



**Policy Advisory Committee**  
**10 October 2017**  
**Registration Assessment Policy**

<b>Classification</b>	Public.
<b>Purpose</b>	For discussion
<b>Issue</b>	Consultation on fees charged to applicants for registration assessment and literature review for mutual recognition.
<b>Recommendations</b>	<ol style="list-style-type: none"><li>1. To consider the proposed consultation on changes to fees charged to applicants for registration assessment and timeline.</li><li>2. To consider the literature review for mutual recognition and next steps.</li></ol>
<b>Financial and resourcing implications</b>	The consultation proposes an increase to registration assessment fees so that the burden of the cost of registration assessment falls on applicants rather than registrants.
<b>Equality and diversity implications</b>	There are potential equality and diversity implications arising from the changes to costs because if the consultation proposals are agreed, the cost of registration assessments will increase for internationally qualified applicants. We have developed these matters through a draft equality impact assessment which will be available as part of the consultation. We have sought to explore and ensure the fairness of the proposals as a proportionate way of securing a legitimate aim and collecting further data about this is a key component of the consultation.
<b>Communications implications</b>	The consultation will be promoted to all our stakeholders and published through our usual channels. We will also take particular steps to bring the consultation to potential applicants because this group is the group most likely to be affected by our proposals.
<b>Annexes</b>	<ol style="list-style-type: none"><li>A. Consultation document: Charges payable by international qualified applicants.</li><li>B. Literature review to inform subsequent policy decisions about mutual recognition.</li></ol>
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## Background

1. In March 2017, Policy Advisory Committee (PAC) received a paper which set out the direction of travel of several cross departmental registration based activities which are detailed in the 2017-18 Business Plan.
2. Those cross departmental activities are summarised as follows:

Finalise and implement proposals for consultation on changes to registration assessment charges for international qualified 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

3. This paper deals with three linked but separate matters namely:
  - a. Fees charged to applicants for registration assessment and timelines for consultation – the Committee is invited to consider the proposals for consultation on changes to fees charged to applicants for registration assessment and timelines. Have we considered the relevant options and perspectives of all our stakeholders? Is the Committee content with the narrative and direction of travel? Is anything missing?
  - b. Literature review to inform registration policy with specific reference to mutual recognition – the Committee is asked to note the literature review and to suggest any other sources that should be included to assist with policy development to feed into the development of proposals for more effective and efficient registration assessment.
  - c. Exploration of changes to the registration assessment processes to ensure an efficient, effective and proportionate registration assessment process.

## Discussion

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

4. A summary of the March 2017 paper and the PAC discussion is set out below for the benefit of those members who are new to the Committee.
  - a. It was noted that both the fees payable to registration assessors and those paid by applicants applying with an international qualification had not been reviewed for a long while.
  - b. The fees paid to assessors appeared to be disproportionately low for the work involved. This had been amplified by the introduction of the new EU Directive which had made the EU application process more labour intensive.
  - c. Information was being collected from the assessors after each stage of an application process to understand the time commitment required.
  - d. There has been desk research completed to understand how other healthcare regulators approach applications from international qualified applicants. However, regulators handle the applications quite differently, in part due to automatic recognition requirements compared to the general systems approach, and this means that any decisions we reach will need to be based on our own experiences and requirements.<sup>1</sup>
  - e. Fees paid by international qualified applicants are also not reflective of the work involved and in essence, existing registrants are subsidising this registration pathway. It was not considered that this was a sustainable position moving forward.
  - f. The fees that are paid to assessors and charged to international qualified applicants is as follows:

<b>Registration Assessment</b>	<b>Number of Registration Assessors involved</b>	<b>Fee payable to Registration Assessors</b>	<b>Fees charged to international qualified applicant (EU)</b>	<b>Fees charged to international qualified applicant (Non-EU)</b>
Assessment of qualification	2	£100	Nil	nil

<sup>1</sup> The General Chiropractic Council do not charge EU applicants for assessing their recognition application, whereas they charge £2,000 for Non-EU applicants who will be required to undertake a test of competence. This excludes the entry to the Register fee.

Further evidence of practice questionnaire	2	£100	£100	£100
Assessment of clinical performance	3	£306 plus expenses	£330	£330

*Summary of registration assessor feedback*

5. From August 2016, registration assessors were sent a survey of eight questions following each stage of an international qualification assessment to gauge their insights into areas such as the fitness for purpose of the assessment and the time involved in preparing and undertaking the assessment.
6. The feedback from registration assessors, collated up to end May 2017, can be summarised as follows:
  - a. Registration assessors considered the assessment types to be fit for purpose.
  - b. With the exception of an Assessment of Clinical Performance (ACP) assessors spend a greater time in preparation than actually conducting or undertaking the assessments.
  - c. The Further Evidence of Practice Questionnaire (FEPQ) requires the most preparation time out of all of the assessment routes. This can be anything from 3-6+ hours.
  - d. Assessors are likely to need slightly more preparation time for FEPQs through the EU registration pathway than the non-EU registration pathway, by up to one additional hour.
  - e. Assessors are likely to need more preparation time for Assessment of qualifications in the non-EU registration pathway than the EU registration pathway, by up to two additional hours.
7. The response from the registration assessors for the time taken in each registration assessment stage is provided in the table below.

<b>Assessment type</b>	<b>Number of survey responses</b>	<b>Typical preparation time to undertake assessment</b>	<b>Typical time required to undertake moderation meeting</b>
<b>Non-EU</b>			
Assessment of qualifications	4	2 hours – 5 hours 59 minutes	30 minutes – 1 hour 59 minutes
Further Evidence of Practice Questionnaire	2	3 hours – 4 hours 59 minutes	30 minutes– 59 minutes
Assessment of Clinical Performance	4	30 minutes – 3 hours 59 minutes	5 hours – 6+ hours
<b>EU</b>			
Assessment of qualifications	3	2 hours – 3 hours 59 minutes	30 minutes – 59 minutes
Further Evidence of Practice Questionnaire	2	3 hours – 6+ hours	30 minutes – 1 hour 59 minutes
Assessment of Clinical Performance	1	1 hour – 1 hour 59 minutes	1 hour – 1 hour 59 minutes

*Principles for fees paid and charged*

8. Before reviewing the fees paid to assessors and those charged to international qualified applicants, it is important to set out some principles which can be used as a framework for the fees paid and charged.
  - 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 international 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 international qualified applicants should only cover the cost of the international qualification application pathway and should not be designed so to subsidise any other registration application process.
- e. The General Osteopathic Council (GOsC) is a charity registered in England and Wales and as such is not looking to generate profit from internationally qualified applicants.

*Consideration of the fees paid to assessors*

9. The GOsC currently has an approved day rate figure of £306 which can be claimed by co-opted members to the GOsC committees and by fitness to practise panellists and other associates.
10. A full day meeting tends to last six hours, being a meeting commencing at 10am and concluding at 4pm. The day rate equates to £51 per hour.
11. Using the raw data captured through the survey of the registration assessors, and which is presented at paragraph 6, we are able to average out the time spent by the assessors preparing and undertaking the assessment of the qualification and the assessment of the FEPQ for each registration pathway.
12. The ACP has been excluded from this summary as the day fee remains appropriate for that work.
13. These average times are presented below:

<b>Assessment type</b>	<b>Average time taken for preparation</b>	<b>Average time taken for moderation</b>	<b>Total average time for assessment</b>
<b>Non-EU</b>			
Assessment of qualification	4 hours 30 minutes	45 minutes	5 hours 15 minutes
Further Evidence of Practice Questionnaire	4 hours 45 minutes	1 hour 15 minutes	6 hours
<b>EU</b>			
Assessment of qualification	5 hours	1 hour 30 minutes	6 hours 30 minutes
Further Evidence of Practice Questionnaire	3 hours 40 minutes	1 hour 10 minutes	4 hours 50 minutes

14. This hourly rate can be applied to the average time spent on the different assessment types. The fee per assessment is provided below:

<b>Assessment type</b>	<b>Total average time for assessment (rounded)</b>	<b>Hourly rate £</b>	<b>Total per assessor £</b>
<b>Non-EU</b>			
Assessment of qualification	5 hours	£51.00	£255
Further Evidence of Practice Questionnaire	6 hours	£51.00	£306
<b>EU</b>			
Assessment of qualification	7 hours	£51.00	£357
Further Evidence of Practice Questionnaire	5 hours	£51.00	£255

15. We suggest that a flat fee is paid to the assessors for an assessment of qualification and an assessment of an FEPQ, regardless of whether it is for an EU or Non-EU applicant. Over time, we would expect that as assessors become more used to the streamlined process that the minor differences in the length of time will even out.

16. Consolidating the raw data further provides the following insight into the average time taken for the two assessment strands. This is summarised below:

<b>Assessment type</b>	<b>Average time taken for preparation</b>	<b>Average time taken for moderation</b>	<b>Total average time for assessment</b>
Assessment of qualification	4 hours 45 minutes	1 hour 5 minutes	5 hours 50 minutes
Further Evidence of Practice Questionnaire	4 hours 20 minutes	1 hour 10 minutes	5 hours 30 minutes

17. Applying the hourly rate of £51 per hour, leads to the follow flat fees which could be paid to the registration assessors.

<b>Assessment type</b>	<b>Total average time for assessment (rounded)</b>	<b>Hourly rate £</b>	<b>Total per assessor £</b>
Assessment of qualification	6 hours	£51.00	£306
Further Evidence of Practice Questionnaire	6 hours	£51.00	£306

18. Decisions on any increase in the fees payable to the registration assessors falls within the remit of the Remuneration and Appointments Committee and a paper will be presented to that committee in October 2017. Discussion at the PAC will be incorporated into that paper.

*Consideration of charges levied on internationally qualified applicants*

19. The next part of the paper is based on an assumption that registration assessor fees will be increased as indicated above.

20. When applying the revised fees payable to registration assessors to each stage of the application process, the cost of the process is as follows:

<b>Assessment type</b>	<b>Number of registration assessors involved</b>	<b>Fees payable to registration assessors £</b>	<b>Total cost of registration assessor involvement £</b>
Assessment of qualification	2	£306	£612
Further Evidence of Practice Questionnaire	2	£306	£612
Assessment of Clinical Performance	3	£306	£918

21. The ACP is the only stage in the process where an assessor may claim expenses for travel and accommodation. This is because the ACP is the only assessment which requires the assessors to be at a particular venue. All other assessments are carried out remotely. The average expenses claimed by assessors since January 2016 is £67 per assessor. This would result in an average of £201 in expenses per ACP event.

22. In addition, there is the amount of staff involvement from the Registration team and specifically the Registration and International Application Officer.

23. The Registration and International Application Officer will handle every enquiry from an internationally qualified applicant and guides the individual through the assessment process. The officer ensures the documents are fully anonymised before being sent to the assessors and the officer also attends and facilitates each moderation meeting.

24. The table below sets out the average staff time spent on each registration stage.

<b>Assessment type</b>	<b>Average staff time spent (rounded)</b>	<b>Cost to GOsC £</b>
Assessment of qualification	4 hours	£74
Further Evidence of Practice Questionnaire	4 hours	£74
Assessment of Clinical Performance	7 hours (full day)	£129

25. The total cost of each assessment stage made up of fees paid to registration assessors, expenses where applicable, and staff time is as follows:

<b>Assessment type</b>	<b>Fees to registration assessors £</b>	<b>Expenses, if applicable £</b>	<b>GOsC staff time £</b>	<b>Total cost £</b>
Assessment of qualification	£612	£nil	£74	£686
Further Evidence of Practice Questionnaire	£612	£nil	£74	£686
Assessment of Clinical Performance	£918	£201	£129	£1,248

26. It is proposed that for the assessment of qualification and the FEPQ, the total cost of the process becomes the new charge to be levied on applicants applying with an international qualification.

27. For the ACP, since January 2016 there have been eight assessment dates featuring 11 candidates, with either 1 or 2 candidates in attendance per event. Applying the £1,248 total cost per date, this would mean that on average each candidate would need to pay c£907.
28. It is therefore proposed that the new charges to be levied on applicants applying with an international qualification would be:

<b>Assessment type</b>	<b>Total cost to be levied per assessment</b>
Assessment of qualification	£686
Further Evidence of Practice Questionnaire	£686
Assessment of Clinical Performance	£907

### *Equality Impact Assessment*

29. We have undertaken a draft equality impact assessment for these proposals which is available on request from Matthew Redford at [mredford@osteopathy.org.uk](mailto:mredford@osteopathy.org.uk) and which will form part of the consultation. Key aspects of the equality impact assessment note that there is a potential impact for internationally qualified applicants.
30. In order to ensure that we have reflected the views of those affected, we will take particular steps to ensure that the consultation is brought to the attention of those most likely to be affected by:
- Sending the consultation to all internationally qualified applicants who have enquired commenced or completed the process.
  - Sending the consultation to regulatory bodies and competent authorities in other countries and asking them to disseminate the consultation to their registrants or members.

### *Consultation process*

31. We will need to undertake a consultation on increasing the fees to be levied on applicants applying with an international qualification. The Committee is asked to consider the matters outlined in this paper and to consider:
- Are the Committee content with the principles outlined at paragraph 8? Are there any gaps?
  - Are the Committee content with the methods that we have used to identify the costs of the registration assessment process both for applicants and assessors?

- Are there other options that the executive should be considering?
- Are the proposals fair and a proportionate means of securing a legitimate aim?
- Is the approach to consultation specified sufficient to support the quality and quantity of responses?
- Are there any other aspects that should be featured in the consultation?

32. It would be proposed to run a consultation between Winter 2017/18.

*B. Mutual recognition and C. Exploration of changes to the registration assessment processes to ensure an efficient, effective and proportionate registration assessment process*

33. Our current registration process for internationally qualified applicants involves a three stage process:

- Recognition of qualification
- Completion of a further evidence of practice questionnaire
- Assessment of clinical performance.

34. The process is resource intensive for both the GOsC and the applicants and only around 10 internationally qualified applicants register with us each year taking up a disproportionate use of our own resources. We want to undertake an analysis to explore whether our current approach is the most efficient and effective registration process for internationally qualified applicants whilst ensuring a primary objective of ensuring patient safety.

35. In March 2017, the Committee noted the plan to undertake background research in relation to more efficient and effective registration assessment methods. The Committee noted that there were a range of factors to explore including:

- a. Osteopaths qualified and registered in regulated countries e.g. Australia, France
- b. Osteopaths qualified in non-regulated countries, e.g. Italy
- c. The European context - EU countries, e.g. France, Italy (and implications of Brexit on mutual recognition)
- d. Osteopaths regulated in countries without education institutions, e.g. South Africa.
- e. Information about registration assessments from other health professional regulators.

36. We have undertaken a review of materials around mutual recognition and also a review of methods of registration assessment in other health professions and this report is attached at Annex B.
37. The Committee are invited to comment at this early stage of background research about the findings and the implications of those findings for registration policy. For example:
- Are there any gaps in our background research so far?
  - Are there any examples of mutual recognition or registration assessment in other sectors that we should be considering?
  - What questions should we be addressing as we look to create a more efficient and effective registration assessment process?
38. Our next steps will be to undertake a more detailed analysis of the registration assessments in place in other regulators, to analyse nature of the 'problem' (both from a patient safety perspective and also a resource implication perspective), along with policy options for discussion and development with stakeholders in order to develop proposals for consideration by the Committee.

**Recommendations:**

1. To consider the proposed consultation on changes to fees charged to applicants for registration assessment and timeline.
2. To consider the literature review for mutual recognition and next steps.