

Feedback received by the GOsC on Oct-Nov 2012 registration fee consultation

	Registrant feedback	GOsC response
1	I feel this does not apply to me as I am based overseas. I don't really benefit from registration with fees as they stand. I hope this helps.	We value the views of all registrants and we would encourage you to participate in the consultation. A fee reduction across all fee levels benefits all registrants irrespective of where they are located.
2	Please record my view that this consultation is inherently flawed. Most registrants pay the highest fee, and most registrants are likely to look after their own self-interest when replying to question 2. It is therefore almost a foregone conclusion that most registrants will answer question 2 by choosing option 1.	The consultation is seeking the views of all registrants on how best to reduce the registration fee. It is a consultation and not a ballot, and therefore all views will be taken into account.
3	You giving us just two options does NOT feel like me giving you my views.	The GOsC consulted on two specific questions one of which required registrants to express which method they felt was best for passing savings back via a fee reduction.
4	I have just filled in the submission online about fee reductions and have said that I do not think that there should be a fee reduction but if you have to have to it should be across the board. My reasons for no fee reduction is that they money should be used for a more robust revalidation process.	Thank you for your feedback and explaining why there should not be a fee reduction. We have only just completed our revalidation pilot and there is a considerable development process and consultation still required before a scheme could -be introduced. Therefore there is not a need to earmark fee income for revalidation at present.
5	I have been overseas in USA for 15 years - a group that already receives 50% reduction so this category is not a priority. Then, I visited the UK for one month to talk to practitioners and visit the schools in determining whether to relocate back to the UK as well as attending a research conference. I found even the most established practices are feeling the economic pinch. As a MBA business valedictorian, I would say that the maximum feasible reduction funded by the GOsC reserves (which should handsomely support a reduction) in alignment with government recommended reductions would provide regular members and	There has been no requirement from Government for specific fee reductions but we continue to make savings which have led to a 10% fee reduction in 2012-13 and our proposals for a further reduction for 2013-14. It would not be prudent to use our reserves to fund a fee reduction as they are held either for specific projects or for contingency reasons. Further information about our reserves is contained in our Annual Reports and Accounts which can be found via the following link: http://www.osteopathy.org.uk/resources/publications/annual-reports/

	<p>new graduates the maximum benefit. I do not know if the government actually stipulated a figure or time frame? But I hear the Chiropractors reduced theirs by £200.</p>	<p>While the General Chiropractic Council registration fee was reduced by £200 for 2012-13 at £800, it remains £125 higher than the GOsC headline registration fee before our further fee reduction consultation.</p>
<p>6</p>	<p>Why don't you do a survey asking if registrants would like to describe the GOsC as (a) fantastic, or (b) brilliant? Don't give any other options. I'm sure you'll get some really useful feedback.</p>	<p>Thank you for your feedback and for your suggested survey question, which we do not believe would amount to a good use of GOsC resources.</p> <p>You may be interested to read the results of the wider Osteopaths' Opinion Survey which was conducted earlier this year and focused on a broad range of subjects, including the profession's views on the role of the GOsC and its confidence in osteopathic regulation. The results of this survey can be found via the following link: http://www.osteopathy.org.uk/about/our-work/consultations-events/Osteopaths-opinion-survey-2012/</p>
<p>7</p>	<p>BOA response: uploaded on members' website 6-11-2012</p> <p>The GOsC has just opened a consultation about registration fees. The BOA is very disappointed that this appears to represent a limited consultation and offers no opportunity for the factors surrounding this issue to be discussed.</p> <p>The GOsC council considered registration fees at their council meeting on 10 October when they reviewed a paper on budget strategy for 2013-14. That paper required them to consider the financial envelope in which the organisation should operate. They did not determine the budget at that time.</p> <p>The strategy paper outlined 4 financial scenarios for the council to consider. The least ambitious would leave the registration fee unchanged and the most ambitious would have led to a reduction of around £100 (this would have required a modest use of the reserves to fund it). In the end the council chose the third option - which would not require a use of reserves and would allow a reduction of approximately £75 if applied to the headline registration fee.</p>	<p>When discussing potential fee reductions, Council was keen to ensure that it set a direction of travel which was financially sound, but would not prevent it from using some of its reserves to fund short-term development initiatives in partnership with others.</p> <p>Council recognised there is a balance which needs to be struck between doing short-term development with partners and implementing smaller or larger fee reductions in 2013 and beyond. However, Council continues to believe that as a body with statutory responsibilities it is important to retain reserves to meet any unforeseen eventualities, for example a major increase in the number of complaints.</p> <p>We look forward to continuing to work with the BOA, the Osteopathic Alliance and the Council of Osteopathic Educational Institutions on the development agenda which is important to the development of the profession.</p>

	<p>Listening to the debate this approach appeared to be influenced by 2 major factors: a) this would allow further substantial reductions in future years (<i>surely it is better to have this now</i>); and b) it would allow them to support other development projects which they are still required to do (<i>we believe this factor should be tempered by the need for the profession to take responsibility for its development as the regional meetings this summer seemed to conclude</i>).</p> <p>The BOA attends the GOsC council meeting and we are entitled to ask questions at the start of the meeting. We asked them to consider a fifth option that would require a greater use of reserves and allow a greater fee reduction.</p> <p>We know that their costs reduce in 2014 and the effect on reserves is likely to be mitigated by this.</p> <p>A fee reduction is welcomed by the BOA but we do feel, very strongly, that the opportunity to make more significant reductions in fees has been lost by the GOsC, and this is particularly disappointing when other organisations will need to secure funding as the infra-structure of the profession has to change to reflect the feedback from the profession at this summer's round of discussion meetings.</p> <p>You might wish to reflect on the content of this note when you are providing your feedback to the GOsC on registration fee reductions. Please make sure you let the regulator know what you think about this issue.</p>	
8	<p>The so-called consultation on the fee reduction is woefully inadequate. The questions asked avoid the principal issue and to give just two closed questions with only yes/no answers available is (to my mind) insulting. The issue that needs to be addressed is the structure of the profession and if the GOsC takes such a restricted view of the registration fee issue, then the GOsC will be responsible for preventing the development of the profession. I am really disappointed with this apology of a consultation.</p>	<p>The purpose of the consultation was to seek the views of registrants and others as to the relative merits of a fee reduction in 2013 applying only to the highest level of fee (as was done in 2012) or spread across the range of fees (i.e. including also those who pay a reduced rate).</p> <p>During 2012 the GOsC-hosted six regional conferences held around the UK included an afternoon session focusing on our document <i>UK osteopathy: ten questions for the next ten years</i>. This set out questions asking how the profession should develop over the next decade, who should lead that development and how that development should be</p>

		<p>facilitated. These conferences allowed osteopaths around the UK to contribute to a discussion on the future development of the profession. The conference sessions were led by a panel of senior representatives of the GOsC, the British Osteopathic Association, the Council of Osteopathic Education Institutions and the Osteopathic Alliance.</p> <p>Further collaboration has continued since the conferences and this has been communicated to the profession via <i>The Osteopath</i> magazine and the e-bulletins.</p>
9	<p>It saddens me that the register has not realised that some of their members are struggling to make a living out of osteopathy in the current climate. I fear that the result of this will be a fragmentation of the profession which I love. I feel strongly that we should be wisely led. It is not just our registration fees that be reduced, we should see the GOsC trying to reduce its overheads by reducing staffing just as osteopaths in the field are being forced to do at this time. I trust that you really do want the opinions and genuine concerns of your members.</p>	<p>We recognise the difficulties osteopaths are experiencing which is why the GOsC has, and will continue where possible, to reduce its expenditure. It is through reducing expenditure that we were able to cut the headline fee by 10% in 2012, and how we can propose further reductions in 2013. The savings that the GOsC made in Financial Year 2012-13 and those we intend to make in Financial Year 2013-14 include staff reductions. Further information can be found in our Council paper available via the following link: http://www.osteopathy.org.uk/about/the-organisation/meetings/</p>
10	<p>At the last Northern Counties Society of Osteopaths meeting on 10th November 2012 the members discussed the fee survey which is being undertaken by GOsC.</p> <p>It was felt that there was insufficient background information regarding the proposed reduction in fees. Members were keen to know how cost savings would be made. We would be grateful if you could provide an outline of GOsC's plans for cost savings eg will staff levels be maintained at the current level, will certain services be reduced or cut back altogether?</p> <p>It was also felt that as there has been a steady increase in registrant numbers revenue will have increased accordingly therefore a pro rata reduction in fees should be possible without compromising services. Similarly, as GOsC no longer undertakes its original remit of developing and promoting the profession then further reductions in registration fees should be automatic.</p> <p>We would welcome your thoughts on the above issues.</p>	<p>The purpose of the consultation was to seek the views of registrants and others as to the relative merits of a fee reduction in 2013 applying only to the highest level of fee (as was done in 2012) or to be spread across the range of fees (i.e. including also those who pay a reduced rate).</p> <p>Over the past two years we have been undertaking a fundamental re-examination of our costs and the way in which we deliver our statutory duties. The results of this have included a reduction in staff numbers, changes in the way we undertake our work and also ceasing to undertake work altogether.</p> <p>At a high level much of this is set out in Council papers which are published on our website http://www.osteopathy.org.uk/about/the-organisation/meetings/. This work to examine how we can make savings will continue in future years. While it is the case that there continues to be some growth in the register, this could not of itself sustain the level of fee reductions we have been able to make. Further information about our income and budget is published in our Annual</p>

		<p>Reports which are available via the following link: http://www.osteopathy.org.uk/resources/publications/annual-reports/</p> <p>Finally, as you know the GOsC no longer has a statutory duty to promote osteopathy. However, it remains within our remit to seek to develop the profession. This is work that is continuing and following the very productive regional conferences earlier this year, this is increasingly something we hope can be done in partnership with other bodies within the UK osteopathic profession.</p>
11	Having reviewed the proposals for fee reduction to registrants, may I please refer you to the further comments made by BOA	We have provided a response to the BOA's views above.
12	Firstly I would like the reduction to be considerably more than £75.00 and secondly of then two choices given I would prefer the reduction to go to full fee payers.	We have provided a response on the amount of the fee reduction above.