

Comments added to consultation form

No.	Registrant feedback	GOsC response
1	<p>I feel you should have added a section for comments. I find it incredible that the only savings you could find were 8%. I am sure that all osteopaths would like to see a breakdown of the costs involved and how the savings have been found and I would like to know where I might find this.</p> <p>I also feel incredible disappointed that the GOsC could not follow the other healthcare professional associations in trying to help their members more in the current economic climate.</p>	<p>Thank you for your feedback on the consultation form.</p> <p>We have identified £175k of savings which allow us to reduce the main level of registration fee in 2012 by 10%. This was the amount of guaranteed savings that we were able to identify in this year. Our cost review will continue with the aim of seeking further fee reductions for osteopaths in subsequent years.</p> <p>Details of where we have found savings to date can be found in papers for Council meetings available on our public website. Full details of the 2012-13 GOsC budget can be found in the March 2012 meeting papers at: http://www.osteopathy.org.uk/about/the-organisation/meetings/.</p> <p>The GOsC is not a professional association, it is a regulator with statutory duties so the scope for reducing costs is not the same as for a professional association.</p>
2	<p>Most companies reduce their number of employees to reduce costs in a recession. One might ask why you are not doing what would seem a sensible way to cut costs.</p> <p>As I guess most of us are afraid to put our heads above the parapet I really wonder why I am bothering to say this. Anyway I have said it now and may need to regret it later.</p>	<p>The savings that the GOsC has made in 2012-13 include a reduction in staff numbers.</p> <p>We thank you for your feedback and would like to assure you that there is no reason either to be afraid of doing so, nor for you to regret saying what you think.</p>
3	<p>Though I welcome any proposal to reduce our registration fees, and will respond to your questionnaire as requested, I am surprised at the fee levels only being overall reduced by 10%.</p> <p>Since the GOsC fees (full fee) were set at £750.00 the membership has been rising significantly each year, and with the increasing number of new osteopathic schools/ university courses this will further accelerate the size of the profession. Although with each new registrant there will be some extra work and hence cost, this relative increase is only minor and relatively small compared to the increase in income for the GOsC. Much of your communication and the register itself being electronic and hence no more cost even though more members. Yes there has been some inflation since then, but nothing</p>	<p>We have commented on the size of the reduction above.</p> <p>While the number of registrants has increased since the GOsC was established the demands on the organisation have also grown and the cost base reflects the regulatory environment in which we are required to operate and the work which we are required to undertake.</p> <p>While a proportion of our communication with registrants is electronic, many osteopaths still prefer to receive letters and printed items from us. We hope, in future, to move to more electronic communication to further reduce our costs.</p> <p>The GOsC has built up reserves in order to cover fluctuations in its income due</p>

<p>like the % increase in the size of the profession and hence income of the GOsC. Consequently the increasing membership and hence the GOsC balance sheet (income over expenses) will be significantly growing year on year and I expect have done so for quite a few years in the past.</p> <p>In this light, surely the fees can be reduced by significantly more than 10% to bring them far closer to those of the other medical professions, as stated in the Governments wish.</p> <p>Is the Government satisfied by your only reducing the fee by 10%, or would they prefer a greater reduction?</p> <p>Is there any technical reason why we as a profession do not get to see the accounts of the GOsC? If we did, maybe we could give further efficiency feedback.</p> <p>I am strongly involved in postgraduate education for the profession, as a founding faculty member of the [REDACTED] (name of organisation redacted for reasons of commercial confidentiality'). We have in the past 2 years noted a significant reduction in osteopathic attendance to our courses, by some 30-40%. Talking to osteopathic colleagues at such courses, there is general agreement that patient numbers have fallen significantly. Very many long term practitioners as well as newer members of the profession are seeing 20-50% fewer patients than 18-24 months ago. I don't know about other colleagues, but I have not seen fit to increase my fees for the past 4 years as being a caring practitioner I have to respect the finances of my patients. Consequently I have had a very significant drop in real income - without the extra cost from inflation, in the last 2 years. I know of colleagues who are seeing over 60% fewer patients, and these are long term practitioners with well established patient lists.</p> <p>I am writing this, to let you know that most of the profession have had to make very, very tough personal adjustments to their personal and professional expenditure, far far greater than a 10% reduction. Maybe it is time for the GOsC to do similar.</p> <p>I would value your comments.</p>	<p>to unforeseen circumstances. The GOsC reserves position is set out in full in its Annual Report and Accounts which can be found on the GOsC website via: http://www.osteopathy.org.uk/resources/publications/annual-reports/.</p> <p>In FY2004/05 the GOsC Council decided to reduce the size of its general reserve from nine months average annual expenditure to six months average annual expenditure, and then to three months average annual expenditure in FY2007/08. The surplus funds were reinvested back into the profession via research projects, specifically the Adverse Events project, and the Standardised Data Collection project.</p> <p>We have commented on the size of the reduction above.</p> <p>The Government has not expressed a view on the size of the fee reduction or whether they would prefer it to be greater.</p> <p>The GOsC accounts, past and present, are available on the public website at: http://www.osteopathy.org.uk/resources/publications/annual-reports/. We also publish an article in <i>The Osteopath</i> magazine to draw attention to the accounts and to highlight key areas of activity and spend.</p> <p>Thank you for this useful feedback about the attendance numbers at the [REDACTED] (name of organisation redacted for reasons of commercial confidentiality') and about patient numbers. The GOsC is conscious of the difficult economic conditions osteopaths now find themselves facing. It is for this reason that our cost reduction plans will continue into the future so that we can aim to reduce the registration fees further.</p>
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4	<p>Yes I agree fees should be reduced for those that pay them!</p> <p>Across the board reductions but per rata reductions proportional to amount paid ie a percentage reduction for all! The fees have been way too high for way too long and the standing of osteopathy in the community has fallen in the time of the GOSc not risen. Also in my opinion the public awareness of osteopathy has plummeted in the last 10 years!</p>	<p>Our consultation was on two options to reduce the registration fee, one of which was for an across the board reduction as you suggest.</p> <p>We were sorry to hear that you feel the standing of osteopathy and public awareness of osteopathy has fallen in the last 10 years. We are not aware of any evidence to suggest that this is the case.</p>
5	<p>Do you really need to consult us? This fee is one of the reasons each year I struggle to decide whether to continue working as an osteopath.</p> <p>When I joined up as GOSc was being set up I remember a promise to reduce the fees once the council was set up. This obviously never happened. I don't even receive a magazine anymore.</p> <p>Osteopathy is a very lonely expensive profession to be part of and I often wish I had never trained up. I can't even afford the decent cpd courses anymore. It's a sad state when you find you've been worn down by a profession you so wanted to join.</p> <p>I thank you for gathering response regardless. I can only imagine the wealthy practitioners, and council members may object.</p>	<p>It is a requirement of the Privy Council which must approve the new fee rules that we consult before making these changes.</p> <p>While the number of registrants has increased, the demands upon the organisation have also risen and the cost base reflects the regulatory environment in which we are required to operate and the work which we are required to undertake.</p> <p>We are concerned that you have not been receiving our bi-monthly magazine which is sent by post to all registrants. Our registration team will contact you to make sure that we are holding the correct contact address details for you.</p> <p>We believe that all registrants and Council members will welcome the reduction in registration fees.</p>
6	<p>I have just submitted my response via the GOSC website re the fee reduction proposals, but I wanted to further clarify what I thought should be done as the two options did not allow me to do this.</p> <p>I think that a proportional reduction across the board (all fees) would be correct, such that the highest rate have the largest proportional reduction, and the lowest rate, the lowest proportional reduction.</p> <p>Perhaps this proportional reduction could be calculated by the approximate ratio of members paying each fee? To me, that would seem fairest so that the largest group of people have the greatest proportional reduction of fees. I hope what I am trying to clarify makes sense?</p> <p>Many thanks and good luck with the proposals. It is fantastic seeing</p>	<p>Our consultation was on two options to reduce the registration fee, one of which was for an across the board reduction as you suggest.</p> <p>The option to reduce the main rate of fee will provide a reduction to the approximately 80% of registrants who are paying the highest level of fee.</p> <p>Thank you for your feedback and please be aware that the cost review will continue with the aim of seeking further fee reductions for osteopaths in subsequent years.</p>

	the GOsC trying to make some savings in this difficult time for their members.	
7	That "fee reduction consultation" with just two questions, doesn't feel like a consultation? Personally I think fees could/should be related to income, so that part time osteo's such as parents with young kids should pay less; semi-retired osteo's should pay less etc. etc.	It would be very difficult to implement an effective fee system based on income or part-time work. Such an approach would require the GOsC to undertake an audit of each osteopath's income and identify from within that how much was derived from osteopathy. We think this would be unacceptably intrusive for osteopaths and prone to avoidance.
8	If you are seeking our views why have you only given two options for each question? Neither of them reflects my view. Typical of the GOsC/BSO	<p>The GOsC consulted on two specific questions one of which required registrants to express which method they felt was best for passing savings back via a fee reduction. We considered the two options were the simplest and fairest reductions that could be put in place quickly and easily.</p> <p>The fee consultation was a GOsC initiative and is not connected to the British School of Osteopathy (BSO).</p>
9	<p>However, I'm disappointment to find it only refers to those in the first three years of practice. As a registrant with small children, who works part time, this does not really help me. I currently make little income from my osteopathic practice as my fixed fees swallow up most of my income.</p> <p>As I work part-time I have limited time to build the practice. Associate work is also problematic due as most associate positions require relocation or significant travelling times, which are not possible on a shorter working day due to school runs. While this will not always be the case, and I have no intention of leaving the profession - it's a job I love - any help for us part-timers in difficult economic circumstances would be a life-line, as at time it can be very disheartening to earn so little for so much training and effort poured into each patient.</p>	<p>The fee reduction will apply to all registrants not just those in the first three years of practice. Registrants pay an entry fee and a reduced registration year in their second year of practice before moving to the higher fee. This fee remains the same thereafter. The proposed fee reduction will benefit <u>all</u> registrants who pay the current £750 registration fee.</p> <p>We have commented on the challenges of varying the fees for those on low income or working part-time above.</p>
10	There was no option or opportunity for other suggestions - Is there a possibility that the savings could be used by the Council to promote ourselves? We have collectively urged more structured promotion/advertising for the work of Osteopaths. Using a relatively small individual reduction for an awareness campaign would be, in my view, money well spent. Is there enough surplus for this? How much	<p>Last year the Government required all healthcare regulators to commence a fundamental review of their cost base with a view to passing savings back to their registrants via fee reductions. Diverting funds for another purpose would not meet the Government's requirements</p> <p>The GOsC is not allowed to spend money on promoting the work of</p>

	support would this attract?	osteopaths; this is a matter for the professional association (the BOA) and not the regulator.
11	<p>In regard to your recent survey, on the proposed fee reduction, I feel the survey misses the most important point -i.e. the size of the proposed reduction.</p> <p>The GCC has apparently managed to reduce member's fees by around £200, and in my opinion a similar sized reduction for osteopaths is appropriate.</p> <p>More savings need to be identified, before any survey. I agree that savings should then be passed on to full paying registrants.</p>	<p>We have commented on the size of the reduction above and our plans to seek further reductions in subsequent years.</p> <p>While the General Chiropractic Council registration fee has been reduced by £200 this year, it remains £125 higher than the GOsC registration.</p>
12	<p>I have just responded to your questionnaire via the ozone website.</p> <p>I did want to gently express my opinion regarding the statement that full paying members are subsidising those on fee reductions who are in early years of practice, non-practising or overseas, despite the admin costs being the same for both.</p> <p>I have returned from overseas where I paid a reduced rate, purely for the privilege of staying on the register. I find it very hard to believe my being on the register, receiving a practising certificate which is useless and holds no legal power in Canada, and receiving the occasional magazine costs more than 375 pounds a year.</p> <p>So for the point to be made that those paying full fee are supplementing those on a reduced fee seems a little ridiculous, when the benefits to those overseas are next to none. It's not like they can make that money back as they are not being governed by the GOsC in that country. The only benefit is not having to jump through hoops if they wish to continue practising if they ever choose to come back to the UK.</p> <p>I am currently paying 750 pounds a year to work 1 and a half days a week. As a working mother expecting her 2nd child I cannot get a fee reduction as I can't afford to take 3 months of mat leave, so don't qualify for a fee reduction. I'm not complaining about the fee and I love my work, but the fees are not a great deal for every</p>	<p>The GOsC is unusual among regulators in making a reduced fee available for those working overseas.</p> <p>While there is no requirement for those working in countries where osteopathy is not regulated to be registered with GOsC, many choose to do so because it gives them a level of professional standing otherwise not available to them. The cost to the GOsC of these registrants is no less than those based in the UK.</p>

	<p>osteopath.</p> <p>Just thought it needed pointing out.</p>	
13	<p>Please reduce our fees</p> <p>I work in the South West and our prices are lower than in more affluent areas of the country. Due to child care I work part time and the monthly costs of being an Osteopath (BOA membership, insurance, CPD, equipment, clinic costs, student loan repayments etc) almost make it unaffordable.</p> <p>I love my work; I am passionate about osteopathy and proud of what we have achieved as a profession. However, sometimes we are our own worst enemy. Our fees make it impossible for many talented osteopaths to practice part time, their skills wasted and patients suffering.</p>	<p>We have commented on the challenges of varying the fees for those on low income or working part-time above.</p>
14	<p>No-one would begrudge the fees if GOsC was seen to seriously promote osteopathy!</p>	<p>The GOsC is not allowed to spend money on promoting osteopathy; this is a matter for the professional association (the BOA) and not the regulator.</p>
15	<p>Maybe a reduced fee for those working part-time?</p>	<p>We have commented on the challenges of varying the fees for those on low income or working part-time above.</p>
16	<p>I think that even with the proposed discount the fees will still be far too high.</p>	<p>We have commented on our plans for seeking further fee reductions above.</p>
17	<p>I am a little outraged as to why it is still so costly. It is very hard to bring new clients into practice especially when you are a new Osteopath. Seems like the costs of maintaining this profession is far more than the income that I am currently receiving which at times can be very de-moralising.</p> <p>I still think that the costs should consider a further cut.</p>	<p>We acknowledge that new entrants to the profession may find it difficult establishing a practice which is why the fees for entry to the Register and the second year of registration are set at a reduced rate.</p> <p>We have commented on our plans for seeking further fee reductions above.</p>
18	<p>I am disappointed with the GOsC's paltry proposed reduction in fees. The GCC have reduced their fees by £200. I will be urging the BOA and other members to continue to challenge the GOsC on this issue.</p>	<p>We have commented on our plans for seeking further fee reductions and the level of the GCC fee above.</p> <p>We will keep the location of the GOsC's offices under review, but there is not</p>

	One way of making savings would be to move out of central London.	a clear business case for moving the GOsC out of central London at present. An office move – particularly out of London – would result in a number of different problems ranging from needing to recruit a new staff team, paying redundancy to staff members not relocating, to trying to sell Osteopathy House. The latter, in the current climate, would not be prudent.						
19	(Q2 answered)...+ reduction in fee comparable to GCCs annual reduction of £200 for its members.	We have commented on our plans for seeking further fee reductions and the level of the GCC fee above.						
20	<p>I think the reduction of 8% is disappointing, it is not in line with other professional bodies in the same area, if the reduction was similar to the chiropractors it would be 20% or 25%.</p> <p>Nursing registration fees are only £76 annually.</p> <p>There has been no consultation on the amount of the reduction with the profession</p>	<p>We have commented on our plans for seeking further fee reductions and the level of the GCC fee above.</p> <p>There are about 660,000 nurses regulated by the Nursing and Midwifery Council (NMC) compared to c. 4,500 osteopaths. The size of the NMC Register is reflected in the fees charged.</p> <p>We are unclear as to how we could have conducted such a consultation, even if it were appropriate. Our expenditure is determined largely by our statutory duties as a regulator. It is the job of the Council to determine the level of resources required for this work. We are then accountable to Parliament, via the Council for Healthcare Regulatory Excellence, for the effective discharge of our duties.</p>						
21	<p>Without wishing to cause any offence...</p> <p>The real questions are a) why are your fees so high (many regulatory bodies charge £150) b) what on earth do you spend it on?</p> <p>Perhaps I just don't know where to look, but I don't feel your accounts are transparent.</p> <p>While a reduction of 8% would be welcome, I'm not sure that cost cutting by sharing resources with another body would be ideal. Surely a Regulatory Body is basically a database, with some support staff and a policy making department.</p> <p>I cannot see how that can be worth £750 pa in an industry where many have second jobs to make ends meet, and give 50% of their earnings to other osteos. Maybe a lower rate for associates would be helpful, as some make a fortune, but after your fees, insurance, CPD,</p>	<p>The table below highlights the fees paid by some other healthcare practitioners:</p> <table><tr><td>General Chiropractic Council</td><td>£800</td></tr><tr><td>General Dental Council</td><td>£576</td></tr><tr><td>General Medical Council</td><td>£390</td></tr></table> <p>The GOsC accounts, past and present, are available on the public website at: http://www.osteopathy.org.uk/resources/publications/annual-reports/. We also publish an article in <i>The Osteopath</i> magazine to draw attention to the accounts and to highlight key areas of activity and spend.</p> <p>The role of healthcare regulatory bodies is to protect patients and the public which requires more than simply maintaining a database. Our role involves quality assuring education and training standards; developing, setting and maintaining standards of osteopathic care; ensuring an osteopath's continued fitness to practise and handling concerns and helping patients with any</p>	General Chiropractic Council	£800	General Dental Council	£576	General Medical Council	£390
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	<p>running costs and materials, it can be very tough.</p> <p>Another question may be the ever increasing number of osteopathic training courses, and while we welcome the new Welsh M.O. course, it may be interesting to note the figures for graduates still practicing after 5-10 years.</p>	<p>concerns and complaints about an osteopath.</p> <p>While there has been a gradual increase in the number of osteopathic graduates, there is no evidence that large numbers of these graduates do not maintain their registration.</p>
22	I am very annoyed that this is the best reduction that you can come up with! – aren't you listening?	We have commented on the level of the fee reduction above.
23	Please use savings to set up "Royal" College of Osteopathy and a research fund	<p>Last year the Government required all healthcare regulators to commence a fundamental review of their cost base with a view to passing savings back to their registrants via a fee reduction. We are doing this and as such diverting funds for another purpose would not meet the Government's requirements.</p> <p>It would be inappropriate for the regulator to impose a "Royal" College of Osteopathy on the profession. Any such initiative must be a matter for the profession to pursue and to fund itself.</p>
24	(Q1 answered followed by) You will bankrupt up us all if you don't!	Thank you for your feedback.
25	<p>(Q1 answered followed by) obviously!!</p> <p>I think the GOsC could do much better than only 8%!! Double the number of members since inception but no reduction in fees!!</p>	<p>We have commented on the level of the fee reduction above.</p> <p>While the number of registrants has increased since the GOsC was established the demands upon the organisation have also risen and the cost base reflects the regulatory environment in which we are required to operate and the work which we are required to undertake.</p>
26	Yes to a reduction so long as it does not start a yo-yo effect on the fees	We have identified bankable savings to pass back to the profession via a fee reduction. We have not based our costings on speculative savings which could cause the fees to go up and down from one year to the next.
27	<p>Your questions of whether we should have a 10% or 8.87% reduction in our annual fee is the wrong question.</p> <p>The question is why have we been paying £750 a year? when surgeons pay only £300/£350 a year and physiotherapists a lot less.</p>	<p>We have commented on the level of the fee reduction above.</p> <p>The role of healthcare regulatory bodies is to protect patients and the public which requires more than simply maintaining a database. The role of the regulator involves quality assuring education and training standards; developing, setting and maintaining standards of osteopathic care; ensuring</p>

<p>As there are fewer of us our administration should be much less.</p> <p>The reason we pay so much is because the GOsC bought a building in London for £10 million pounds.</p> <p>It's probably not what you want to hear, but it is what most of us think. A building outside of London would have been a tenth of the price.</p> <p>I believe our fees should be less than a surgeon – say £200/£250 a year.</p> <p>The GOsC has made it clear that their role is to protect the public from us, therefore perhaps the fee should be publicly funded.</p> <p>All institutions start off to serve its members, but in a very short time, it is the members who serve the institution.</p> <p>At its inception I believed in the GOsC, but now I think it is self-serving, and by having us jump through hoops, validates itself.</p> <p>Your Re-validation by its nature invalidates our diplomas.</p> <p>What the GOsC should be doing is promoting us to the medical world not giving leather bound receipt books and pens to London cabbies.</p> <p>We promote osteopathy every time we treat.</p> <p>As for CPD, it should be the GOsC who sends lecturers around the regions covering aspects of osteopathy the GOsC feels relevant. Then they would know if our CPD is valid.</p> <p>How does this relate to our £750 fee, well, with that kind of money you should be able to pay lecturers to travel the regions and lecture us.</p> <p>No question lives in isolation – and no answer is so simply answered. Your choice is between a rock and a hard place.</p>	<p>an osteopath's continued fitness to practise and handling concerns and helping patients with any concerns and complaints about an osteopath.</p> <p>While the number of registrants is lower than other professions the demands upon the organisation are not fewer and the cost base reflects the regulatory environment in which we are required to operate. The smaller professions therefore will pay a higher registration fee for independent recognition.</p> <p>The purchase price of Osteopathy House, including all charges, was £1.08m not £10m.</p> <p>It is the role of all healthcare professional regulators to protect the public. Parliament has determined that these regulators must be paid for by registrants and not by the taxpayer.</p> <p>Please note that the GOsC is a regulator with which osteopaths are required to register. It is not a membership organisation.</p> <p>All healthcare regulators have been asked to consider how revalidation could improve the safety and quality of practice. The purpose of revalidation is not to invalidate your original diploma but to ensure that all osteopaths remain up to date and fit to practise throughout their careers.</p> <p>It is not the role of the GOsC to promote individual osteopaths or businesses. We ensure the promotion of high osteopathic standards to achieve patient safety and public. We do not give gifts to taxi drivers. We believe that you are referring to an activity some years ago – led and funded by the Health and Safety Executive – to promote the effective treatment of back pain by a regulated professional.</p> <p>It is important for all professionals to continue learning in order to maintain and enhance their standards of practice. Using a reflective learning cycle this will mean different things for different practitioners. It would be inappropriate, not to say expensive, for the GOsC to send lecturers around regions dictating what aspects of osteopathy we felt relevant. It is for the individual practitioner to ensure that they are undertaking valid CPD.</p> <p>We thank you for your response and we have not marked your response as invalid. We welcome your feedback and have attempted to reply to all the points you have raised.</p>
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	<p>It seems that Dr. Foster (king of statistics) has somehow removed what little common sense we had left. So you'll probably put my reply down as invalid, a don't know or an obstention.</p> <p>I, on the other hand, like to think of it as a last gasp from a retiring osteopath.</p>	
28	<p>The General Osteopathic Council (GOsC), have identified five strategic objectives:</p> <p>Firstly, to ensure patient and public protection through effectively targeted regulation. Secondly, to promote high standards of osteopathic healthcare. Thirdly to maintain and enhance the integrity of the Register. Fourthly, to engage effectively with osteopaths, patients, the wider public, educators, and other key stakeholders to ensure our policies and processes are informed. Lastly, to keep our activities and use of resources under review, making changes where necessary to ensure optimum performance and cost-effectiveness.</p> <p>I am writing to complain that the GOsC have failed to offer their membership a realistic reduction in registration fees. They have failed to explain the methods they employed to determine the proposed 8% reduction in fees. In particular they have not explained what measures they have taken to reduce the cost to both the membership and the taxpayer to reduce major running expenses, such as staffing costs.</p> <p>For some time the osteopathic community have been concerned over the seeming lack of transparency in what the GOsC decides over important aspects of regulatory policy. During the recent issue of revalidation, many members voiced concerns over the validity of burdening what is a small profession, with an added burden of additional administration. Many osteopaths work in sole practice with limited profit margins. These margins are deteriorating with the ongoing recessionary downturn, yet the regulator has shown little inclination to substantially reduce the requirements on members.</p> <p>The regulator seems determined to push on its chosen method of revalidation. This proposal is both complex and costly to administer</p>	<p>We have commented on the size of the reduction above as well as where to find details of the cost reduction programme.</p> <p>We have commented on the relationship with and accountability of the GOsC to registrants as opposed to 'members' above.</p> <p>We are undertaking a year-long pilot of the revalidation scheme to obtain a better understanding of the costs and benefits of revalidation. No decisions have been taken on the final form of the revalidation scheme which we have said would only proceed following further consultation with the profession in 2013. The development of the scheme and the pilot are being funded using a grant from the Department of Health rather than by using registrants' fees.</p> <p>The GOsC will be looking to facilitate a debate on the development of the profession through its programme of regional conferences. We would welcome your attendance at one of the six events in order for your views to be heard by us and also your fellow registrants.</p>

	<p>and has no evidence to support its primary purpose of ensuring improved patient safety. Much of the consultation phase and research has been passed on to outside agencies. This will be at considerable cost to the taxpayer at a time when government is attempting to reduce the level of bureaucracy.</p> <p>These observations give members the impression that the regulator has lost sight of its stipulated role as an agent for ensuring patient safety, and is focused more on furthering its own regulatory agenda.</p> <p>Recently there has been a proposal to reduce regulatory fees on members by 8%, with the only choice offered to members as to how this small reduction should be allocated. This proposal reflects the extent of the disconnect between regulator and membership. The proposed reduction is entirely insufficient, and puts our profession at a significant disadvantage in the UK market place, with other musculoskeletal practitioners.</p> <p>The osteopathic profession is recognized as being a particularly safe form of primary healthcare, compared to other groups. The future development of the profession is dependent on its members being permitted to compete fairly in the United Kingdom's healthcare market.</p> <p>The regulatory body needs to radically scale down its activities, or within the next decade it may preside over extinction of osteopathy as a viable profession in the United Kingdom.</p>	
29	<p>Just a quick note on the fee consultation.</p> <p>It is great that you are planning to reduce the fees and are looking at the fairest way of doing so. What I would like to add, is to include a look at further reducing the reduced fee. Surely most osteopaths who goes off register for a short period of time do so for either health or family reasons. Since we are a profession of mostly self-employed I do find it a big ask to pay £340 or £375 a year. I have recently been on a ten months maternity leave and my only income was £125 a week for around 9 months. The combined GOsC and BOA fees did take a significant bite out of my disposable income. I do not suggest that GOsC membership should be free while off register but I think it</p>	<p>We have commented on the challenges of varying the fees for those on low income or working part-time above.</p>

	should be considered.	
30	You asked to send you the attached questionnaire and here it is. Thanks so much and thanks for all you do.	Thank you for your feedback.
31	<p>Our response to your 2 consultation questions is:-</p> <p>Question 1. Yes – the identified savings should be passed back to registrants via a fee reduction, and we choose Option 1 (that the fee reduction should be passed back to those paying £750) because the others are already receiving a considerable fee reduction.</p> <p>Whilst any reduction is most welcome, we believe that more realistically the aim should have been to reduce the fee in the first instance down from £750 to £500.</p> <p>We also believe the Council needs to look more closely at the extreme expenses being incurred in respect of revalidation. We do not understand why revalidation in the form being proposed needs to be so complicated. We can see why some type of revalidation is necessary but the information being received concerning the proposed plans for revalidation would appear to show it to be excessive and in some areas inappropriate.</p> <p>It is our intention to make further observations concerning the format regarding revalidation.</p> <p>The final regional conferences are scheduled for Saturdays – but for many of use Saturday is an important working day. Why are there no Sunday opportunities (other than the conference in Edinburgh)?</p>	<p>We have commented on the size of the fee reduction above. We do not believe it would have been possible, while fulfilling our statutory duties, to reduce the fee to £500 in one year.</p> <p>The development of the GOsC revalidation scheme and the pilot are being funded using a grant from the Department of Health rather than by using registrants' fees.</p> <p>The purpose of the pilot is to test the revalidation process and gain a greater understanding of the costs and benefits of the proposed approach.</p> <p>We will be consulting further on revalidation after the conclusion of the pilot and will welcome your input.</p> <p>Feedback has been sought from osteopaths attending previous regional conferences to determine views on a range of subjects from the location to the preferred day for holding them. With the exception of osteopaths in Scotland, the feedback we have received suggests that osteopaths prefer regional conferences to be held on Saturdays.</p>
32	<p>This proposal is very funny, now be serious, can you give me an actual idea of how you will give more than the insult that 8% is?</p> <p>I have on good information that the gcc, your opposition, that they plan a further reduction to their fees, beyond the 20% they've just passed. How will you react to this, especially when given that you have fobbed the profession off with a mere 8% as well as your "inflation". Of course no one will be happy until the registration fee is equal to that of the hpc, but then as you regulate the same as they do</p>	<p>We have commented on the size of the reduction and that of the GCC above.</p> <p>We do not consider the General Chiropractic Council to be our 'opposition' they are the regulator of a separate profession.</p> <p>We do not expect the fees paid to the HPC and to the GOsC to be equalised at any time.</p>

	then it should just be a matter of time before your fees are equal to the hpc.	
33	<p>I am sending the document re- fees, which I had been too busy to see to in time.</p> <p>I also feel that those working very part-time, such as the pregnant, and or mothers with young children, might be given some consideration. Additionally, those who are part-time prior to retirement and have given many years to the profession and perhaps see only 15 or 20 patients a week. They have all the normal costs of remaining in practice and continuing to give a very rich contribution from their years' of experience and work.</p>	We have commented on the challenges of varying the fees for those on low income or working part-time above.
34	<p>I want to support a reduction in our fee which is currently ridiculously high (also in comparison to chiropractors and other professionals). Not only will the recession affect patient numbers and patient visits, but as a part-timer and working parent it seems even more outrageous that there is no reduction for those working part-time.</p> <p>I was also wondering why this consultation was only open for about two weeks?</p>	<p>We have commented on the challenges of varying the fees for those on low income or working part-time above.</p> <p>The timetable for the consultation was very short because we were informed at a late stage by the Department of Health that a consultation was a requirement of the fee rule-making process. In order to implement a fee reduction for a majority of registrants by early May it was necessary for the consultation to be short in length. To ensure that all osteopaths had the opportunity to respond the consultation letter was sent either by email or post to all osteopaths.</p>
35	What would be the fees if we were registered with the HPC?	Registration with the HPC is not available for osteopaths unless they are also qualified in another discipline. The fee for registration with the HPC is £76.
36	Many thanks for asking my opinion on this matter	Thank you for your feedback.
37	<p>The proposed reduction in fees is obviously just a token gesture and almost an insult, it works out to be £1.50 a week; chiropractors seem to have done a lot better.</p> <p>For many years the GOsC has not wanted to follow its full remit, which included promoting osteopathy, but has happily taken all the money.</p> <p>Most commercial companies reduce fees for direct debit payments because it is cheaper to do so, but as you have a monopoly you can get away with charging.</p>	<p>We have commented on the size of the reduction and that of the GCC above.</p> <p>The GOsC is not allowed to spend money on promoting the work of osteopaths; this is a matter for the professional association (the BOA) and not the regulator.</p> <p>The small additional charge for payment by direct debit reflects the loss of interest from fees paid in instalments and the additional administrative costs involved with direct debits.</p>

38	Another option might be to reduce fees for osteopaths who work part time, say under 20 hours per week.	We have commented on the challenges of varying the fees for those on low income or working part-time above.
39	<p>If savings are to be made they should be directed into research to assist our evidence base for NHS and Medical Insurance purposes.</p> <p>Important to widen our cross-section of patients not just for those who can afford it.</p> <p>High subs should maintain high standards</p>	Last year the Government required all healthcare regulators to commence a fundamental review of their cost base with a view to passing savings back to their registrants via fee reductions. Diverting funds for another purpose would not meet the Government's requirements.
40	Proposed reduction is insufficient. If GCC can reduce fees by 20% then surely we can have a similar reduction.	We have commented on the size of the reduction and that of the GCC above.
41	Congratulations on finding savings.	Thank you for your feedback.
42	Your proposed reduction is insufficient. Q2 a distraction since we know the chiropractors have a £200 reduction.	We have commented on the size of the reduction and that of the GCC above.
43	It is nice to know that you do care about us and wish to reduce the fee appropriately.	Thank you for your feedback.
44	It's about time; in fact it's long overdue. Fees are exorbitant and always have been and apart from buying the right to the title osteopath there are absolutely no benefits from paying them.	The role of healthcare regulatory bodies is to protect patients and the public which requires more than simply protection of title. Our role involves quality assuring education and training standards; developing, setting and maintaining standards of osteopathic care; ensuring an osteopath's continued fitness to practise and handling concerns and helping patients with any concerns and complaints about an osteopath. All of these provide benefits to the osteopathic profession and the individuals that practise within it.
45	<p>BOA written response</p> <p>I am now responding to the GOSC consultation on fees and this is our formal response concerning this matter. We would be happy for our comments to be shared with the Finance and General purposes committee.</p> <p>The BOA has to express its deep concern and disappointment that this</p>	<p>Your feedback was shared with the Finance and General Purposes Committee which recommended to Council that the fee reduction should be 10% for those paying the highest fee.</p> <p>We have commented on the size of the fee reduction above.</p>

	<p>consultation is based upon a fee reduction for some of considerably less than £100.00.</p> <p>We do not feel it is appropriate for us to show a preference for one specific option and that your judged response should be based on feedback from osteopaths in this respect.</p> <p>Whilst we have noted the papers discussed by the GOSC at the various council meetings in 2011 we do feel that potential reduction is very low and less than the amount that would have been anticipated by many of our members and indeed by the BOA as well. When your consultation has been completed we do feel that the GOSC should provide a very detailed commentary in <i>The Osteopath</i> and on the GOSC website (registrants section) to explain the process you took to identify possible cost savings over the last 12 months or so. We note that this issue was briefly referred to in the August/September issue of <i>The Osteopath</i>.</p> <p>It would be helpful if this commentary outlined the process that was gone through to consider discretionary activity carried out at the GOSC (beyond its role as a regulator) that could be ceased or postponed to save staffing costs as well as any productivity initiatives that you may have considered to reduce staff costs.</p> <p>You may also wish to inform registrants of any action taken to identify possible job sharing with other regulators.</p> <p>We do not make these observations to be difficult or obstructive but to outline the issues that we believe that registered osteopaths should be well informed about.</p>	<p>We will continue to provide information about the cost savings programme in public Council papers (available on the public website), in <i>The Osteopath</i> and elsewhere.</p> <p>We are unclear as to what is meant by the discretionary activity carried out at the GOsC beyond its role as a regulator and would welcome clarification of this.</p> <p>We have been in discussion with a number of other regulators on the potential for cost sharing. The BOA will be aware of this work from the content of Council papers on cost savings over the past year.</p> <p>Thank you for your feedback; we do not consider your views to be difficult or obstructive.</p>
46	<p>Comment: one written response has been removed from the table as it contained detailed personal information which could identify individual practitioners. A separate response has been sent to the individuals concerned.</p>	