



**Council**  
**3 May 2018**

**Charges for international applications for registration**

<b>Classification</b>	Public.
<b>Purpose</b>	For decision.
<b>Issue</b>	<p>This paper considers the results of a consultation on increasing the charges levied on international applicants for registration and makes a recommendation to increase the charging structure.</p> <p>The consultation was held for 12 weeks between November 2017 and January 2018.</p>
<b>Recommendation</b>	To increase the charges levied on international applicants for registration as detailed in the paper.
<b>Financial and resourcing implications</b>	<p>The charges levied on international applicants for registration would come into effect following the Council meeting.</p> <p>The budget for financial year 2018-19 was drafted on the working assumption that the charges levied on international applicants would increase.</p>
<b>Equality and diversity implications</b>	An Equality Impact Assessment was completed and is attached to this paper at Annex B.
<b>Communications implications</b>	Application documentation and website information will need to be updated to reflect the new charging structure.
<b>Annexes</b>	<ul style="list-style-type: none"><li>A. Consultation Analysis</li><li>B. Equality Impact Assessment</li><li>C. Website, e-bulletin and social media analytics</li></ul>
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## Background

1. At the Council meeting in November 2017, it was agreed to publish a consultation on increasing the charges levied against international applicants who were applying for registration.
2. The consultation was published in November 2017 and ran for 12 weeks until January 2018. The consultation was published through the usual communication channels and sent specifically to contacts in overseas bodies.
3. A copy of the consultation document can be located here:  
<http://www.osteopathy.org.uk/news-and-resources/document-library/about-the-gosc/council-november-2017-item-13-registration-assessment-review/?preview=true>

## Discussion

4. The consultation was not expected to generate a significant response rate as the subject matter was narrow and likely to appeal to a limited number of registrants. A total of 16 responses were received, the full results are set out in Annex A.
5. However, while the response rate was low, the website, e-bulletin and social media analytics are quite respectable for what was a narrow consultation subject. These can be found at Annex C.
6. Council asked at the November 2017 meeting for sight of the Equality Impact Assessment (EIA) which supported the consultation and is attached at Annex B.

### *Summary of results*

7. The consultation analysis has shown that the 16 responses have generated a mixed set of answers, which appear to contradict each other. A summary of the responses is set out below:

Question	Yes	No
Q1. Do you agree that the cost of administering the process for registering internationally qualified applicants should be borne by the individuals with the international qualification who are applying for registration?	8	8
Q2. Do you agree that the cost of the process for registering internationally qualified applicants should be cost neutral to existing GOsC registrants?	11	5
Q3. Do you agree with the proposed increase to the charges levied on internationally qualified applicants for the following: <ul style="list-style-type: none"> <li>• Assessment of qualification</li> </ul>	5	11

<ul style="list-style-type: none"> <li>• Further evidence of practice questionnaire</li> <li>• Assessment of Clinical Performance</li> </ul>	6	10
Q4. Do you agree with the rationale for increasing the charges levied on internationally qualified applicants?	7	9
Q5. 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	2	1

8. The analysis demonstrates that those individuals who replied to the consultation are equally split between those who agree with international applicants bearing the cost of applying for registration and those who disagree (Q1).
9. While the majority agree that the cost of the international application process should be cost neutral to existing GOsC registrants (Q2) the respondents then disagree that charges paid by international applicants for the three-stages of the assessment process should be increased (Q3).
10. The respondents to the consultation are then almost equally split as to whether or not they agree with the rationale for increasing the charges levied on internationally qualified applicants (Q4), with a slim majority disagreeing with the rationale.
11. The written responses to the consultation were also varied in opinion. One consultation response argued for the charging structure to remain low to encourage diversity from international applicants for registration, whereas as another consultation response, from a registrant who has been through the overseas application process, argues for the fees to be increased for applicants so the cost is not borne by existing registrants.
12. Two consultation responses commented that the proposals were because of a Brexit, nationalistic ideology and with one consultation response suggesting that the proposals were racist in nature. It is important to state that the policy work and the collection of evidence to support the consultation was being gathered before the referendum on EU membership took place and the proposals were not developed as a consequence of the UK decision to exit the EU. The Equality Impact Assessment, attached at Annex B, sets out evidence which demonstrates the proposals were considered and thought-out.
13. The purpose of consultation is to allow interested parties to express their opinions about a proposed policy direction. The responses are then given due consideration with interest given to those responses which identify gaps in the policy development or where the number of responses overwhelmingly favours a particular outcome.

14. While the 16 consultation responses have been given due regard, it is the view of the Executive that the consultation did not yield any new information which would suggest the proposals to increase the charges levied on international applicants should be amended or rejected.
15. The Executive presents the revised charging structure to Council as per the consultation document.

*Charging structure and rationale*

16. The consultation proposed increasing the charges levied on international applicants applying for registration as follows:

<b>Assessment type</b>	<b>Proposed charge to be levied per assessment</b>
Assessment of qualification	£690
Further Evidence of Practice Questionnaire	£690
Assessment of Clinical Performance	£910

17. The revised charging structure would come into effect following approval by Council.

**Recommendation:** to increase the charges levied on international applicants for registration as detailed in the paper.

**Consultation analysis: charges payable by internationally qualified applicants**

The General Osteopathic Council (GOsC) held a consultation on proposal to increase the charges payable by internationally qualified applicants for the registration application process. The consultation opened on 8 November 2017 and closed on 30 January 2018. The consultation responses are set out below.

In total, 16 completed consultation responses were received.

Questions	Yes	No	Comments
Do you agree that the cost of administering the process for registering internationally qualified applicants should be borne by the individuals with the international qualification who are applying for registration?	8	8	International osteopathic input should be welcomed and encouraged by the General Osteopathic Council. It strengthens the profession and widens the scope of osteopathic experience in the UK. Therefore the process should be less expensive for the individual applicant.
			If there's any it should be paid by the applicant.
			I read the osteopath magazine the other day. I was more or less horrified to realise that you propose to increase fees to EU nationals to come to England registering with the GOsC to over £2000. I was given this extract from a letter sent to EU nationals living in England at present. Paragraph 2 made me realise that your suggestion of a few increase of such horrific magnitude might not be in the spirit of peace and a kind Brexit. It seems more in a spirit of nationalistic over reaction and rather unnecessary.
			It would be a higher cost for a newly qualified practitioner which is sometimes difficult when you are just out of school. However, if the analysis you have conducted shows that "fees paid to the Registration Assessors are greater than those recouped from the individuals with an international qualification who are applying for registration", then it has to change.
			No - by spreading the cost of this across all osteopaths makes this more affordable and has less impact on any one osteopath financially. A change to this does not provide a big cost savings to all osteopaths.

## Annex A to 8

Questions	Yes	No	Comments
			<p>Also the proposed changes make the cost of an internationally registered osteopaths first year prohibitive (when adding it on top of the fees) and make it a huge sum, not in line with what likely earning will be for an osteopath working in a new country during their first year of practice in a new place. Also any internationally registered applicants that then work in the UK will contribute with their ongoing registration fee to the pool of further osteopaths.</p> <p>I feel the cost of registration should be the same for everyone.</p>
Do you agree that the cost of the process for registering internationally qualified applicants should be cost neutral to existing GOsC registrants?	11	5	<p>The osteopathic profession in the UK grows with diversity; international applicants should be welcomed and encouraged to join the GOsC.</p> <p>From an equality point of view every fee should be used for the needs and expenses of GOsC. So is not fair that someone else bear the assessment process costs.</p> <p>It is totally fair that it should be cost neutral to existing GOsC registrants.</p> <p>The cost to subsidise the international applicants is only small to the existing registrants.</p>
Do you agree with the proposed increase to the charges levied on internationally qualified applicants for the following:			<p>Raising the fees by the proposed amount greatly decrease the number of applicants and therefore limit international influence on the wider osteopathic community in the UK.</p> <p>The increasing of the fee is disproportionate comparing to the current. It pass from £100 to £690 which is honestly a huge gap. It could be acceptable an increase but not so substantial.</p> <p>Moreover I have to say that the currently process for the application of GOsC is really tricky and not clear even reading the instruction in the web-site. The examples are not thorough enough. I know that because I have been asked to some friends for the new process and sometimes taking information about that is even complicated for me.</p> <p>I also have to say that there are some steps of the application that are repetitive so the problem is for sure that the assessors has to be paid the right amount for the time they</p>

## Annex A to 8

Questions	Yes	No	Comments
			<p>work but also that the entire pathway for applicants has really to be reviewed in order to make it easier and faster.</p> <p>If the assessor can take less time with the documents of course there is no need to pay them more.</p>
			<p>Assessment of qualification and further evidence of practice questionnaire fees are x7 and x6 regarding the actual ones.</p> <p>This is a big change in one go!</p> <p>But, following your analysis, if it reflects what registration assessors' time worth then it has to be done to respect their involvement in this process.</p>
(a) Assessment of qualification	5	11	
(b) Further evidence of practice questionnaire	6	10	
(c) Assessment of Clinical Performance	7	9	
Do you agree with the rationale for increasing the charges levied on internationally qualified applicants?	7	9	<p>The problem is that the process is too slow and complicated. You also don't consider the expenses that the bureaucracy can create. Approval and certification has a cost and in your analysis you don't consider it. You should ask yourself if your proposal is based on a sort of protectionism to make things less accessible or if is really for the rationale you show in the paper.</p>
			<p>I feel it is much better to spread the load amongst many rather than making it very expensive for a few who wish to practice in the UK. And that if the cost is getting too high then the GOsC need to look at ways of making the process more cost effective - rather than on charging to be 'cost neutral'.</p> <p>If you look at the cost of the fee you are proposing and consider the number of</p>

## Annex A to 8

Questions	Yes	No	Comments
			<p>patients each applicant would need to see to pay this fee in their first year, when still building up their reputation, so patient numbers are likely to be slow, it makes financially challenging. You will have the figures more than I do, but if you look at the average an associate earn per patient, the fee you are proposing requires the cost of probably 80-100 patients to earn which I feel is too disproportionate between the cost of registration and likely earnings.</p> <p>Better to spread between many and look at ways to keep the costs of registering internationally qualified applicants as low as possible to prevent making it exclusive to those who are financial enough to pay a fee that would be difficult to fund on an osteopaths wages</p>
<p>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.</p>	2	1	<p>International applicant. The fees would be too high for new graduates to apply hence limiting applications.</p>
			<p>I do believe that such measures would potentially prevent recently graduated Osteopaths from applying due to the overall cost of the process. Each step of the process needs to be paid for but no one can predict if they would have to go through each steps of if only one would be enough.</p> <p>The level of qualification can be so very different depending on the school and the country. It would make things easier and also less costly if there was some kind of consensus on the level of qualification between schools in Europe.</p>
			<p>Yes it borders on racism if you really want my opinion.</p>
			<p>I registered with the GOsC from an EU diploma when I was freshly qualified. At the time I didn't have much money so any costs were difficult to handle. Setting up a practice and/or starting a working life is a tough time (buy a car, rent apartment, find a practice, new computer. etc)!</p> <p>However I absolutely wanted to be registered with the GOsC to value and promote my professional standards to ensure patient safety and also oblige myself to maintain a correct continuum professional development because in the country I qualified (France)</p>



## Annex A to 8

Questions	Yes	No	Comments
			<p>there isn't such an organisation.</p> <p>For those reasons I believe international students want to register with the GOsC. Today you have outlined in this consultation that the cost has to change because it does not fairly cover time spent upon each application. I then think this rise has to be levied on internationally qualified students and not existing registrants.</p> <p>To my opinion there is no disproportionate effect upon any particular group as you do not separate individuals from EU or non EU qualifications. (I am not sure all countries regulating osteopathy do this).</p>
			<p>If you look at the cost of the fee you are proposing and consider the number of patients each applicant would need to see to pay this fee in their first year, when still building up their reputation, so patient numbers are likely to be slow, it makes financially challenging.</p> <p>You will have the figures more than I do, but if you look at the average an associate earn per patient, the fee you are proposing requires the cost of probably 80-100 patients to earn which I feel is too disproportionate between the cost of registration and likely earnings.</p> <p>Better to spread between many and look at ways to keep the costs of registering internationally qualified applicants as low as possible to prevent making it exclusive to those who are financial enough to pay a fee that would be difficult to fund on an osteopath's wages.</p>
Please provide us with any other comments	n/a	n/a	<p>This process should be dropped all together. The GOsC should have a list of international universities that fulfil the GOsC practice guidelines, offering reciprocal rights to qualified osteopaths from (at the very least) English speaking countries. Those who speak English as a second language should be granted the same rights after providing English language qualifications.</p>
			<p>I think that's a great idea to increase the fees for the new applicants; People who really want to work and establish their lives in the UK will still apply and those who apply "for</p>

## Annex A to 8

Questions	Yes	No	Comments
			<p>the fun" without considering the regulations of our profession won't apply. I've been through the registration with the GOsC as I was graduated in France; I have been working hard for it and I'm proud to be registered with the GOsC.</p> <p>Unfortunately I receive emails everyday of people from France wanting to come and work here "just for a summer or a year"; I think they need to know that here we have a regulation of the profession.</p>
			<p>I went through that process myself. Each step was so complicated and confusing that I felt as if it was made so that I couldn't succeed. But I did, through hard work and endless efforts. But at the time I'm really not sure I couldn't have done it with the proposed increasing of the charges.</p> <p>Nonetheless, I completely understand the need for a very thorough review and assessment of qualification. I just think that it would be too expensive for new graduates.</p>
			<p>I agree with the fact the assessor take time for applicant review so I think is fair to paid them the right amount. At the same time I believe that, as is done now, all the application process is too slow and complicated which lead the assessor to take more time to control all documents. Basically what I sustain is: a review of the current process and if an increase of the fee has to be done not so substantial.</p>
			<p>I totally appreciate the transparency of this consultation. Reasons of this consultation are clearly explained. I believed it is truly fair to the assessors that costs may rise. As a charity organization I trust the rise of the cost to be made only for a right reason.</p>
			<p>I have just had to complete this process moving back to NZ - which is my home and country I grew up in, just because I trained in the UK. The fees to return have been astronomical and I had to take on an extra job in the UK to try and save them to return home, which due to the varying patient numbers in my new clinic I was still unable to achieve despite working 6 days a week, and then have had to borrow money, because the fees here for my first year are much higher than my earning allow me to afford -</p>

## Annex A to 8

Questions	Yes	No	Comments
			<p>despite working in busy clinics.</p> <p>So I think the GOsC need to look at equality and justify the any fee in terms of its relative affordability relating to the proportion of the average earnings of an osteopath in their first year of practice to make sure it seems reasonable - and be transparent in publishing this. Also if you remember that by spreading the fee across all osteopaths any osteopaths working in the UK who trained elsewhere will continue to fund others in the same position with their ongoing fee contributions.</p> <p>I think it would appear ethically better to anyone observing the GOsC fees to have them the same for all applicants. This proposed consultation could potentially be influenced by prejudice; it certainly has a whiff of Brexit.</p>

**Charges payable by internationally qualified applicants for registration assessment: General Osteopathic Council Equality Impact Assessment**

**Step 1 Scoping the equality impact assessment (EIA)**

<p><b>Name of the policy</b></p>
<p>Charges payable by internationally qualified applicants for registration</p>
<p><b>Is this a new or existing policy?</b></p>
<p>This is an existing policy. We already charge internationally qualified applicants a fee for registration assessment and the policy intention has always been that as the benefit of registration falls primarily on the registrant (the successful applicant), the applicant for registration should pay the actual costs of their assessment and that this should not be subsidised by the GOsC (and therefore by existing registrants).</p> <p>This consultation is about proposals to increase that fee to maintain this policy intention. (Over time, the costs of the assessments have increased to GOsC, but the fee charged to registration applicants has not increased).</p>
<p><b>What is the main aim, purpose and/or outcome of the policy?</b></p>
<p>Internationally qualified applicants are assessed in a different way to those in the UK. This is because UK 'recognised qualification' courses are quality assured by the GOsC so that standards at the point of graduation are assured. We do not quality assure any international qualifications. It would be disproportionate and costly (and potentially unethical) to undertake a process of quality assuring the courses that international applicants graduate from.</p> <p>Therefore, we assess qualifications and individuals' competence for those with international qualifications to ensure and maintain standards for entry to the register.</p> <p>The fee charged to internationally qualified applicants is intended to reflect the actual cost of assessing their application. Currently, the fee charged does not reflect the actual cost. This means that the cost of the individual's registration assessment is currently being subsidised by the General Osteopathic Council and therefore by fees paid by current registrants.</p> <p>The purpose of the increase of the charges to applicants is to ensure that the cost of the assessment is paid by the applicant whilst also ensuring that entry standards to the register are maintained ensuring the integrity of the Register. The GOsC is a charity and we do not wish to make a profit from registration assessments.</p>

**Who is most likely to benefit from or be affected by the policy?**

All stakeholders including patients, current and future osteopaths and other healthcare professionals benefit from the integrity of the register, ensuring that only those meeting the *Osteopathic Practice Standards* are entitled to apply for registration and entry onto the Register of Osteopaths, practising as osteopaths in the UK.

Individual registrants benefit from their registration as it entitles them to practise as osteopaths in the UK.

Assessment of internationally qualified applicants, ensuring that standards are met prior to entry onto the Register is an integral part of this process.

All internationally qualified applicants who are not already registered with us or who have not previously been registered with us will be affected by the change to the policy. This is because the change in the policy means that fees they pay to have their qualifications and experience assessed will be increased to their actual cost for internationally qualified applicants applying for registration with us in the future, if the consultation proposals are agreed.

All existing registrants will benefit if the proposals are agreed as it means that their registration fees will not continue to subsidise assessment costs for internationally qualified registrants. Such an approach means that these fees can be used to undertake our other statutory functions related to integrity of the Register, for example, quality assurance of pre-registration and undergraduate education, standards, continuing professional development and fitness to practise.

**What data, research and other evidence or information is available which is relevant to this EIA?**

The Equality Act 2010 provisions are relevant in considering this policy. The General Osteopathic Council is listed in Schedule 19 to the Equality Act 2010 and is subject to the general equality duty outlined in s149 of the Equality Act 2010 which states that: 'In the exercise of their functions, public authorities in England, Scotland and Wales must have due regard to the need to:

- Eliminate unlawful discrimination, harassment and victimisation and any other unlawful conduct in the Equality Act 2010.
- Advance equality of opportunity
- Foster good relations'

It is therefore important that we examine our proposals and the equality impact

assessment from the perspective of:

- Ensuring that there is no unlawful discrimination as a result of our policy. This includes exploring and understanding whether or not our policy is a proportionate way of achieving a legitimate aim or whether it in fact constitutes indirect discrimination.
- Ensuring that we take steps to remove or minimise disadvantages suffered by people with protected characteristics due to having that characteristic.
- Taking steps to meet the needs of people with protected characteristics that are different from people who do not have that characteristic (including taking account of a disability).<sup>1</sup>

Eliminating unlawful discrimination – Unlawful discrimination is defined in section 19 of the Equality Act 2010 as follows: '19 Indirect discrimination (1) A person (A) discriminates against another (B) if A applies to B a provision, criterion or practice which is discriminatory in relation to a relevant protected characteristic of B's. (2) For the purposes of subsection (1), a provision, criterion or practice is discriminatory in relation to a relevant protected characteristic of B's if— (a) A applies, or would apply, it to persons with whom B does not share the characteristic, (b) it puts, or would put, persons with whom B shares the characteristic at a particular disadvantage when compared with persons with whom B does not share it, (c) it puts, or would put, B at that disadvantage, and (d) A cannot show it to be a proportionate means of achieving a legitimate aim. (3) The relevant protected characteristics are— age; disability; gender reassignment; marriage and civil partnership; race; religion or belief; sex; sexual orientation

We currently hold data about numbers of internationally qualified applicants applying for registration with us each year. We do not collect equality and diversity data from them at the point of application at the present time, only at the point of registration.

Whilst we do not currently require data from applicants about protected characteristics, we can and probably should assume that internationally qualified applicants may be more likely to have protected characteristics such as race. Race is defined in section 9 of the Equality Act 2010 as follows: 'Section 9 (1) Race includes— (a) colour; (b) nationality; (c) ethnic or national origins.' In other words, it is probably reasonable to assume that in a pool of people with a UK qualification and a pool of people with an international qualification, the pool of people with an international qualification are more likely to have a higher proportion of people with a non - UK nationality. (We suggest that it would be inappropriate to consider that because we do not hold direct data, that therefore discrimination could not be a possibility as a result of our proposals and that therefore such an assumption is appropriate to apply proper consideration of our statutory duties under the legislation.)

It is important to note that our proposed policy will apply equally to those with

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<sup>1</sup> See <https://www.equalityhumanrights.com/en/advice-and-guidance/public-sector-equality-duty>

international qualifications, regardless of protected characteristic. Therefore there is no direct discrimination which is absolutely unlawful. This means that we do not have a policy of assessing all people with a different 'race' differently. (This is because the policy depends on place of qualification not race).

However, we can reasonably assume that in applying our policy equally to those with an international qualification, a greater proportion of this pool will have a protected characteristic of race. We can reasonably consider that our policy may indirectly discriminate against people with certain characteristics as indicated above unless it is captured by section 19(4) as 'justified as a proportionate means of achieving a legitimate aim.

Please see step 4 below for further discussion about whether the process of charging internationally qualified applicants cost price for the assessment process is justified as a proportionate means of achieving a legitimate aim?

**What further data or information is needed to carry out a full assessment?**

Over time, it would be preferable to collect detailed equality and diversity data from all of our applicants for registration to assist us to understand the application of our policies over time.

**Step 2 Involvement and consultation**

**If you have involved stakeholders, briefly describe what was done, with whom, when and where. Please provide a brief summary of the response gained and links to relevant documents, as well as any actions.**

For this policy, our key stakeholders are potential applicants for registration likely based outside of the UK, registration assessors, current registrants, students and patients.

Our engagement in developing the proposals has been using data from registration assessors and applicants who have begun the registration application process.

Our consultation strategy on the proposals involves further discussion with a range of international osteopathic organisations who may have members or registrants who might be affected by our policies in the future. These organisations include: Osteopathic International Alliance, Forum for Osteopathic Regulation in Europe, European Federation of Osteopaths, Osteopathic Board of Australia, Australian Osteopathic Association, Osteopathic Council of New Zealand, Osteopaths New Zealand, Allied Health Professionals Board of South Africa. We also intend to specifically target all current and past applicants to our international registration processes.

We will also encourage all current registrants, patients and the public and others to respond to our consultation.

**Step 3 data collection and evidence**

**What evidence or information do you already have about how this policy might affect equality for people with protected characteristics under the Equality Act 2010?**

Please cite any quantitative (such as statistical data) and qualitative (such as survey data, complaints, focus groups, meeting notes or interviews) relating to these groups. Describe briefly what evidence you have used.

As stated above, we do not have detailed data to demonstrate a potentially unfair impact. However, we think it is appropriate to assume a potentially unfair impact that needs to be justified under this policy.

We do have data about the numbers of internationally qualified applicant assessments carried out as follows:

We have undertaken the following assessments during 2016 to 2017:

<b>Assessment Type</b>	<b>Number of completed assessments March 2016-Feb 2017</b>	<b>Number of failed assessments March 2016-February 2017</b>
Non UK Qualification Review	14	2
Further Evidence of Practice Review	9	2
Assessment of Clinical Performance	7	2
<b>Total</b>	<b>30</b>	<b>6</b>

As indicated above, we do not and cannot require applicants to provide equality and diversity data. But we do offer registrants the opportunity to provide this data at the point of registration.

We do hold limited equality and diversity data from our existing registrant population and this is indicated below:

**Register statistics: 1 June 2017**



Osteopaths on the Register: 5,181

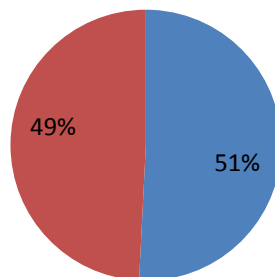
Female: 2,632 Male: 2,549

- 4,433 practise in England
- 138 practise in Wales
- 158 practise in Scotland
- 24 practise in Northern Ireland
- 428 practise in the rest of the world.

**Osteopaths on the Register 1 June 2017:**

**Total = 5,181**

■ Female ■ Male



Sexual orientation of registered osteopaths

It is not a requirement that osteopaths disclose this information when registering,

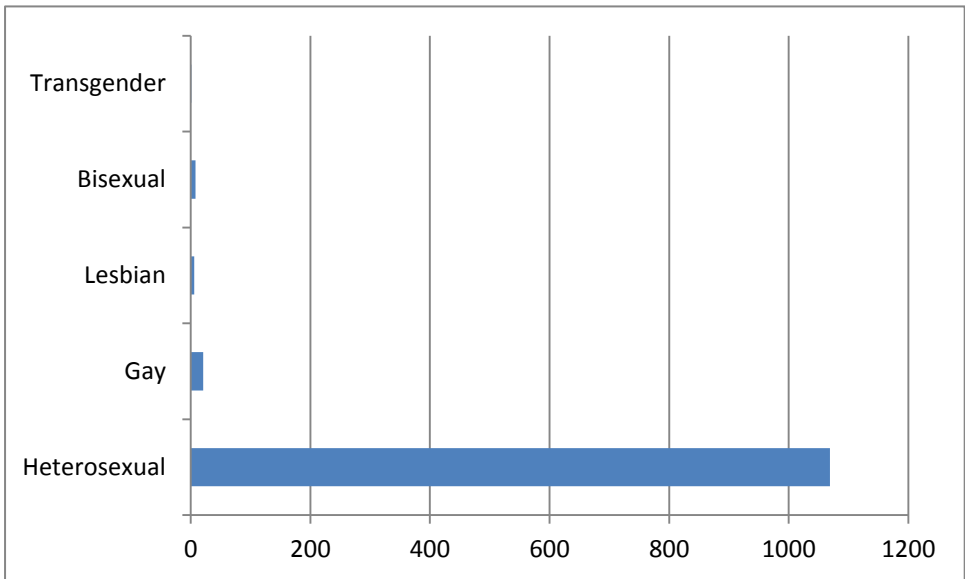
Heterosexual 1069

Gay 21

Lesbian 6

Bisexual 8

Transgender 1



Disabilities declared by osteopaths on the register

Very few osteopaths declare a disability, and there are only six who have done so currently on the register. This gives a percentage of 0.12 per cent of registrants. Given that the estimate for the percentage of the working age population who meet the definition of disability in the Equality Act is 17.5 per cent and that about half of the working age population who meet the definition are in paid work, this is likely to represent significant underreporting. It may be that registrants do not understand the definition against which the GOsC is asking for personal information; it may be that there is limited understanding of the importance of collecting such data or its storage and use.

Data on the age or ethnicity of registrants was not available for this EIA.

**What additional research or data is required to fill any gaps in your understanding of the potential or known effects of the policy? Have you considered commissioning new data or research?**

In due course, as part of our overarching equality and diversity strategy, we will consider further collecting equality and diversity data from applicants to better assess the impact of the international registration assessment process on protected characteristics.

**Step 4 – assessing impact and strengthening the policy**

**What impact does, or could, the policy have on:**

- **promoting equality of opportunity for people with protected**

**characteristics;**

- **eliminating unlawful discrimination, harassment and victimisation?**

The overarching approach of assessment onto the register enables applicants to be able to access the register against the same standards, although, these are assessed in a different way depending on whether an applicant has qualified through a quality assured UK recognised qualification or through an individual assessment process if they have an international qualification.

This policy is aimed at exploring and ensuring that there is no unlawful discrimination and that the policy is a proportionate means of achieving a legitimate aim. This is explored further below.

*Is the policy of charging international qualified applicants cost price for the assessment process as justified as a proportionate means of achieving a legitimate aim?*

It is a legitimate aim that we should have processes for ensuring that standards are met prior to entry onto the register. This is part of our statutory duties as outlined in the Osteopaths Act 1993 to protect the public.

The Osteopaths Act 1993 requires us to 'recognise qualifications' and sets out a detailed statutory process for appointment of Visitors and the provision of reports on educational provision. We have previously considered the arguments for quality assuring international qualifications and we have concluded that it is not proportionate, legitimate or ethical. Further information about this discussion is outlined at: <http://www.osteopathy.org.uk/news-and-resources/document-library/our-work/education-committee-13-june-2012-item-2-minutes-march-2012/> and <http://www.osteopathy.org.uk/news-and-resources/document-library/our-work/education-committee-14-march-2012-agenda/> (See Item 5a). In any event, the unit cost of quality assuring an institution is c£20,000. Whereas, the cost of an individual assessment are less than £2000.

It is therefore suggested that it having separate registration assessment processes for applicants qualified in the UK and outside the UK is a justified as a proportionate way of achieving a legitimate aim.

The next question is it proportionate to charge internationally qualified applicants for that process? Or should that cost fall on existing registrants either wholly or partly (thus reducing or removing the cost to internationally qualified applicants)?

The context is that UK students now pay fees upwards of £9000 in order to gain their recognised qualification. Internationally qualified students may also pay fees for their qualification plus the additional cost to us for assessment.

Who receives the benefit of an individual's registration?

The primary benefit to registration is to the individual being registered. There is a

commercial value in being registered by the GOsC to the individual osteopath that enables them to earn.

However, other stakeholders also benefit from the individual's registration. For example, patients benefit from being able to access that individual osteopath.

It could be argued that all osteopaths benefit from increasing numbers on the Register. The increasing establishment of the profession affects the reputation of all osteopaths and increases awareness of osteopathy with patients, society and other health professionals. However, osteopaths in the commercial environment could also be argued to be competitors, and in this respect, it could be suggested that the benefits to existing registrants are less strong.

The question is therefore, who gets the benefit of an individual's registration and who should pay?

There are a number of options:

Option 1 – International applicants pay cost price for registration assessments.

- This is consistent with models in other regulators, for example, General Chiropractic Council, General Medical Council where internationally qualified applicants pay for assessment of their competence.
- It is fair that as the individual registrant gains the primary commercial benefit from their registration, that they should pay for assessment of their qualification rather than expect someone else to pay for this.

Option 2 – Costs for international applicants assessment of qualifications are paid by GOsC / existing registrants

- It is difficult to argue that the benefit to registrants is proportionate to the costs involved.
- It could be argued that the wider benefit to registrants and patients is worthy of some contribution to the profession. But this benefit is difficult to quantify and monetise in real terms and in any event, it is suggested that it is outweighed by the commercial benefit to the individual.

Option 3 – A hybrid model whereby costs to international applicants are subsidized by the GOsC / existing registrants.

- It is difficult to argue that the benefit to registrants is proportionate to the costs involved.
- It could be argued that the wider benefit to registrants and patients is worthy of some contribution to the profession. But this benefit is difficult to quantify and monetise in real terms and in any event, it is suggested that it is outweighed by

the commercial benefit to the individual.

Having examined the different models in place, and the costs and benefits to all stakeholders it is suggested that Option 1 – that applicants should pay the full cost of their registration assessments and that no burden should fall on the GOsC or existing registrants is a justified way of achieving a proportionate means.

As part of our equality duty, we also have a statutory duties to: advance equality of opportunity and foster good relations’.

Therefore, it is important that as part of our registration assessment processes, we do all we can to support applicants to successfully complete the process by publishing guidance and sources of further advice and by providing bespoke support to all applicants. It is also important to ensure that our rationale for our proposals is transparent and also that all those affected have the opportunity to comment on our proposals. This consultation document contributes to that.

**If the policy is likely to have a negative effect on equality (‘adverse impact’), what are the reasons for this?**

This is described in detail above.

**What practical changes will help to reduce any adverse impact on particular groups?**

We could do more to understand the impact of our registration assessment processes on applicants. We will explore this aspect of the policy as part of our review of registration assessments which is ongoing.

**What could be done to improve the promotion of equality within the policy?**

We must ensure that our consultation strategy is targeted to ensure that all those potentially affected by our policy are aware of the consultation and have the opportunity to respond.

**Step 5 – procurement and partnerships**

**Is this project due to be carried out wholly or partly by contractors? If yes, have you done any work to include equality into the contract already?**

No. As part of the consultation, we will also seek expert advice on our equality impact assessment.

**Step 6 – making a decision**

**Summarise your findings and give an overview of whether the policy will meet the GOsC’s responsibilities in relation to equality.**

A decision on this policy will be undertaken after consultation. The consultation questions are all designed to explore the matters identified from this equality impact assessment as follows:

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?

**What practical actions do you recommend to reduce, justify or remove any adverse/negative impact?**

We are consulting on our rationale for the proposals with a view to exploring whether there are any other issues that we have not incorporated into our decision

making process.
<b>What practical actions do you recommend to include or increase potential positive impact?</b>
As above.

**Step 7 – monitoring, evaluating and reviewing**

<b>How will the recommendations of this assessment be built into wider planning and review processes?</b>
Any updating of other GOsC policies should draw on the findings of the consultation exercise and the drafting changes made as a result of the review and this EIA.
<b>How will you monitor the impact and effectiveness of the new policy?</b>
Through analysis of any relevant comments, complaints and compliments from applicants, registrants, students, patients and others.
<b>Give details of how the results of the impact assessment will be published.</b>
This EIA will be presented to the relevant Committee so that the implications for equality of the review can be included in governance processes.

**Step 8 – action plan**

<b>Taking into consideration the responses outlined in steps 1-7, complete the action plan below.</b>		
	<b>Actions</b>	<b>Target date</b>
<b>Involvement and consultation – stage 1</b>	To consult widely in accordance with the consultation strategy to ensure that as far as possible, all potential and existing and past applicants are aware of the consultation and have the opportunity to respond.	2018

## Annex B to 8

<b>Data collection and evidence</b>	As in section 3	Completed
<b>Assessment and analysis</b>	As in section 4 – the impact will be explicitly explored as part of the consultation response.	Ongoing
<b>Procurement and partnerships</b>	As in section 5 – we will commission expert advice on equality impact as part of our consultation.	Completed
<b>Making a decision</b>	The decision to implement the proposals will be made by Council following consultation and updating of the equality impact assessment.	2018
<b>Monitoring, evaluating and reviewing</b>	Ongoing – this will also be considered as part of the registration assessment review.	2018



### Charges payable by international applicants for registration consultation Website, e-bulletin and social media analytics

#### Website analytics

Consultation page views:	374
Consultation page visitors:	311

#### Source of visitors:

• direct (e.g. news items, magazine)	113
• Google	104
• Bing	11
• Facebook	8
• Yahoo	1
• Several from osteopathic practices	

Length of time on page	02:33
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Consultation document downloads	113
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Consultation response form downloads	19
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Equality and diversity form downloads	20
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Online response form visits	33
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#### E-bulletin: November e-bulletin (30 Nov 2017)

Sent to	5,441 recipients
E-bulletin opened (read by)	2,348 readers (43.6%)
Clicked through to this consultation page	17 - (6 <sup>th</sup> most popular content item)

#### Social media

Facebook post 8 Nov reach	384
Engagement	13 post clicks; 1 like; 1 comment

Twitter post 8 Nov reach	872
Engagement	2 retweets; 7 link clicks

LinkedIn post 8 Nov reach	193
Engagement	1 click

The Osteopath magazine – p7 of the Dec 17/Jan 18 issue:

<http://www.osteopathy.org.uk/news-and-resources/document-library/the-osteopath/the-osteopath-magazine-december-2017january-2018/>