



Council
1 November 2017
Registration Assessment review

Classification Public

Purpose For discussion

Issue The fees payable to registration assessors and those charged to international applicants has not been reviewed for some time. This paper seeks Council approval to increase the fees which can be claimed by registration assessors and to publish a consultation on increasing the charges levied on international applicants.

- Recommendations**
1. To agree to increase the amount which may be claimed by a registration assessor for undertaking registration assessments to £306 for each registration assessment activity, effective from 1 April 2018.
 2. To agree to publish a consultation document on increasing the charges levied on international registration applicants.

Financial and resourcing implications The consultation proposes an increase to registration assessment fees so that the burden of the cost of registration assessment falls on those applying for registration rather than existing registrants.

Equality and diversity implications There are potential equality and diversity implications arising from the changes to costs because if the consultation proposals are agreed, the cost of registration assessments will increase for internationally qualified applicants. We have developed these matters through a draft equality impact assessment which will be available as part of the consultation. We have sought to explore and ensure the fairness of the proposals as a proportionate way of securing a legitimate aim and collecting further data about this is a key component of the consultation.

Communications implications

The consultation will be promoted to all our stakeholders and published through our usual channels. We will also take particular steps to bring the consultation to potential applicants because this group is the group most likely to be affected by our proposals.

Annex

Consultation document: Charges payable by international qualified applicants.

Authors

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Background

1. The 2017-18 Business Plan set out a number of cross-departmental registration based activities which have been reported to the Policy Advisory Committee (PAC). One of these work streams was as follows:

Finalise and implement proposals for consultation on changes to registration assessment charges for international qualified applicants	Registration and Resources and Professional Standards	September 2017 to March 2018
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2. The General Osteopathic Council (GOsC) receives applications for registration from internationally qualified applicants. Depending on whether the internationally qualified applicant is from within the EU-EEA or outside of the EU-EEA then the pathway for registration is different.
3. For the purpose of this paper, Council members do not need to know specific detail about the registration pathways, other than to have an appreciation that there may be three stages to an application which are:
 - Assessment of qualification
 - Further evidence of practice questionnaire
 - Assessment of clinical performance.
4. The GOsC has a pool of registered osteopaths who have been appointed as registration assessors to assist with these international applications. The registration assessors review materials provided by the international applicant and make a decision about whether an applicant meets UK standards, i.e. those outlined within the *Osteopathic Practice Standards*. If an international applicant meets UK standards, they may apply for registration.

Discussion

5. As part of the work stream to develop proposals for changing the charges paid by internationally qualified applicants, it became clear there needed to be a review of the fees payable to registration assessors as these fees had not been considered for some time. The fees paid to registration assessors appeared to be disproportionately low for the work involved, which had been amplified by the introduction of the new EU Directive which had made the EU application process more labour intensive.

Fees payable to Registration Assessors

6. The fees that are paid to assessors at present are as follows:

Registration Assessment	Fee paid to assessors	Number of registration assessors	Total fees paid to assessors
Assessment of qualification	£100	2	£200
Further evidence of practice questionnaire	£100	2	£200
Assessment of clinical performance	£306 (plus expenses)	3	£918

7. The Remuneration and Appointments Committee (RAAC) considered a paper in October 2017 on the fees payable to registration assessors. The paper focussed on the first two stages of the process only because the assessment of clinical performance already attracts a fee equivalent to the GOsC daily rate of £306 and this remains an appropriate fee for the work.
8. The paper to RAAC included evidence collected from the registration assessors which provided the average time taken for preparation and the average time taken for moderation at each assessment stage. This is presented below:

Assessment type	Average time taken for preparation	Average time taken for moderation	Total average time for assessment
Non-EU			
Assessment of qualification	4 hours 30 minutes	45 minutes	5 hours 15 minutes
Further Evidence of Practice Questionnaire	4 hours 45 minutes	1 hour 15 minutes	6 hours
EU			
Assessment of qualification	5 hours	1 hour 30 minutes	6 hours 30 minutes
Further Evidence of Practice Questionnaire	3 hours 40 minutes	1 hour 10 minutes	4 hours 50 minutes

9. The RAAC noted that the GOsC operates a remuneration system where a daily attendance fee of £306 is paid to approved individuals (i.e. fitness to practise panellists or co-opted committee members) for work undertaken. In the event that work lasts 3.5 hours or less, a half-day fee is payable.
10. The Committee felt the evidence collected from the registration assessors demonstrated the total average time for the registration assessment activity is in

excess of the half-day cut off and concluded the £306 fee would be appropriate for each stage of registration assessment activity as this would ensure consistency across the remuneration structure. This would take effect from 1 April 2018.

Charges to be levied on internationally qualified applicants

11. In considering the charges to be levied on internationally qualified applicants, a set of simple principles were established and considered by the PAC. These are set out below:
 - a. Registration assessors should be paid a fee for their work which is commensurate to the time incurred, particularly as the assessors are primarily self-employed practitioners.
 - b. The application process should be cost neutral¹ for those individuals who are already registered, i.e. existing registrants should not be expected to subsidise a registration application pathway for international qualified applicants.
 - c. Applicants applying with international qualifications should be expected to pay for each stage of the application process before the assessment is completed.
 - d. Fees charged to internationally qualified applicants should only cover the cost of the international qualification application pathway and should not be designed so to subsidise any other registration application process.
 - e. The General Osteopathic Council (GOsC) is a charity registered in England and Wales and as such is not looking to generate profit from internationally qualified applicants.
12. With regards to the application process being cost neutral, we have defined this using an approach we consider as being pragmatic and which provides clarity and consistency for those internationally qualified applicants who wish to apply for registration.
13. The time spent on international applications by GOsC staff is unlikely to vary significantly unless there is a dramatic increase in registration application numbers, which we do not anticipate. Indeed, even if application numbers were to fall, we would still require a staff member to have the requisite expertise in processing the reduced number of internationally qualified registration applications.

¹ For the purpose of this document we define cost neutral as being the time spent by GOsC staff and GOsC Registration Assessors and expenses incurred by GOsC Registration Assessors.

14. For the registration assessors, the time involved reviewing and assessing the qualifications is also unlikely to vary dramatically irrespective of whether there was a change in application numbers.
15. We have excluded other overhead costs from our calculations. There are two main reasons for doing so:
- We feel it is better for the fee to be levied on internationally qualified applicants to be 'fixed' for a set period of time rather than it being subject to fluctuation as overheads vary. This provides clarity for those internationally qualified applicants applying for registration.
 - Secondly, the number of internationally qualified applicants applying for registration is limited in number. We do not feel it would be a good use of staff resources to have to regularly recalculate the charge to be levied on such a small number, particularly when under the proposed scheme, the applicants would be covering the significant proportion of its own costs.

Consideration of charges levied on internationally qualified applicants

16. The next part of the paper is based on an assumption that registration assessor fees will be increased as indicated earlier in the paper.
17. When applying the revised fees payable to registration assessors to each stage of the application process, the cost of the process is as follows:

Assessment type	Number of registration assessors involved	Fees payable to registration assessors £	Total cost of registration assessor involvement £
Assessment of qualification	2	£306	£612
Further Evidence of Practice Questionnaire	2	£306	£612
Assessment of Clinical Performance	3	£306	£918

18. The ACP is the only stage in the process where an assessor may claim expenses for travel and accommodation. This is because the ACP is the only assessment which requires the assessors to be at a particular venue. All other assessments are carried out remotely. The average expenses claimed by assessors since January 2016 is £67 per assessor. This would result in an average of £201 in expenses per ACP event.

19. In addition, there is the amount of staff involvement from the Registration team and specifically the Registration and International Application Officer who handles every enquiry from an internationally qualified applicant and guides the individual through the assessment process. The officer ensures the documents are fully anonymised before being sent to the assessors and the officer also attends and facilitates each moderation meeting.

20. The table below sets out the average staff time spent on each registration stage.

Assessment type	Average staff time spent (rounded)	Cost to GOsC £
Assessment of qualification	4 hours	£74
Further Evidence of Practice Questionnaire	4 hours	£74
Assessment of Clinical Performance	7 hours (full day)	£129

21. The total cost of each assessment stage made up of fees paid to registration assessors, expenses where applicable, and staff time is as follows:

Assessment type	Fees to registration assessors £	Expenses, if applicable £	GOsC staff time £	Total cost £
Assessment of qualification	£612	£nil	£74	£686
Further Evidence of Practice Questionnaire	£612	£nil	£74	£686
Assessment of Clinical Performance	£918	£201	£129	£1,248

22. It is proposed that for the assessment of qualification and the FEPQ, the amount described in the total cost column becomes the new charge to be levied on internationally qualified applicants applying for registration.

23. For the ACP, since January 2016 there have been eight assessment dates featuring 11 candidates, with either 1 or 2 candidates in attendance per event. Applying the £1,248 total cost per event, this would mean that on average each candidate would need to pay c. £907.

24. For simplicity, we have rounded the amount to be levied per assessment to the nearest pound.
25. It is therefore proposed that the new charges to be levied on applicants applying with an international qualification would be:

Assessment type	Total cost to be levied per assessment
Assessment of qualification	£690
Further Evidence of Practice Questionnaire	£690
Assessment of Clinical Performance	£910

Equality Impact Assessment

26. We have undertaken a draft equality impact assessment for these proposals which is available on request from Matthew Redford at mredford@osteopathy.org.uk and which will form part of the consultation. Key aspects of the equality impact assessment note that there is a potential impact for internationally qualified applicants.
27. In order to ensure that we have reflected the views of those affected, we will take particular steps to ensure that the consultation is brought to the attention of those most likely to be affected by:
- Sending the consultation to all internationally qualified applicants who have enquired commenced or completed the process.
 - Sending the consultation to regulatory bodies and competent authorities in other countries and asking them to disseminate the consultation to their registrants or members.

Consultation process

28. We will need to undertake a consultation on increasing the fees to be levied on applicants applying with an international qualification and it is proposed that the consultation be launched in winter 2017.
29. The results of the consultation will be presented to Council at its meeting in May 2018.
30. The consultation document is attached at Annex A and Council is asked to agree to publish the consultation on the charges payable to internationally qualified applicants.

Recommendations:

1. To agree to increase the amount which may be claimed by a registration assessor for undertaking registration assessments to £306 for each registration assessment activity, effective from 1 April 2018.
2. To agree to publish a consultation document on increasing the charges levied on international registration applicants.

Charges payable by internationally qualified applicants

Consultation: [Dates to be confirmed]

About the General Osteopathic Council

1. The General Osteopathic Council (GOsC) regulates the practice of osteopathy in the United Kingdom. By law osteopaths must be registered with the GOsC in order to practise in the UK.
2. The over-arching objective of the GOsC is the protection of the public. We do this through:
 - Keeping a register of all those permitted to practise osteopathy in the UK;
 - Working with the public and the osteopathic profession to promote patient safety by registering qualified professionals;
 - Setting, maintaining and developing standards of osteopathic practice and conduct;
 - Helping patients with any concerns or complaints about an osteopath and having the power to remove from the Register any osteopaths who are unfit to practise;
 - Assuring the quality of osteopathic education and ensuring osteopaths undertake continuing professional development.

The consultation

3. The purpose of the consultation document is to seek views on a proposal to increase the charges levied on internationally qualified individuals who apply for registration with the GOsC.
4. Individuals who hold international osteopathic qualifications may apply for registration with the GOsC. They will be processed through one of two registration pathways which depend on whether the applicant gained their qualification in the EU/EEA or Switzerland or outside of the EU/EEA or Switzerland.
5. This consultation document outlines the current charges payable by international applicants and explains the rationale behind the proposal to increase the charges. This consultation has been designed to help formulate the decision that the Council will need to make so that any increase in the fees payable by international applicants comes into effect on 1 April 2018.
6. It is hoped that those with an interest in osteopathy, including potential future applicants, will contribute to the consultation. This includes patients and the public, current registrants and their professional groups and osteopathic students.

Background

7. There are currently four routes to registration with the GOsC. These are:
 - a. Applications for initial registration from individuals who have obtained a UK recognised qualification (through an osteopathic educational institution);

- b. Applications for initial registration from individuals who hold a qualification which was obtained from a country in the EU/EEA or Switzerland;
 - c. Applications for initial registration from individuals who hold a qualification which was obtained from a country outside of the EU/EEA or Switzerland;
 - d. Applications for restoration to the Register from individuals who have previously held registration with the GOsC.
8. This consultation document is focused on internationally qualified applicants: those individuals applying for initial registration who hold a qualification from a country either inside the EU/EEA or Switzerland or outside of the EU/EEA or Switzerland.
9. The two registration pathways differ and are explained below in some further detail.

Applying from the EU/EEA or Switzerland

10. An individual applying from the EU/EEA or Switzerland will need to provide the following:
- a. Proof of nationality
 - b. Proof of qualification
 - c. Certified copy of the academic transcript
 - d. Course guideline/handbook
 - e. Certificate of Current Professional Status (if applicable)
 - f. Outline of osteopathic education, work experience and lifelong learning
 - g. Mapping of academic transcript, experience and training to the *Osteopathic Practice Standards*
11. The documents sent to the GOsC will be assessed by two qualified GOsC osteopaths who have been trained as GOsC Registration Assessors. It will be for the assessors to determine whether the evidence provided is equivalent with UK standards or whether there is a substantial difference.
12. If there is no substantial difference the applicant may apply directly for registration.
13. If there is a substantial difference the applicant is able to choose a compensation measure which may be either an aptitude test (a route provided by the GOsC) or a period of adaptation (a route to be found by the applicant).

The aptitude test

14. An aptitude test has two parts being (a) completion of a Further Evidence of Practice Questionnaire, and (b) an Assessment of Clinical Performance.

15. The Further Evidence of Practice Questionnaire asks the applicant about their practice and requires examples of specific aspects of practice where they have taken sole clinical responsibility. The applicant will also need to include case histories and clinical presentations in these examples.
16. The documents sent to the GOsC will be assessed by two qualified GOsC osteopaths who have been trained as GOsC Registration Assessors.
17. There is currently a fee of £100 payable by applicants for assessment of their questionnaire.
18. If the applicant is successful the next stage of the assessment process is an Assessment of Clinical Performance.
19. The Assessment of Clinical Performance is a competency-based practical examination, held in the UK and involving real patients in a clinic setting. This part of the assessment process involves three GOsC Registration Assessors, and including one moderator.
20. There is currently a fee of £330 payable by applicants to attend an Assessment of Clinical Performance.
21. If the applicant is successful they may apply directly for registration with the GOsC.

The period of adaptation

22. A period of adaptation is a period of practice and/or academic training under the supervision of a UK osteopath which can last up to three years. The applicant will be responsible for arranging the period of adaptation themselves, usually by contacting an osteopathic educational institution.
23. The cost of the period of adaptation will be determined by the supervising individual and body and is met by the applicant.

Applying from outside of the EU/EEA or Switzerland

24. An individual applying from outside of the EU/EEA or Switzerland will need to provide the following:
 - a. Proof of nationality
 - b. Proof of qualification
 - c. Certified copy of the academic transcript
 - d. Course guideline/handbook
 - e. Certificate of Current Professional Status (if applicable)
 - f. Evidence of your ability to communicate in English.

25. There is a three stage process which all applicants must go through. It is as follows:

Stage 1: Assessment of qualification

26. The documents sent to the GOsC (as above) will be assessed against UK standards by two qualified GOsC osteopaths who have been trained as GOsC Registration Assessors. The assessors will determine whether the applicant has an osteopathic qualification and whether the applicant can progress to stage 2.

Stage 2: Further Evidence of Practice Questionnaire

27. The Further Evidence of Practice Questionnaire asks the applicant about their practice and requires examples of specific aspects of practice where they have taken sole clinical responsibility. The applicant will also need to include case histories and clinical presentations in these examples.
28. The documents sent to the GOsC will be assessed by two qualified GOsC osteopaths who have been trained as GOsC Registration Assessors.
29. There is currently a fee of £100 for the questionnaire.
30. If the applicant is successful they may progress to stage 3.

Stage 3: Assessment of Clinical Performance

31. The Assessment of Clinical Performance is a competency-based practical examination, held in the UK and involving live patients in a clinic setting. This part of the assessment process involves three GOsC Registration Assessors, of which one is the moderator.
32. There is currently a fee of £330 to attend an Assessment of Clinical Performance.
33. If the applicant is successful they may apply directly for registration with the GOsC.

Summary of current charges paid by internationally qualified applicants

34. A summary of the current charges paid by internationally qualified applicants is as follows:

Registration Assessment	Fees charged to internationally qualified applicant (EU)	Fees charged to internationally qualified applicant (Non-EU)
Assessment of qualification	Nil	Nil
Further evidence of practice questionnaire	£100	£100
Assessment of clinical performance	£330	£330

Cost of current process

35. The GOsC Registration Assessors are paid a fixed fee for each stage of the process. The fees paid to the assessors, which are currently under review, are set out below:

Registration Assessment	Fee paid to assessors	Number of registration assessors	Total fees paid to assessors (EU/ Non-EU process)
Assessment of qualification	£100	2	£200
Further evidence of practice questionnaire	£100	2	£200
Assessment of clinical performance	£306	3	£918

36. The fees paid to the Registration Assessors are greater than those recouped from the individuals applying for registration with an international qualification. This excludes staff time involved in administering the process which means the process is even more costly to GOsC.

37. Based on an analysis of their time involvement in each stage of the registration process, it is being proposed to increase the fee paid to each assessor to £306 per assessment event.

Principles for fees paid and charged

38. There are five principles which explain the framework for setting the fees paid to GOsC Registration Assessors and the charges which should be paid by applicants applying for registration with an international qualification.

39. These principles are effectively the rationale for the decision to increase the charges levied on those applicants applying for registration with an international qualification.
40. The principles are set out below:
- a. Registration assessors should be paid a fee for their work which is commensurate to the time incurred, particularly as the assessors are primarily self-employed practitioners.
 - b. The application process should be cost neutral² for those individuals who are already registered, i.e. existing registrants should not be expected to subsidise a registration application pathway for internationally qualified applicants.
 - c. Applicants applying with international qualifications should be expected to pay for each stage of the application process before the assessment is completed.
 - d. Fees charged to internationally qualified applicants should only cover the cost of the international application pathway and should not be designed so to subsidise any other registration application process.
 - e. The General Osteopathic Council is a registered charity in England and Wales and as a registered charity it is not looking to generate profit from overseas applicants.

Proposed increases to the charges levied on overseas qualified applicants

41. The table below sets out the proposed increases to the charges levied on overseas qualified applicants. This incorporates:
- a. Fees paid to Registration Assessors;
 - b. Expenses incurred (ACP stage only);
 - c. Staff time.

² For the purpose of this document we define cost neutral as being the time spent by GOsC staff and GOsC Registration Assessors and expenses incurred by GOsC Registration Assessors.

Registration Assessment	Fees charged to internationally qualified applicant (EU)	Fees charged to internationally qualified applicant (Non-EU)
Assessment of qualification	£690	£690
Further evidence of practice questionnaire	£690	£690
Assessment of clinical performance	£910	£910

42. The above charges reflect the fees paid to the GOsC Registration Assessors for their work, and ensure that the process is not subsidised by those individuals already registered with the GOsC.
43. It ensures that applicants applying with an international qualification are paying a fair fee for their registration assessment and registration pathway.

Timeframe for implementation

44. The deadline for responding to this consultation is **[date to be confirmed]**. Responses will be considered and incorporated into a decision paper for the Council of the GOsC in May 2018.
45. We anticipate that the new charging structure will take effect from **1 April 2018**.

Consultation questions:

46. There are four consultation questions which are set out below. Information about how to respond to the consultation can be found in the next section headed, How to respond.
1. Do you agree that the cost of administering the process for registering internationally qualified applicants should be borne by the individuals applying for registration with the international qualification?
 2. Do you agree that the cost of the process for registering internationally qualified applicants should be cost neutral to existing GOsC registrants?
 3. Do you agree with the proposed increase to the charges levied on internationally qualified applicants?
 - a. Assessment of qualification
 - b. Further Evidence of Practice Questionnaire
 - c. Assessment of Clinical Performance

4. Do you agree with the rationale for increasing the charges levied on internationally qualified applicants?
5. We have undertaken an equality impact assessment of our proposals and this is available at: [insert link]. Do you think any proposals outlined above would have a disproportionate effect upon any particular group? If so please explain this and please explain how you think any impact should be mitigated.
6. Do you have any other comments?

How to respond

You can send us your views by responding to our online consultation at:

[Insert link]

by emailing us at: mredford@osteopathy.org.uk or by post to:

Charges payable by overseas applicants for registration

General Osteopathic Council
Osteopathy House
176 Tower Bridge Road
London
SE1 3LU

We are asking some specific questions that we would like responses to, but you are welcome to offer any comments you wish. All feedback will be taken into consideration.

We will publish a report about the consultation and the responses we have received. If you would prefer your response not to be made public, please indicate this when sending us your views.

The deadline for responses to this consultation is **[date to be confirmed]**.

We look forward to receiving your comments.

Thank you.

Consultation Questions:

1. Name of individual or organisation (optional)

2. Are you happy for the GOsC to publish your response to this consultation?

Happy for GOsC to public my response

I would prefer my response to be published in a non-attributable form

3. Do you agree that the cost of administering the process for registering internationally qualified applicants should be borne by the individuals applying for registration with the international qualification?

Yes

No

Comments

4. Do you agree that the cost of the process for registering internationally qualified applicants should be cost neutral to existing GOsC registrants?

Yes

No

Comments

5. Do you agree with the proposed increase to the charges levied on internationally qualified applicants?

Assessment of qualification

Yes

No

Further Evidence of Practice Questionnaire

Yes

No

Assessment of Clinical Performance

Yes

No

Comments

6. Do you agree with the rationale for increasing the charges levied on internationally qualified applicants?

Yes

No

Comments

7. We have undertaken an equality impact assessment of our proposals and this is attached at Annex A. Do you think any proposals outlined above would have a disproportionate effect upon any particular group? If so please explain this and please explain how you think any impact should be mitigated.

8. Please provide us with any other comments

Thank you for your response to this consultation.

We would also like to ask some questions about you. Completing the diversity questionnaire is optional, but we would welcome information about our respondents. The information you provide will only be used for the purposes of analysing the consultation responses.

[Insert E&D questions]