

## Registration fees consultation

The GOC is seeking feedback on whether changes are needed to its schedule of registration and retention fees.



## About the General Optical Council

### Introduction

The General Optical Council (GOC) is one of 13 organisations in the UK known as health and social care regulators. These organisations oversee the health and social care professions by regulating individual professionals. We are the regulator for the optical professions in the UK. The Council currently registers around 23,500 optometrists, dispensing opticians, student opticians and optical businesses.

### Mission and values

The GOC's mission is to protect the public by promoting high standards of education, conduct and performance amongst opticians. Our work is built on a foundation of six core values. These values are based on the Better Regulation Commission's criteria for good regulation.

#### **Proportionate:**

We will identify and target the issues of greatest risk to public safety.  
We will remove unnecessary bureaucracy.

#### **Accountable:**

We will seek, and respond to, the views of stakeholders and partners.  
We will consider and review the consequences of our actions.

#### **Consistent:**

We will work in collaboration with UK health regulatory bodies and other partners to develop consistent policies and procedures.

#### **Transparent:**

We will explain and publicise decisions, and make public, wherever possible, Council information, activities and proceedings.

#### **Targeted:**

We will ensure that our activity is focused on the areas of greatest risk, or where there is most benefit to public health and safety.

#### **Organisational Excellence:**

We will provide good value for money.  
We will pursue high standards of customer service.  
We will ensure that the Council is a good place to work, particularly through developing and training our staff and members.  
We will promote and develop equality and diversity in all our work.

### Contact details

Address: 41 Harley Street, London, W1G 8DJ  
email: [goc@optical.org](mailto:goc@optical.org)

tel: 020 7580 3898  
web: [www.optical.org](http://www.optical.org)

## Responding to the Consultation

### Respond to

Please send your responses to **Matthew Tait**, Policy and Projects Officer, no later than **9 October 2009**.

Post: 41 Harley Street, London, W1G 8DJ

Email: [mtait@optical.org](mailto:mtait@optical.org)

This document is an open consultation on possible changes to the GOC's schedule of registration and annual retention fees. We will use your responses to inform decisions on whether the GOC's existing fee structure is as fair as possible to all registrants, or if changes are needed. We have identified a range of potential changes that we would particularly like feedback on; however, if you have any suggestions for alternative approaches to the fee structures, we would be happy to receive these.

Please include contact details so that we can follow-up any relevant aspect of your response. Unless you state otherwise (and an automatic disclaimer generated by your IT system will not be taken as such), we will assume you are happy for us to publish your response and to share it with other appropriate bodies and stakeholders.

### Further information

Where possible, please provide evidence to support your response. If you are a representative group, it would be helpful if you could include a summary of the people and organisations that you represent.

If you have any queries about the consultation then please contact Matthew Tait on 020 7307 3472 or [mtait@optical.org](mailto:mtait@optical.org).

### The GOC's commitment to consultation

The General Optical Council believes it is important that the people affected by our work have a say in how we deliver it. We believe it is vital to consult with all the groups with an interest in the GOC; patients, the public, our registrants, optical organisations, healthcare organisations, employers, other regulators, staff and other stakeholders.

Effective consultation is valuable to help us improve the way we work. It informs us and helps us to achieve our mission of protecting the public through promoting good eye care.

Feedback on the consultation process itself would be welcome. If you have any comments then please contact **Simon Grier** on [sgrier@optical.org](mailto:sgrier@optical.org).

## Consultation summary

**Start date:** 17 July 2009

**End date:** 9 October 2009

**Results published:** Consultation summary to be published in November 2009. Decisions on any changes will be announced following the Council meeting in November.

**Contact:** Matthew Tait. 020 7307 3472, [mtait@optical.org](mailto:mtait@optical.org)

### Consultation summary

1. The GOC is currently considering whether to amend our schedule of registration and retention fees. We have received some suggestions for changes to the fee schedule, and are seeking views on a range of possible options.
2. One proposal that we have been asked to consider is the introduction of differential fee levels, under which some groups of registrants may pay lower fees relative to other registrants. We are also considering making it possible for registrants to spread their registration/retention fee payments over a number of instalments, and other fee options.
3. We are seeking views from our stakeholders on these proposals, and any information relevant to the consultation. We would also be interested in other suggestions or issues which should be considered by the GOC in setting its registration/retention fee schedule.
4. We will issue a consultation summary in November 2009. Responses to the consultation will inform decisions by the Council at its meeting on 18 November 2009 on any changes to the fees schedule. Any changes to the registration and retention fee schedule will be announced following that meeting.

## Background

Registration fees are the GOC's primary source of income – we do not receive any government funding, nor do any fines awarded in court or fitness to practise cases come to the GOC. The GOC is committed to keeping costs down for registrants while fulfilling our statutory role and ensuring public protection.

The GOC's registration and retention fees remain among the lowest of all the UK health and social care regulators. Full information about the GOC's budget and expenditure is available on the GOC website, [www.optical.org](http://www.optical.org). A copy of the GOC's full fee schedule for 2009/10 is attached as Annex 1 to this document.

The GOC wishes to ensure that our registration fee schedule is reasonable and proportionate for all registrants, and so we are reviewing our existing fee structure. We have also recently been asked by some optical bodies and practitioners to consider making changes to the existing fee schedule, to reduce the fee burden on some registrants.

There may in the future be some changes to the fee schedule associated with the revalidation process, currently expected to begin around 2012. For instance, we may consider having separate fees for retention and a new 'licence to practise'. This might reduce the burden on registrants taking a career break or not currently practising for any reason. Therefore, some possible options for changes to the registration fee schedule may be more appropriately considered alongside the work to prepare for the introduction of revalidation and as a result have not been included in this consultation.

Some options discussed in this consultation document will be dependent on changes being made to legislation. The timetable for achieving legislative change is set by the Department of Health. As a result, some options may not necessarily be able to be implemented in time to be in place for the next registration year.

## 1. Differential fee levels

### Background

Many other UK health regulatory bodies apply different registration fees to different groups of registrants, rather than a single flat fee for all registrants.

At present the GOC applies a single flat fee to all its registrants, on the basis that they have the same status and receive the same service. If this is the case, a differential fee structure could be seen as unfair to some registrants. We would be interested in feedback on the fairness and need for applying different levels of fees to different registrant groups, and on the practical issues involved with applying differential fees.

We note that in all but one case, the regulators that apply differential fees to different groups of their practising registrants have significantly higher base fee levels than the GOC. A lower base fee might mean that there is less need for differential fees.

We are also aware that, in many cases, employers pay the registration and annual retention fees of their employees, but we do not have information on the full extent to which this happens. We would be interested in receiving views on the extent and implications of this practice for registrants.

**Question 1** If you are an employer, do you pay the GOC registration and annual retention fee for your employees? If so, for how many employees? Are these optometrists, dispensing opticians or student registrants?

If you are an employee, does your employer pay the GOC registration and annual retention fee for you? Are you an optometrist, dispensing optician or student registrant?

**Question 2** Does the fact that many employers pay the registration fees of their employees have any implications for the way the GOC sets registration fees? Does it affect any particular group of registrants more?

### *a. Reduced fees for dispensing opticians*

#### Context

Some other health regulators that regulate more than one profession apply different registration/retention fees to practitioners from the different professions. In this context, of particular relevance are:

- **The General Dental Council**
  - Dentists - £438
  - Dental care professionals (eg dental nurses) - £96

- **The Royal Pharmaceutical Society of Great Britain**
  - Pharmacists - £413 retention plus a registration fee
  - Pharmacy technicians - £135 retention plus variable registration fees.

It should be noted that in both examples above there are considerable differences in the levels of training and earning potential between the professions concerned.

### **Impact of different GOC practitioner fees**

There are currently 11,961 optometrists registered with the GOC, and 5,532 registered DOs. As there are significantly fewer DOs, it may be possible to reduce the fees paid by DOs without greatly increasing the fee that optometrists would need to pay to compensate.

The following table shows, as an example, the possible impact of differential fees on each group, based on the GOC's 2009/10 budget:

Table 1: Possible impact of lower DO fees on optometrist fees

Dispensing Opticians	Optometrists
£219 (current)	£219 (current)
£200	£227.50
£175	£239
£150	£250

### **Relative incomes**

The GOC does not collect data on the relative incomes of optometrists and dispensing opticians. We understand, however, that DOs generally (though not always) earn less than optometrists. This might justify applying lower registration and retention fees for all DOs, as the registration fee would impose a higher burden on this group.

### **GOC expenditure**

It is likely that the GOC expends proportionately more of its budget on optometrists than DOs, even accounting for the smaller number of DOs on the register.

The GOC's largest area of expense is fitness to practise (27% of the total GOC budget in 2009/10):

- Of 165 GOC registrants subject to fitness to practise complaints in 2007/08, 123 were optometrists (74.5%), while optometrists make up 51.2% of total registrants.
- In the same period 26 DOs (15.75%) were the subject of a complaint, while DOs make up 23.9% of total registrants.

This distribution of fitness to practise complaints has been broadly consistent in recent years. Additionally, of 49 substantive hearings held since March 2006, 35 have involved optometrists (71.4%), while eight have involved DOs (16.3%).

If the GOC is spending proportionately more time and resources on optometrists, there may be an argument for reducing the level of registration fees for DOs to reflect this imbalance in expenditure.

### ***b. Reduced fees for new registrants***

#### **Context**

Some other UK health regulators apply a reduced registration fee for new registrants/recent graduates, rather than for specific professional groups. The key schemes of this type are:

- **The Health Professions Council:** 50% lower fee for the first two years on the register (£38 rather than £76 per year) – only available to recent UK graduates.
- **The General Osteopathic Council:** 50% lower fee in first year on the register, 25% lower in second year (full annual fee = £750) – UK graduates only.

#### **Lower incomes of recent graduates**

Recent graduates entering the register for the first time are likely to earn relatively lower incomes than experienced practitioners. However, the GOC does not have specific information about the relative salaries of recent graduates and more experienced employees.

It is reasonable to assume that both recently-registered DOs and optometrists earn relatively lower incomes than more experienced practitioners. Therefore it might be more appropriate to apply a reduced fee to all new registrants, rather than all DOs as outlined in the previous section.

#### **Impact on other fees**

A reduced fee for new registrants would not increase administrative costs for the GOC. However, the loss of income created by this lower fee would be likely to require a modest fee increase for other registrants, in order to maintain the GOC's income at the level necessary to fulfil our statutory role.

For example, in 2009/10, there were approximately 900 new fully-qualified GOC registrants. If those new registrants had paid 50% lower fees in their first year of registration, this would have created a shortfall of approximately £100,000 in the 2009/10 GOC budget, based on existing fee levels. All other things being equal, this level of differential fee for new registrants might therefore require a fee increase for other registrants of approximately £5 per year.

### ***c. Reduced fees for low income earners***

#### **Context**

The other form of differential registration fee currently adopted by UK health regulators is a fee discount for low income earners. The key schemes of this type are:

- **The General Medical Council:** Low income fee reduction (income less than £21,862) – 50% lower annual fee (£205 rather than £410).
- **The Royal Pharmaceutical Society of Great Britain:** Low income fee reduction (income less than £16,500) – annual fee reduced to £275 (from £413).

#### **Fairness of a low income fee reduction**

Applying a general low income fee reduction might in some respects be fairer than a reduction which is only available to particular groups of practitioners (such as DOs or new registrants). For instance, while many DOs may have lower incomes than optometrists, this will not always be the case. A low income fee reduction would help to ensure that only those who need help with paying the registration fee receive a reduction.

A low income fee reduction might benefit practitioners with a range of different circumstances, such as: part-time workers; those taking career or study breaks; those having health problems; those currently unemployed; those on maternity/paternity leave; or those working in low income countries or undertaking charity work.

#### **Criteria and administration issues**

Existing low income fee reduction schemes require registrants to make a declaration that, in the forthcoming year, their annual income from all sources will be below the threshold set by the regulator. Confirmation of actual income may be requested at the end of the year, and if earnings exceed the threshold, the registrant is required to immediately inform the regulator and pay the remainder of the full annual fee. Registrants are required to provide, upon request, copies of payslips, bank statements or other proof of income documents.

Creating a low income fee reduction may impose a significant administrative burden on the GOC. Considerable staff resources might be needed to assess eligibility for the scheme, deal with any potential false declarations, and follow up outstanding payments. This would have implications for fee levels for other registrants.

As noted above, the GOC does not collect information on registrants' incomes, and it is therefore not possible to accurately predict take-up of a GOC low income fee reduction. Depending on take-up of the scheme and the level of the reduction, it could significantly reduce the GOC's income.

In order to maintain income at the level needed to effectively fulfil our role, the GOC would need to increase the fee for other registrants. It is not possible to

predict at this stage the extent of such an increase. We would be interested in views on the appropriate level of the maximum income threshold for accessing a low income fee reduction, if this was introduced.

As noted earlier, all but one of the regulators applying differential fees have significantly higher base fee levels (£400-£750 per annum) than the GOC (£219 per annum). It may be that a lower base fee reduces the need for discounted fees for particular groups. The potential costs of administering a low income fee reduction would need to be balanced against the benefits for registrants.

**Question 3** Do you think that the GOC should put in place a differential registration/retention fee structure, or should the existing flat registration/retention fee for all registrants be retained?

**Question 4** If you believe that there should be a differential fee structure - do you believe that lower fees should be paid by DOs, new registrants, or low income earners? Or is there another group that should pay reduced fees? Please explain your answer.

**Question 5** If you believe that a particular group should pay lower fees, what do you believe should be the level of the reduction, taking into account the impact this might have on the fees of other registrants? Why?

**Question 6** If the GOC applied a general low income fee reduction, what do you believe would be an appropriate maximum income threshold to receive the reduction? Why?

## 2. Staged fee payments

### Context

Some other UK health regulators allow registrants to spread the payments for their annual retention fee over a number of instalments, using Direct Debit instructions. This provides registrants with flexibility in managing their payments. In the majority of cases, the regulators offering staged payments have considerably higher registration and retention fees than the GOC.

In cases where the registrant misses a staged Direct Debit payment, the regulators have adopted different approaches. Either the Direct Debit is stopped immediately and a letter sent out requesting the full payment of the remaining fee, or the registrant is given a grace period to provide the instalment payment and the Direct Debit resumed. Where the instalment is not received within the timeframe, the registrant will be removed from the register.

### Administration costs and implementation issues

Under its current Registration Rules, the GOC may not currently be able to offer staged payments. This is due to the drafting of the Rules, which are expressed in terms of a single 'application fee' and which require a notice to

be sent out by 15 March in the event of non-payment. Offering staged payments may create uncertainties around the legal status of a registrant in the event of a non-payment of an instalment, unless the Rules are amended.

While possible, amending the Registration Rules would be a complex and time-consuming process, and the legislative process involved would delay any implementation of staged payments. Before beginning this work, the GOC would like stakeholders' views on the necessity and priority of providing a staged payment option to registrants. Alongside the consultation, the GOC is also currently exploring alternative ways of offering staged payments which might not require a change to the Registration Rules.

Initial implementation and ongoing administration of staged payment arrangements would impose some costs on the GOC, particularly following up missed payments. This might require an increase to fees for all registrants. Alternatively, those wishing to take up the option of staged payments could be required to pay a slightly higher fee to compensate for the additional costs

**Question 7** How important do you think it is that the GOC offers registrants the ability to make staged payments of the annual retention fee?

**Question 8** Do you believe that any additional costs associated with implementing staged payments should be borne by all registrants, or by those wishing to take up the option of paying by instalments?

### 3. Other fee proposals

#### *Online retention*

The GOC is currently working to implement a full online retention system, which will give registrants more control of the retention process. Online retention will allow all registrants to update their personal and contact details, complete their retention application and pay the appropriate fee online, and should reduce problems such as forms being lost in the post or errors in data processing resulting from paper forms. This will provide a more accessible and user-friendly service for registrants, and allow the GOC to improve its service delivery.

We expect that, over time, increasing numbers of registrants will choose to complete their retention online rather than by paper copy. We would be interested in views on whether the GOC should continue to retain a paper-based retention option once the online system is in place, or whether once most registrants are applying for retention online we should consider requiring all registrants to apply in this way.

As long as the GOC retains paper-based retention, it may be appropriate for registrants using online and paper retention to pay slightly different retention fees. Paper-based retentions would impose higher costs on the GOC relative to online retention, such as postage, printing and additional staff time for data

processing and filing. A slightly higher fee for paper retention would reflect this imbalance and encourage registrants to apply for retention online, which would save paper and postage and help GOC staff deliver a better service for all registrants.

**Question 9** Should the GOC consider requiring all registrants to apply for retention online, and if so, when should this come into effect? Or should we always retain a paper-based retention option?

**Question 10** If the GOC retains paper-based retention, should we charge different fees for those applying for retention online and by paper copy, to reflect the different costs of each process?

### ***b. Non-EEA exam registration***

At present, DOs and optometrists who have qualified outside of the European Economic Area (EEA) are required to sit an exam to prove their competence to work in the United Kingdom. These non-EEA qualified practitioners are required to register as students in order to sit the UK qualifying exam. After qualifying in the UK the practitioner may transfer to the full DO or optometrist register. If they do not pass the exam, they are no longer eligible to be registered as students and their names are removed from the register.

There have been cases where non-EEA-qualified practitioners have failed to pass the UK qualifying exam, but have not informed the GOC in order to be removed from the student register, and have begun practising in the UK as pre-registration trainees on the student register. As a result, the GOC will now only register these non-EEA practitioners for the four days during which they sit the exam.

After the exam they are automatically removed from the student register, but have one month from the time the results are available during which they can take advantage of the pro rata rate for full registration as a GOC practitioner, should they pass the exam.

Currently, the GOC registers these non-EEA practitioners under the general 'student registration' category, and charges the corresponding £20 fee. However, we wish to alter the fee schedule to distinguish non-EEA practitioners from student registrants. This will assist in clarifying that non-EEA practitioners will not be registered as students for the full year.

The GOC intends to add a separate category to the fee schedule for non-EEA practitioners sitting the qualification exam, and to charge a one-off administration fee of £20. We would be interested in any views on the appropriateness of this proposal.

**Question 11** Do you believe that the GOC should charge non-EEA practitioners a one-off £20 administration fee, for registration during the time that they are sitting the qualifying exam?

### ***c. Specialty registration***

In addition to basic registration as a practising dispensing optician or optometrist, GOC registrants must also have a specialty entered against their name on the register in order to practise particular specialties within their profession (contact lens specialty for dispensing opticians, and additional supply, supplementary prescribing and independent prescribing specialties for optometrists).

Most relevant UK health regulators charge a fee for registration of a specialty, additional to the base registration/retention fee:

- **General Dental Council:** annual £52 retention fee for each specialty (in addition to the base registration/retention fee of £438).
- **The Royal Pharmaceutical Society of Great Britain:** one-off £51 fee for annotation to the register as a supplementary or independent prescriber (in addition to the base registration/retention fee of £413).
- **Pharmaceutical Society of Northern Ireland:** one-off £25 fee for annotation to the register as a supplementary or independent prescriber (in addition to the base registration/retention fee of £372).

At present, the GOC does not require an additional fee to be paid for entry of a specialty. This means that costs associated with processing applications and maintaining specialty entries are currently borne by all registrants.

We would like feedback on whether it would be more appropriate for registrants applying for registration of a specialty to pay a separate fee. The GOC would propose that this fee would be a one-off registration fee rather than an annual retention fee in most cases.

However, practitioners with an independent prescribing specialty will be required to provide additional information as part of the annual retention process to renew their specialty. There will be additional processing costs to check these returns. If these practitioners pay a one-off specialty registration fee then recurrent additional costs will be borne by all registrants. Therefore, we would welcome feedback as to whether practitioners in this category should pay an additional annual retention fee for renewing their specialty registration.

**Question 12** Do you believe that the GOC should require those applying for entry of a specialty to pay an additional one-off registration fee, to cover the costs of processing that registration?

**Question 13** Should practitioners with an independent prescribing specialty pay an additional annual retention fee for renewing their specialty registration?

## Annex 1: the registration fees rules 2009/10

Each application falling within a category set out in the table below shall be accompanied by the fee shown:

<b>Applications for registration</b>	<b>Fee</b>
Application for registration in the register of optometrists or the register of dispensing opticians for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£219
Application for registration in the register of student optometrists or the register of student dispensing opticians for all or part of the year commencing on 1st September 2009 and ending on 31st August 2010	£20
Application for registration in the register of bodies corporate carrying on business as an optometrist or dispensing optician or both for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£219

<b>Applications for retention of registration</b>	<b>Fee</b>
Application for retention in the register of optometrists or the register of dispensing opticians for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£219
Application for retention in the register of student optometrists or the register of student dispensing opticians for all or part of the year commencing on 1st September 2009 and ending on 31st August 2010	£20
Application for retention in the register of bodies corporate carrying on business as an optometrist or dispensing optician or both for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£219

<b>Late applications for retention of registration</b>	<b>Fee</b>
Application for retention to the register of optometrists or the register of dispensing opticians for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010 received after 15th March 2009 and before 31st March 2009	£239
Application for retention to the register of student optometrists or the register of student dispensing opticians for all or part of the year commencing on 1st September 2009 and ending on 31st August 2010 received after 15th July 2009 and before 31st August 2009	£30
Application for retention to the register of bodies corporate carrying on business as an optometrist or dispensing optician or both for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010 received after 15th March 2009 and before 31st March 2009	£239

<b>Applications for transfer of registration</b>	<b>Fee</b>
Application for transfer between full registers for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£70
Application for transfer from the register of student optometrists to the register of optometrists for each period of three whole calendar months on the full register commencing 1st April 2009 and ending 31st March 2010	£54.75 per 3 months
Application for transfer from the register of student dispensing opticians to the register of dispensing opticians for each period of three whole calendar months on the full register commencing 1st April 2009 and ending 31st March 2010	£54.75 per 3 months

<b>Applications for restoration of registration</b>	<b>Fee</b>
Application for restoration to the register of optometrists or the register of dispensing opticians following removal or erasure from the registers for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£289
Application for restoration to the register of student optometrists or the register of student dispensing opticians following removal or erasure from the registers for all or part of the year commencing on 1st September 2009 and ending on 31st August 2010	£40
Application for restoration to the register of bodies corporate carrying on business as an optometrist or dispensing optician or both following removal or erasure from the registers for all or part of the year commencing on 1st April 2009 and ending on 31st March 2010	£289

*Rosie Varley*  
Chair of Council

*Geoff Harris*  
Deputy Chair of Council

*Dian Taylor*  
Acting Registrar

## Annex 2: Consultation response form

### How to respond

Please send your responses to **Matthew Tait**, Policy and Projects Officer, no later than **9 October 2009**.

Post: 41 Harley Street, London, W1G 8DJ

Email: [mtait@optical.org](mailto:mtait@optical.org)

Alternatively, visit [www.optical.org](http://www.optical.org) where you will find an electronic version of this form.

### Response form template

#### Your Details

Name:

Address:

Telephone number:

Email:

#### Are you replying on behalf of an organisation?

Name of the organisation:

Your position:

Nature of the organisation's work:

#### Keeping in touch

Because we value your input, we would like to contact you occasionally to let you know when we launch consultations and to invite you to future events. We will not pass your data on to any third party. Please tick here if you do not wish to be contacted in this way about the GOC's consultations:

**Question 1** If you are an employer, do you pay the GOC registration and annual retention fee for your employees? If so, for how many employees? Are these optometrists, dispensing opticians or student registrants?

If you are an employee, does your employer pay the GOC registration and annual retention fee for you? Are you an optometrist, dispensing optician or student registrant?

**Question 2** Does the fact that many employers pay the registration fees of their employees have any implications for the way the GOC sets registration fees? Does it affect any particular group of registrants more?

**Question 3** Do you think that the GOC should put in place a differential registration/retention fee structure, or should the existing flat registration/retention fee for all registrants be retained?

**Question 4** If you believe that there should be a differential fee structure - do you believe that lower fees should be paid by DOs, new registrants, or low income earners? Or is there another group that should pay reduced fees? Please explain your answer.

**Question 5** If you believe that a particular group should pay lower fees, what do you believe should be the level of the reduction, taking into account the impact this might have on the fees of other registrants? Why?

**Question 6** If the GOC applied a general low income fee reduction, what do you believe would be an appropriate maximum income threshold to receive the reduction? Why?

**Question 7** How important do you think it is that the GOC offers registrants the ability to make staged payments of the annual retention fee?

**Question 8** Do you believe that any additional costs associated with implementing staged payments should be borne by all registrants, or by those wishing to take up the option of paying by instalments?

**Question 9** Should the GOC consider requiring all registrants to apply for retention online, and if so, when should this come into effect? Or should we always retain a paper-based retention option?

**Question 10** If the GOC retains paper-based retention, should we charge different fees for those applying for retention online and by paper copy, to reflect the different costs of each process?

**Question 11** Do you believe that the GOC should charge non-EEA practitioners a one-off £20 administration fee, for registration during the time that they are sitting the qualifying exam?

**Question 12** Do you believe that the GOC should require those applying for entry of a specialty to pay an additional one-off registration fee, to cover the costs of processing that registration?

**Question 13** Should practitioners with an independent prescribing specialty pay an additional annual retention fee for renewing their specialty registration?