



**Council**  
**2 May 2017**  
**Registration Report**

<b>Classification</b>	Public
<b>Purpose</b>	For decision
<b>Issue</b>	This paper provides an update of registration activity covering the six month period from 1 October 2016 - 31 March 2017.
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To agree that the qualifications which should be shown on the Register should be restricted to:<ol style="list-style-type: none"><li>a. A primary osteopathic qualification;</li><li>b. A primary medical qualification which can be verified, for example, by checking the General Medical Council website;</li><li>c. A non-medical doctorate, e.g. PhD.</li></ol></li><li>2. To note the remaining content of the registration report.</li></ol>
<b>Financial and resourcing implications</b>	None
<b>Equality and diversity implications</b>	None
<b>Communications implications</b>	None
<b>Annexes</b>	None
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## Background

1. The eleventh regular 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 October 2016 to 31 March 2017.
2. In addition, this report also seeks to clarify an existing approach concerning the qualifications shown on the statutory register of osteopaths as it would appear that Council had not previously been advised of this approach.

## Qualifications to be shown on the Register

3. The General Osteopathic Council (Registration) Rules 1998, form of the Register, section 3 states, 'The registrar shall, in respect of each person whose name is entered in the register contain, in addition to his name, the following information...'
4. Section 3(3)(f) says '...such other qualifications as the General Council have determined may be entered in the register'.
5. A recent enquiry from a registrant led to the identification of a gap as it would appear that Council has never explicitly agreed the qualifications which should be shown on the statutory Register. This paper seeks to outline the existing procedure and to give Council that oversight.
6. When considering the provisions outlined above, it is necessary to read them in conjunction with the surrounding registration rules in order to ascertain the intention which is aligned with the purpose of those registration rules.
7. So, while the rules may appear to suggest that Council can allow any qualification it wishes to be shown on the Register, this approach could essentially allow an 'open-door' for any qualification to be displayed. This cannot have been the intention of the Rules when they were drafted.
8. An approach which potentially allows for any qualification to be shown on the Register cannot be helpful for the public and for patients, who we know from calls to the office, already struggle to understand the difference between current osteopathic qualifications.
9. Furthermore, if we were to allow any qualifications, i.e. those for a variety of educational or professional qualifications, to be shown on the Register we would need a process of verification which has the potential to be time consuming and difficult to administer consistently.
10. The approach which is currently being operated, and for which we seek Council agreement to, follows three simple principles which provides a clear framework for what qualifications should be shown on the Register.

11. Qualifications to be shown on the Register should be restricted to:
- A primary osteopathic qualification;
  - A primary medical qualification which can be verified, for example, by checking the General Medical Council website;
  - A non-medical doctorate, e.g. PhD.
12. The reason for allowing a medical qualification and a non-medical PhD doctorate, is to ensure that registrants are able to comply with the *Osteopathic Practice Standards* and specifically D14, 2.3 which states that as an osteopath you should make sure that:
- 'You do not use any title which implies you are a medical practitioner (unless you are a registered medical practitioner), though this does not prevent you from using the title 'Doctor' if you have a PhD or other doctorate and it is clear that the title relates to this.'

### **Registration activities**

#### *Performance against service targets*

13. 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.
14. Performance against the targets in the reporting period was:
- UK graduates/restorations: median time two days
  - EU applicants: median time 36 days (four applications)
  - Non-EU applicants: median time 59 days (two applications).

### **Registration data**

#### *Number of registrants and gender split*

15. At the end of March 2017, the Register contained 5,204 osteopaths of which 50.69% of registrants are female (2,638) and 49.31% are male (2,566).

#### *Internal Market Information (IMI) system alerts*

16. 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.

17. In the reporting period, GOsC received 1,459 IMI alerts relating to prohibitions placed on healthcare practitioners by competent authorities. Each alert is checked by the Registration team, although to date, no further action has been required. Over a 12 month rolling period we are receiving c. 2,500 IMI alerts.

*New registrants' survey*

18. A survey of all new registrants who joined the Register in 2017 was completed. The results continue to be positive with the headlines being:
- a. Respondents found the registration application pack (application forms and information booklet) clear and useful.
  - b. Contact with GOsC staff was professional, preferable and maintained a high standard of customer service.
  - c. Respondents found the reminder emails about DBS checks, Health and Character reference forms, and Application forms helpful and a good tool to keep them on track with the application process during a stressful period with final exams.
  - d. The need for continuing business support after gaining registration has been outlined.
19. The results of the survey were reviewed by the Senior Management Team in April who noted the following actions arising from the survey:

<b>Theme</b>	<b>Action taken/to be implemented</b>
It was identified that some enhancements could be made to the way information is provided to new registrants on the 'For students' section of the o zone.	The information made available on the 'For students' section will be reviewed and changes to the presentation of the information contained will be made, e.g. adding short instructional videos.
We have again identified that new registrants are looking for business support.	The Institute of Osteopathy (iO), the professional association, are better placed to provide this support. The results of this survey will be shared with the iO.
We identified that there was the potential to enhance the existing survey by creating separate surveys for new registrants, EU/ROW qualified registrants and registrants who restored their name to the register.	A discussion has taken place between the Head of Registration and Resources, the Web Manager and the Registration and Resources Officer, to outline what each survey should contain and this will be implemented in 2017.

<p>We believe that new registrants do not complete the survey because the survey has been circulated some time after the individual gains registration. There is the potential to enhance the response rate to the survey.</p>	<p>During the current year, at the end of each month, a link to the new registrant's survey will be circulated to each new registrant, giving them the opportunity to reflect on the application process and provide feedback whilst the process is still fresh in their minds.</p>
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### *Student presentations*

20. During the opening quarter of 2017, nine student presentations were conducted across the country, with two presentations still to be completed. Feedback from the student presentations has been very positive with 100% of attendees rating the presentation as being of use.
21. Over the summer the Registration team will review the final feedback with the intention of refreshing the presentation to ensure clarity of focus as well as making sure the presentation is an appropriate length and not too long.

### *Entrants to the Register*

Total number of entrants to the Register	59
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*of which*

First time applications	50
Restorations to the Register	9

*of which*

Number of registrants residing in the UK	49
Number of registrants residing in the EU	5
Number of registrants residing outside of the EU	5

22. The graph below represents the number of new entrants to the Register, and where they initially resided, since the Executive started reporting registration statistics to Council in October 2011.

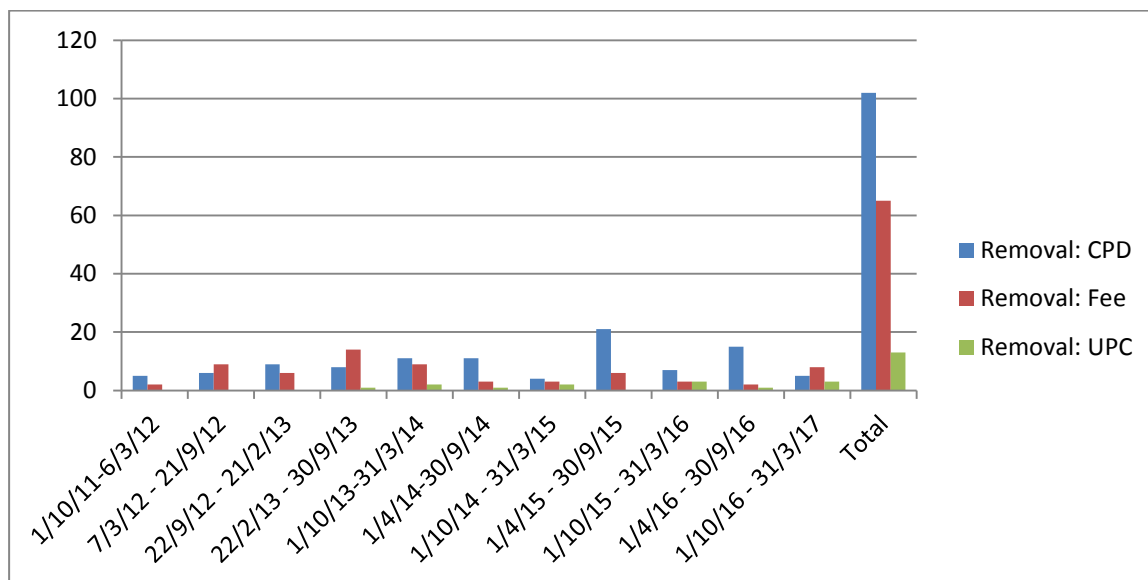
*Removals from the Register*

Total number of removals (excluding resignations, retirements and death)	16
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*of which, those removed for*

Non-compliance with CPD	5
Non-payment of fee	8
Unacceptable professional conduct	3

23. Since the reporting of statistics to Council began, 180 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.



24. The data below sub-analyses the removal from the Register data into different categories including age and gender.

*Removals from the Register (age)*

25. Of those registrants removed from the Register, 79% (142 registrants) are below the age of 50, of which 61% (86 registrants) are below the age of 40. The age range per reason for removal is set out in the table below.

26. It is also interesting to note that 100% of those removed from the Register under fitness to practise proceedings are all above the age of 40, although it is recognised that with our numbers being so few, it is not possible to determine trend data.

<b>Age range</b>	<b>Number of registrants</b>	<b>Removed for fee non-payment</b>	<b>Removed for CPD non-compliance</b>	<b>Removed under FtP proceedings</b>
20-29	33	18	15	0
30-39	53	21	32	0
40-49	56	22	28	6
50-59	31	5	20	6
60-69	5	1	3	1
70-79	2	0	2	0
<b>Total</b>	<b>180</b>	<b>67</b>	<b>100</b>	<b>13</b>

*Removals from the Register (gender)*

27. The total number of registrants removed from the Register since reporting of statistics to Council began in October 2011, indicates an exact 50:50 split between female to male registrants removed from the Register.

28. Regardless of gender, removal for non-compliance with the CPD requirements outweighs removal for non-payment of the registration fee.

<b>Gender</b>	<b>Number of registrants</b>	<b>Removed for fee non-payment</b>	<b>Removed for CPD non-compliance</b>	<b>Removed under FtP proceedings</b>
Male	90 (50%)	27	50	13
Female	90 (50%)	40	50	0
<b>Total</b>	<b>180</b>	<b>67</b>	<b>100</b>	<b>13</b>

*Reasons for resignations*

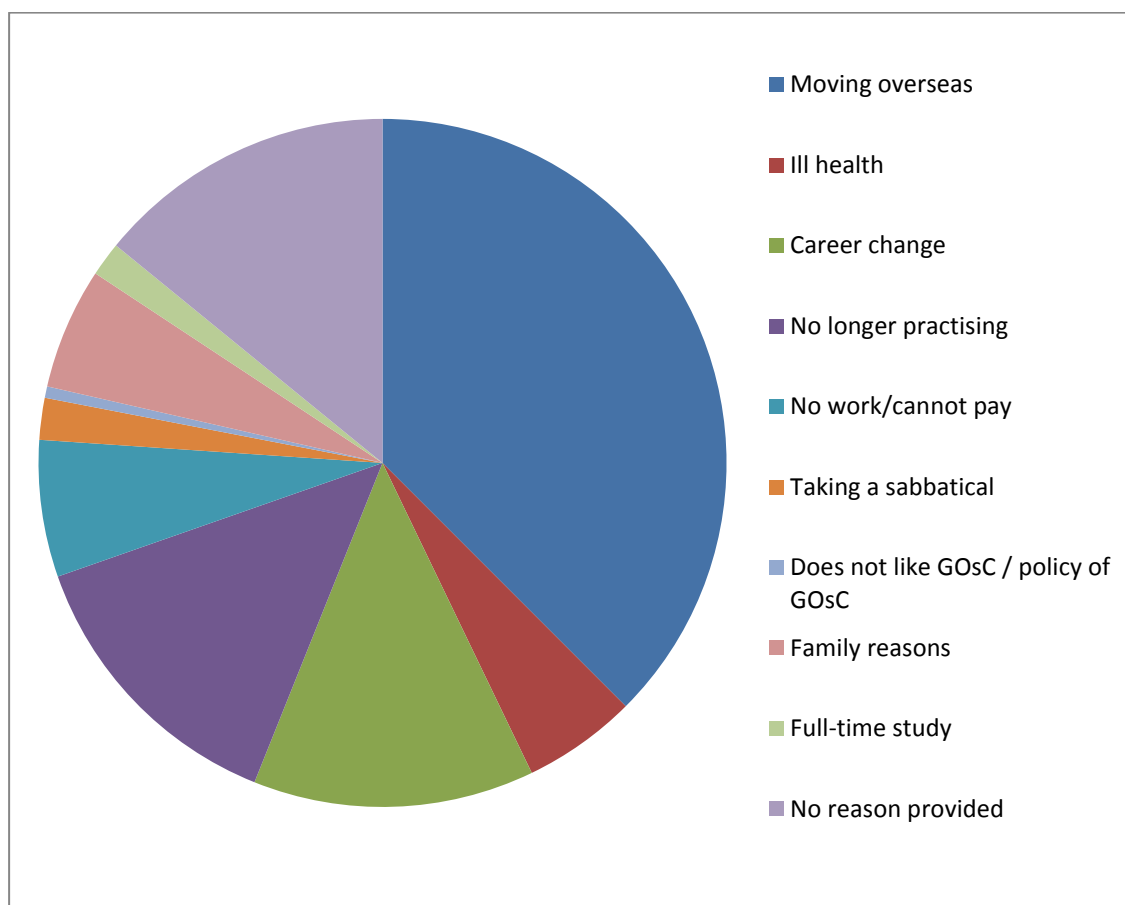
Total number of resignations	33
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*of which, the reasons cited were*

Moving overseas	11
Ill health	2

Career change	5
No longer practising	6
No work/cannot afford fee/meet renewal requirements	0
Taking a sabbatical	0
Family reasons	4
Full-time study	2
Does not like GOsC/agree with policy	0
No reason provided	3

29. 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	0
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Number of new registration appeals lodged	0
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*Non-practising registrants*

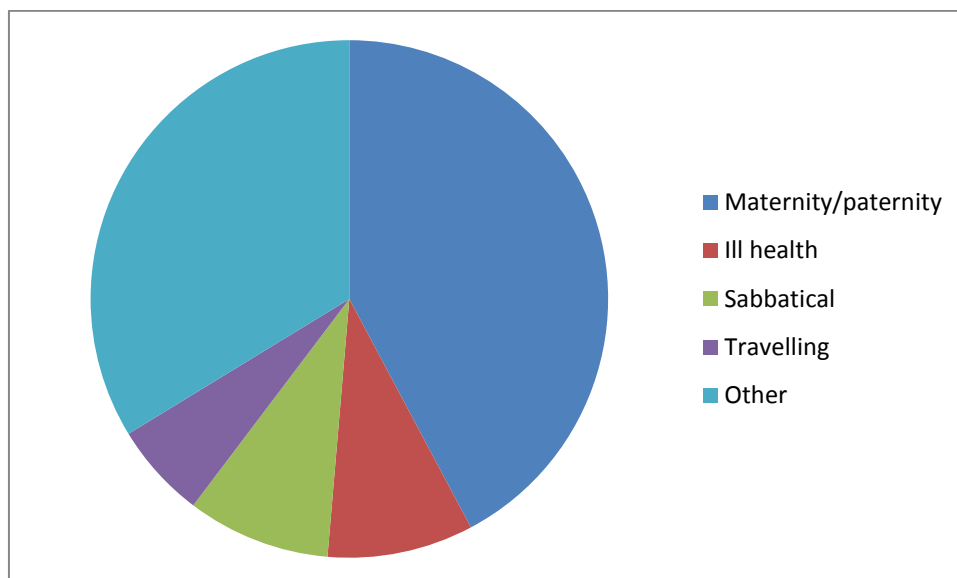
Total number of registrants who are listed as non-practising	154
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*of which*

Maternity/paternity	65
Ill health	13
Sabbatical	10
Travelling	10
Other*	56

\*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.

30. 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*

31. The Business Plan 2016-17 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.

32. CPD Annual Summary Form auditing and CPD record folder auditing was completed fully within the Business Plan year. Work has already begun on the auditing of CPD Annual Summary Forms for the 2017-18 year.

*Return to practice activity*

33. 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	6
Of which, the number who also undertook a Return to Practice review	6

*International Registration Assessment activity*

34. A total of 14 registration assessments were completed in the reporting period. During the reporting period, seven applicants were found to be eligible to register with the GOsC.

Number of Non-UK Review of Qualifications	7
Number of Further Evidence of Practice Questionnaires	4
Number of Assessments of Clinical Performance	3

**Recommendation:**

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  - c. A non-medical doctorate, e.g. PhD.
2. To note the remaining content of the registration report.