



Policy Advisory Committee

9 March 2017

Registration Assessment review and update

Classification	Public
Purpose	For discussion
Issue	The paper sets out the planning and initial thinking associated with a review of elements of the registration assessment process including mutual recognition of qualifications/regulated professionals.
Recommendations	<ol style="list-style-type: none">1. To consider the mechanism for reviewing the current fees payable to assessors and by applicants (EU/Non-EU)2. To consider proposals for progressing mutual recognition of qualifications.3. To note the general registration update.
Financial and resourcing implications	These are set out in the paper.
Equality and diversity implications	We will undertake an equality impact analysis in relation to any new proposals for recognition of international qualifications.
Communications implications	Communications about registration processes are on-going
Annexes	None
Author	Matthew Redford and Stacey Clift

Background

1. The overarching aim of this paper is to plan and set the direction of travel of several cross departmental Registration based activities in the Business Plan for 2017-2018. An extract of Business Plan activities is set out in the table below:

Finalise and implement proposals for consultation on changes to registration assessment charges for overseas applicants	Registration and Resources and Professional Standards	September 2017 to March 2018
Undertake literature review about mutual recognition in other sectors.	Professional Standards	September 2017
Seek feedback from those using or applying our registration processes (including registrants, registration applicants and registration assessors) in order to better understand their experiences and improve our registration system.	Registration and Resources Communications	All year
Undertake engagement with relevant stakeholders and develop of proposals for changes to registration assessments if required.	Professional Standards	March 2018

Discussion

Fees payable to assessors and by applicants (EU/Non-EU)

2. The GOsC has a pool of Registration Assessors who conduct assessments as part of the application for registration process for overseas qualified applicants. The Registration Assessors are contracted by the GOsC (they are not employees) and are paid for the work they complete. Overseas qualified applicants are charged at different stages of the registration process.
3. It has been a number of years since the fees paid to Registration Assessors and the fees charged to overseas qualified applicants were last reviewed and our experience is that changes to the charging structure is now overdue.
4. The table below sets out the fees paid to Registration Assessors and those charged to overseas qualified applicants.

Registration Assessment	Number of Registration Assessors involved	Fee payable to Registration Assessors	Fees charged to overseas qualified applicant (EU)	Fees charged to overseas qualified applicant (Non-EU)
Assessment of qualification	2	£100	£-	£-
Further evidence of practice questionnaire	2	£100	£100	£100
Assessment of clinical performance	3	£306 plus expenses	£330	£330

5. Following the introduction of the revised EU Directive, overseas applications from the EU have become more labour intensive for the assessors as the applicant is now required to provide evidence of their qualification, lifelong learning and work experience. This is because the EU Directive was trying to ensure that EU applicants should be able to register at an earlier stage unless there is a substantial difference between their qualification, lifelong learning and work experience and UK standards.
6. The further evidence of practice questionnaires are also labour intensive for the assessors as this assessment involves the review of case studies provided by the applicant. We are aware that because of the current low charge paid for this work, there can be reluctance from assessors to sign up for this assessment.
7. Since August 2016 we have sent a questionnaire to each assessor following the conclusion of each assessment stage. The questionnaire is designed to elicit information about the time taken for the assessments. Unfortunately, we have only received 14 responses out of a possible 41.
8. An initial market review has indicated that the other healthcare regulators approach overseas applications in very different ways and we would not be able to benchmark effectively against others. Therefore, any approach we take will need to be based on our own experience and appropriate to our requirements.
9. The fees paid by applicants are also no longer reflective of the work involved and in essence, UK registered osteopaths are subsidising those applying from overseas when our policy intention is that this should not be the case. We feel this is not viable and needs to change so that a future charging structure is at least cost neutral.

10. We will need to seek legal advice to ensure that there are no immediate legal barriers which would prevent GOsC from charging overseas applicants to apply for registration.
11. Any changes to the charging structure for overseas applicants would be subject to consultation. We would hope to be in a position to ask Council to agree to publish a consultation on a new charging structure from summer 2017.
12. In terms of the fees paid by registration assessors and those charged to overseas applicants, we propose to collect more evidence and to bring proposals back to the Policy Advisory Committee and the Remuneration and Appointments Committee later this year.

Mutual recognition of qualifications

13. Our current legislative framework, allows us to recognise qualifications awarded outside the UK. Section 14(3) of the Osteopaths Act 1993 provides that: 'Where the General Council is satisfied that a qualification granted by an institution outside the United Kingdom is evidence of having reached the required standard of proficiency, or of reaching a comparable standard, it may, with the approval of the Privy Council, recognise that qualification for the purposes of this Act.' We currently do not operate a process of quality assuring institutions outside the United Kingdom for a range of reasons not least the impact of imposing UK educational standards in countries outside of the United Kingdom.
14. However, our registration processes come primarily from particular universities outside the United Kingdom. We would like to consider whether it is possible under the existing legislative framework to establish mutual recognition of qualifications from overseas countries/institutions.
15. There are a range of factors to explore, including:
 - a. Regulated countries e.g. Australia, France
 - b. Non-regulated countries, e.g. Italy
 - c. EU countries, e.g. France, Italy
 - d. Regulated countries without education institutions, e.g. South Africa.
16. In a regulated country, e.g. Australia and using Victoria University as an example, GOsC has received a high proportion of applicants from that university. Currently, each applicant has to go through the three stage assessment process of (1) Qualification Review, (2) Further Evidence of Practice Review and (3) Assessment of Clinical Performance – two individuals with exactly the same qualification are assessed individually. Further, this application process can take months depending on the scheduling of assessments. We want to explore, for example, whether an individual with an Australian 'RQ' currently in good

standing with the Australian regulator, need be subject to such a rigorous process.

17. We propose to undertake this work as follows:

- September 2017 – Undertake (a) a legal analysis to confirm that the GOsC have the power to recognise non UK qualifications, (b) establish policy intent to streamline application process for certain non UK qualifications (e.g. perhaps on the basis of number of applicants received from an institution over a designated period of time), (c) to have undertaken a literature review concerning other healthcare regulators approaches to international registration from different countries and how they assess applicants (e.g. GDC, HCPC) and (d) undertake an equality impact analysis.
- By March 2018 – depending on the results of the above, undertake a consultation on mutual recognition of qualifications.

General registration update

18. The current registration assessment figures are as follows from March 2016 to date:

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

19. Registration Assessor training took place on 24 January and 16 February 2017. The agenda for these training days was drawn up from a thematic analysis of the assessor's last appraisal documents which took place in February 2016 – so these sessions covered what the assessors had said they wanted to receive in terms of training.

20. The training consisted of the following sessions:

- a. Sharing learning with fellow UK health regulator, HCPC in interpreting and introducing new EU directive,
- b. Two sessions on standards and assessment, which involved exploring and discussing shared expectations of standard and how they can be applied to assessment, together with exploring the analysis of evidence to assist in the process of standard-setting when undertaking individual assessments. This

also involved discussing the language of feedback, its value in supporting applicants and its relationship to standards.

- c. An Assessment of Clinical Performance session, which examined issues and trends, including clinical responsibility, support for applicants and process matters and
 - d. A reflective learning session, which focussed on action planning to organise learning points to promote effective practice.
21. Feedback from the training sessions was very positive and highlighted that the sessions had been very informative. All assessors learned something new from the training. Overall feedback included:
- Welcome opportunity to meet new recruits to the assessor team and to support their induction
 - Lots of opportunities for discussion and developing skills
 - Good understanding of expectations and challenges
 - Well paced out
 - Thorough planning and preparation really shone through
 - Excellent information pack including actual samples of evidence'
22. Take away messages identified by participants included:
- The importance of a structured approach to assessment - registration assessment is a constantly evolving process - we must keep up-to-date and keep looking innovatively for alternative methods and improvements
 - Evidence of best practice in terms of evidence gathering for assessments
 - To look at only the evidence provided in front of you
 - An understanding of the different processes and expectations
 - Making feedback explicit
 - The need to work out a better way of matching evidence from FEPQ to the osteopathic practice standards.
 - The importance of listening to those who have experience
 - Key clinical responsibilities for full patient care package
23. Future training planned includes:
- Educational Visitors training to be undertaken by the GOsC and QAA on the 14 and 15 March 2017 and
 - A developmental day on the new CPD scheme and the Osteopathic Practice Standards (OPS) Review on 30 March 2017 for all assessors and Visitors to be undertaken by GOsC.
24. Registration Assessor appraisals are due to commence in June/July 2018. Jane Fox will be commissioned to undertake these appraisals, so as to maintain continuity of relationships that have already been established and to ensure independence from the GOsC.

Recommendations

1. To consider the mechanism for reviewing the current fees payable to assessors and by applicants (EU/Non-EU).
2. To consider proposals for progressing mutual recognition of qualifications.
3. To note the general registration update.