

## Associates Remuneration: Review of Fees 2019

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<b>Type of business</b>	For decision
<b>For Council only:</b>	Public session
<b>Issue</b>	This paper sets out the review of Associates fees which was undertaken by the HR team in 2019 and the subsequent decision made at the SLT Board on 10 December 2019 and Remuneration Committee on 30 January 2020 following a review of the recommendations.
<b>Recommendation</b>	The Council is asked to discuss the contents of this report and approve the recommendations of the SLT Board and Remuneration Committee not to make any changes to Associates fees.

### 1. Introduction and Background

- 1.1 A review of Associates remuneration was undertaken by the HR Manager Projects (Associates) and was finalised by the then Head of HR before leaving the organisation in September 2019.
- 1.2 The research included undertaking benchmarking of Associates fees with other regulators and concentrated on four main strands which were:
- The **current fee amounts** for all Associate groups and whether any changes are needed.
  - Whether Associates who formally **chair panels** should be paid more than other panel members.
  - If the booked work is **cancelled** by the GDC, whether the different payment rules between different Associate groups can be aligned.
  - Potential adjustments to how Associates are paid for **meeting preparation time**.
- 1.3 This research was presented to the SLT Board on 10 December 2019 and the Remuneration Committee on 30 January 2020 and consisted of the following documents:
- Associate remuneration review 2019 – research and recommendations
  - Summary of the current approach to remuneration for Associate roles
  - Preparation time guidance for Hearings.

A copy of the research and recommendations from the Associate remuneration review is included at **Appendix 1**. The other documents have not been included as appendices due to the length, however, copies are available to the Council upon request.

- 1.4 The following recommendations were presented to both the SLT Board and Remuneration Committee as a result of the research:

- no changes should be made to Associate fees, Chair fees or cancellation terms.
- there should be a revision to preparation time apportionment, to include quarter days for hearings panellists and education quality assurance Associates only.
- a periodic review of Associates remuneration should occur every two years with the next review completed for implementation in 2022.

- 1.5 The full rationale for the recommendations is included in **Appendix 1**, however, a brief summary is provided in section 2.
- 1.6 The SLT Board discussed the recommendations in detail on 10 December 2019 and made the decision that no changes should be made to Associate/Chair fees, cancellation terms, or revisions to preparation time to quarter days for hearing panellists and education quality assurance Associates. The reason for this decision is documented in section 3.
- 1.7 The Remuneration Committee discussed the recommendations and agreed with the decision not to make any changes to Associates fees and, in line with its terms of reference, is recommending to the Council that no changes are made to Associates fees.
- 1.8 The Council are invited to discuss and approve these recommendations.

## 2. The recommendations presented to SLT

- 2.1 The full research undertaken is included in **Appendix 1**, however a summary of the recommendations that were presented to the SLT are highlighted below:
- **Associates fees:** The recommendation not to change Associate fees was based on research which found the GDC pays comparable rates to other regulators in most categories of Associates (see Appendix 1, section 1).
  - **Panel Chair fees:** The research found that there did not appear to be a compelling reason to increase Chair fees as the evidence shows the GDC pays competitively, however, it was recommended the situation should be kept under review should panel fee rates be increased by other regulators (see Appendix 1, section 2).
  - **Cancellation fees:** The Associates Project Board decided that cancellation fees should not be changed as the rationale for the two models was felt to be sound and there was evidence to suggest that any benefits from making a change would far be outweighed by the effort and concerns such changes would cause (see Appendix 1, section 3).
  - **Preparation time:** It was proposed there should be a revision to the preparation time apportionment to include quarter days for Hearing Panellists and Education Quality Assurance Associates only to allow the GDC a more proportionate means of recompensing panellists (see Appendix 1, section 4).
  - **Periodic review of Associate fees:** It was recommended the People Services team undertake a review of Associates remuneration every two years.

## 3. SLT Board and Remuneration Committee Recommendations

- 3.1 The SLT Board discussed the paper presented and the recommendations at their meeting on 10 December 2019.
- 3.2 A point was raised as to whether any changes should be made to Associates remuneration, given the Council decision on the administrative separation of the investigation and adjudications functions.
- 3.3 Following this point, SLT considered whether making only a small number of changes to the fees at this stage was prudent given the expectation that the role of Panellist Associates may change significantly in light of the development of the adjudications function.

- 3.4 The SLT Board agreed that no changes should be made in relation to Associates fees, Panel Chair fees, cancellation fees or preparation time and that the matter should be revisited later as part of the adjudications project.
- 3.5 This issue was presented at the Remuneration Committee on 30 January 2020. The Committee were advised of the SLT Board decision which was not to recommend any changes to Associates fees.
- 3.6 The Remuneration Committee endorsed the SLT decision and recommended the paper to Council. This decision was taken following assurances that this work would likely form part of a wider review of Associates in parallel with the wider adjudications work.
- 3.7 The Committee also considered whether Associates fees should be reduced, however, it decided against this as it acknowledged fees were currently competitive and there had been no significant challenges recruiting Associates.
- 3.8 Although separate to the fees issue but connected by the way of a hiring issue, the Remuneration Committee noted the work the People Services team had undertaken on understanding our Associates, reviewing roles and the use of Associates at the GDC. Mandatory pre-engagement checks have been introduced to ensure Associates are engaged on a self-employed basis which ensures compliance with HMRC's IR35 Regulations. It was noted that ongoing litigation, concerning other healthcare regulators, would give an indication to the future role of Associates which remained a priority focus for the organisation.

#### **4. Legal, policy and national considerations**

- 4.1 If any changes are made to Associates fees which may affect the terms of their employment, legal advice would be sought via the In-House Legal Advisory Service Team.

#### **5. Equality, diversity and privacy considerations**

- 5.1 The fees are applied and paid in the same way across each of the individual Associate groups. As such, all Associates are paid equally irrespective of their protected characteristics.
- 5.2 The GDC will remain mindful of the need to consider reasonable adjustments in relation to reading time should this be requested by an Associate. Reasonable adjustments are currently afforded to service users where conditions like dyslexia or learning disabilities are identified.
- 5.3 Work is currently ongoing to gather EDI monitoring data from Associates. This data – both for current Associate groups and in relation to future recruitment campaigns – will enable a more informed position on this point.

#### **6. Risk considerations**

- 6.1 Risks associated with making any changes to Associates remuneration will be discussed if this work is to be considered in line with the project to review adjudications.

#### **7. Resource considerations and CCP**

- 7.1 Not applicable.

#### **8. Monitoring and review**

- 8.1 Not applicable.

**9. Development, consultation and decision trail**

- 9.1 The research has been undertaken in consultation with key stakeholders such as Associate Managers across the GDC.
- 9.2 This issue has been discussed at the SLT Board on 10 December 2019.
- 9.3 This issue has been discussed at the Remuneration Committee on 30 January 2020.

**10. Next steps and communications**

- 10.1 A communication plan will be developed following the decision made at Council. This will include an email to all Associate managers followed by an article on the new Associates microsite and an intranet article for all employees to read.

**Appendices**

- a. Associate Remuneration Review 2019 – research and recommendations.

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**Appendix 1****Associate remuneration review 2019 – research and recommendations****Background**

This research was undertaken by Andrew Obst, HR Project Manager- Associates with additional data from Anne Sinclair, Fitness to Practise and in consultation with Associate managers across the GDC.

The research reviews four main areas of remuneration practice for all Associate groups and in doing so considers differentiation between the groups and if any changes are recommended:

1. current fee amounts
2. chair of panels rates
3. cancellation payment
4. preparation time

Additionally, a fifth issue in regard to the relevance or not of dentists' earnings to the rates provided to GDC Associates is considered.

**Recommendations of the research**

This research and analysis leads to the following recommendations to be presented to the Senior Leadership Team and Remuneration Committee for consideration:

1. no change to Associate fees, chair fees or cancellation terms
2. revision to preparation time apportionment to include quarter days for Hearings Panellists and Education Quality Assurance Associates

## 1. DAILY FEE RATES

### 1.1 Why are we looking at this?

Feedback from Associates indicates that their fees have not changed for many years, and there are concerns about whether the money they receive is fair and keeping pace with inflation. The Head of Finance and Procurement advised that fees were last reviewed in 2012 or 2013 and the decision was taken to leave them unchanged; however, any papers for this work have not been located.

Previously there did not appear to be any formal process in place for reviewing Associate fees, which may have resulted in fees falling below market rates and potential difficulties in recruiting and retaining Associates in the longer term.

### 1.2 Analysis

Table of UK Healthcare Regulator Associate fees as at January 2019<sup>1</sup>

Associate type <sup>2</sup>	General Dental Council	General Medical Council (inc. MPTS)	Nursing & Midwifery Council	Health Care Professionals Council	General Optical Council	General Pharmaceutical Council	General Osteopathic Council	General Chiropractic Council
<b>Fitness to Practice Panellists</b>	£353	£310	£310	£202	£319	£300	£306	£300
<b>FtP Panel Chairs</b>	£353	£360 <sup>3</sup>	£340	£341	£372	£440 <sup>4</sup>	£306 <sup>5</sup>	£350 <sup>6</sup>
<b>FtP Legal Advisers</b>	£668.04 <sup>7</sup>	£500	Not provided	£627	Not provided	£583	Not provided	Not provided
<b>FtP Medical Advisers</b>	£668.04	N/A	Not provided	N/A	Not provided	£400	Not provided	Not provided
<b>Education QA Inspectors</b>	£353	£310	Not provided	£202	£319	£300	Not provided	Not provided
<b>Clinical Advisers</b>	£120/ hour + VAT for reports	N/A	Not provided	N/A	£150/ hour + VAT for reports	£500/ report	Not provided	Not provided
<b>Expert Witnesses</b>	£650	N/A	Not provided	£202	£650	£750	Not provided	Not provided

<sup>1</sup> Unless otherwise specified, all fees are expressed in daily amounts for comparison purposes, however they may be paid in smaller units e.g. half-days.

<sup>2</sup> GDC terminology is used for this table, however other regulators may use different names.

<sup>3</sup> £500/day for legally qualified chairs.

<sup>4</sup> £590/day for legally qualified chairs.

<sup>5</sup> Chair can claim daily fee for other work done outside preparing for and attending hearings and meetings.

<sup>6</sup> £500/day for legally qualified chairs

<sup>7</sup> Fee is linked to the Ministry of Justice rate for Recorders, and increases in line with that (10/6/19).

It can be seen that:

- The GDC is the highest payer for most Associate types.
- Most common day rate in the GDC is £353 which equates to an annual salary (45 weeks) of approximately £79,425.

Associate managers have advised that there has been no difficulty in recruiting to roles and do not see rates as a substantive issue.

### **1.3 Conclusion:**

Given the competitive rates paid by the GDC compared to other regulators in most categories of Associates, and the ability to recruit effectively, there is no case for increasing rates at this time.

## 2. PANEL CHAIR FEES

### 2.1 Why are we looking at this?

We received feedback from some Associates (survey 2018 and drop in sessions of FtP Panellists) that the lack of additional payments to panel chairs is unfair because of the additional work and different skillset required. Some indicated that this was a disincentive to apply for appointment as a chair.

We were also aware that other regulators did differentiate.

It is noted that this issue was examined in depth by SPC in 2018 in particular to consideration of legally qualified chairs and determined to leave as is for the current time.

Nevertheless, for completeness in understanding remuneration elements and totality for Associates it is reconsidered here.

### 2.2 Analysis

The table in section 1 above shows that most other health sector regulators pay an additional fee to their Fitness to Practise panel chairs. However, the lack of an additional fee at the GDC is offset by the higher day fees (which is the highest for FtP Panellists amongst all regulators).

Even taking into account the additional payments to chairs by other regulators, the GDC payments are still higher than four of them. The GDC does not have legally qualified chairs, instead we appoint a Legal Adviser (who is also an Associate) for each panel.

At the GDC, only Hearings and Education QA have Associates who chair panels. When contacted about their views on paying chairs more than panel members, Val Shepherd (Senior Hearings Manager) and Manjula Das (Head of Education Policy & QA) both indicated that they were happy with the current practice of paying panel chairs the same as panellists, as this promotes a culture of equality of voice in decision making.

For Hearings, paying a higher rate to chairs would also result in undesirable administrative complexity and confusion in situations where the chair role is rotated between panel members (e.g. where the same panel is allocated multiple short hearings such as Interim Orders on the same day), or where an experienced Panel Chair is assigned to support a newly appointed Panel Chair.

Hearings do not report any shortfall of FtP panellists applying or being appointed to Chairs and see this as a development route for panellists.

### 2.3 Conclusion

There does not appear to be any compelling reason for increasing chair fees at this time. However, situation should be kept under if there are any relevant changes in the above information (e.g. panel fee rates are overtaken by other regulators).



### 3. PAYMENT FOR CANCELLATION

#### 3.1 Why are we looking at this?

This concerns what is paid to Associates if their booked work is then cancelled by the GDC.

This has not been raised as an area of concern by any Associate as far as can be ascertained. Rather, with the implementation of the new Associate contract in October 2018, and the launch of a project to review the Clinical Advisers/Expert Witnesses group, it has been noted by some GDC Associate managers that the rules differ and it would make sense to align them.

Also, an audit of the Education QA team recommended that this issue be examined more closely to see if the GDC could save money. It was subsequently determined to look at these rules more holistically across all Associate groups.

#### 3.2 Analysis

Current cancellation rules are as follows:

Associate Group	Cancellation by GDC
Registration Assessment Panellist – Dentists and Dental Care Professionals	0-5 working days' notice – full fee 6-10 working days' notice – half fee More than 10 working days' notice – no fee
ORE External Examiners, Chief External Examiners and ORE Advisory Group	0-5 working days' notice – full fee 6-10 working days' notice – half fee More than 10 working days' notice – no fee
Education Associates	0-5 working days' notice – full fee 6-10 working days' notice – half fee More than 10 working days' notice – no fee
Clinical Advisors and Clinical Experts	0-5 working days' notice – full fee (including allowance for surgery overheads, where applicable) More than 5 working days' notice – no fee
Hearings Legal, Medical and Professional Advisers	0-5 working days' notice – full fee More than 5 working days' notice – no fee
Fitness to Practise Panellists	0-5 working days' notice – full fee 6-10 working days' notice – half fee More than 10 working days' notice – no fee
Specialist List Appeals Panel Members, including Director of Appeals	0-5 working days' notice – full fee 6-10 working days' notice – half fee More than 10 working days' notice – no fee

There are two different models, one of which is more generous to the Associates than the other. Discussions at a Project Board meeting on 8 April 2019 have identified that those groups/roles subject to the less favourable rules (Clinical Advisors/Experts and Hearings Legal, Medical and Professional Advisers) are more likely to find alternative work at short notice; in contrast, others such as Hearings Panellists may find themselves short of income due to a cancellation at short notice.

If changes to these rules were to result in a reduction of fees payable to some Associate groups, it is reasonable to expect the changes would be unpopular.

Conversely, if all cancellation rules were aligned to those that are more generous to the associate, there would be higher costs for the GDC, at a time when how the GDC spends the ARF from registrants is under scrutiny.

It should be noted that these rules are contained within Associate contracts, so any changes would need to be agreed to by the Associates. Alternatively, they could be gradually introduced through application to new appointments only, however this may take some years to be complete due to the length of terms of some Associates, and would result in confusion through Associates doing the same role having different rules

### **3.3 Conclusion**

The Project Board determined there is no compelling reason to change payment for cancellation rules at this time, as the rationale for the two models was sound and any benefits from making a change would be far outweighed by the effort and concerns such changes would cause.

## 4 PAYMENT FOR PREPARATION TIME

### 4.1 Why are we looking at this?

As part of information gathering during phase 1 of the Understanding Associates project, some Associates expressed concerns about payment for preparation time in advance of meetings. This feedback was especially prevalent from hearings Associates. Hearings management have also reported that there is dissatisfaction amongst Associates about when they get paid for reading time.

In addition, some Associates who have more than one role with the GDC had noted there are inconsistencies between Hearings and their other work.

The project board considered it would be useful to compare the approach to all Associate groups within the GDC to see if there should be alignment or there is good rationale for differentiation.

### 4.2 Analysis

A full analysis of approach to preparation time for all groups was undertaken (contained within the summary table at Appendix 3). Consideration was given to the differing treatment across the varying Associate roles and whilst it would at first appear desirable to equalise treatment consultation with the associate managers has shown no requirement to change apart from **FtP hearings panellists** and **education quality assurance associates**. The remaining Associate managers have confirmed that there are no issues and the system of either paying a flat rate for reading time or agreeing times up front in advance of the work being undertaken are effective and sufficient.

**Education quality assurance** associate managers considered that with the widening of the work assigned to their associates the rigidity of half day payments for preparation or other tasks was unhelpful. More flexibility to allow for payments in quarter day portions would suit the work requirements and be more cost efficient.

The application of reading/preparation fees for **FtP hearings panellists** has become an area of occasional discord, particularly over the last few years with the introduction of iPads where we aim to deliver reading for the majority of cases prior to the hearing. In particular this has been centred on the application of guidance rather than the payments set.

This current FtP hearings panellist guidance about how the reading fees are applied has been a blunt instrument to manage a wide variety of scenarios and does not reflect the current variability of hearings listing scenarios. In particular the GDC's current listing of hearings sees a very mixed set of weekly schedules with either single longer hearings or multiple shorter hearings. Reading requirements (size of bundle/complexity of bundle/amount of clinical reading etc) produce a wide set of variables for panellists of the three different groups: dentist/DCP/Lay. This is set alongside the variables in individual's reading speed and methodology of mark up/notes.

Examples of typical variables are:

- **A Chair preparing for a set of paper review hearings, usually in situations where (a) the Registrant has not engaged with the GDC, either at the initial hearing, or at subsequent reviews or (b) The Registrant is engaging and is legally represented and is not seeking a change to the current order . Whilst bundles in themselves may not be massive or complex, the need to ensure a full knowledge of the content in the absence of Case Presenters, means that additional time may be spent to map a bundle.**

- **A dental care professional panellist on a clinical case may need to spend some time comparing radiographs/records in a bundle than the lay panellist sitting on that particular hearing.**

The prospect of paying panellists at different rates mapped to the requirements of the case, or at different rates according to their reading speed is not viable.

Another issue is that it currently is left up to the committee secretary to make a decision about whether the fees are waived in these instances, and they and the panels are instructed not to leave the hearing rooms until the matter is decided. This brings tension into the relationship between the panel and the Committee Secretary which can be unhelpful as the Committee Secretaries are the GDC rep who works most closely with the panel (and is the same room as the panel while the hearing takes place), and also gives rise to payments being waived by some and not others in the same or similar circumstances. In many situations where a decision has been made to waive a fee and the panel requests that a more senior manager reviews the decision, it is considered that the original waiver was not appropriate, and the decision overturned.

Current guidelines state the following:

Reading/preparation time is usually paid as follows, where e-bundles are sent out in advance:

Health Committee	½ day for every 2 Committee days (or pro rata)
Interim Order	½ day per 1 Committee day
Professional Conduct Committee (PCC) and Professional Performance Committee (PrPC) initial cases (when eBundle provided in advance)	½-1 day per 5-day Committee day depending on size of bundle
PCC resumed or part-hearings	- ½-1 day per 5-day Committee day depending on size of bundle if >5 days of transcripts there may be a discretionary extra day's fee
PCC reviews	½ day fee
Registration appeals	½ day per 1 Committee day
Restoration applications	½ day per 1 Committee day

However, there are situations when the reading/prep fee is waived – e.g.:

- When a hearing finishes a day or two early and the panel is discharged on full fees
- Where there is downtime mid-week when reading can be done for future shorter cases such as IOC hearings.
- Where a bundle is exceptionally small and/or easy to read

We are mindful that our panellists will sometimes offer to forego a reading fee where the cases have finished early and we are paying a fee for their time. However, in other situations, panellists may request a reading fee because they have given up time to read the papers in advance of the session commencing. Whilst pre-reading is not always delivered to panellists, the provision of iPads was costed on that basis and so for the majority of hearings we expect to give advance reading. Panellists have contracted to be able to do this, and as noted if time is set aside for this, the expectation set out at their appointment and in their terms and conditions is that this is paid. If we are unable to use their time on hearings that finish early, we have booked out their time away from their day jobs, so they are unlikely to be able to go back to work.

We have reviewed a number of other regulator's schemes. We do not consider that the application of one set fee for any amount of reading due is fair given the variables described above.

The identification of a larger range of tariffs based on the type of hearing, is attractive but would place an even more complex and binary solution that would probably negate the flexibility that the GDC benefits from where panellists are willing to offset some time that they gain in lieu if a hearing finishes early.

#### 4.3 Recommendation

In producing an updated set of guidance, it is intended that the fuller range of options will both allow the GDC to pay nominal fees for smaller amounts of reading and preparation and give an opportunity to more closely reflect some typical hearings scenarios. Our aim is that the readings fees should be as close to a norm as possible but have the flexibility to more fairly reflect the application of fees to greater (or lesser) amounts of reading or across multiple cases or very short cases or those with small amounts of reading.

In essence the revised guidance allows for quarter day increments (as below) rather than starting at half days. This should help provide more clarity and fairness and resolve some of the concerns of associates and the committee secretaries who are often called upon to make such decisions about when payment for preparation time will be made.

	<b>Situation</b>	<b>Payment *</b>
1	Ad hoc IOC panel sitting or discrete single case lasting for one day	0.25
2	Session listed for 5 days	0.50
3	Session listed for 5 days where 6-10 cases are listed	0.75
4	Session listed for 5 days and where 11 cases or more are listed	1.0
5	Part-heard case where reading material is provided in advance of the hearing	1.0

\* Payments are shown as multiples of a full day's fee.

*Where the same scheduled sitting runs over into a second or third week and new cases are to be considered in those weeks that necessitate reading after 5:00pm on a working day or any time on a weekend or bank holiday, payment will be made in accordance with 1 or 2 above, depending on the number of cases listed.*

*In exceptional circumstances, and at the discretion of the Senior Hearings Manager, additional payments may be made.*

#### 4.3 Costs

The key aspect of this revision of scheme is that it is not making a fundamental variance that will need for a further allocation of budget to fund a different scheme.

We have set out some typical scenarios that allow a provision to recompense in quarter day increments. We believe this will give the GDC a more proportionate means of recompensing panellists. We have checked against a three-month period of fees paid and found that in some cases we would save the GDC money by paying a smaller fee where there has been a very small amount of pre-reading. In some we would pay slightly more but proportionately so, rather

than in multiples of half days. The sample we have checked indicate that the fees incurred by panellists will not vary significantly.

In the small number of hearings where excessive amounts of reading are given prior to the hearing, it is important that we decide a proportionate payment based on the actual work undertaken. Such payments by exception would typically either be for very mixed weeks of short cases or be for situations in the case of part-heard hearings. The number of part-heard cases is small, and sometimes no reading at all may be needed, if the hearing splits between a finalised Stage 1 (facts) and Stage 2, (impairment and sanction). However, if part-heard prior to the conclusion of Stage 1, it may be necessary for panellists to refresh their memories of the case by reading several days' worth of transcripts and other documents submitted as part of the evidence at the hearing (hundreds of pages may be required reading).

An alternative scenario is part-heard during drafting on long cases, where drafts may need to be individually checked prior to a resumption to aid recall and speed up the production of a final copy. These situations would always need to be according to the circumstances of the hearing and the time spent and payments should be agreed by exception.

Budgets will therefore not need to be increased as the proposed model will have no or negligible cost impact for the GDC, however this will be closely monitored.

The proposed model for should provide more clarity, fairness, and resolve some of the concerns of associates and the committee secretaries who are often called upon to make such decisions about when payment for preparation time will be made.

#### **4.4 Conclusion**

The review leads to a recommendation to revise the current guidance to allow for quarter day payments in FtP hearings panellists and education quality assurance and keep the current allowances to all other groups.

## 5 Relevance of dentist earnings levels to setting of fees

### 5.1 Why are we looking at this?

Survey – some respondents suggested they are losing money by working as an associate. While survey responses are anonymous, it is assumed that those who raised this are Dentists.

### 5.2 Analysis

Former Head of Hearings (Anne Sinclair) advised that the current fee for FtP Panellists is based on a decision made in 2003 when it was considered important that the fee be sufficient to compensate single practice dentists for loss of earnings. It is understood there was a view that of all the regulated professions in the UK, Dentists and Accountants are those who have the highest earning potential; however, this has not been independently verified.

Since that time, the employment arrangements for dentists have changed significantly and this aim may no longer be a key consideration when setting future fees.

It is also important to note that associates who work as part of panels and committees have an equal voice regardless of whether they are a Dentist, Dental Care Professional or Lay member. Paying the Dentist member more may undermine this, and as noted above, it is difficult to see a compelling reason to increase all fees at this time.

While working as associates, Dentists are not working in a clinical setting, so it can be argued that they should not necessarily be earning the same amount. While the GDC has sometimes had some challenges in recruiting Dentists to be associates, it is understood that this is not always the case and there are currently sufficient numbers.

### 5.3 Conclusion

In discussions with the CEO, Executive Director Organisational Development, Executive Director of Legal and Governance, and Head of HR, it was agreed that it is not necessary to fully compensate Dentists in this way; the GDC would rather an Associate undertake the work for us for reasons other than financial, and that the fees Dentists earn while working as Associates are fair and reasonable as they are. This has been reflected in the Associate Remuneration Policy developed in early 2019 agreed by the Remuneration Committee and the recommendation in regard to fees at section 1 of this research.

Should this become an issue in the future, there is a potential solution - the GDC's Clinical Experts (a different group of Associates to the FtP Panellists) have been able to claim a Practice Overheads fee of £650/day when attending a hearing if they are a practice owner. Similarly, the GMC/MPTS pays a locum fee to GPs of up to £500 when working as a Panellist subject to provision of an invoice/evidence (GMC have reported that not all GPs who may be eligible for this actually make a claim).