

Processes used by nine health and care professional regulatory bodies in the UK to register applicants trained and applying from outside of the European Economic Area (EEA)

Rapid review by the Professional Standards Authority

October 2013

1. Introduction

- 1.1 We received a commissioning letter from the Department of Health on 1 August 2013, in accordance with section 26A of the NHS Reform and Health Care Professions Act 2002. The letter asked us to review the processes used by the nine regulators¹ whom we oversee for registering international applicants, that is, those trained and applying from outside the European Economic Area (EEA). The letter also asked us to ask the regulatory bodies to give assurance as to the level of confidence that they have in the robustness of their current policies and processes, and to highlight any areas of concern. It also asked us to review any recent significant changes, and suggested a range of data that could form an evidence base.

2. Process

- 2.1 As a first stage in this work, we researched the information available on the regulators' websites, and for each regulator compiled a document setting what we could find out about their processes and forms of assurance, and with specific questions to each regulator on any areas where we were unclear or required further information. We sent these documents to the regulators and received replies back from all of them.
- 2.2 We also asked the regulators to provide data on the number of applications received annually for registration from international applicants; a breakdown by country of the numbers of registrants held by each regulator; and comments on any trends in numbers of applications.

3. Approach to summarising the data

- 3.1 The regulators have all supplied detailed data to us about their processes. Because of the range of practice and differences in approach it would be extremely difficult to compare the processes side by side. Instead, we have attempted to identify the common points on which each process is trying to

¹ General Chiropractic Council, General Dental Council, General Medical Council, General Optical Council, General Osteopathic Council, General Pharmaceutical Council, Health and Care Professions Council, Nursing and Midwifery Council, Pharmaceutical Society of Northern Ireland

assure itself, and to provide supporting evidence for each as to how this is being met for each. Later in this report we have provided detailed (but not exhaustive) evidence for each regulator on how it satisfies itself for each of the professions regulated that the different requirements are met.

- 3.2 The common dimensions of assurance that we have identified are:
- The applicant's language ability
 - The applicant's identity
 - The applicant's academic qualification
 - Proof of the applicant's registration overseas
 - Any requirements for the applicant to provide evidence of experience or practice overseas
 - Any additional training, adaptation programme or exam required to be taken in the UK
 - Any other checks or forms of assurance
 - The currency of documents or decisions in the process.
- 3.3 We have also identified some points of interest or notable practice – again this is to be taken as illustrative and not comprehensive.
- 3.4 We have also provided summary statistical information in an appendix.

4. Findings and limitations of this exercise

- 4.1 We have found that all of the regulators have measures in place to assure themselves that international applicants are safe and fit to practise, with checks in place to ensure that applicants have relevant and current qualifications, adequate language ability, and that the documents that they bring forward in support of their application and their identity are authentic. Across the nine regulators there are differences in the details of their approach, and we would encourage regulators to review this report and reflect on whether the practice of other regulators could inform their own.
- 4.2 However, this has only been a paper and desk-based exercise. We are not able to comment on the regulator's performance with regard to the measures they have described to us, or to comment, for example, on how effective or appropriate these measures are in the absence of more evidence of the risks that they are seeking to manage. We would not want to suggest that any specific measures should be adopted by all of the regulators as good practice without further analysis of the risks and their prevalence.
- 4.3 With regard to the question of the regulators' confidence in their own procedures, some have expressed general confidence with recognition of the scope for continuous improvement, with some acknowledging a small number of minor weaknesses which will be addressed. Although the descriptions of the processes that have been provided appear to be thorough and detailed, we do not think it would be appropriate for us to express an opinion given that this has been purely a desk-based exercise. A logical next step would be to commission

an audit of registrations in these circumstances, to test the effectiveness with which the regulators are applying their own processes.

5. Dimensions of assurance

- 5.1 In this section we have set out the 'dimensions of assurance' under which we have summarised the regulators' processes, and provided some examples of the range of approaches taken by the regulators under each.

Language ability

- 5.2 In the majority of cases the regulators require applicants to provide evidence of their language ability by having passed the academic version of the IELTS exam (International English Language Testing System). The exam has four sections (speaking, writing, reading, listening) and the regulators usually require an average score and a minimum below which no single score must fall. The level required by each regulator with any differences for different regulated groups is set out in detail in the section of this report giving examples of the detailed requirements of each regulator. The highest level required is for Speech and Language Therapists who must achieve IELTS 8.0 with no element below 7.5 (or TOEFL 118/120). The lowest requirement is applied to dental nurses and dental technicians who must achieve a minimum overall score of 6.0, with no less than 6 in speaking and writing and no less than 5.5 in the reading and listening.
- 5.3 In some cases, for example the Health and Care Professions Council, other examination results are accepted, or the applicant can make a declaration that English is their first language. Several regulators make use of the IELTS results online verification service, and require applicants to provide the original Test Results Form. We note that some attend IELTS seminars amongst other forms of engagement.
- 5.4 In a small number of cases (the General Chiropractic Council and pharmacy technicians at the General Pharmaceutical Council) there is no specific test result required, but assurance is provided by the applicant's ability to pass the test that is required before registration is granted – the Test of Competence for chiropractors and the level 3 qualifications required of pharmacy technicians.

Identity checking

- 5.5 All of the regulators require applicants to produce either originals or certified copies of key documents including photographic evidence to provide their identity – usually their passport, their birth certificate, and other documents where their name has changed for example marriage or civil partnership certificate. There are differences in detail regarding acceptable forms of certification. Usual practice involves cross checking of documents to ensure that names and details of qualifications are consistent across all of them, and liaison with institutions offering any necessary examinations or test aimed to ensure that the person taking the test is the same as the person who has applied. We notice that some regulators make use of an online source of verification of

document authenticity, the Keesing global documents database. This may merit attention from other regulators.

Proof of overseas qualification; is the qualification recognised?

- 5.6 In many cases, the regulator requires the applicant to hold a recognised qualification, or to hold a qualification which meets specific criteria relating to hours of study and particular curriculum elements. In these cases, applicants are universally required to prove that they hold the qualification in question, by producing their original certificate or certified copy, and/or the transcript or detailed breakdown of modules studied and the applicant's scores for each. In some cases as an alternative this information can be completed as a form or in a letter, directly from the University/educational institution involved.
- 5.7 We note the engagement of many regulators with UK NARIC – the National Academic Recognition Information Centre – including their general guidance, advice on counterfraud checks, courses on identifying fraudulent documents, and in some cases there is a specific requirement for the applicant to provide a NARIC statement of comparability of the qualification.
- 5.8 In some cases there is a specific assessment of individual applications, including the applicant having to set out in detail how their qualification and experience equip them for practice in the UK, which is then considered as evidence towards registration or whether any further examination, test or other assurance is required for the application to proceed.

Proof of registration overseas

- 5.9 In the vast majority of cases regulators require certificates of good standing or equivalent proof from the applicant's country of qualification or other country of practice, stating that the applicant is legally entitled to practise in that country and that they have not been suspended, disqualified or prohibited. In many cases the requirement for certificates of good standing goes back five years. In some cases the statement is provided via the applicant, whereas in others the regulator will only receive the application directly from the regulatory body or other authority. We also note that in some cases the UK regulatory body will contact the overseas regulatory body directly, and in others the overseas regulator is asked to provide other details (such as date of birth and details of qualification) to provide for further cross-checking of the authenticity of the application. In general, the requirement that documents are submitted direct to the regulator from another institution, rather than via the applicant, would appear to offer an additional degree of assurance.

Evidence of experience/practice overseas

- 5.10 In some cases the applicant must have completed a specified period of practice overseas, and this must be evidenced for example through an employer reference. In other cases, although a specific period of practice is not required, applicants must nonetheless provide a detailed CV, and references, for all employment. This CV must in some cases include detailed information on roles and responsibilities.

Additional training/adaptation programmes/exam required in the UK

- 5.11 In some cases, applicants must pass an exam specifically designed for non-EEA applicants, or successfully complete an adaptation programme. In others, the applicant must complete UK exams. The requirements are set out in detail later in this report.

Other checks and forms of assurance

- 5.12 Other checks and forms of assurance which feature in the processes include:
- Requirement for GP medical reports
 - Requirement for police record checks
 - Requirement for evidence of professional indemnity cover
 - Requirement for character references
 - Requirement that all documents not in English are translated by an authorised translator
 - A single member of staff attached to a particular applicant throughout the process
 - Requirement for enhanced check for regulated activity (Disclosure and Barring Service)
 - Internal and external audit of processes
 - Monitoring of trends in Fitness to Practise concerning registrants from outside the EEA, feeding back learning into service improvement.

Not all of these are required by all of the regulators.

Currency of documents and other decisions

- 5.13 All of the processes feature at different points time limits on the currency of documents and decisions. For example, the IELTS result being only valid for two years; limits on the time allowed to register after completing the relevant exam; certificate of professional good standing must be no more than three months old.

6. Recent significant changes

- 6.1 The commissioning letter asked us to identify recent changes to practice. These include:
- NMC has strengthened requirements for document certification and ID checking, including requirements for stamps on third party documents. However, they note that this has slowed down the processing of applications
 - GMC has introduced changes to the alternative evidence policy for language ability

- GDC has introduced requirement for applicants to provide a UK NARIC statement of comparability
- GDC has amended and revised the application forms for dental care professional applications
- GDC has taken steps to improve the security of its Part 1 and Part 2 question banks
- GOsC has reviewed registration requirements and assessments in the light of new Osteopathic Practice Standards
- GCC has reduced the requirements to submit all documentation before the test of competence, all documentation must now be submitted prior to registration
- PSNI has reviewed pre-registration standards in 2012 to make them more robust, fair and transparent.

7. Future changes to processes

7.1 The commissioning letter asked us to review recent significant changes to processes. These include:

- NMC is consulting on the introduction of a competence test to replace the adaptation programmes
- NMC plans the imminent introduction of face to face ID checks with passport scanning
- Several regulators are planning to review their processes for such applications (GDC) and to review specific exams (GOC/College of Optometrists, GMC re PLAB test, GCC test of competence)
- GMC is planning to consult on limits to the time for which doctors can be provisionally registered
- HCPC plans to create a separate application form for those applying from outside the EEA
- HCPC continues to develop a database of contact details for education providers and regulatory and professional bodies around the world.

Annex 1 – Examples of forms of assurance used by each of the regulators

Regulator	General Chiropractic Council
Language ability	No specific requirement; language ability proven through ability to pass test of competence.
Identity checking	<ul style="list-style-type: none"> • Copy of passport • Original birth certificate • Original marriage certificate • Change of name deeds • Originals of any naturalisation papers
Proof of overseas qualification; is the qualification recognised?	<p>Must have completed a course in chiropractic of 4,800 hours or a first degree in human science plus 2,200 hours study in chiropractic. No automatic recognition of any non-UK course.</p> <p>Certified letter from academic institution required. Letter must set out name, qualification, date of qualification, number of hours of study.</p>
Proof of registration overseas	<p>Certificate of Good Standing from all other regulatory/licensing bodies.</p> <p>The application form asks whether there are any previous disciplinary findings or unresolved complaints, or whether negligence has ever been proved.</p>
Evidence of experience/practice overseas	None specified.
Additional training/adaptation programme/exam required in UK	<p>Applicants must pass the Test of Competence run by the University of South Wales. Test comprises 1 hour Clinical OSCE; 1 hour radiology /radiography OSCE; 2 case studies for 1 hour; 1 hour written exam on the UK healthcare environment and the chiropractor.</p> <p>All components must be passed at a single sitting.</p>
Other checks and forms of assurance	<ul style="list-style-type: none"> • Medical report from GP (4 years) • Police record checks • Evidence of professional indemnity insurance • Registration application form

	<ul style="list-style-type: none"> • Character reference (4+ years). • Translations must be by an authorised translator.
Currency of documents and other decisions	<p>Application form, character reference and medical report dated no more than 3 months prior to the point of registration.</p> <p>Police record checks and certificates of good standing no more than a year old.</p>
Notable practice	

Regulator	General Dental Council - dentists
Language ability	<p>Applicants must provide an Academic IELTS Test Report Form with minimum overall score of 7.0 and no individual section lower than 6.5. Checked by GDC through the password-protected IELTS Test Report Form Verification Service online.</p> <p>Staff participate in IELTS arranged seminars and training and meet IELTS staff.</p>
Identity checking	<ul style="list-style-type: none"> • Original or certified copy of passport. • Certified copy of professional qualification. • Any name change documents must be provided. • Overseas Registration Examination has a 'candidate verification process': form produced for each candidate containing name, GDC number and photo.
Proof of overseas qualification; is the qualification recognised?	<p>Must hold a 'recognised overseas diploma'. Applicants must provide a UK NARIC statement of comparability.</p> <p>Applicants must also provide a certified copy of their professional qualifications.</p> <p>Small number of recognised qualifications from Hong Kong, Singapore, South Africa, Malaysia, New Zealand and Australia pre-2001 eligible to apply directly for registration. (Section 16 (2)).</p>
Proof of registration overseas	<p>Certificate of Good Standing required which states that applicant is legally entitled to practise dentistry in that country and that they have not been suspended, disqualified or prohibited.</p> <p>Affidavit or affirmation can be arranged where document unavailable (eg due to refugee status or migration from a war zone).</p>
Evidence of experience/ practice overseas	<p>Applicants must provide evidence of 1,600 hours of clinical experience during degree, post-qualification experience or a combination.</p>
Additional training/adaptation programme/exam required in UK	<p>Applicants must pass both parts of the Overseas Registrations Examination (ORE). Part 1, provided by Kings College London: theory examination, two three-hour written papers. Part 2, provided by consortium of dental schools based in London: four component exam of clinical and practical skills. Exam is based on UK dental curriculum.</p> <p>The Licence in Dental Surgery from the Royal College of Surgeons of England is also accepted as determining eligibility for registration in addition to a recognised overseas qualification.</p>

<p>Other checks and forms of assurance</p>	<ul style="list-style-type: none"> • Original or certified copies of documents required. • ORE has a ‘candidate verification process’: form produced for each candidate containing name, GDC number and photo. • Candidate verification forms are used to check identity at the exam centres. • Evidence of prior clinical experience and references are verified directly with referees. • UK NARIC provides a fraudulent document-checking service. • Name and date of birth must match on all documents. • Security measures in place around Part 1 and 2 question banks. • Translations must be authorised. • GDC staff have attended UK NARIC courses on identifying fraudulent documents. • Good character, health and ID evidence required at point of application.
<p>Currency of documents and other decisions</p>	<p>IELTS form must be no older than two years at the point of submission.</p> <p>From first attempt at Part 1 of the ORE candidates have five years to complete both parts.</p> <p>Certificate of Good Standing must be no more than three months old at the point of application.</p> <p>Updated certificates of good standing, character and health declaration and, if applicable, ID documents, are required for registration post completion of ORE.</p>
<p>Notable practice</p>	<p>There is an ORE Advisory Group whose role is to advise GDC on academic quality, development and improvement, guidance and support on the management of external examiners, inter alia.</p> <p>Internal compliance team does audits – aim to expand in 2014 to registration decisions</p> <p>Staff attend UK NARIC training courses and seminars</p>

Regulator	General Dental Council – dental care professionals
Language ability	Applicants must provide an academic IELTS Test Report Form (general for dental nurses and technicians). Minimum overall score of 7.0 with no less than 6.5 in any of the sections must be achieved by dental hygienists, dental therapist, orthodontic therapists and clinical dental technicians. A minimum overall score of 6 with no less than 6 in speaking and writing and no less than 5.5 in the other areas must be achieved by dental nurses and dental technicians. Checked by GDC through the password-protected IELTS Test Report Form Verification Service online.
Identity checking	<ul style="list-style-type: none"> • Original or certified copy of passport. • Certified copy of professional qualification. • Any name change documents must be produced.
Proof of overseas qualification; is the qualification recognised?	Applicants submit details of their qualification, including the 'learning outcomes form'. Applicant must hold a qualification that entitles them to practise as a DCP in their home country. This is assessed by the Registration Assessment Panel, which assesses whether the applicant has the requisite knowledge and skill to practise with reference to the UK DCP curricula document 'Developing the Dental Team'. Panel makes a recommendation to the Registrar who decides on registration (usually delegated to Registration Manager). The relevant overseas authority may be contacted directly if there is any concern or doubt about qualifications.
Proof of registration overseas	<p>Certificate of Good Standing required which states that applicant is legally entitled to practise in that country and that they have not been suspended, disqualified or prohibited.</p> <p>Affidavit or affirmation can be arranged where document unavailable (eg due to refugee status or migration from a war zone)</p>
Evidence of experience/ practice overseas	CVs and professional references must be provided. Professional experience will be considered in the assessment of knowledge and skill where qualifications do not meet the current UK requirement for registration.
Additional training/adaptation programme/exam required in UK	None. Only three possible outcomes of the assessment of application process: recommend for registration, refuse registration, request further information. Applicants refused registration have the right to appeal to the Registration Appeal Committee.
Other checks and forms of assurance	<ul style="list-style-type: none"> • References are verified directly with referees prior to registration being granted • Original or certified copies of documents are required • Assessors receive bundles electronically rather than in paper bundles • UK NARIC provides a fraudulent document checking service • Name and date of birth must match on all documents • Translations must be authorised

	<ul style="list-style-type: none"> • Staff attend UK NARIC courses on identifying fraudulent documents • Good character, health and ID evidence required at point of registration
Currency of documents and other decisions	<p>IELTS form must be no older than 2 years at the point of submission.</p> <p>Certificate of good standing must be no more than three months old at the point of application.</p>
Notable practice	<p>A dedicated registration caseworker is assigned to an applicant throughout the registration process.</p> <p>Internal compliance team does audits – aim to expand in 2014 to registration decisions.</p> <p>Staff attend UK NARIC training courses and seminars.</p>

Regulator	General Medical Council
Language ability	A minimum score of 7.0 in all four areas of the test. Original IELTS test form must be produced.
Identity checking	<p>ID checked at PLAB Part 1 and 2 test. Applicant must provide photo ID, and booking reference; marriage certificate etc in case of name change.</p> <p>Acceptable documents:</p> <ul style="list-style-type: none"> • Passport • UK Immigration and Nationality Dept ID document • Home Office travel document • UK driving licence • EU identity card <p>Documents verified against the inline Keesing global document database; passports checked with a passport scanner.</p> <p>Documents and names exhaustively checked. Photo taken and stored on GMC database.</p> <p>At final stage (when all other requirements have been met), applicant must attend an appointment at the GMC with their original passport and originals of all other supporting documentation. Registration is only granted after this appointment.</p>
Proof of overseas qualification; is the qualification recognised?	<p>Applicant must hold an 'acceptable overseas qualification', awarded by an institution listed in the Avicenna directory for medicine, or is otherwise acceptable.</p> <p>Institution in question must have an address within the country under whose auspices the qualification is issued.</p> <p>The qualification must include at least 5,500 hours over a minimum period of three years or four academic years FT equivalent study.</p> <p>Must not involve more than 50% of study outside the country in which the qualification awarded.</p> <p>Must not be more than 25% distance learning.</p> <p>If the qualification does not meet all of the criteria for acceptability it will be refused.</p> <p>Applicants must bring their primary medical qualification certificate when taking PLAB 1 and 2.</p>

<p>Proof of registration overseas</p>	<p>Applicant must produce original certificates of good standing for every country in which the applicant has worked or been registered in the past five years.</p> <p>Certificate of good standing must confirm that:</p> <ul style="list-style-type: none"> • The applicant is entitled to practise medicine in the appropriate country; • And the applicant was not disqualified suspended or prohibited from practising medicine • And, the regulatory authority is not aware of any matters that call into question the applicant's good standing
<p>Evidence of experience/ practice overseas</p>	<p>To apply for full registration with a licence to practise, applicant needs to prove they have gained the experience necessary to practise fully registered medical practitioner in the UK. They must have completed either Year 1 of Foundation Programme in the UK or period of PG training outside EEA (internship). Internship must be either 12 month programme including minimum of three years in surgery and three in medicine; a ten month programme that includes a minimum of three months in surgery and three in medicine with up to two months to prepare for an exit exam; or two years full time post qualification experience at a public-funded hospital in at least two branches of medicine and/or surgery. Applicants must produce original evidence of their internship.</p>
<p>Additional training/adaptation programme/exam required in UK</p>	<p>Applicant must have passed the PLAB test or hold an acceptable postgraduate qualification. GMC provides list of acceptable qualification or will accept a letter from a UK Medical Royal College confirming that an international qualification is equivalent to its own qualification.</p> <p>Exception: doctors who graduated in Australia, New Zealand, Hong Kong, Singapore, South Africa or the West Indies and hold or who have held provisional registration with the GMC since before 31 December 2003; or doctors who graduated from the University of Malaya on or before 31 December 1989 and hold or have held provisional registration since before 31 December 1989.</p> <p>PLAB 1 is a three hour written examination which includes 200 questions which may include images, ECGs and x-rays.</p> <p>PLAB 2 is an OSCE examination with 14 clinical scenarios or stations each lasting 5 minutes.</p>
<p>Other checks and forms of assurance</p>	<p>If the applicant has worked in a non-medical capacity in the UK or overseas in the last five years they will need to ask their employer to complete the non-medical employer reference form.</p> <p>If the applicant has undertaken any clinical attachments or observerships in the UK or overseas in the past five years that last longer than two months, they will need to obtain an employer reference form to cover each attachment or observership.</p>

<p>Currency of documents and other decisions</p>	<p>IELTS must be no longer than two years ago.</p> <p>Pass in the PLAB test is valid for three years. Applicants must gain registration with a licence to practise within three years of passing PLAB 2 or they will need to resit the PLAB test. Applicants must pass Part 2 PLAB within three years of passing Part 1.</p> <p>Certificate of good standing and employer references are valid for three months from the date they are issued.</p> <p>Applicants have three months after demonstrating that they meet all requirements to the GMC's satisfaction to attend an appointment (see column three) after which registration is granted.</p>
<p>Notable practice</p>	<p>Use of Keesing global document database and passport scanner.</p> <p>Primary source verification.</p> <p>Internal audit.</p>

Regulator	General Optical Council – dispensing opticians NB Applications are submitted to the Association of British Dispensing Opticians, ABDO
Language ability	Score of at least 7 in general IELTS. No individual score below 6 except speaking where minimum requirement is 7. Applicant must submit original stamped test report card.
Identity checking	Registering body in the country of qualification completes certificate of identity section of the application form to ABDO. To include a photo of the applicant signed by an official. Official also to certify that applicant holds the claimed qualification, and has seen original certificates, which are then attached to the certificate of identity. Also to confirm that the qualification enables practice as a dispensing optician in that country. Applicant must provide copy of birth certificate/ marriage certificate.
Proof of overseas qualification; is the qualification recognised?	Applicants prove to ABDO that they have completed an appropriate optical course. Completed form is submitted to ABDO including certified copy of the professional diploma, copy of the course syllabus and schedule relating to all courses taken authenticated by the institution. Schedule to detail subjects taught, course content, number of teaching hours and practice in respect of each subject. Applicant must complete section of application form on core competences to describe their knowledge and skills.
Proof of registration overseas	Applicants prove that they are legally able to practise in a country outside the EEA either from regulatory body or Government department. Certificates of Current Professional Standing or equivalent required for every country that applicant has worked in requested for five years previous to application if available.
Evidence of experience/ practice overseas	Applicants prove that they have undertaken at least 12 months unsupervised work experience in a country outside the UK. Can be letter from employer, on company headed paper, giving dates.
Additional training/adaptation programme/exam required in UK	Application assessed by ABDO Director of Professional Examinations. Exemptions may then be offered from UK exams. If no exemptions offered, applicant must complete full course at a recognised UK training institute and register as student with GOC. If applicant is offered exemptions but must still complete certain units, they must register with GOC and as an ABDO member. After passing all/any exams applicant must complete 1600 hours in no less than 200 days of practice under supervision (Pre-

	<p>Qualification Period).</p> <p>Successful completion of all requirements leads to Fellow of ABDO, FBDO.</p> <p>Prior to full registration with GOC, applicant must provide ABDO certification of qualification.</p>
Other checks and forms of assurance	<p>Applicants encouraged to provide any other supporting evidence: letters of good standing, qualifications, references.</p> <p>All documentation must be on headed paper and duly certified.</p>
Currency of documents and other decisions	<p>Currently no time limit within which applicants must register fully with GOC after completing all study/exam requirements but a two year rule may be considered in discussion with General Optical Council.</p>
Notable practice	<p>Process is led by ABDO rather than the regulatory body.</p>

Regulator	General Optical Council – optometrists NB Applications are submitted to the College of Optometrists
Language ability	Academic IELTS with a minimum overall score of 7, with no individual score less than 6, except for speaking where minimum requirement is 7 Applicant must submit stamped original IELTS Test Report Card.
Identity checking	College checks either passport or certified ID form, usually both. Registering body in the country of qualification completes certificate of identity section of the application form. To include a photo of the applicant signed by an official. Official also to certify that applicant holds the claimed qualification, and has seen original certificates, which are then attached to the certificate of identity. Also to confirm that the qualification enables practice as an optometrist in that country.
Proof of overseas qualification; is the qualification recognised?	Applicants must have completed three years full time training either post-baccalaureate or from age 18. A list of recognised degrees for entry to the non-EEA examinations is listed on the COO website. Applicants submit their dated degree certificate and other documentary proof (original or certified copy). Applicants with other qualifications are offered an assessment process by the GOC Overseas Accreditation Panel.
Proof of registration overseas	Applicants must be legally able to practise optometry in the country in which the qualification was granted. The registering body must provide proof of being able to practise legally/of being registered.
Evidence of experience/ practice overseas	Applicants must have completed one year's unsupervised practice post- qualification. They must submit a logbook documenting experience, mapping it to each of the 28 competencies.
Additional training/adaptation programme/exam required in UK	College sends the logbook to an assessor for mark. If successful, the applicant is able to enter the Non EEA exam, administered by the College of Optometrists, in seven section, practical, oral or both. Exam seeks to ensure that applicant is competent to practise without supervision at level of someone UK trained with one year of post-graduation unsupervised experience. Candidates have to register with the GOC for the week of the exam and the College verifies with the GOC that they have been accepted to enter the exam.
Other checks and forms of assurance	There is an ID check at the exam. GOC registration application is signed by the College of Optometrists and forwarded to GOC. One person deals with people throughout the process from initial

	enquiry through to exams.
Currency of documents and other decisions	Applicants who have been successful in the Non-EEA exam have a two year time limit to apply for GOC registration.
Notable practice	Scheme is operated by the College of Optometrists. Single member of staff throughout there process.

Regulator	General Osteopathic Council
Language ability	<p>Preferred qualification is academic IELTS with minimum overall score of 7.0 and no score less than 7.0 in any section. Other equivalents are accepted.</p> <p>This requirement is waived for applicants from Australia, Canada, New Zealand and the USA whose first language is English.</p>
Identity checking	<p>Photocopy of passport or national ID card on application.</p> <p>Original passport or ID card required at the Assessment of Clinical Performance.</p> <p>Where application is made from outside the UK, certified copy of passport is required.</p>
Proof of overseas qualification; is the qualification recognised?	<p>Applicants must provide certified copy of their osteopathic qualification, certified copy of their academic transcript including results for each module, course guidelines/handbook.</p> <p>GOsC ensures institution exists, makes contact if necessary, visual check of certificate, check of name on qualification against application. Checks are based on general guidance from NARIC.</p>
Proof of registration overseas	<p>If they are registered with a regulatory body in their country of origin applicants must provide evidence of this.</p> <p>GOsC seeks to obtain a Certificate of Current Professional Standing from the relevant regulatory body and any fitness to practise records where possible.</p>
Evidence of experience/ practice overseas	<p>Applicants must complete a Further Evidence of Practice Questionnaire. Requires applicant to relate experience to the GOsC's Osteopathic Practice Standards, including providing anonymised patient records where possible. £100.</p> <p>Only after successful assessment of the completed questionnaire can applicants proceed to the Assessment of Clinical Performance.</p>
Additional training/adaptation programme/exam required in UK	<p>Applicants must pass the Assessment of Clinical Performance, a practical clinic-based exercise. Applicants are asked to manage and treat two new patients as they would in practice over a period of three hours. Held at an osteopathic training institution in London. Applicants are assessed against the GOsC's Osteopathic Practice Standards. £330.</p>
Other checks and forms of assurance	<ul style="list-style-type: none"> • Police check from country of origin • Enhanced check for regulated activity (Disclosure and Barring Service) • Character reference form (four years)

	<ul style="list-style-type: none"> • Health reference form (four years) • Passport sized photograph for ID card • Proof of indemnity insurance <p>All non-English documents must be accompanied by translations by an official agency, a university language department or the British Embassy or High Commission, be on headed paper and signed by the translator. Certified copies of documents are accepted.</p>
<p>Currency of documents and other decisions</p>	<p>No time limit between either: successful completion of Further Evidence of Practice Questionnaire and applying to sit the Assessment of Clinical Performance; or, between completing the Assessment of Clinical Performance and applying for registration, but this is under review.</p>
<p>Notable practice</p>	<p>Thorough pre-examination process against Osteopathic Standards.</p>

Regulator	General Pharmaceutical Council - pharmacists
Language ability	Academic IELTS with a minimum overall score of 7.0 with a score of at least 7.0 in all of the test parameters and at one sitting. Applicant must provide original Test Result Form. GPhC verify using IELTS online verification service.
Identity checking	<p>Passport. Certified copy at initial stage but before starting OSPAP course applicant must attend GPhC office with original passport. This is checked against online document verification website.</p> <p>Completed questionnaire, accompanied by two passport-style photographs, giving name, address, email address, DOB, nationality qualification, and regulatory authority; this must be signed before a UK registered solicitor or equivalent legal witness in country from which applicant is applying.</p> <p>Applicants must provide a certified copy of their birth certificate and a certified copy of any marriage/civil partnership certificate, or statutory declaration for name change for other reason.</p> <p>Extensive checks are performed on the documents submitted for eligibility for OSPAP.</p>
Proof of overseas qualification; is the qualification recognised?	<p>Applicant must have obtained a degree in pharmacy enabling practice as a pharmacist in the country in which qualification was obtained. Original degree certificate must be provided before applicant can register. Degree must include at least three academic years of exclusively pharmacy-related modules. Degree must be assessed by UKNARIC as comparable to UK bachelor degree and have been awarded by an institution recognised by UKNARIC. If UKNARIC deems degree below British standard, applicant has option to submit evidence (self-assessment, transcripts, curricula) for an assessment to an OSPAP- providing HEI.</p> <p>GPhC receives applicant's academic transcript, certified, directly from the University.</p>
Proof of registration overseas	<p>Applicants must have completed all of the requirements to practise independently and be registered (if required) to practise as a pharmacist practitioner in the country of qualification, without restriction, and be in good standing.</p> <p>Letters confirming registration and good standing must be provided directly to the GPhC from the relevant authority, including confirmation of applicant's University, when degree obtained, DOB and registered address.</p> <p>Applicant must also provide a letter confirming good standing from any pharmacy governing body where they have worked in previous five years.</p>

<p>Evidence of experience/ practice overseas</p>	<p>Applicants must provide a CV including all work experience since qualifying as a pharmacist, including non-pharmacy related.</p> <p>For each role applicant must provide job titles and role summaries.</p>
<p>Additional training/adaptation programme/exam required in UK</p>	<p>Applicant must complete a two year qualifying process in the UK: comprises a one year 120 credit Master's level postgraduate diploma, OSPAP (the Overseas Assessment Programme) accredited by the GPhC and provided by four schools of pharmacy; and 52 weeks of pre-registration training; and the GPhC registration assessment.</p> <p>NB: GPhC provides copy of application file to the HEI to ensure the person taking the OSPAP course is the same as the person who applied to GPhC. Lists of people who have successfully completed the course are sent to the GPhC.</p> <p>Further ID checks are undertaken post OSPAP when the applicant applies to GPhC to start pre-registration training.</p> <p>Further ID checks when applicant then takes registration assessment including photo and signature checking.</p> <p>Further ID and other checks when applicant applies for registration.</p>
<p>Other checks and forms of assurance</p>	<p>A minimum of two references must be supplied from the applicant's country of qualification. One from current or most recent employer, the other from a professional eg University tutor or former employer. Must be on headed paper, stamped, not from a relative, state is in support of application to GPhC.</p> <p>Renewed CCPS required at application for registration</p> <p>Translations of documents in English must be authorised.</p>
<p>Currency of documents and other decisions</p>	<p>IELTS result valid for two years.</p> <p>Applicant must start the OSPAP within two academic years of being confirmed as eligible. Applicants must complete all stages (OSPAP, 12 months pre-registration training, registration assessment and apply to register) within four calendar years of starting on an accredited OSPAP.</p>
<p>Notable practice</p>	<p>Initial application is for eligibility to take the OSPAP PG diploma, rather than for registration.</p> <p>Third party confirmation of details.</p> <p>UK NARIC fraud information seminars and other anti-fraud training.</p> <p>Contact made with Met Police to discuss any causes for concern.</p>

Regulator	General Pharmaceutical Council – pharmacy technicians
Language ability	No specific requirement. In order to succeed in the knowledge and competence exams (see column 7) candidate would be unable to do so if they did not have the necessary language skills. Knowledge qualification requires 60 learning hours on interpersonal skills.
Identity checking	Certified copies of: <ul style="list-style-type: none"> • Passport identity page – including photograph • Birth certificate • Marriage certificate/civil partnership certificate • Certificates of courses taken in the UK (see column 7) • International qualification certificate. Passport photo certified by non-relative person of standing known two years +
Proof of overseas qualification; is the qualification recognised?	Applicant must arrange for a certified copy of the academic transcript relating to their international pharmacist or pharmacy technician qualification to be sent to the GPhC including years of study, subjects, and marks obtained.
Proof of registration overseas	The applicant must arrange for a letter of good standing or current professional status or equivalent to be sent to the GPhC from the country of qualification – to be issued not more than 6 months before the applicant expects to register. Also to be provided from any other countries in which applicant has practised in last five years from appropriate authority.
Evidence of experience/practice overseas	None specified.
Additional training/adaptation programme/exam required in UK	Applicants must complete a GPhC recognised level 3 knowledge qualification and a GPhC recognised level 3 competence qualification before they can apply to register. While completing these qualifications the applicant must be working in the UK under the supervision of a registered pharmacist for not less than 14 hours a week.
Other checks and forms of assurance	Documents are checked to ensure that all names match exactly, DOBs are identical, academic information is consistent. Any documents from overseas authorities not received directly are rejected.
Currency of documents and other decisions	Applicant must apply for registration as a pharmacy technician not more than five years after commencement on a recognised course, or within two years of completing a course – whichever is sooner.
Notable practice	

Regulator	Health and Care Professions Council
Language ability	<p>Speech and language therapists must achieve IELTS8.0 with no element below 7.5 or TOEFL minimum score of 118/120. All other professions must score 7.0 with no element below 6.5 or TOEFL 100/120.</p> <p>Applicant must present Test Report Form or photocopy. IELTS online verification is used to check TRF number. Photo/DOB on test result checked against other documents.</p> <p>IELTS can be academic or general. Results must be achieved at one sitting.</p> <p>Applicant can make a declaration that English is their first language.</p>
Identity checking	<p>Applicants must provide certified copies of two documents to prove their identity. At least one must be photographic and one must prove address. In the absence of photo ID, an endorsed photo can be provided.</p> <p>Passport is checked using an online database: Keesing Referencing Systems 'Document checker' which includes a check of the Machine Readable Zone of the passport and provides descriptions and images of more than 2,000 passports, driving licences and ID cards from over 190 countries and highlights their security features.</p> <p>Applicants must provide certified evidence of any change of name.</p>
Proof of overseas qualification; is the qualification recognised?	<p>Applicant must submit full details of their education and training, including any qualifying or entrance examination that they have taken for their profession in addition to the one that was part of their professional education. They must provide a certified copy of their qualification certificate and certified translation if applicable. HCPC contacts awarding institution to confirm that applicant completed the programme in timescale claimed.</p> <p>Institution completes and certifies (with the official seal) course information form providing details of the theoretical and practical content of the course in hours by module, scope of course content, method of assessment and contact for the course administrator/leader.</p> <p>HCPC use UK NARIC 'My Counter Fraud Checks' service and a database that provides information on known 'diploma mills'. HCPC also holds a contract with a screening organisation (Kroll) in case of doubt or difficulties in confirming validity.</p>
Proof of registration overseas	<p>Applicants must identify any relevant regulator for their profession in respect of each position set out in their career history with contact details. They must provide a certificate of professional status from the regulator in country where they last practised.</p> <p>HCPC contacts any known regulatory bodies if applicant has</p>

	practised overseas to check professional status including any conditions of practice.
Evidence of experience/ practice overseas	Applicants must provide a full career history, including description of main duties and responsibilities.
Additional training/adaptation programme/exam required in UK	<p>The application as a whole is assessed by two assessors from the relevant part of the HCPC's register, comparing both qualifications and experience against the relevant HCPC standards of proficiency.</p> <p>Assessors make a recommendation which is reviewed by the Education and Training Committee which sends a decision to the applicants.</p> <p>One possible outcome is that the applicant is required to undertake a test of competence. This may relate to any aspect of professional practice and may be written, oral or involve practical demonstration. The assessors of the test will be two registrants from the relevant part of the register.</p>
Other checks and forms of assurance	<p>At least one professional reference: HCPC contacts the referee directly to verify.</p> <p>A self-declaration of character and health</p> <p>Information about membership of professional associations; HCPC contacts directly to verify.</p> <p>A character reference from a person of standing (known for at least three years).</p> <p>A background check consent form, which enables HCPC to employ a third party agent to conduct background checks where HCPC itself is unable to.</p>
Currency of documents and other decisions	IELTS score valid for two years from passing.
Notable practice	<p>Keesing Documentchecker.</p> <p>UK NARIC 'My Counter Fraud Checks' service.</p> <p>In-house database of education providers, regulatory bodies and professional bodies from around the world has been established over a number of years.</p> <p>Planning to introduce an application form specifically for those applying from outside the EEA.</p>

Regulator	Nursing and Midwifery Council – nurses
Language ability	<p>Academic IELTS with minimum overall score of 7.0 and a score of at least 7.0 in each section. Applicants must provide candidate number and test scores.</p> <p>NMC checks score on IELTS online test verification website. British Council does ID check.</p>
Identity checking	<p>Application is in two stages. First stage is ‘application request form’: applicants provides certified copies of:</p> <ul style="list-style-type: none"> • Passport • Birth certificate • Marriage certificate/civil partnership certificate/statutory declaration/deed poll for name change.
Proof of overseas qualification; is the qualification recognised?	<p>Must have completed at least ten years of secondary education, before starting a nursing training programme.</p> <p>Must have successfully completed a qualification in nursing of comparable standard to a UK nursing qualification. NMC assesses duration and content of training – educational content requirement will depend on which part of register applicant wishes to join.</p> <p>Example: general nurse programme must have been a minimum of 4,600 hours</p>
Proof of registration overseas	<p>Applicants must hold current registration or licence to practise without restriction with the regulatory body/licensing authority in country of qualification or subsequent practice; and any other countries in which applicant claims to have practised (if required to do so by that country/those countries).</p>
Evidence of experience/ practice overseas	<p>Applicant provides details of post-qualification work experience and countries in which applicant has practised.</p> <p>12 months post-qualification practice in any overseas jurisdiction (full-time or part time equivalent) is required ; OR, if 12 month period more than three years prior, 450 hours practice in the last three years. If applicant has not practised for more than five years, then will need to complete a longer version of the overseas nurses programme.</p>
Additional training/adaptation programme/exam required in UK	<p>Applicant must complete overseas nursing programme provided by an approved HEI, only after second stage of application. (Currently 25 such programmes are approved).</p> <p>Programme comprises 20 days of protected learning and at least three months of supervised practice</p> <p>HEI completes ID checks as part of admission process to overseas nursing programme. HEI informs NMC of individuals who have successfully completed the programme and submits to NMC a good</p>

	health and good character reference after the programme is complete.
Other checks and forms of assurance	<p>At second (full application) stage, applicant must provide:</p> <ul style="list-style-type: none"> • Health declaration • Two employer references provided direct to NMC from employers • Fully completed transcript of training form • Fully completed verification of registration forms. <p>At third stage (application to register after completion of programme) additional checks are made and updated references must be supplied.</p>
Currency of documents and other decisions	<p>Health declaration valid for three months from the date completed.</p> <p>Applicant has two years from starting overseas nursing programme to complete and register. If application to register is received after this point new assessment made as to whether to re-open the application.</p>
Notable practice	<p>NB 3 stage process:</p> <p>Stage 1 submission of documents as listed above;</p> <p>Stage 2, submission of documents as listed above;</p> <p>Then applicant if successful can progress to overseas nursing programme;</p> <p>Then Stage 3, having successfully completed programme, applicant applies to go on the register.</p> <p>Keesing Authentiscan software and face to face identity checks being implemented.</p> <p>UK NARIC being commissioned to provide training and support.</p>

Regulator	Nursing and Midwifery Council - midwives
Language ability	<p>Academic IELTS with minimum overall score of 7.0 and a score of at least 7.0 in each section. Applicants must provide candidate number and test scores.</p> <p>NMC checks score on IELTS online test verification website. British Council does ID check.</p>
Identity checking	<p>Application is in two stages. First stage is 'application request form: with which applicants provides certified copies of:</p> <ul style="list-style-type: none"> • Passport • Birth certificate • Marriage certificate/civil partnership certificate/statutory declaration/deed poll for name change
Proof of overseas qualification; is the qualification recognised?	<p>Must have completed at least ten years of secondary education, before starting a midwifery training programme.</p> <p>Must have completed a qualification of comparable standard to a UK programme; NMC assesses duration and content of training. Fully completed transcript of training form must be submitted.</p>
Proof of registration overseas	<p>Applicants must hold current registration or licence to practise without restriction with the regulatory body/licensing authority in country of qualification or subsequent practice; and any other countries in which applicant claims to have practised (if required to do so by that country/those countries).</p>
Evidence of experience/practice overseas	<p>Applicant provides details of post-qualification work experience and countries in which has practised.</p> <p>12 months post-qualification practice overseas (FT or PTE) required; OR, if 12 month period more than three years prior, 450 hours practice in the last three years. If applicant not practised in 5 years prior to application must return to practice in home country/country of qualification for at least 12 weeks or 450 hours.</p>
Additional training/adaptation programme/exam required in UK	<p>Applicant must complete Adaptation to Midwifery Programme. Currently there is only one approved course, which is run by Kingston University at St George's Hospital, Tooting.</p>
Other checks and forms of assurance	<p>At second (full application) stage, applicant must provide:</p> <ul style="list-style-type: none"> • Health declaration • Two employer references provided direct to NMC from employers • Fully completed transcript of training form • Fully completed verification of registration forms. <p>At third stage (application to register after completion of programme)</p>

	additional checks are made and updated references must be supplied.
Currency of documents and other decisions	<p>Health declaration valid for three months from the date completed.</p> <p>Applicant has two years from starting Adaptation to Midwifery programme to complete and register. If application to register is received after this point new assessment made as to whether to re-open the application.</p>
Notable practice	<p>NB 3 stage process:</p> <p>Stage 1 submission of documents as listed above.</p> <p>Stage 2, submission of documents as listed above.</p> <p>Then applicant if successful can progress to overseas nursing programme;</p> <p>Then Stage 3, having successfully completed programme, applicant applies to go on the register.</p> <p>Keesing Authentiscan software and face to face identity checks being implemented.</p> <p>UK NARIC being commissioned to provide training and support.</p>

Regulator	Pharmaceutical Society of Northern Ireland
Language ability	As per GPhC
Identity checking	Passport
Proof of overseas qualification; is the qualification recognised?	Applicants referred to GPhC
Proof of registration overseas	As per GPhC
Evidence of experience/ practice overseas	As per GPhC.
Additional training/adaptation programme/exam required in UK	<p>One year OSPAP accredited by GPhC and 52 weeks of pre-registration training (same programme as MPharm graduates undertake).</p> <p>Applicant may undertake pre-registration year in Northern Ireland</p> <p>Pre-registration examination conducted by the PSNI</p>
Other checks and forms of assurance	Supporting documentation from home state and university
Currency of documents and other decisions	Four year limit from commencement of OSPAP to completion of pre-registration training
Notable practice	Applicants are referred to GPhC.

Annex 2 – Statistics

General Chiropractic Council

	Chiropractors
Total number on register ²	137/2,846
Test of competence candidates 2011	22
Test of competence candidates 2012	21

Trends: candidates hold a range of qualifications from the US, Australia, South Africa and Canada. There has been a general drop in candidate numbers of the past five years.

General Dental Council

	Dentists & dental care professionals
Total number on register	3,060/101,901
Registrations 2011	69
Registrations 2012	117
Registrations 2013	120

Trends: no particular trends apparent.

General Medical Council

	Applications	Of which successful
Total number on register	67,540 (of whom 60,091 hold a licence to practice)/252,431	
2011	3,174	2,543
2012	2,460	2,016
2013	1,588	1,072

Trends: There is an overall decline in IMG applications since 2010, and in particular a sharp decline in applications under the PGQ route. This is linked to the withdrawal of recognition for a number of qualifications by the Royal Colleges who have been unwilling or unable to continue to undertake relatively onerous validation visits overseas that awarding recognition requires.

² In this section 'total number on register', 'registrations' and 'applications' refers to international registrants/applicants. The data is held in different ways by the different regulators.

General Optical Council

	Optometrists
Total number on register	22/23,858
Applications 2011	19 (8 exam passes)
Applications 2012	25 (12 exam passes)
2013 to date	20 (6 exam passes)

Only one application has been received by the ABDO in the past two years and that applicant has not proceeded to register.

Trends: Most international applications received by the College and subsequent GOC registrants are from non-English speaking countries. Nigeria is the country of origin of most applicants and subsequent GOC registrants. There is a relatively small number of GOC registrants from other English speaking countries, with the most (four) from New Zealand.

General Osteopathic Council

	Osteopaths
Total number on register	41/4759
Applications 2011	0
Applications 2012	3

Trends: the majority of current international registrants are from Australia. The small numbers involved mean that it is not possible to draw any conclusions on trends.

General Pharmaceutical Council

	Pharmacists	Pharmacy technicians
Total number on register	3,168/48,953	532/22,033
Applications 2011-12	132	177
Applications 2012-13	164	133

Trends: Pharmacists: increasing numbers from Egypt and Syria, less from Nigeria. India and Pakistan remain constant. General decrease overall, possibly due to UK immigration policy.

Health and Care Professions Council

	All professions
Total number on register	15,976/314,903
Applications 2011	1,270
Applications 2012	1,331

Trends: figures for current number are by nationality. The largest numbers of current registrants are from Australia (2,955) and India (2,827). In a large number of cases nationality is not known (129,139). The HCPC has informed us that the majority of this

figure includes professions which were registered via a register transfer from a professional body or another statutory regulator where this data was either not consistently held or was not transferred. Additionally, the HCPC has informed us that this data was not consistently recorded by its predecessor organisation, the Council for Professions Supplementary to Medicine. The number of new registrants registered via the non-EEA route with Australian nationality has increased by 37% from 2011 to 2012. The increase has mainly been for physiotherapists (90% increase) and radiographers (51%).

Nursing and Midwifery Council

	Nurses and midwives
Total number on register	62,470/675,148
Registrations 2011	1233
Registrations 2012	1098
Registrations 2013	393

Trends: the overall numbers fluctuate, the NMC states that this is largely dependent on any specific NHS recruitment activities. Although the top three countries change their order, they are consistently the same and significantly higher than the rest of the field (Philippines, India, Australia).

The NMC notes that the figure quoted as total number on register has been estimated to be 5,000 too low.

Pharmaceutical Society of Northern Ireland

PSNI received one application to complete the pre-registration year in NI in 2010-11. However the applicant did not successfully complete the pre-registration year. Data on current registrations not provided.