

## A practical example for Spain

### What are special features of your regulated profession?

A quick overview to enable comparison with the examples of the different countries.

<p>What are the special features of your regulated profession?</p>	<p>While the title (Bachelor of Science in Human Nutrition and Dietetics) is protected at national level, (<a href="#">CIN730/2009</a>) currently, there is no national register of professionals or specific criteria established by the Ministry of Health to include professionals in that registry. The profession of dietitian-nutritionist is regulated in Spain by the Law of Ordinance of health professionals (<a href="#">44/2003 LOPS</a>), in which there is a reference (article 7.2.g) to the dietitian-nutritionist, its definition and access title for professional practice.</p> <p>The LOPS establishes in its development, that a national registry must be created that will be fed by regional registries. At the moment these registers are not all developed yet by the regional governments, all of them holding full competences in Health policies. The <a href="#">General Council of Dietitians-Nutritionists of Spain</a> (CGDNE) is in charge of the national register. This national register is fed by the regional registers. The regional bodies of dietitians-nutritionists, (i.e. <a href="#">Balearic Islands</a>) are in charge of the regional registries.</p> <p>The Regional Bodies of Dietitians-Nutritionists are created by regional laws and regulate and protect the profession at regional levels. The obligation to be registered for practising the profession, is different from one region to another, being mandatory in Navarre, Balearic Islands, Comunidad Valenciana, Catalonia, Aragon and Castilla la Mancha, but not in Andalusia, Galicia, Castilla and Leon, Basque Country, Community of Madrid, Region of Murcia and Cantabria. The regions of Extremadura, Canary Islands, La Rioja and Princedom of Asturias have not yet completed the process at their Regional Parliaments.</p> <p>It is expected to bring into effect a Bill of Law regarding Professional Services and Professional Bodies, currently halted in National Parliament, that will regulate which professions must be registered for practicing and which don't need to be included in that register.</p> <p>Bill of Law regarding Professional Services and Professional Bodies, which has been developed by the National Ministry of Economy and responds to the EU's request to liberalize markets and competition, is currently at a standstill because its preliminary drafts have created much social discussion. Although the Ministry of Health has stated that all health professions regulated by 44/2003 LOPS Law, including dietitians-nutritionists must be registered, the Ministry of Economy wants to exclude the dietitian-nutritionist, podiatrist and occupational therapist.</p>
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	<p>The CGDNE has had a round of contact with the political parties represented in the National Parliament and Senate to put in value the dietitian-nutritionist and defend the compulsory registration, to ensure that the citizen receives health and nutrition assistance service, by the appropriate professional, ensuring quality and safety of care and avoiding professional encroachment. Registries that are currently operational in the regions continue to be updated by Regional Bodies of Dietitians-Nutritionists. It differs per Regional Body if registration on the register is compulsory. To register only the title is required. There are no additional requirements on lifelong learning. <b><u>It means that Spain has an incomplete initial registration for dietitians-nutritionists.</u></b></p> <p>The Bill of Law regarding Professional Services would also change the law of professional bodies that has been in force since 1974 and actually regulated all the National Professional Councils (CGDNE among others) and the regional professional bodies in the 17 Spanish Regions. In this Bill, in addition to regulating compulsory registration of some professions (for now does not include dietitian-nutritionist), it would also regulate the need for professional bodies to act as certifying entities of the competencies of professionals included in the register, <b><u>it means that criteria and requirements for a full registration are not established in Spain yet.</u></b></p> <p>In summary:</p> <ul style="list-style-type: none"> <li>• Professional bodies regulate the practice of dietitian-nutritionist at regional (regional bodies) and the CGDNE at national levels</li> <li>• It is not yet clear whether the registration will depend on the Ministry, allowing individual registration, or whether the professional bodies will provide the data, being in charge of keeping updated the regional registers.</li> <li>• Currently, only the title is required to be registered</li> <li>• There are no specific requirements on entrance examination or continuing education, although one of the duties of regional professional bodies is to provide continuing education to their members.</li> <li>• The registration has no duration limit and is maintained while the member pays the annual fees.</li> <li>• There is registration for practicing and non- practicing dietitians-nutritionists.</li> </ul>
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### What does your health care system looks like?

A help to put the other answers in perspective.

Please explain your healthcare system globally.	The National Health System offers free services to all citizens. There is a portfolio of basic services. The Regions have a wide range of autonomy. They have self-control in the management of regional health services, so they regulate the access of the professionals to the health care services
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	<p>and can expand the basic portfolio of services, according to a National Law.</p> <p>The position of dietitian-nutritionist is not created/established in all the Autonomous Regions. At the moment the services in dietetics and nutrition provided by dietitians-nutritionists are very irregular depending on the Autonomous Regions, and when they are offered, it is done from the hospitals and not from primary care. The decision of having dietitians in a hospital or not, depends exclusively on the Regional Health Services, and sometimes on the director of the hospital.</p> <p>There are dietitians-nutritionists in dietetic and nutrition units in some hospitals in Catalonia, Navarre, Madrid, Balearic Islands, Castilla la Mancha, Canary Islands and Comunidad Valenciana. There is also a part of the population that has access to private healthcare through health insurances. The portfolio of services is very similar to the public system.</p>
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### Step 1: Which aims have you already covered?

*These are the aims described in the Roadmap step 1: Title protection, Initial registration, Full registration, Specialisation*

What aims have you already covered?	<b><u>Protected title and part of the initial registration.</u></b>
If you have covered more than one aim, did you work on them separately or together?	<p>Firstly the title was protected by Royal Degree which was later rendered ineffective by the Bolonia Plan with the CIN730 / 2009 by which requirements for the verification of the official university qualifications, that qualify for the exercise of the profession of Dietitian-Nutritionist, were established. The registries were established, firstly at regional level by the regional professional bodies and secondly at national level by the CGDNE.</p> <p>In 2014 the <a href="#">King signed the Law of creation</a> of the CGDNE that regulates the profession at national level and is formed by all regional professional bodies of dietitians-nutritionists, and which is currently being developed.</p>
Which aim(s) are you still working on?	<p>Currently there is a modification of the Royal Degree by which accreditation of health centers and services and healthcare units are established. The CGDNE has made an appeal that dietitian-nutritionist should be in charge of Dietetics and Nutrition units. The reason Dietetic and Nutrition units are currently not allocated to a particular professional body is that the Royal Degree was brought into force one month before the profession of dietitian-nutritionist was brought into force for the first time by the 44/203 LOPS</p> <p><b><u>We are not working to finish the initial registration because there is no regulatory framework that allows us to do so. The same is happening with the full registration. The framework will be provided</u></b></p>

	<p><b><u>by the adoption of the Bill of Law regarding professional services.</u></b></p> <p>We are working on specialisation in clinical nutrition.</p>
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## Step 2: What matters did you explore?

See the Roadmap Step 2

Why did you decide to work on the aim?	We want the NHS to incorporate dietitians-nutritionists in all areas of its professional competences (primary, hospital, social and public health care).
What were/are relevant laws and regulations to take into consideration? Please explain	<ul style="list-style-type: none"> <li>• <a href="#">44/2003</a> Law of Ordinance of health professionals (<a href="#">LOPS</a>), the law that regulates health professionals</li> <li>• Order <a href="#">CIN730/2009</a> by which requirements for the verification of the official university qualifications that qualify for the exercise of the profession of Dietitian-Nutritionist were established. Bachelor Science in Human Nutrition and Dietetics) is protected at national level.</li> <li>• <a href="#">2/1974</a> Law of professional bodies, the law that regulates how regions should create regional bodies as well as the national one.</li> <li>• <a href="#">19/2014</a> Law of creation for the CGDNE</li> <li>• <a href="#">1277/2003</a> Royal Degree by which accreditation of health centers and services and healthcare units are established</li> </ul>
What were/are relevant stakeholders?	<ul style="list-style-type: none"> <li>• Other professional associations</li> <li>• Regional and National political parties</li> <li>• Conference of deans - High Education Entities.</li> <li>• Ministry of Health</li> <li>• Regional Governments</li> <li>• Association of patients</li> </ul>
What partners did/do you collaborate with?	<ul style="list-style-type: none"> <li>• Other professional associations</li> <li>• Regional and National political parties</li> <li>• Conference of deans - High Education Entities.</li> <li>• Ministry of Health</li> <li>• Regional Governments</li> <li>• Association of patients</li> </ul>
Who was responsible for the whole process towards regulation?	<p>Regional governments through their health ministry have been responsible for the approval in the regional parliaments of the laws of creation of professional bodies. Association of dietitians are directly responsible of making their Parliaments approve the regional law to create the Regional Professional Bodies of Dietitians-Nutritionists in their own regions.</p> <p>The National Government was in charge of the Law of creation of the <a href="#">General Council of Dietitians-Nutritionists of Spain</a> , which was promoted for by the CGDNE</p>

Are there other elements that are/were relevant in the exploration?	The regulatory system in Spain allows the creation of professional bodies for all professions that prove to be of public interest.
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### Step 3: What route did you decide on? Why? And how long did it take?

These are the routes as described in the roadmap: route A is government as regulator; route B is NDA as regulator.

What route did you decide on and why?	Route B, since professional bodies and CGDNE regulate the profession at regional and national level respectively.  Nonetheless, we must be prepared for the Bill of Law regarding professional services, which could establish which health professional should be registered and the criteria to be included or excluded.
How much time did it take to accomplish initiation of registration?	Approximately 3 years by Regional Professional bodies.
If you decided on route B did you ever try to change it to route A? Please explain	The legislation in Spain is not yet fully developed, since the Bill of Law regarding Professional Services is halted and we don't know for how long. This law will regulate national and regional registers, as well as the role of the CGDNE and Council and Regional Professional bodies.
Do you have additional information relevant for this step?	

### Step 4: What requirements do you have and what is the process?

See the roadmap, Step 4

#### 4.1 Requirements

What are the basic principles for the register?	Having the title of BSc in Human Nutrition and Dietetics
What are requirements for title protection? <i>e.g. minimal standards of competence (academic learning plus practical work in the field), periodical evaluation, enforcement system</i>	BSc in Human Nutrition and Dietetics Academic learning plus practical work in the field
What are requirements for initial registration? <i>e.g. minimum standards of competence</i>	Having the title and fulfil the Code of Ethics It has no limits and lasts until fees are paid There are registers for practicing and non- practicing dietitians-nutritionists.
What are requirements for full registration?	We have not a full registration yet.

<i>e.g. requirements on Life Long Learning (LLL), competences, work experience, code of ethics</i>	
Do you have requirements with regard to Code of Ethics?	Yes. All registered dietitians-nutritionists are required to comply it  Regional Professional Bodies have disciplinary regulations for those member that breach the ethical code.
What is the time period for dietitians to meet the requirements for full registration? Full registration means maintaining the registration	We have not a full registration yet.
What are the requirements for specialisation? <i>e.g. fields of specialisation, requirements on LLL, competence, work experience</i>	We are working in a clinical nutrition specialisation through the figure of dietitian-nutritionist internal resident, which is a figure regulated by Royal Degree that involves a postgraduate degree linked to a contract of practices in the National Health System. The current objective is to obtain the approval of Royal Degree to obtain the title of Dietitian-Nutritionist Specialist in Clinical Nutrition
What is the time period for dietitians to meet the requirements for specialisation? This means the period of reaching or maintaining the specialisation	We are taking the first steps. We have had a meeting with the Health Ministry. The perspective is that it may be 10 years before the approval of this postgraduate degree, so it will be considered as a preliminary step to obtain official diplomas of continuing education so that in 1 or 2 years dietitians-nutritionist can specialise in different areas. The CGDNE will be responsible for promoting these diplomas that will be endorsed and financed by the Ministry of Health.
Did the requirements develop over the years? (YES / NO)	Not applicable
If yes, how did the requirements develop over the years?	Not applicable
Are there other elements that are relevant in regard to the requirements?	

#### 4.2 Process

What are the procedures with regard to the register? <i>e.g. responsibility for development, maintenance and managing of register</i>	The regional professional bodies and the CGDNE are responsible for keeping the registries updated.
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How can a dietitian show she/he meets the criteria?	The accession to the professional bodies is regulated by regional law and is basically limited to having the title and some personal data.
What are the procedures for reviewing of meeting the requirements? <i>e.g. who, how, how often</i>	There is no tracking system
What are procedures in regard to communication strategy? <i>Internal and external communication towards different stakeholders</i>	The Council's register is published on the Council's website and updated every month. The registration in the database is done by each Regional professional body. The Council sends regular newsletters to registered dietitians on professional topics.
What are the procedures with regard to credentials? <i>How a competent (specialised) dietitian is made visible to the public?</i>	Public access to the registry on the web Use of a personal number for registration Use of the professional logo Certificate of registration for job search abroad
What are the procedures with regard to the financial plan? <i>e.g. what is the cost to the individual dietitian of setting up and maintaining registration ? How much is the cost for entering the register?</i>	Payment of annual fees to regional professional bodies, ranging from €200 - 250
What are the procedures with regard to remedial or disciplinary measurements? <i>e.g. when not meeting requirements, in case of unethical behaviour</i>	Regional Professional Bodies have disciplinary regulations established by their law
What are the procedures with regard to evaluation of regulation, procedure and requirements?	Regional Professional Bodies secretariat checks the documents required and the board of directors approves the applications
Are there other relevant elements?	

### What is the added value you see in a regulated profession?

The introduction explains the added value of a regulated profession. What is the added value you experience in your country? Or what is the added value that lead you to start a regulated profession?

What added value do you	Ensures quality of services and professional competences
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see at individual level?	Identification as a professional qualified to approach dietetics and nutrition care/assistance Ensures that non-competent dietitians-nutritionists cannot offer care services Accreditation as a professional for private health Protection of citizenship against professional encroachment
What added value do you see at national level?	Safer services and control of professional encroachment
What added value do you see at international level?	Easier Professional mobility
Do you have some additional comments?	

### Contact information

If other National Dietetic Associations want more information, who can they contact?	Manuel Moñino Gómez
Contact information	mmonyino@gmail.com
Website to register	<a href="http://www.consejodietistasnutricionistas.com/">http://www.consejodietistasnutricionistas.com/</a>

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