



General  
Osteopathic  
Council

**Annex A to 4**

## **Charges payable by internationally qualified applicants**

**Consultation: November 2017 to January 2018**

### 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 overseas qualified individuals who apply for registration with the GOsC.
4. Individuals who hold an international osteopathic qualification 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 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 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 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 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:

<b>Registration Assessment</b>	<b>Fees charged to internationally qualified applicant (EU)</b>	<b>Fees charged to internationally qualified applicant (Non-EU)</b>
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:

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

<b>Registration Assessment</b>	<b>Fees charged to internationally qualified applicant (EU)</b>	<b>Fees charged to internationally qualified applicant (Non-EU)</b>
Assessment of qualification	£686	£686
Further evidence of practice questionnaire	£686	£686
Assessment of clinical performance	£907	£907

42. The above charges reflect the fees paid to the GOsC Registration Assessors for their work, and ensure that the process is cost neutral to those individuals already registered with the GOsC.
43. It is 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 **8 January 2018**. Responses will be considered and incorporated into a decision paper for the Council of the GOsC in February 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 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.
  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](mailto: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 **8 January 2018**.

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.