

**Registration Fees Implementation Programme:
Amendment to Fees Regulations to introduce
Registration Application Fees**

Purpose of paper	The paper seeks to provide finalised application fee levels for approval in line with the formally approved registration fees model and includes revised fees regulations (at annex 1 and 2) to be sealed for both Dentists and DCPs.
Action	To discuss and approve application fee levels and make new fees regulations.
Corporate Strategy 2016-19	<p>Corporate Strategy 2016 – 2019</p> <p>02 To improve our performance across all our functions so that we are highly effective as a regulator</p> <p>Costed Corporate Plan 2019 – 2021</p> <p>02 To improve our management of resources so that we become a more efficient regulator</p> <p>Corporate Strategy 2020 – 2022</p> <p>01 Operate a regulatory system which protects patients and is fair to registrants, while being cost-effective and proportionate; which begins with education, supports career-long learning, promotes high standards of care and professional conduct and is developed in the light of emerging evidence and experience.</p> <p>05 Continue to develop an outcome-focused, high-performing and sustainable organisation</p> <p>Alignment to Strategic Planning Framework – Corporate Strategy 2020-2022</p> <p>Alignment to Strategic Planning Framework – Costed Corporate Plan 2020-2022</p>
Decision Trail	<ul style="list-style-type: none"> i. Fees policy effective from 1 January 2019 ii. Fees implementation project initiated Q1 2019 iii. Update to FPC on implementation plans 21 May 2019 iv. Update to FPC on implementation plans 17 July 2019 v. Review of Fees Model at SLT Workshop 12 Aug 2019 vi. Review and endorsement of Fees Model at SLT Meeting 3 Sep 2019

	<p>vii. Review and endorsement of Fees Model at FPC Meeting 10 Sep 2019</p> <p>viii. Review of Fees Model at Special Council 11 Sep 2019</p> <p>ix. Review and approval of fees model for registration fees policy implementation at Public Council 3 Oct 2019</p>
Next stage	This paper seeks approval of specified fee levels based on the approved model for registration fees implementation from the Council at its meeting on 3 October 2019 and seeks Council make and seal the revised fees regulations for both Dentists and DCPs.
Recommendations	The Council are asked to formally approve the specified application fee levels and to seal fees regulations (introducing application fees for Dentists and DCPs) for implementation on 2 January 2020.
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Appendices	<p>Appendix 1: Drafted fees regulations for Dentists</p> <p>Appendix 2: Drafted fees regulations for DCPs</p>

1. Executive Summary

- 1.1. This paper sets out to provide finalised fee levels and regulation changes in line with the fees model that the Council approved at its meeting on 3rd October 2019 (when the Council reviewed the full fees model and approach that provided visibility of each of its components, as well as detailed breakdown of fees structures and calculations). Further information on the finalised fee levels is provided at section 3 of this paper.
- 1.2. This paper provides a summary of the approach taken to draft both Dentists and DCPs application fees regulations. The revised fees regulations are included at Appendix 1 and 2 were reviewed and approved by SLT in November 2019. Further information on the draft regulations is provided at section 4 of this paper.
- 1.3. The Registration Fees Programme Board have developed naming conventions and explanations for the processing fee and assessment fee components that make up the overall application fees. This naming will be used in the operational implementation of the fees to support clear and

consistent internal and external communications on the purpose of each aspect of the fees model. Further information on the naming conventions is provided at section 5 of this paper.

2. Introduction and background

- 2.1. Early work on registration application fees was presented to Council in 2016, when four indicative models for a potential approach to fee charging were reviewed.
- 2.2. GDC Fees Policy was developed through 2018 and came into effect from 1 January 2019 which included principles to guide the setting of registration scrutiny fees. During Q2 2019, the Strategic Planning Framework set 2 January 2020 as the implementation date for the introduction of new fees (processing and assessment fees).
- 2.3. The Registration Fees Implementation Programme Board was formed in June 2019. Programme board sponsorship and management has progressed this work through several discretionary management decisions. The assurance process has included formal review and discussion in monthly programme board meetings, as well as formal governance meetings; SLT workshop of 12 Aug 2019, SLT board meeting of 3 Sep 2019; FPC board meeting of 10 Sep 2019 and Council meeting of 11 Sep 2019. Ongoing feedback and recommendations have led to an FPC endorsed fees model.
- 2.4. Council formally approved the fees model (introducing processing and assessment fees) and specified fees levels in Public Council of 3 October 2019.

3. Naming convention and explanation of fees

- 3.1. Within the Strategic Planning Framework Board Meeting of 13 Nov 2019 an item discussing Communications and Engagement specific to the implementation of registration fees resulted in an action for Registration Fees Programme board to name and explain fees so that they can be easily interpreted and understood, internally and externally.
- 3.2. This terminology is intended to introduce clear and consistent operational terminology which will be commonly used to describe each component of the fee, as opposed to the technical language used in the regulations. In the development of the fees proposals, we have used terms such as 'scrutiny fee,' 'registration fee', 'assessment fee' and 'application fee' somewhat interchangeably and we are seeking to streamline the use of this terminology to make it consistent going forward.
- 3.3. The Registration Fees Programme Board agreed upon the following names including an explanation for each distinct fee;
 - 3.3.1. The Processing Fee is the non-refundable fee covering the cost of basic application processing. The cost of this processing is incurred on every application the GDC receives and therefore cannot be refunded.
 - 3.3.2. The Assessment Fee is the subsequent fee that covers the cost of complex application processing (for routes where a further assessment is required). This can be refundable only in exceptional circumstances or if it is immediately clear that an application will not be successful prior to any assessment work having commenced.
 - 3.3.3. The Application Fee is the overarching name that will be given to the overall fee that the applicant is asked to pay for their application to join the register to be considered. This will consist of the sum total of the Processing Fee and the Assessment Fee.
- 3.4. For reference, the terminology for existing fees that are already in use are:
 - 3.4.1. Registration Fee – the pro rata fee that a new registrant pays to have their name entered to the register for the first time.

3.4.2. Annual Retention Fee – the fee that a registrant pays to retain their name on the register at each annual renewal period.

3.5. There will be clear communications around the refundable/non-refundable elements of the new fees and the circumstances in which this would be permitted have been described in an internally-facing refunds policy and an externally-facing refunds guidelines document. These have both been reviewed (subject to minor amends) in Registration Programme Board Meeting of 30 Oct 2019 and due for formal sign-off in board meeting of 28 November 2019.

4. Specified fees levels as per approved fees model (see annex 1)

4.1. The Fees Implementation Programme Board has used their discretion where necessary to make decisions to allow fees structuring to progress without undue delay.

4.2. With respect to the specified fees levels demonstrated within the fees model that was approved in Public Council 3 Oct 2019, it was recommended by the board that these final figures are rounded-up to the nearest 0 or 5 pence in order to provide cleaner figures for external communications (which is in line with the approach used for ARF fee setting).

4.3. The table overleaf at section 3.4 provides the unrounded application fee levels that were presented to the October Council meeting. The subsequent table at section 3.5 provides the rounded application fee levels, and these are the fee levels that are being requested for formal approval and sealing within the revised regulations.

4.4. Unrounded application fee figures demonstrated in the approved fees model paper (as of Public Council 3 Oct 2019):

REGISTRATION APPLICANT CATEGORY	PROCESSING FEES (WITH NO OVERHEADS CONTRIBUTION)				ASSESSMENT FEES (WITH NO OVERHEADS CONTRIBUTION)			APPLICATION FEES	IMPACT
	Part 1 DIRECT REG PROCESSING	Part 2 ASSOCIATED REG ACTIVITY	TOTAL Processing Fee	PROCESSING FEE BLENDED RATE	Part 1 COMPLEX ASSESSMENT	Part 2 ASSESSMENT PANEL COSTS	TOTAL Assessment Fee	PROCESSING FEE (BLENDED RATE) + ASSESSMENT FEE	% Applicants 2018
1 UK Reg Dentist	£7.86	£14.62	£22.48	£22.95	£0.00	£0.00	£0.00	£22.95	11.0%
2 Dentist Assessment Application	£7.86	£17.01	£24.87		£459.56	£202.83	£662.38	£685.34	2.0%
3 Dentist EEA Application	£7.86	£17.01	£24.87		£65.65	£0.00	£65.65	£88.61	4.5%
4 Dentist Overseas Application	£7.86	£17.01	£24.87		£65.65	£0.00	£65.65	£88.61	4.5%
5 UK Reg DCP	£7.86	£14.62	£22.48		£0.00	£0.00	£0.00	£22.95	51.0%
6 EEA DCP Assessment Application	£7.86	£17.01	£24.87		£317.10	£189.11	£506.21	£529.16	2.0%
7 Non-EEA DCP Assessment Application	£7.86	£17.01	£24.87		£317.10	£189.11	£506.21	£529.16	2.0%
8 Temporary Dentist Registration Application	£7.86	£17.01	£24.87		£79.27	£0.00	£79.27	£102.23	0.5%
9 EEA DCP Assessment Additional Titles	£7.86	£17.01	£24.87		£264.25	£189.11	£453.36	£476.31	0.5%
10 Non-EEA DCP Assessment Additional Titles	£7.86	£17.01	£24.87		£264.25	£189.11	£453.36	£476.31	0.5%
11 UK DCP Additional Titles	£7.86	£14.62	£22.48		£0.00	£0.00	£0.00	£22.95	3.0%

4.5. Rounded application fee figures, for request for formal approval within this paper: *(please note - fees banded in the vertical red boxes are those requested for approval, other figures are retained for reference to show original working breakdown but will no longer add up to the figures in the red boxes due to the application of rounding).*

REGISTRATION APPLICANT CATEGORY	PROCESSING FEES (WITH NO OVERHEADS CONTRIBUTION)				ASSESSMENT FEES (WITH NO OVERHEADS CONTRIBUTION)			APPLICATION FEES	IMPACT
	Part 1 DIRECT REG PROCESSING	Part 2 ASSOCIATED REG ACTIVITY	TOTAL Processing Fee	PROCESSING FEE BLENDED RATE	Part 1 COMPLEX ASSESSMENT	Part 2 ASSESSMENT PANEL COSTS	TOTAL Assessment Fee	PROCESSING FEE (BLENDED RATE) + ASSESSMENT FEE	% Applicants 2018
1 UK Reg Dentist	£7.86	£14.62	£22.48	£22.95	£0.00	£0.00	£0.00	£22.95	11.0%
2 Dentist Assessment Application	£7.86	£17.01	£24.87		£459.56	£202.83	£662.40	£685.35	2.0%
3 Dentist EEA Application	£7.86	£17.01	£24.87		£65.65	£0.00	£65.65	£88.60	4.5%
4 Dentist Overseas Application	£7.86	£17.01	£24.87		£65.65	£0.00	£65.65	£88.60	4.5%
5 UK Reg DCP	£7.86	£14.62	£22.48		£0.00	£0.00	£0.00	£22.95	51.0%
6 EEA DCP Assessment Application	£7.86	£17.01	£24.87		£317.10	£189.11	£506.25	£529.20	2.0%
7 Non-EEA DCP Assessment Application	£7.86	£17.01	£24.87		£317.10	£189.11	£506.25	£529.20	2.0%
8 Temporary Dentist Registration Application	£7.86	£17.01	£24.87		£79.27	£0.00	£79.30	£102.25	0.5%
9 EEA DCP Assessment Additional Titles	£7.86	£17.01	£24.87		£264.25	£189.11	£453.40	£476.35	0.5%
10 Non-EEA DCP Assessment Additional Titles	£7.86	£17.01	£24.87		£264.25	£189.11	£453.40	£476.35	0.5%
11 UK DCP Additional Titles	£7.86	£14.62	£22.48		£0.00	£0.00	£0.00	£22.95	3.0%

5. Fees regulations (see annex 2 and 3)

- 5.1. Council exercised its power to make fees rules and regulations to approved revised versions of the fees regulations in October, to implement the new Annual Retention Fees. The regulations have now been updated to include reference to the new registration fees. It was not possible to make all of the changes at the same time, as Council's approval of the registration fees model was required before the regulations could be drafted (this point was also referenced in the ARC paper 'Item 10: GDC Fees Regulations' on 19 June 2019, anticipating and recognising that it is likely to be necessary for the GDC to deliver two amendments to fees regulations within a short period of time). These revised versions are at Appendix 1 and 2 and, if approved, will replace those made in October.
- 5.2. The majority of the provisions are unchanged. The registration fees have been added to the existing draft, and the transitional provisions have been amended slightly to ensure that the registration fees will apply to DCPs from the start of 2020, and the new DCP ARF will come into force as planned on 1 August 2020.
- 5.3. The application fee related changes to the regulations were drafted by ILAS in accordance with a set of instructions provided by the Strategy team based on the Council approved fees model.
- 5.4. During this exercise further policy development around the complexity of DCP additional title applications was required to understand the different scenarios that exist within this route. This discussion clarified that one processing fee would be charged in the event that an application for entry onto the register under multiple DCP titles was received together on the same date, but that any subsequent receipt of an application for an additional title on a later date would be subject to another processing fee. This engagement was necessary to inform ILAS with clearer instructions to draft fees specific to DCP applications and adding of additional titles.

6. Review of Fees Policy Implementation

- 6.1. The Fees Implementation Programme Board has used their discretion where necessary to make several decisions to allow the work of fees policy implementation to progress without undue delay; aligning the fees model as practicably as possible with as many of the principles and key points of the GDC Fees Policy. Within these decisions, there were a number of types of registration activity that were ruled out of scope for the initial implementation of application fees, but where there we recognised that there would be a need to give further consideration in the future (for reference, Council were previously informed of this in section 3.2 of Fees Implementation Paper to the Public Council meeting of 3 October 2019).
- 6.2. To summarise, as part of programme close out, we will be reviewing the scope of all potential such activities that have been identified, to collect further data to support evidence-based decision making on activities that were deemed out of scope for this review. This will include the feasibility/suitability of whether; any routes other than those currently in scope may be considered for application fees in the future, whether application related indirect support team costs may be reflected into future fees, and whether; there will be any future requirement to review the need for the current separate fee for the entry of additional titles onto the register.

7. Risks and considerations

Communications

- Communications have been discussed alongside the work of the fees in programme board meetings as well as within forward-planning sub-group meetings.

- A communications plan is currently underway to meet the communication and engagement requirements as a result of the work to implement new fees structure by 2 Jan 2020. This communications plan encompasses both communications and engagement related to the ARF and to application fees.

Equality and Diversity

- An Equality Impact Assessment was carried out in the work leading to the new fees policy effective from 1 January 2019. Work was carried out in September 2019 to update the Equality Impact Assessment to give updated consideration specifically to the implementation of the policy, and this was presented to the Council at its meeting on 3rd October 2019.

Legal

- The In-House Legal Advisory Service (ILAS) have been a key part of the programme team and have carried out the drafting of the revised fee regulations.

Policy

- The approved application fee model and the draft revised regulations have all been developed in line with the GDC fees policy that came into effect on 1 January 2019.

Resources

- Apart from staff resource and time which have been included in the financial update contained within the monthly programme board report, there are no additional costs or expenditure to be incurred.

National

- There is no recognised impact to the four countries within the UK as a result of this programme.

Risks on registers

This programme does not directly link to but has correlation with the following risks on the strategic risk register;

- CP5; Uncertainty over constitutional changes following the referendum result to exit the EU
- CP13; Loss of MRPQ mean GDC options for registering European Dentists are dependent on DHSC action

The Fees Implementation Programme is continuing to liaise closely with the owners of these risks.

8. Recommendations

- 8.1. The Council are asked to formally approve the specified application fee levels and to seal fees regulations (introducing application fees for Dentists and DCPs) for implementation on 2 January 2020.

9. Internal consultation

- 9.1. The following departments have membership on the programme board

Department	Board Member
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Registration & Corporate Resources	Executive Director of Registration & Corporate Resources
IT	Head of IT
Registration Team	Head of Registration
Registration Operations	Head of Registration Operations
Policy & Research Programme	Head of GDC Policy and Research Programme, Policy Manager
Communications & Engagement	Head of Communications and Engagement, Head of Nations and Engagement
In-House Legal Advisory Service	Head of In-House Legal Advisory Service, Senior Advisory Lawyer
Finance and Procurement	Head of Finance and Procurement, Senior Financial Planning and Analysis Manager
Governance	Governance Manager

10. Appendices

- Appendix 1: Fees Regulations for Dentists
- Appendix 2: Fees Regulations for DCPs