

# Registration Fees Implementation Programme (RFIP)

Council Meeting  
03/10/2019

1. Provide background and introduction to fees implementation
2. Introduce the fees model, providing a walkthrough to explain structuring of fees
3. Provide detailed information to support the fees model
4. Provide information around the impact of this work to applicants

- Early work on registration scrutiny fees was presented to Council in 2016.
- GDC Fees Policy was developed through 2018 and came into effect from January 2019 which included principles to guide the setting of registration scrutiny fees.
- During Q2 2019, the Strategic Planning Framework set the 2<sup>nd</sup> January 2020 as the implementation date for the introduction of the new fees model.
- Registration Fees Implementation Programme Board was formed in June 2019. Programme board sponsorship and management has progressed this work through several discretionary management decisions.
- This work has evolved significantly to establish a policy compliant fees model. The assurance process has included formal review and discussion in monthly programme board meetings, as well as formal governance meetings.

- 21 May 2019: FPC Meeting – Provided fees implementation update
- 17 July 2019: FPC Meeting – Provided fees implementation update
- 12 Aug 2019: SLT Workshop – Review and discussion of fees model
- 3 Sep 2019: SLT Meeting – Review and endorsement of fees model
- 10 Sep 2019: FPC Meeting – Review and endorsement of fees model
- 11 Sep 2019: Council Meeting – Discussion and review of fees model
- 3 Oct 2019: Council Meeting – Decision on fee model principles, Council decision on ARF levels and Council making fees regulations in respect of the ARF
- 5 Dec 2019: Council making fees regulations in respect of registration fees

1. Background information – Using the fees policy to inform the model
2. Background information – Initial Application Fees, Assessment Fees, Out-of-Scope Activity
3. Introducing the Building Blocks for each Fee
4. Application Fee and Assessment Fee Building Blocks explained
5. Out of Scope Exclusions explained
6. Application Processing & Assessment Effort and Complexity
7. Payment Bands Based on Equivalent Cost of Processing
8. Fees Model: Unit Cost of both the Initial Application Fee and the Assessment Fee
9. Applicant Payment Journey
10. Supporting Information: Application Route Profiles

The GDC 2018 Fees Policy set three core principles in relation to the implementation of a Registration scrutiny fee:

**Principle 1: Fee levels should be primarily determined by the cost of regulating each registrant group**

**Principle 2: The method of calculating fee levels should be clear**

**Principle 3: Supporting certainty for registrants and the workability of the regulatory framework**

Principles

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2  
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In addition to the revised fees policy, implementation must align with six key points that were recognised and addressed within the post-consultation report, 'Clear and Certain: a New Framework for Fee-setting':

**Key Point 1: A cost-based system of regulation, setting fees according to planned programme of work, therefore fees to be calculated to meet the costs of those plans**

**Key Point 2: Fee per application is an effective way to eliminate cross-subsidy between successful and non-successful applications**

**Key Point 3: Introduction of an assessment fee for applications that require a considerably higher degree of scrutiny (as the cost of processing these applications is higher)**

Key Points

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6

**Key Point 4: Cross-subsidy could be reduced by implementing a model which sets different fees for different applicant groups (depending on route to registration)**

**Key Point 5: UK registrants currently subsidise the costs of overseas applications; however, due consideration must be given to the need not to create barriers to free-movement within EEA (higher fees for EEA/non-EEA applicants could potentially be a disincentive for those nationals applying to the register)**

**Key Point 6: To consider the introduction of pro-rata fees for those who restore their name to the register following a break from practice (particularly relevant to those registrants with unforeseen and/or exceptional circumstances)**

To make reference where these principles and key points are more prevalent, we have used an indicator on relevant slides.

During 2016, some indicative models were developed which were shared with the Council at the time. Models considered were:

- Option 1 - Flat scrutiny fee for all applicants
- Option 2 - Flat scrutiny fee for Dentists and flat scrutiny fee for DCPs
- Option 3 - Blend of flat application fee for all applicants and flat assessment fee for certain complex applications
- Option 4 - Specific scrutiny fee per Registration route based on cost of processing the route

In our current work, we have been able to utilise some of the thinking around cost apportionment and data modelling from the 2016. However, in the main part our indicative thinking from 2016 has had to be substantially revised to:

- Align with the nine principles/key points emerging from the 2018 GDC Fees Policy
- Align with the three year budget planning approach now established through the Costed Corporate Plan Process
- Utilise more accurate and granular processing time data that was not available at the time
- Utilise up to date forecasting data to give a better picture of expected activity volumes

Following the introduction of the 2018 GDC Fees Policy, which established the principle that '**Fee levels should be primarily determined by the cost of regulating each registrant group**' option 4 from the above list of 2016 models is the only one which remains compliant with the policy.

As such, a refined version of option 4 has become the focus of our current work.

**Consultation Key Point 2: Fee per application is an effective way to eliminate cross-subsidy between successful and non-successful applications**



## REGISTRATION PROCESSING BUDGET 2020 - 2022

**1. REGISTRATION ACTIVITY SPECIFIC TO INITIAL APPLICATION FEES**

**2. REGISTRATION ACTIVITY SPECIFIC TO ASSESSMENT FEES**

**3. REGISTRATION ACTIVITY OUT OF SCOPE FOR FEES CHARGING**



**Consultation Key Point 3: Introduction of an assessment fee for applications that require a considerably higher degree of scrutiny (as the cost of processing these applications is higher)**

### REGISTRATION PROCESSING BUDGET 2020 - 2022

**1. REGISTRATION ACTIVITY  
SPECIFIC TO INITIAL  
APPLICATION FEES**

**2. REGISTRATION ACTIVITY SPECIFIC  
TO ASSESSMENT FEES**

**3. REGISTRATION ACTIVITY OUT OF  
SCOPE FOR FEES CHARGING**

**Principle 1: Fee levels should be primarily determined by the cost of regulating each registrant group**

## REGISTRATION PROCESSING BUDGET 2020 - 2022

**1. REGISTRATION ACTIVITY SPECIFIC TO INITIAL APPLICATION FEES**

**2. REGISTRATION ACTIVITY SPECIFIC TO ASSESSMENT FEES**





**3. REGISTRATION ACTIVITY OUT OF SCOPE FOR FEES CHARGING**







## INITIALLY CONSIDERED BUILDING BLOCKS FOR THE APPLICATION AND ASSESSMENT FEES

- 1
- 2
- 1
- 2
- 3

### Initial Application Fees

			
Staff time spent directly on basic Registration application processing	Staff time spent on associated Registration activity	Contribution to non application Registration overheads	Contribution to Registration estate overheads
1	2	3	4

### Assessment Fees

			
Staff time spent on complex application assessment	Cost of assessment panels (where applicable)	Contribution to non application Registration overheads	Contribution to Registration estate overheads
1	2	3	4



Not covered in Reg Fees—  
To be included in the Annual Retention Fee

## CONFIRMED BUILDING BLOCKS FOR THE APPLICATION AND ASSESSMENT FEES

1

2

1

2

3

### Initial Application Fees



Staff time spent directly on basic Registration application processing



Staff time spent on associated Registration activity

### Assessment Fees



Staff time spent on complex application assessment



Cost of assessment panels (where applicable)



Not covered in Registration Fees  
– To be included in the Annual Retention Fee

## Initial Application Fees



**PART 1. Staff time spent directly on basic Registration application processing**

**INCLUDES:**

- All processing activity for UK Dentist and DCP applications
- For all other routes: basic equivalent processing activity (data entry, qualification loading, basic checklist processing, etc)



**PART 2. Staff time spent on associated Registration activity**

**INCLUDES:**

- Response to queries
- Phone calls
- Complaints/FOI/alert responses
- Banking
- Post handling
- Working with legal/policy on complex cases
- Auditing applications
- Process enhancement/SOP review
- Preparing files for archiving
- Audit activity (within team)
- Audit activity (Mazars/Reg audit liaison)

## Assessment Fees



**PART 1. Staff time spent on complex application assessment**

**INCLUDES:**

Depending on route, type of activity may include:

- checking eligibility through review of documentation relating to character
- standing and nationality status
- detailed assessment of applicant's syllabus and primary dental qualification, etc



**PART 2. Cost of assessment panels (where applicable)**

**INCLUDES:**

- Assessment panel bundle preparation, assessment panel member reading and attendance time, applicant liaison and outcome processing
- Additional element of assessment specific associated activity – eg panel coordination liaison activity

## Out Of Scope Activity



TEAM EXCLUSIONS	RATIONALE
Registration Operations teams	Work not related to applications: ARF collection, ORE oversight etc
Registration Support	Application related elements of registration support activity. Although the team play a role in the initial processing of applications, including a small percentage into fees would add an additional layer of complexity.
Customer Advice & Information Team	Application related elements of CAIT customer service work. As per registration support rationale.
ROUTE EXCLUSIONS	RATIONALE
Restoration	Dentists Act 1984 allows us to charge fees on the entry of a name into the register or otherwise in connection with an application for registration. Therefore, the legislation does not permit us to introduce application fees for these particular routes and increases the risk of legal challenge.
Visiting EEA Practitioner	Dentist Act expressly prohibits us from charging any fees in respect of registration in the list of visiting practitioners from relevant European States.
Specialist List	A specialist list application fee already exists
Overseas Registration Examination	Funded by examination fees already
Health/Conviction Assessment	Charging applicants specifically would not be commensurate with ethical, legal and policy considerations
Registration Appeals	Majority of appeal activity relates to Specialist list applications (which are out of scope as noted above)
Adaptation Periods	Applicant will pay assessment fee for the application, but no surcharge for adaptation period

# 6. Application Processing & Assessment Effort and Complexity

**PROCESSING COMPLEXITY**

1	UK Reg Dentist	Avg. time to process application (30mins)
5	UK Reg DCP	Avg. time to process application (30mins)
11	UK DCP Additional Titles	Avg. time to process application (30mins)
3	Dentist EEA Application	Avg. time to process application (1hr includes Caseworker assessing)
4	Dentist Overseas Application	Avg. time to process application (1hr includes Caseworker assessing)
8	Temporary Dentist Registration Application	Avg. time to process application (1hr 15mins includes Caseworker assessing)
9	EEA DCP Assessment Additional Titles	Avg. time to process application (3hrs) + panel costs + reading time (1hr 15mins x3)
10	Non-EEA DCP Assessment Additional Titles	Avg. time to process application (3hrs) + panel costs + reading time (1hr 15mins x3)
6	EEA DCP Assessment Application	Avg. time to process application (3hrs 30mins) + panel costs + reading time (1hr 15mins x3)
7	Non-EEA DCP Assessment Application	Avg. time to process application (3hrs 30mins) + panel costs + reading time (1hr 15mins x3)
2	Dentist Assessment Application	Avg. time to process application (4hrs) + panel costs + reading (3hrs x 3)

1  
3  
3

# 7. 6 Bands: based on Equivalent Cost of Processing

1	UK Reg Dentist
	UK Reg DCP
	UK DCP Additional Titles
2	Dentist EEA Application
	Dentist Overseas Application
3	Temporary Dentist Registration Application
4	EEA DCP Assessment Additional Titles
	Non-EEA DCP Assessment Additional Titles
5	EEA DCP Assessment Application
	Non-EEA DCP Assessment Application
6	Dentist Assessment Application



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

**Please note:**

- If a no-deal Brexit materialises, some applicant routes would cease to exist (free-movement legislation)
- The blended rate for application fees is derived by calculating the total income achieved from charging the two variable application fees to the individual registrant groups, then averaging this cost across the total number of registrants applicants. This means that GDC income is unaffected whether individual or blended rates are used.

PAYMENT 1 (APPLICATION FEE)

PAYMENT 2

INITIAL  
APPLICATION FEE

ASSESSMENT FEE

VARIABLE FIRST  
REGISTRATION FEE  
(+ FIXED ARF)

Payable by all  
Applicant Routes

Only payable by  
non-UK applicant  
routes

*Pro-rata* registration fee payable by all applicants whose applications have been successful.  
  
Fee amount is variable due to the time they join the register in relevant Dentist and DCP cycle

Fixed ARF would only be payable by applicants when they join the register in the last two months of the current ARF cycle (in advance of the ARF deadline)

EXAMPLE 1: **UK Reg Dentist** payment journey having applied **in May** (not within last two months of Dentists ARF cycle);

PAYMENT 1 (APPLICATION FEE)		PAYMENT 2	
INITIAL APPLICATION FEE	ASSESSMENT FEE	VARIABLE FIRST REGISTRATION FEE	FIXED ARF
£22.95	£0.00	£500.00	£0.00

EXAMPLE 2: **EEA DCP Assessment Application** payment journey having applied **in June** (within last two months of DCP ARF cycle);

PAYMENT 1 (APPLICATION FEE)		PAYMENT 2	
INITIAL APPLICATION FEE	ASSESSMENT FEE	VARIABLE FIRST REGISTRATION FEE	FIXED ARF
£22.95	£506.21	£21.66	£130.00

REGISTRATION APPLICANT CATEGORY	APPLICATION FEE BLENDED RATE	TOTAL ASSESSMENT FEE	TOTAL FEES	LOWEST FEE (October)			MOST COMMON FEE (July)			HIGHEST FEE (November)			IMPACT
			APPLICATION FEE (BLENDED) + ASSESSMENT FEE	REG FEE	ARF	GRAND TOTAL	REG FEE	ARF	GRAND TOTAL	REG FEE	ARF	GRAND TOTAL	% APPLICANTS 2018
1 UK Reg Dentist	£22.95	£0.00	£22.95	£187.50	£0.00	£210.45	£375.00	£0.00	£397.95	£125.00	£750.00	£897.95	11.0%
2 Dentist Assessment Application		£662.38	£685.34	£187.50	£0.00	£872.84	£375.00	£0.00	£1,060.34	£125.00	£750.00	£1,560.34	2.0%
3 Dentist EEA Application		£65.65	£88.61	£187.50	£0.00	£276.11	£375.00	£0.00	£463.61	£125.00	£750.00	£963.61	4.5%
4 Dentist Overseas Application		£65.65	£88.61	£187.50	£0.00	£276.11	£375.00	£0.00	£463.61	£125.00	£750.00	£963.61	4.5%
8 Temporary Dentist Registration Application		£79.27	£102.23	£187.50	£0.00	£289.73	£375.00	£0.00	£477.23	£125.00	£750.00	£977.23	0.5%

Please note:

- We have for the purposes of demonstration only, used the higher figure of the consulted Dentists ARF range (£730-£750)

REGISTRATION APPLICANT CATEGORY	APPLICATION FEE BLENDED RATE	TOTAL Assessment Fee	TOTAL FEES	LOWEST FEE (May)			MOST COMMON FEE (March)			HIGHEST FEE (June)			IMPACT
			APPLICATION FEE (BLENDED) + ASSESSMENT FEE	REG FEE	ARF	GRAND TOTAL	REG FEE	ARF	GRAND TOTAL	REG FEE	ARF	GRAND TOTAL	% APPLICANTS 2018
5 UK Reg DCP	£22.95	£0.00	£22.95	£32.49	£0.00	£55.44	£54.15	£0.00	£77.10	£21.66	£130.00	£174.61	51.0%
6 EEA DCP Assessment Application		£506.21	£529.16	£32.49	£0.00	£561.65	£54.15	£0.00	£583.31	£21.66	£130.00	£680.82	2.0%
7 Non-EEA DCP Assessment Application		£506.21	£529.16	£32.49	£0.00	£561.65	£54.15	£0.00	£583.31	£21.66	£130.00	£680.82	2.0%
9 EEA DCP Assessment Additional Titles		£453.36	£476.31	£32.49	£0.00	£508.80	£54.15	£0.00	£530.46	£21.66	£130.00	£627.97	0.5%
10 Non-EEA DCP Assessment Additional Titles		£453.36	£476.31	£32.49	£0.00	£508.80	£54.15	£0.00	£530.46	£21.66	£130.00	£627.97	0.5%
11 UK DCP Additional Titles		£0.00	£22.95	£32.49	£0.00	£55.44	£54.15	£0.00	£77.10	£21.66	£130.00	£174.61	3.0%

Please note:

- We have for the purposes of demonstration only, used the higher figure of the consulted DCPs ARF range (£120-£130)

## 10. Supporting Information: Application Route Profiles

		Person Profile	% of 2018 register
1	UK Reg Dentist	Dentists qualified in the UK	11 %
5	UK Reg DCP	DCP qualified in the UK	51 %
11	UK DCP Additional Titles	A UK DCP registering a title to expand their scope of practice	3 %
3	Dentist EEA Application	Dentist, qualified in an EEA state, registering to practice in the UK	4.5 %
4	Dentist Overseas Application	Dentist, qualified overseas (non EEA), to practice in the UK	4.5 %
8	Temporary Dentist Registration Application	Dentist, qualified overseas (non EEA), to practice in the UK for a limited period under supervision	0.5 %
9	EEA DCP Assessment Additional Titles	DCP, qualified in an EEA state, registering a title to expand their scope of practice	0.5 %
10	Non-EEA DCP Assessment Additional Titles	DCP, qualified overseas, registering a title to expand their scope of practice	0.5 %
6	EEA DCP Assessment Application	DCP, qualified in an EEA state, registering to practice in the UK	2 %
7	Non-EEA DCP Assessment Application	DCP, qualified overseas, registering to practice in the UK	2 %
2	Dentist Assessment Application	Dentists for whom applications require a greater degree of assessment	2 %