

**RESPONSE OF THE ROYAL PHARMACEUTICAL SOCIETY OF GREAT BRITAIN TO  
THE GENERAL OSTEOPATHIC COUNCIL LEGISLATIVE REVIEW CONSULTATION  
QUESTIONNAIRE**

Questions responded to:

- Q1. The Register in book form should be kept indefinitely but distributed only on request.
- Q2. A Deputy Registrar should be appointed
- Q3. Registration fees should be set by the Council
- Q5. “Sufficient health” should not replace “good health” as a condition of registration
- Q6.1 Newly registered osteopaths should be supported during their initial period of practice
- Q6.2. There should be a mandatory and formal support scheme
- Q6.3 During the initial period, newly registered osteopaths should have a supervisor
- Q6.4 The “initial period” should be defined as one year
- Q9.1 Previously registered osteopaths who have not practised for a specified period of time should be assessed before being restored to the register
- Q9.2 The assessment should include a practical assessment
- Q9.3 The specified period should be 12 months
- Q12.1 The registration renewal processes should be consolidated by introduction of an annual licensing system
- Q12.2 Practitioners who fail to renew registration by the due date should lose their registered status
- Q12.3 Practitioners who have good reason for failure to renew should be able to renew their registration status
- Q13.1 The General Osteopathic Council should not be allowed to bring fitness to practise proceedings against *former* registrants
- Q14.1 Applications for registration should not be considered for a minimum of five years following removal by the Professional Conduct Committee
- Q14.3 Further applications for restoration should only be allowed 12 months after a previous unsuccessful application
- Q15.3 The Registrar {or Registration Committee} should be able to place conditions on initial registration
- Q15.4 The Registrar [or Registration Committee] should be able to remove or suspend registration for failure to comply with conditions
- Q16.1 An Appeal Tribunal should hear appeals against the decision of the Registrar
- Q17.1 There should *not* be an appeal fee to deter unmeritorious appeals
- Q18.1 The Act and Rules should *not* refer to complaints rather than allegations
- Q18.2 The Act and Rules should make it clear that the General Osteopathic Council may initiate complaints on its own volition

- Q18.3 The General Osteopathic Council should be able to investigate and determine complaints relating to overseas convictions
- Q18.4 The General Osteopathic Council should **not** be allowed to treat findings of other regulators as proof of the facts
- Q20.1 The Investigating Committee should give reasons for its decision
- Q21.1 The Investigating Committee should have power to dispose of cases by “Agreement Orders”
- Q21.3 The Investigating Committee should have power to dispose of cases by “Advice Letters”
- Q22.1 The Investigating Committee should have power to summons documents
- Q23. The Investigating Committee should have sole authority to instruct lawyers to draft charges
- Q25.1 Suspensions imposed by other regulators should not act as an interim suspension by the General Osteopathic Council
- Q26.1 The length of time for interim orders should be extended to 18 months
- Q27.1 The Investigating Committee should be able to impose interim conditions of practice orders
- Q28.1 Interim suspensions should be considered by an Interim Suspensions Committee
- Q29.1 The sanctions available to the Professional Conduct Committee should be extended to include reprimands; immediate suspension; and declarations of unfitness
- Q30 The Professional Conduct Committee should impose a sanction after a finding of guilt
- Q31.1 The maximum period of a conditions or suspension order should not exceed 3 years
- Q32.1. The Council should be given power to impose suspension or removal from the Register, following a breach of an order imposing conditions or suspension
- Q33.1 The Professional Conduct Committee should be able to give guidance to practitioners who have been acquitted
- Q35.1 The objects of the General Osteopathic Council should be stated in the Act
- . Q36.1 The requirement to undertake CPD should be stated in the Act
- Q43.1 The requirement for Council members to sit on Professional Conduct Committee should be removed
- Q44.1 The Chairman of the Council should not sit on Fitness to Practise Committees
- Q46.1 Chairmen should not have a casting vote
- Q46.2 Committee members should not be allowed to abstain from voting
- Q48 Legal and Medical Assessors who advise Committees should be independent of Council.

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