ctte</td>
<td>Minutes from Education Ctte</td>
<td>Council dates for 2017</td>
<td>Minutes from Education Ctte</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>Minutes from Audit Ctte</td>
</tr>
</tbody>
</table>