



Policy Advisory Committee

18 October 2018

Registration Assessors and Education Visitors – length of appointments

Classification	Public
Purpose	For discussion
Issue	<p>It has been identified there is a potential policy gap in relation to GOsC appointed Registration Assessors and Education Visitors and specifically how long they can remain as an assessor or visitor.</p> <p>This paper seeks early input from the Policy Advisory Committee as the Executive considers what action might be required to fill the gap.</p>
Recommendation	To consider the content of the paper.
Financial and resourcing implications	None arising.
Equality and diversity implications	None identified at this stage.
Communications implications	A consultation with Registration Assessors and Visitors to explore the issues will be undertaken before any policy decisions are finalised.
Annexes	None
Authors	Matthew Redford, Fiona Browne

Background

1. The General Osteopathic Council (GOsC) has a pool of appointed Registration Assessors who undertake assessment activities. Registration assessment activities include assessments of international registration applications, and reviews of osteopaths/applicants returning to practice after more than two years out of clinical contact with patients.
2. The GOsC also has a pool of education visitors. Visitors are formally contracted and employed and trained by the Quality Assurance Agency for Higher Education (QAA), as part of our five year contract with the QAA, but the GOsC retains statutory responsibility to appoint Visitors ahead of each visit. Visitors can remain as part of this pool for an unlimited period at present.
3. There are currently 18 Registration Assessors and 19 Education Visitors (including five lay members).
4. Formal contracts for Registration Assessors were introduced in 2013. The contracts last for a total of four years and may be renewed at the end of the four year period.

Discussion

Identification of policy gap

5. It has been identified that a registration assessor contract may be renewed at the end of every four year period with no cut off for length of service. This means in theory an assessor may continue for an indefinite period. Education Visitors may also be appointed to undertake visits for an unlimited period. This is inconsistent when compared to other appointments made by the GOsC.
6. A member of Council; a member of a GOsC committee or a fitness to practise panellist has a term of appointment which means that they may serve no longer than eight years out of 20.
7. The benefit of ensuring a regular refreshing of a pool providing advice or making decisions on behalf of the GOsC, is to ensure good quality independent decision making, appropriate challenge, avoidance of bias and avoidance of group think. There are arguments that if a group can be appointed for an unlimited period of time, there could be 'regulatory capture' rather than independent input to the GOsC's processes.
8. There is also the more philosophical point about power being centred in a limited number of individuals for an unlimited period allowing being undesirable. It is interesting that best practice for a charity trustee length of service is now a fixed rather than an unlimited period.

9. The work of the registration assessors and the education visitors form part of the assurance framework used by the Executive to ensure the integrity of the Statutory Register specifically around entry to the Register. While registration assessor and visitor appointments do not form part of the governance structure in the same way a Council appointment or a fitness to practise panellist appointment does, there is likely to be an expectation around the consistency of length of appointments.

Position of other healthcare regulators

10. The Director of Registration and Resources has recently taken over the running of the inter-regulatory registration group, and at the July 2018 meeting, he raised the length of appointments of registration assessors (or equivalent positions), as an agenda item.
11. The responses from the other regulators varied, with some having formalised time-limited arrangements, i.e. two terms (eight years maximum) with others in a similar position to GOsC where assessors could be reappointed every four years. Those who are in a similar position to GOsC all agreed that their arrangements needed to be reviewed with potentially new arrangements introduced.

Executive early thinking

12. The early thinking from the Executive is that there is no obvious reason for registration assessors and visitors to be treated differently regarding length of service when compared to other GOsC appointments, aside from ensuring that there is capacity and expertise in the potential pool to enable it to be refreshed on a regular basis.
13. The Executive is considering a proposal that assessors serve for no longer than eight years out of 20. Any service prior to the introduction of formal contracts in 2013 would not apply. This would also result in a consistency across all GOsC appointments. However, alongside this would be the need to develop and build capacity for people to build up the relevant expertise to secure appointment, perhaps along the lines of the recent leadership programme.
14. Of the current pool of 18 there are four assessors who are in their first four year contract which is due to end in July 2021. The remaining 14 assessors are in their second formal contract which is also due to end in July 2021.
15. If the decision to cap the length of service was agreed, the GOsC would need to recruit around 10-12 registration assessors at some point from Autumn 2018 through to Summer 2021 to ensure the continued smooth running of registration assessments. It would also be likely that some form of development programme, perhaps in-conjunction with COEI, would need to run alongside this to ensure capacity and skills and expertise to support successful future applicants.

16. If the introduction of the policy was to go ahead, a plan to recruit the required number of assessors would need to be developed. It is likely this would see recruitment undertaken during the business years 2020-21 and 2021-22. Each new appointment would be made for a period of four years meaning the overall pool would no longer have a single date on which all contracts expire, and the process for the recruitment would become cyclical and could be forward planned into the business cycle.
17. Our experience of previous recruitment campaigns for registration assessors (dating back to 2009) would appear to demonstrate that there is interest within the profession to undertake these roles; however, the number of applications across recent campaigns has varied and has reduced leading to an occasion where we have not been able to recruit our required appointments due to insufficient suitably qualified applicants (2018).

Registration Assessor and Education Visitor views

18. At this stage the views of the current pool of Registration Assessors and education Visitors have not been sought and are not represented in this paper.

Policy Advisory Committee input

19. The purpose of this paper is for Policy Advisory Committee (PAC) to have early insight into the policy thinking/development and to offer comments/advice to the Executive.
20. No policy decisions are being taken at this meeting.

Next steps

21. Following the October PAC, it is planned that further thought would be given to a development programme for both the Education Visitor and Registration Assessors. This would lead to a consultation paper will be drafted and circulated to registration assessors and visitors for their feedback.
22. A paper will come back to the March 2019 Policy Advisory Committee meeting for further discussion.

Recommendation: to consider the content of the paper.