

Education and Registration Standards Committee
14 May 2013
Registration policy issues

Classification	Public
Purpose	For noting
Issue	This paper draws to the attention of the Committee two specific policy development needs within Registration, and to provide a synopsis of each.
Recommendation	To note future registration policy development needs.
Financial and resourcing implications	None
Equality and diversity implications	None
Communications implications	None
Annex	None
Author	Matthew Redford

Background

1. The core function of registration is to maintain the integrity of the statutory Register of osteopaths. Part of this work involves the department processing applications for registration from qualified professionals.
2. There are currently two specific policy development needs in registration which require the benefit of discussion at future meetings of the Education and Registration Standards Committee. The policy areas relate to:
 - a. Temporary and occasional services
 - b. Enhanced disclosures for regulated activity.

Synopsis of policy development needs

Temporary and occasional services

5. The GOsC may receive an application from an individual to be temporary registered where they are an EU/EEA or Swiss national and where their main practice is in one of these states (other than the UK). The application for temporary registration can be made under section 5A of the Osteopaths Act 1993 (as amended) which supports Directive 2005/36/EC on the recognition of professional qualifications.
6. The applicant would need to declare that they are providing temporary and occasional services in the UK and examples of this may include:
 - a. A temporary contract at an osteopathic clinic.
 - b. Delivery of treatment to a specific patient in the UK.
 - c. Delivery of osteopathic technique lectures at an educational institution.
7. The GOsC is allowed to assess the qualification of the individual before they gain access to the Register; however, the GOsC cannot charge a registration fee or subsequently request confirmation that the applicant holds an adequate professional indemnity insurance policy.
8. Historically the GOsC has had two registrants who were registered as providing temporary and occasional services; however both registrants have since converted their status to being fully registered.
9. While the number of applicants has been limited, GOsC needs to develop guidance which ensures the Registration team, and ultimately the Registrar, feel comfortable about how applications for temporary registration are processed. The development of policy will ensure that the limited applications are processed fairly and consistently and would cover the following:

- a. Greater clarity as to what is meant by temporary and occasional services.
 - b. The mechanism for entering an applicant to the Register via this registration route.
 - c. The mechanism for review at the point of renewal, including how the Registrar can test the validity of the temporary and occasional service.
 - d. The mechanism for removal (if allowed under the Directive).
10. It is planned that a draft policy would come before the Committee in Autumn 2013.

Enhanced check for regulated activity

11. Applicants for registration are required to undertake an 'enhanced check for regulated activity' as part of their application. The check, formerly known as a CRB check, discloses any caution or conviction issued to an applicant. The disclosure allows the Acting Head of Registration and the Chief Executive and Registrar to determine whether the nature of any caution or conviction raises issues of character that should be explored further before registration is granted.
12. Currently any disclosure is discussed on a case-by-case basis between the Acting Head of Registration and Chief Executive and Registrar regardless of the severity of the disclosure.
13. To ensure (a) consistency of decision making, and (b) a proportionate approach, it is necessary to develop a decision tree matrix where, for example, small scale disclosures can be handled by the Registration team and Acting Head of Registration, with only those more serious disclosures referred to the Registrar.
14. It is anticipated that this paper will be presented to the Committee in either Autumn or Winter 2013.

Recommendation: To note future registration policy development needs.