

Consultation on HCPC registration fees

Question 1

Do you agree that the HCPC should invest in preventing fitness to practice issues arising?

We would of course agree with this approach. The HCPC should be looking at ways to prevent avoidable FtP issues arising, however the case has not been made for how this links to an increase in fees. There are many ways that this can be addressed, such as working more closely with professional bodies. There is no indication of how further funds, generated from the rise in fees, would be spent on the prevention agenda. Other options to address prevention will not require significant investment. We also believe that successful investment should reduce the need for FtP hearings over time and therefore offset the cost of that investment in the long term.

Question 2

Do you agree that the HCPC should invest in improved services?

Again, although services should always be looking to improve, the case has not been made for an increase in fees in order to deliver this, given that HCPC income has already increased significantly year on year. It would also appear that a considerable part of the investment planned by the HCPC reflects capital spending in systems and technology rather than in ongoing costs. The HCPC might want to consider scoping what other regulators are doing to produce efficiency savings, and possibly changing the business model.

Question 3

Do you agree that the HCPC should invest in the necessary resources to improve the capacity, quality and timeliness of our FTP performance?

Yes, we believe that the HCPC MUST improve the capacity, quality and timeliness when dealing with FtP cases, as the experience of registrants is poor. We are aware of cases where it has taken up to seven years to hear an outcome, and the average length of time to resolve cases has increased year on year¹, despite much higher spend on FtP year on year in the same period².

However, it does not follow that such investment need lead to an increase in fees. Currently, according to HCPC figures, Social Workers account for 51% of all FtP cases³ despite representing only approximately 26% of registrants and therefore income⁴. Therefore, one would imagine the HCPC will in time be able to free up considerable FtP resources when social workers cease to be the HCPC's responsibility. The consultation argues that many of its costs are fixed, but according to HCPC accounts⁵ the large majority of costs are related to staff salaries, professional fees and partnership costs, all of which could arguably change in line with demand.

¹ <https://www.hcpc-uk.org/globalassets/resources/reports/fitness-to-practise/fitness-to-practice-annual-report-2017-2018.pdf> p15

² <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report---key-financial-information-2016-17.pdf> p10

³ <https://www.hcpc-uk.org/globalassets/resources/reports/fitness-to-practise/fitness-to-practice-annual-report-2017-2018.pdf> p 18

⁴ <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report---key-financial-information-2016-17.pdf> p12

⁵ <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report-and-accounts-2016-17.pdf> p44-45

It may also be timely to look at the process as a whole. There are invariably ways that the process can be made more streamlined and efficient, such as adding in deadlines for complainants and employers to comply with information requests for instance, or looking at how technological solutions could reduce travel and subsistence costs.

Question 4

Do you agree that the renewal fee should increase from £90 to £106 to support the proposals outlined in this document?

No, we do not agree that the fee should be increased by £16. We do not believe the consultation document makes it at all clear how this figure has been arrived at. As a professional body and membership organisation, we can appreciate the need to increase fees in line with rising costs, but this proposed increase, coupled with increases in 2015 and 2013, would represent a significantly above-inflation increase over seven years (approx. 40%). In the same period our own fees have increased by just 13%.

It is clear from the consultation paper itself that HCPC fee increases have not been linked to inflation, but have instead taken the form of large and erratic increases at different points, of which this would be the third in seven years. If the proposal was to routinely increase fees in line with inflation, we believe this would be better understood by our members, and more justifiable in terms of increasing cost. As explained above, the departure of Social Workers from HCPCs responsibility should arguably reduce FtP costs given their disproportionate representation in FtP cases. Registration costs represent the second largest area of expenditure for the HCPC after FtP (at around 12% of spend⁶) and one would also expect this to be able to reduce once Social Workers depart.

From the five-year plan document⁷, it is not clear, beyond general claims of “investment” and maintaining headcounts and progress with improvement programmes, how a figure of 18% has been arrived at and where this additional income (accepting that total income will fall with loss of SW) will be spent. The “defer” option, which would still require a 9% increase in fees, claims that significant reductions in staffing and resourcing, with knock on impacts on services, would be required despite expenditure only falling by 16% between 2018 and 2021. One could argue that this does not reflect an intention to improve efficiency or reduce non-payroll costs.

At least some of the investment proposed is likely to be capital, one-off costs, and we do not believe these should be funded through permanent revenue increases.

Question 5

Do you agree that the scrutiny fee for applicants from approved programmes should increase in line with the renewal fee from £63 to £74.

The increase of the scrutiny fee from £63 to £74 is the same proportionate increase as the renewal fee. Again, we do not believe an effective argument has been made for how this figure has been derived, what it equates to and the business case for how the revenue generated will be spent, and why it is needed at all, given that they are applied to graduates from APPROVED courses.

Question 6

Do you agree that graduate applicants should no longer receive a 50% discount on the cost of registration?

We do not feel that the case for removing the discount has been made. Recent graduates are typically the lowest earning members of the profession, and since the removal of bursaries, are likely to be leaving university with significant student debt.

⁶ <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report---key-financial-information-2016-17.pdf> p10

⁷ <https://www.hcpc-uk.org/globalassets/meetings-attachments3/council-meeting/2018/september/enc-08---5-year-plan/>

The consultation document correctly identifies that there are other groups, including those on parental leave or long-term illness, who might arguably benefit from a discount. We do not believe the answer to this inconsistency is to remove all discounts, but for the HCPC to more properly consider whether such discounts should be offered to others.

Question 7

Do you agree that the restoration and readmission fees should also increase in line with the increase in our registration renewal fee?

As with the other proposed increases we are not convinced that the argument has been for where the 18% increase has come from or how it will be used to benefit registrants. The processes for restoration haven't changed so we find it difficult to find the justification for increasing the fees.

Question 8

Do you agree that the international and grandparenting scrutiny fees should increase in line with the increase in our registration renewal fee?

Again, as above, the HCPC is not proposing to change the process involved in grandparenting, and therefore we cannot find the justification for increasing the fees.

Question 9

Do you agree that we should regularly review our fees to avoid infrequent but larger increases in the future?

Yes, we agree that this is the preferred option Now, and in the future, exactly for the reasons outlined in the consultation document. Current increases appear detached from inflationary costs.

Question 10

Do you agree that we should investigate additional charging models for services including charging for the approval of education programmes?

We are concerned that the fees proposed would erode the role of professional bodies such as the BDA in quality assurance and enhancement. Education providers may not be able to afford both sets of fees (and HCPC approval is clearly essential for programmes to run), meaning pressure will be placed on professional bodies.

This would also impact negatively on how the HCPC undertakes its education approval role, given its reliance as a multi-professional regulator on professional bodies to support this work. In turn, this would impact on the quality assurance of education programmes that in turn lead to eligibility for admission to the register, and therefore put the HCPC's fulfilment of its public protection role at risk. However, we welcome the opportunity to be involved in the HCPC's review of its education approval role.

Question 11

Do you agree that a higher fee should be charged for those who request paper renewal forms?

Yes, we would agree that in the main, renewal should be online in order to save natural resources. That said, there may be situations where registrants with specific challenges may appropriately request a paper copy. We feel that no additional charge should be made in this instance. It may prove cheaper not to endorse a charge than to implement a system of exceptions for those with valid reasons for requesting a paper copy.

Question 12

Do you consider there are any aspects of our proposals that could result in equality and diversity implications for groups or individuals based on one or more of the following protected characteristics, as defined by the Equality Act 2010 and equivalent Northern Irish legislation?

Yes, we feel strongly that the proposal to withdraw the discounted fee for new graduates has highlighted the inequity within the HCPCs fees structure. The fact that women on maternity leave have to pay the

same as others, when they can least afford it, directly disadvantages on the grounds of sex and pregnancy & maternity. One could also argue for disproportionate impact on part time workers, who may have chosen part-time working for any number of reasons including sex, age, (e.g. older workers approaching retirement), cultural reasons related to religious beliefs etc.

Question 13

Do you have any further comments on our proposals?

We believe that increasing fees should not be seen as the automatic answer for system improvement, and other options should be investigated alongside this - for example, contracts, suppliers, streamlined processes, staffing, funded Christmas parties, and negotiated deals for travel and subsistence, to name a few.

In addition, there is huge scope to address the prevention agenda and other improvement aspirations, by collaborating more effectively and closely with the professional bodies. For the reasons addressed above, we think it is important that the HCPC sets out clearly how this increase is not attempt to cover the loss of income from Social workers in order to maintain the size of the organisation. The HCPC needs to be flexible to the needs of its registrants and the size of the service it is required to provide.