Public business

**Education-related fees for 2012**

**Purpose**
To agree education-related fees for 2012 and related charges.

**Recommendations**

The Council is asked to agree:

i. no change to the current levels of education-related fees for 2012;

ii. to charge for (1) reprocessing payments which have not been honoured by a bank or card issuer and (2) returning applications to an applicant for additional information more than once, in relation to education-related fees.

1.0 **Introduction**

1.1 At its February 2011 meeting, Council agreed draft registration fees for 2012 for consultation; it is mandatory to consult on these fees. At the same meeting, Council considered education-related fees for 2012; these fees are levied under Article 65 (1) of the Pharmacy Order 2011 and do not require consultation. In the interests of transparency, Council asked for a limited consultation on the second set of fees: accordingly, a four-week consultation was held from 7 April 2011 to 7 May 2011, in which views were sought from pre-registration education & training leads, pre-registration leads in schools of pharmacy and the BPSA.
1.2 The consultation proposals were:

i. to raise education-related fees by 4%. The purpose of this proposal was to bring education-related fee increases in line with proposed registration fee increases;

ii. to charge for (1) reprocessing payments which have not been honoured by a bank or card issuer and (2) returning applications to an applicant for additional information more than once. The purpose of this proposal was to bring education-related fee charges in line with registration fee charges.

Note: the education-related fees referred to in the consultation document are:

1. overseas qualified pharmacists – examination of documents and conducting a pre overseas pharmacist assessment programme (OSPAP) assessment (where relevant): currently £687;
2. entry to the Pre-registration scheme: currently £174;
3. Registration Assessment entry fee: currently £206;
4. Registration Assessment late entry fee: currently £412;
5. manual remarking of Assessment: currently £110.

2.0 Overview of consultation responses

2.1 A full analysis of the responses is in the accompanying document Education-related fees 2012: consultation analysis at appendix 1.

2.2 Proposition 1 (increasing fees for 2012 by 4%): 57% disagreed and 38% agreed with the first proposition. The principal reasons for disagreeing were that NHS salaries had been frozen (therefore education-related fees should be frozen too), that trainees were struggling with the burden of student debt and that the increase had not been fully justified. Principal reasons for agreeing with the proposal were that the increase was under inflation and that everyone was affected by the current economic climate so trainees should not be exempt.

From the point of view of improving efficiency the executive has already identified the need to review the administration of the pre-registration scheme and the examination. Related organisational changes necessary to facilitate this work have recently been discussed with relevant managers and staff. In this context, and in the light of the feedback received, the recommendation in this paper is to make no change to the current levels of the education-related fees, noting the executive’s internal challenge to make good the impact of no increase by improving the efficiency of the processes.
2.3 Proposition 2 (charging processing fees): There was a very clear majority in favour of both parts of the proposal. Respondents cited the need for trainees to be accurate and to behave responsibly as young professionals. The main caveat was that trainees should not be charged if an error was made by a third party (for example, if a bank misprocessed a transaction). It is recommended that this proposal is agreed.

3.0 Equality and diversity implications

3.1 Prospective pre-registration trainees are not especially well off, on the whole. However, by advertising the fee structure for 2012-entry pre-registration and the 2012 Registration Assessment well in advance, (prospective) trainees should be able to set aside sufficient funds to pay the required fees.

4.0 Communications implications

4.1 It will be relatively easy to communicate the change in education-related fees for 2012 in advance of their implementation, assuming they come into force in Autumn 2011.

5.0 Resource implications

5.1 There are no resource implications associated with this paper.

6.0 Risk implications

6.1 The income generated from an increase in fees of anything up to 4% is not mission critical.

Recommendations

The Council is asked to agree:

i. no change to the current levels of education-related fees for 2012;

ii. to charge for (1) reprocessing payments which have not been honoured by a bank or card issuer and (2) returning applications to an applicant for additional information more than once, in relation to education-related fees.
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Appendix 1

Education-related fees for 2012: consultation analysis

1.0 Introduction

1.1. The consultation proposals were:

   iii. to raise education-related fees by 4%. The purpose of this proposal was to bring education-related fee increases in line with proposed registration fee increases;
   iv. to charge for (1) reprocessing payments which have not been honoured by a bank or card issuer and (2) returning applications to an applicant for additional information more than once. The purpose of this proposal was to bring education-related fee charges in line with registration fee charges; and
   v. to consider if from 2012 pre-registration manuals could be made available in web page, .pdf, iPad/iPhone/Android and book reader formats only and to lower the fee for pre-registration by the amount saved by not printing/posting manuals. Note: This question was added to the consultation after Council’s February discussion and is not for consideration as part of Council’s fee item – it is for information only. It was designed to test the water and will be followed up with a wider survey of trainees and tutors.

1.2. The respondents were a mixture of hospital and community pre-registration training leads (including training leads in schools of pharmacy), with hospital training leads being in the majority. Some pre-registration training leads answered in a personal capacity while others answered on behalf of their organisation; one training lead passed on the consultation to a trainee. The respondents are listed in Annex A and an analysis of the respondents by type is in Annex B.

2.0 Analysis of responses

2.1. Question 1: Do you agree that education-related fees for 2012 should be increased by 4%?

   Yes - 10
   No - 15
   Unsure – 1
   Not answered - 1
Comments

Of the 26 respondents who answered the question 57% disagreed and 38% agreed with the proposal. The principal reasons for disagreeing were that NHS salaries had been frozen (therefore education-related fees should be frozen too), that trainees were struggling with the burden of student debt and that the increase had not been fully justified. Principal reasons for agreeing with the proposal were that the increase was under inflation and that everyone was affected by the current economic climate so trainees should not be exempt.

2.2. **Question 2:** Do you agree that we should charge for (1) reprocessing payments which have not been honoured by a bank or card issuer and (2) returning applications to an applicant for additional information more than once.

(1) reprocessing payments which have not been honoured by a bank or card issuer

Yes - 21
No - 2
Unsure - 3

(2) returning applications to an applicant for additional information more than once

Yes - 22
No
Unsure - 3

Comments

The very clear majority in favour of both proposals cited the need for trainees to be accurate and to behave responsibly as young professionals. The main caveat was that trainees should not be charged if an error was made by a third party (for example, if a bank misprocessed a transaction).

2.3. **Question 3:** Do you agree that from 2012 we could make pre-registration manuals available in web page, .pdf, iPad/iPhone, Android and book reader formats only and lower the fee for pre-registration?

Yes - 10
No - 8
Unsure - 7

Comments

This proposal produced a mixed response. Even respondents who were against it, or who were unsure about it, felt it had some merit, although they had practical reasons for not supporting it at this time.

Those in favour supported the GPhC’s desire to save money and to exploit the
potential of new technology. The BPSA thought the ‘principle appears to be excellent’ but pointed out that electronic documents could be difficult to read. The pre-registration trainee who responded felt that the proposal was ‘better for the environment’ and would bring ‘pharmacy education into the 21st Century’.

Those who opposed the proposal cited restricted access to IT at some training sites and the cost of printing manuals locally as barriers. Rather than being a cost saving measure for everyone, some respondents saw the proposal as a means of the GPhC simply transferring a cost to trainees and/or employers (which was not the intention of the proposal). One respondent cautioned that older pharmacists might not be able to cope with such a change.

The unsure respondents acknowledged that the proposal had merit but wondered if a compromise might be better. The suggestions included:

- providing one copy of the manual only per training site;
- making the manual available electronically but sending paper copies on request;
- providing the manual online but making forms downloadable in Word format if they had to be completed by trainees or tutors;
- sending updates only to established tutors.

Given the mixed views on this proposal, we will canvass the views of trainees more widely before progressing it further.

Annex A: Respondents

This list distinguishes between respondents who submitted a personal view and those who submitted an organisational view.

(1) Personal views (alphabetised by surname)

Anonymous, NHS
Caroline Ashton, South London Healthcare QEH Hospital
Gordon Dykes
James L. Ford, Liverpool John Moores University
Jane Giles, Broomfield Hospital, Chlemsford
Adele Gothard, North Manchester General Hospital
Karen Gunnell, Boots
Samantha Knowles, Aston University
Alison Littledwood, University of Manchester
Adam Rathbon, The James Cook University Hospital
Karen Rice, The Cohens Group
Andrew Ritchings, NHS
Khilna Shah, community pharmacy
Jon Standing, Southmead Hospital
Michael Walton, South Tyneside NHS Foundation Trust
(B) Organisational views (alphabetised by organisation)

Helen Badham, Bristol Royal Infirmary
British Pharmaceutical Students’ Association (BPSA)
Aamer Safdar, Guy’s & St Thomas’ NHS Foundation Trust
Seema Dava, Lloyds Pharmacy
Steve Carter, Manor Pharmacy
Jennifer Willis, Mid Cheshire Hospitals NHS Foundation Trust
Ryhanna Hannif, North Middlesex University Hospital NHS Trust
Janet Gilbertson, Royal Glamorgan Hospital
Steven Arkle, University of Portsmouth
Siobhan Burke-Adams, SEMMED (South East Medicines Management Education & Development)

(C) Unclear

Andrew Turton, a London NHS Trust
Annex B: Respondents by type

(1) Country of residence

England - 26
Scotland
Wales - 1
Northern Ireland
Other – 1 (BPSA)

(2) Individual vs organisational responses

Individual response (Section A below)
   as a pharmacy professional - 19
   as a member of the public
   as an allied health professional

Organisational response (Sections B & C below)
   on behalf of a pharmacy organisation – 8 (Section B below)
   on behalf of a non-pharmacy organisation (Section C below)

A. Pharmacy professionals

Responding as a: Pharmacist – 20/Pharmacy technician

Area of work

Academia - 5
Community pharmacy - 5
Hospital pharmacy - 12
Primary care
Pharmacy education and training
Pharmaceutical industry
More than one area/other - 1

B. Pharmacy organisations

Type of organisation

Professional body
Regulatory body
Education & training body - 4
Employer - 5
Union
Trade body
Other – Student representative body
Area of work

Academia - 1
Community pharmacy - 2
Hospital pharmacy - 7
Primary care
Pharmacy education and training - 1
Pharmaceutical industry
More than one area/other

C. Non-pharmacy organisations

Type of organisation

Professional body
Representative body
Regulatory body
University
Education and training provider
Employer
Union
Trade body
Other