

Public minutes of the meeting of the UKPHR Board held on Wednesday 19 February 2025 via Teams at 14.00 hours

**Present:** James Sandy (JS) (Chair)  
Jessica Lichtenstein (JL, Chief Executive)  
Gill Jones (GJ) (Registrar)  
Marianne Coward (MC)  
Helen Featherstone (HF)  
David Evans (DE)  
Jenny Douglas (JD)  
Ranjit Khutan (RK)  
Ben Humphreys (BH)  
Rachel Flowers (RF) (Observer)  
Pavenpreet Johal (PJ) (Secretariat)

**Apologies:** Andrew Jones (AJ)  
Duncan Vernon (DV)  
Linda Smith (LS)  
Joanna Dowd (JD)

**1. Welcome, apologies for absence and new declarations of interest**

The Chair welcomed everyone to the meeting, in particular, RF who was observing the meeting before commencing her new role as Board Director in April 2025. Apologies were noted as above. There were no new declarations of interest.

**2. Minutes of Board meeting held on 27 November 2024**

The minutes of the meeting held on 27 November 2024 were agreed as a true and accurate record.

ACTION	WHO	WHAT	BY WHEN
	JL	Publish 27 November 2024 Board minutes on website	ASAP

**3. Actions and matters arising**

JL reported that all actions were done or on the agenda for an update.

**4. Governance forward planner – 2025**

JL reported that the team are due to begin working on preparing the operational plan for 2025-26. Once completed, this should inform the 2025 governance forward planner.

**5. For decision**

**Interim Orders Policy**

JL thanked Zaira Ejaz who drafted the policy. In PSA's previous annual review, they set UKPHR a condition to implement an Interim Orders Policy. This is common for statutory regulators that allows them to deal with immediate safety concerns whilst a case proceeds through fitness to practise proceedings. UKPHR have not encountered a scenario in which a policy like this would need to be implemented. The policy has been drafted looking at regulatory best practise and reflects what other healthcare regulators do, translated to UKPHR's context. GJ also input into the draft with her experience from GDC panels.

The policy allows the Registrar initial decision-making powers as it was not felt appropriate and neither do UKPHR have to hand a fully trained interim orders panel. The PSA had seen the draft policy and were content.

HF queried the 18-month timeframe to implement an interim order as it's a lengthy time which can be stressful for an individual if they cannot work. JL confirmed that this is a common timeframe for other regulators with large caseloads, however for UKPHR the process shouldn't take as long, but stating this length provides flexibility to ensure UKPHR can get the right people in place to complete fitness to practise proceedings.

GJ sought clarity on the composition of the interim order panel, whether they need to be trained and that they cannot then sit on the fitness to practise panel as well. JL commented that the fitness practise policy includes detail on these matters, and that the policy can be updated to refer to the fitness practise panel procedures and state that an individual cannot sit on an interim orders and fitness to practise panel for the same individual and the Registrar cannot be part of the interim orders panel.

The Chair queried whether the absence of the Interim Orders policy needs to be reflected in the Risk Register if the PSA identified this as a gap. The Board agreed to approve this policy following the amendments raised during the discussion.

ACTION	WHO	WHAT	BY WHEN
	JL & ZE	Update draft Interim Order policy in line with discussion and publish	ASAP

## 6. Standing orders - revision

JL provided a slide, visualising all UKPHR's governing documents to assist directors in understanding how the standing orders fit into UKPHR's oversight. The Standing Orders outline UKPHR's powers (not by statute but self-imposed) and how we discharge those powers. It is reasonable that these will develop over time as the organisation evolves, whilst the fundamental objectives of the organisation aren't intended to change. The standing orders are intended to be reviewed every 5 years.

The Board were provided with a paper outlining the additions and omissions of the revised Standing Orders, this included moving away from advisory and finance committees; inclusion of the complex case panel and separating out appeal and fitness to practise panels.

HF thanked JL and the team for the revision and for making it relatively easy for the Board to review them. JL thanked Anna Lubasinka for her work on the revision. The Board approved the revised Standing Orders.

## 7. Setting fees for 2025-26

JL presented papers that outlined a recommendation made by the Audit, Risk and Remuneration Committee (ARRC) on setting fees for 2025-26. JL provided background on UKPHR's approach to fees. In 2024-25 the budget was in deficit by approximately £20k which meant that reserves had to be used. Whilst this was uncomfortable, it was agreed that investments were required to proceed with establishing our corporate strategy but there was a commitment to not continuing with a deficit approach for 2025-26 and moving towards a surplus. This provided a starting point for fee discussions, with the approach to achieve a surplus, albeit a small one. Two years ago, a 2-year incremental fee rise was implemented. There were no fee rises between 2020-2023. JL recommended that the discussion focuses solely on 2025-26 fees and that future discussion on fees can be held at the Board strategy day which will focus on financial strategy.

Discussion initiated around Specialist Registration by Portfolio Assessment (SRbPA) fees and that the process has never come close to paying for itself. For the 2024-25 financial year the route brought in approximately £8k of income but the expenditure related to the route was over £40k. The Board received comparisons of fees for similar processes with other healthcare regulators. The outcome for the GMC CESR route is the same as applicants have access to the same types of roles, albeit there could be different pay scales. The ARRC agreed that other fees should not subsidise this process, especially practitioner registration fees. The Committee agreed there was a scope to increase SRbPA fees and introduce fees for assessments of clarifications and resubmissions. Currently these are free, whereas GMC charge £812 per review assessments.

There is a significant amount of work in subsequent assessments, often similar to the assessment workload as assessing the initial portfolio. BH commented and the Board agreed that a fee increase and the introduction of fees for subsequent assessments may also encourage good quality portfolios to be submitted. DE commented that the wider system should review these costs as trainees will have a good salary, access to opportunities and don't have these additional costs but someone going through the portfolio route might be working on a lower grade with the personal burden of the costs. JL agreed to raise the financial aspect of support during the national (England-wide) discussions on formalising SRbPA support. The Board agreed to increase SRbPA pre-application fee to £290; SRbPA portfolio assessment fee of £890 (total of £1080 – compared to £1870 for GMC CESR portfolio application) and introduce a £175 assessment fee for each review (compared to GMC £812 fee).

<b>ACTION</b>	<b>WHO</b>	<b>WHAT</b>	<b>BY WHEN</b>
	<b>JL</b>	<b>Raise topic of national funding at formalising support network meetings</b>	<b>When next meeting occurs</b>

The Board moved on to discuss annual registration fees. It was noted that these figures relate to the organisation's overarching financial status and the Board was mindful to strike a balance between income and the retention of registrants, particularly practitioners. Whilst the Board did not receive a draft budget, the ARRC did view a draft budget to make their recommendations. The Board received three fee proposals in the context of forecasted expenditure for 2025-26. The ARRC recommended a 5.5% (£21) increase for specialists and a 4.5% (£7) increase for specialty registrar and practitioners. This would enable a forecasted surplus of £7k for 2025-26. The fee would remain significantly below GMC's fee (£450) for specialists and in line with NMC fee (£120) for practitioner comparison, acknowledging that the NMC fee has not risen in several years. BH queried what the GMC's approach is to fee increases and HF confirmed that they base it on the previous year's CPI. DE highly recommended reviewing practitioner numbers once a fee rise has been implemented to review its impact. HF queried if there has been a noticeable drop off of registrants after previous fee increases and JL confirmed that there had been no noticeable drop in numbers and the number of registrants continue to rise as per the data in the latest annual report. The Board agreed to set specialist registration fees at £409 and specialty registrar and practitioner fees at £128 for 2025-26.

The ARRC also recommended, and the Board agreed a communication piece with a very clear option for individuals to communicate their views in lieu of a formal consultation. A formal consultation was not recommended due to an extremely low response rate, historically approx <4% and to avoid the notion of providing a formal consultation for the optics.

Moving on to practitioner scheme income, JL reported that approximately £100k of income is derived from local schemes. The fees have not changed since 2019 and JL has discussed with scheme coordinators the possibility of fee rises and there was not push back. There is reassurance in England with NHS funding now guaranteed. The majority of schemes fees are to pay practitioner moderators for their quality assurance work and in conjunction with the scheme fee increase, there was a proposed 3% increase for moderator charges (both specialist and practitioner). This has also not increased since 2019. The Board agreed to increase practitioner scheme fees to the figures outlined in the paper (just below 6%) and moderator changes by 3%.

## 8. Q3 2024/25 accounts

JL reported that the Q3 2024/25 accounts are roughly what was expected. Income is appearing as less than predicted and this is because more people chose to pay via Direct Debit so income is more spread out throughout the year. This supports cashflow throughout the year and prevents a huge increase at one point in the year and then a significant drop as the year goes on. However, it does impact how the budget looks at one point in time, but the income will settle itself by the end of the year. JL highlighted that costs are an increasing total of the budget and PJ and herself are looking into every opportunity to decrease them.

Reserves did dip below the three-month running costs at the end of Q2 and JL informed the Chair and ARRC Chair. This was expected as the influx of renewal income was used, and the practitioner scheme invoices were raised and due to be paid imminently. Shortly after the reserves returned to the expected level once local scheme income was received.

The Board acknowledged the Q3 2024/25 accounts.

## **9. Appeal process – learning and reflections**

JL reported that the Board were kept up to date about a pending appeal that took place in January 2025. It was the first time UKPHR's revised Appeal Rules were used and therefore felt appropriate to conduct a reflection piece.

The process ran very well with JL and Helen Jeffries acting as observers in secretariat roles with no active participation. There was an independent appeal panel with two lay members and one professional member, all of whom had relevant experience with panels and regulation. Members of the panel felt the process went well and they conducted a reflection exercise at the panel meeting itself. The Panel agreed that UKPHR's argument was well structured, and they made a unanimous decision in half the time allotted to uphold UKPHR's decision.

JL commented that it was very time consuming and disruptive on workloads. BAU remained manageable with a small team and one appeal, however it would be challenging with multiple appeals. Having had the experience of one under our belt, it will assist in any future appeals.

As a result, SRbPA guidance has been updated to ensure that the process is appeal proof. The Panel recommended that UKPHR reviews the guidance around an unassessable decision and perhaps provide further clarity on the threshold of what makes an application unassessable. This work had already commenced with the Registration Policy Group.

The Panel was held within budget in terms of legal support as the meeting was held virtually and as all evidence was submitted on paper, written input was provided from our solicitor.

## **10. Registration reports**

As the Registration Statistics would be provided on a bi-annual basis, GJ verbally updated the Board on SRbPA statistics, with 50% of pre-applications being approved and more females submitting compared to males, which is reflection of the workforce. It appears that the improved guidance is supporting a higher quality submission. GJ reiterated the robust nature of assessment work seen at the Registration Approvals Committee.

## **11. Audit, Risk and Remuneration Committee report – including Risk Register discussion**

The Chair gave an update from the last ARRC meeting as the ARRC chair had given his apologies. The majority of the discussion was in relation to fees, which the Board had already discussed and the importance of communication and providing an opportunity to feedback. There were no areas of concern to be flagged to the Board.

## **12. Education and Standards Committee report**

The Board acknowledged that there was no Education and Standards Committee meetings since the last Board meeting.

## **13. Board skills audit – update**

Discussed in private meeting.

## **14. Chief Executive Report**

Discussed in private meeting.

## **15. Any other business**

Discussed in private meeting

**16. Date, time and venue of next meeting**

Wednesday 23rd April 2025 at 14.00 via Teams. The Board Strategy day to be held on Tuesday 29 April 2025 10.30-15.30 in UKPHR Office in Birmingham.

**Action points from this meeting**

<b>ACTIONS</b>	<b>WHO</b>	<b>WHAT</b>	<b>BY WHEN</b>
	JL	Publish 27 November 2024 Board minutes on website	ASAP
	JL & ZE	Update draft Interim Order policy in line with discussion and publish	ASAP
	JL	Raise topic of national funding at formalising support network meetings	When next meeting occurs

The Chair closed the meeting at 16.00 hours.