



**Council
21 November 2018
Registration Report**

Classification	Public
Purpose	For noting
Issue	<p>This paper provides an update of registration activity covering the six month period from 1 April 2018 – 30 September 2018.</p> <p>In addition, Council is being given oversight of some initial policy thinking which was discussed at the Policy Advisory Committee. This is in relation to assuring applicant qualifications and registration assessor and education visitor length of appointments.</p>
Recommendations	To note the content of the registration report and the initial policy thinking outlined in the paper.
Financial and resourcing implications	None
Equality and diversity implications	None
Communications implications	None
Annexes	None
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Background

1. The registration report to Council provides detailed information about the statistics and activities which have been undertaken within the Registration team and covers the six months from 1 April 2018 to 30 September 2018.
2. Additionally Council is being provided with an oversight of some initial policy thinking which was discussed by the Policy Advisory Committee (PAC) at its October 2018 meeting.

Initial policy thinking

Assuring applicant qualifications

3. The PAC was asked to input into some early thinking around how to enhance the integrity of the Statutory Register through strengthening the verification of qualifications. The issue under consideration was that with a significant increase in bogus 'degree-mills', and with it becoming easier to replicate genuine qualifications with fraudulent information, it is becoming harder to be assured about the verification of a genuine qualification.
4. PAC were asked to think about the measures which could be taken both for UK graduates and international applicants, specifically the introduction of primary source verification (PSV) which is the background screening and checking of the credentials of qualifications by an independent organisation.
5. The cost of obtaining PSV would typically be c.£200-£250 per check and PAC considered there to be two occasions when GOsC might expect to see the benefits of PSV, being:

An individual wanting to join a UK osteopathic course	PSV employed by the OEI
An international applicant applying to directly to join the Register	PSV employed by the GOsC

6. The Executive will further consider the input from the PAC and will take the policy thinking forward over the coming months.

Registration Assessors and education visitors - length of appointments

7. It was identified that a registration assessor contract (covering a four year period) may be renewed at the end of every four years with no cut off for length of service. In theory, an assessor could see their contract continually renewed for an indefinite period, which is inconsistent with other GOsC appointments, such as those for fitness to practise panels or as a member of Council.

8. The early policy thinking from the Executive was that there was no clear reason why a registration assessor or education visitor would be treated differently regarding length of service when compared with another GOsC appointment, aside from ensuring there was sufficient capacity and expertise within the assessment pool to enable it to be refreshed.
9. PAC was given an opportunity to feed into this early policy thinking with feedback being that registration assessors and education visitors were a more specialised pool and that bespoke contractual arrangements might be required rather than having a fixed cut off period.
10. The Executive will be reflecting on the feedback from PAC and are likely to develop a consultation paper to explore this issue further.

Registration activities

Performance against service targets

11. The service level agreement for registering a new applicant, from receipt of a completed application, is five working days for UK applicants and 90 days for overseas applicants.
12. Performance against the targets in the reporting period was:
 - a. UK graduates/restorations: median time two days
 - b. EU applicants: median time 16 days (three applications)
 - c. Non-EU applicants: median time 64 days (two applications).

Registration data

Number of registrants and gender split

13. At the end of September 2018, the Register contained 5,358 osteopaths of which 50.79% of registrants are female (2,721) and 49.21% are male (2,637).

Internal Market Information (IMI) system alerts

14. Since 18 January 2016 GOsC has been complying with the revised EU Directive 2013/55/EU and sending and receiving alerts through the IMI system about any prohibition placed on a registrant arising through fitness to practise proceedings. Whether the UK will have access to IMI post EU-Exit remains to be seen although the expectation is that access will be denied.
15. In the reporting period, GOsC received 1,679 IMI alerts relating to prohibitions placed on healthcare practitioners by competent authorities, which is 500 fewer than the previous six months. Each alert is checked by the Registration team, although to date, no further action has been required. Over a 12 month rolling period we have received c.3,900 IMI alerts.

Entrants to the Register

Total number of entrants to the Register	204
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of which

First time applications	194
Restorations to the Register	10

of which

Number of registrants living in the UK	176
Number of registrants living in the EU	23
Number of registrants living outside of the EU	5

Removals from the Register

Total number of removals (excluding resignations, retirements and death)	11
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of which, those removed for

Non-compliance with CPD	8
Non-payment of fee	3
Unacceptable professional conduct	0
Failure to demonstrate compliance with the PII Rules	0

16. Since the reporting of statistics to Council began, 214 registrants have been removed from the Register, with the majority removed for non-compliance with the CPD scheme rather than removed for non-payment of the registration fee. With the introduction of the three-year CPD scheme, effective from 1 October 2018, this will certainly change as removal from the Register for non-compliance with the CPD scheme will only arise at the end of a registrant's cycle.
17. The data below sub-analyses the removal from the Register data into different categories including age and gender.

Removals from the Register (age)

18. Of those registrants removed from the Register, 79% (168 registrants) are below the age of 50, of which 63% (105 registrants) are below the age of 40. The age range per reason for removal is set out in the table below.
19. It remains the case that everyone removed from the Register under fitness to practise proceedings are all above the age of 40, although it is also recognised that with our numbers being so few, it is not possible to determine trend data.

Age range	Number of registrants	Removed for fee non-payment	Removed for CPD non-compliance	Removed under FtP proceedings	Removed under PII Rules
20-29	41	22	18	0	1
30-39	64	26	38	0	0
40-49	63	24	33	6	0
50-59	36	6	24	6	0
60-69	7	2	4	1	0
70-79	3	0	2	1	0
Total	214	80	119	14	1

Removals from the Register (gender)

20. The total number of registrants removed from the Register since reporting of statistics to Council began in October 2011, indicates 51:49 between female to male registrants removed from the Register.
21. Regardless of gender, removal for non-compliance with the CPD requirements outweighs removal for non-payment of the registration fee.

Gender	Number of registrants	Removed for fee non-payment	Removed for CPD non-compliance	Removed under FtP proceedings	Removed under PII Rules
Male	109 (51%)	34	61	14	0
Female	105 (49%)	46	58	0	1
Total	214	80	119	14	1

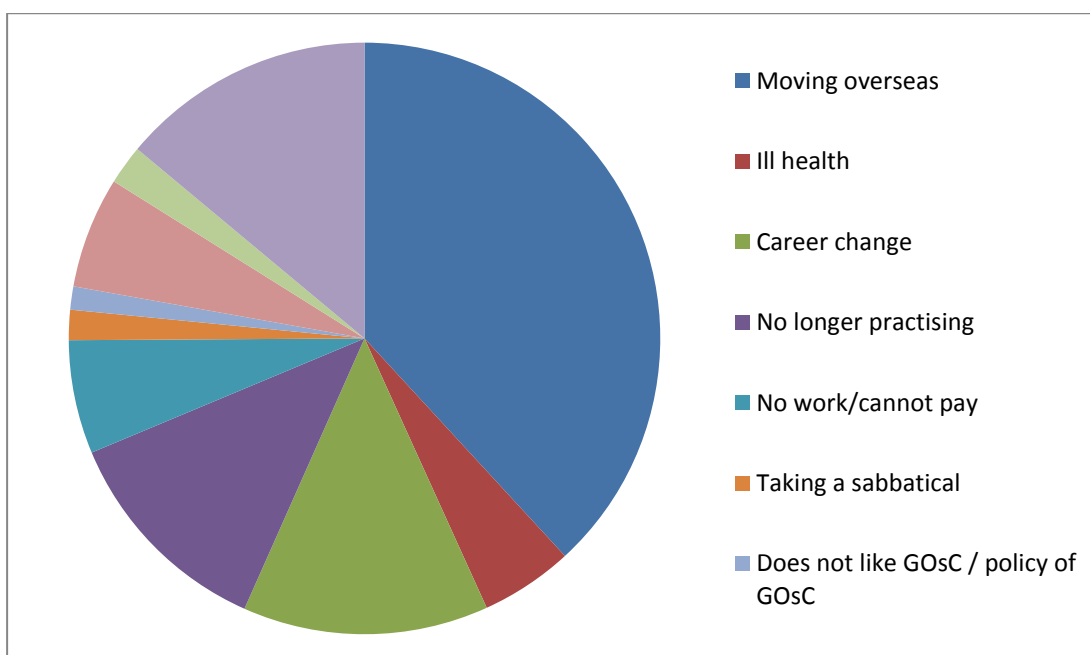
Reasons for resignations

Total number of resignations	98
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of which, the reasons cited were

Moving overseas	39
Ill health	6
Career change	14
No longer practising	9
No work/cannot afford fee/meet renewal requirements	5
Taking a sabbatical	1
Family reasons	6
Full-time study	6
Does not like GOsC/agree with policy	3
No reason provided	9

22. The graph below represents the reasons provided by registrants for their resignation from the Register since statistics were reported to Council.



Registration refusals

Number of registration appeals carried forward from previous report and heard in the reporting period	0
Number of new registration appeals lodged	0

Non-practising registrants

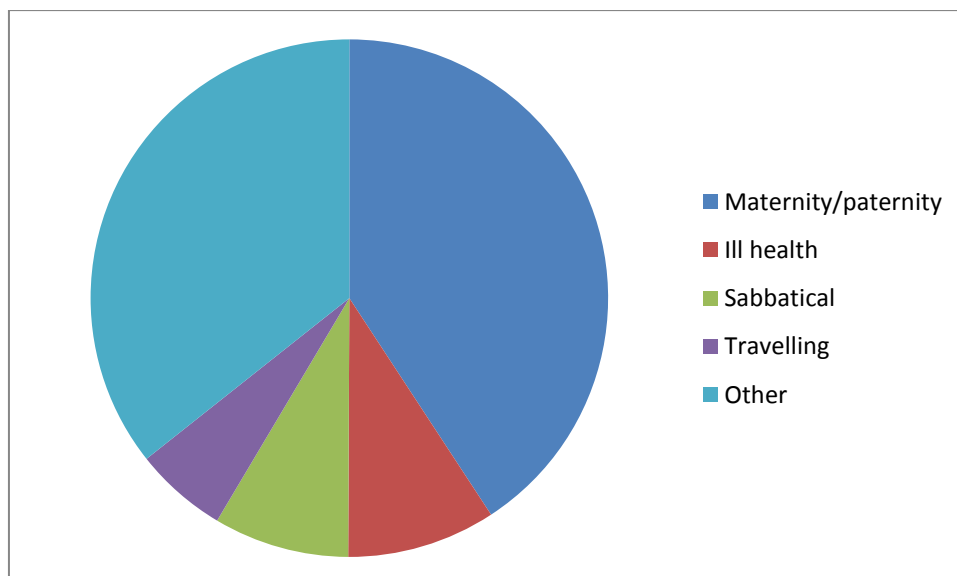
Total number of registrants who are listed as non-practising	146
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of which

Maternity/paternity	53
Ill health	11
Sabbatical	12
Travelling	6
Other*	64

*Other includes: studying; not being able to find work; relocation of home/work premises; circumstances around the loss of a spouse/parent/child; acting as a carer; research; and pursuing other careers.

23. Based on the statistics reported to Council since October 2011, at any one time GOsC has on average 155 registrants who are out of clinical contact with patients. The main reason for registrants to be listed as 'non-practising' is because of maternity leave.



CPD Audits

24. Council members have previously asked for additional information around the CPD auditing process. While this is set out below, members are asked to note that this auditing process will cease from October 2019 as all registrants would have joined the new three-year CPD cycle.

Headline CPD audit position

25. The Business Plan 2018-19 includes a commitment for Continuing Professional Development (CPD) audit activity of:
- 20% of CPD Annual Summary Forms [submitted] each month to support registrants to meet existing standards and to identify areas of good practice and development.
 - 2% of CPD Record Folders [submitted] each year to support registrants to meet existing standards and to identify areas of good practice and areas of development.

CPD Annual Summary Form audits

26. CPD Annual Summary Form audits consist of a detailed review of the activities declared by a registrant, specifically focussing on the relevancy of the activity to a registrant's osteopathic practice. An assessment will be made as to whether the activity and the associated relevancy comply with the spirit of the CPD Guidelines.
27. The Registration team has a range of letters which can be sent out following the completion of an audit. These are:

Category A	Audit passed, no further information required
Category B	Audit passed, advice/guidance provided by team for future summary form submissions
Category C	Further information/clarity required from registrant. New submission required

28. At 30 September 2018, a total of 405 CPD Annual Summary Forms were audited. Of these forms:

Category A	150
Category B	232
Category C	23

Of the 23 that were classified as category C audits, on re-submission:

Category A	14
Category B	9

29. The advice/guidance provided by the team in the category B and C audits often related to insufficient information being provided on the CPD annual summary form and there being limited relevancy shown as to how the CPD activity related to the *Osteopathic Practice Standards*.

30. This information is used to write articles for *the Osteopath* magazine in order to feedback to the profession learning points. The most recent article, *How to submit the best possible CPD Annual Summary Form*, was published in the October/November 2017 edition: <http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/the-osteopath-octnov-17/>

CPD Record Folder audits

31. CPD Record Folder audits consist of the registrant submitting the evidence to underpin the CPD activities declared on their CPD Annual Summary Form. The Registration team will then undertake a review of the Record Folder to assess whether the evidence provided matches the activities declared and the relevancy recorded by the registrant.

32. The Registration team will categorise the CPD Record Folders as:

Category A	Audit passed, no further information required
Category B	Audit passed, advice/guidance provided by team for future folder submissions
Category C	Further information/clarity required from registrant. New submission required

33. No CPD Record Folder audits were undertaken by 30 September 2018. CPD Record Folder audits are completed in the latter half of the business year.

Return to practice activity

34. We offer a return to practice process to all applicants who have been away from UK practice for two years or more to support their transition back to practice. This process involves a self-assessment activity, which may then be followed by a meeting with two trained Return to Practice Reviewers.

Total number of applicants who went through the Return to Practice self-assessment process	11
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Of which, the number who also undertook a Return to Practice review	2
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International Registration Assessment activity

35. A total of eight registration assessments were completed in the reporting period. During the reporting period, five applicants were found to be eligible to register with the GOsC.

Number of Non-UK Review of Qualifications	6
Number of Further Evidence of Practice Questionnaires	1
Number of Assessments of Clinical Performance	1

Recommendation: to note the content of the registration report and the initial policy thinking outlined in the paper.