

## **HCPC consultation on registration fees increase UNISON response – December 2018**

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**“I get no more benefits from the HCPC now than I did 5 years ago but the cost of registration keeps rising. And the justification of putting up fees to keep in line with rates of inflation is unfair since pay rises have not kept up with rates of inflation”.**

**OCCUPATIONAL THERAPIST**

### **Introduction**

1. UNISON is the largest public service union in the United Kingdom with over 1.3 million members across a wide range of services including health, social care, education and police and justice.
2. UNISON is uniquely placed to respond to this survey. We represent members in all 16 of the professions that the HCPC regulates. For some of the largest groups of HCPC registrants – paramedics, social workers and occupational therapists – we are the primary union in the UK. As well as our partnership with the British Association of Occupational Therapists, we also have partnerships with the College of Operating Department Practitioners.
3. UNISON liaises regularly with HCPC on policy and strategic issues as well as on fitness to practice policies and procedures. We also represent registrants through fitness to practice proceedings, and as such make a major contribution to public protection and fair and just outcomes for professionals.
4. The HCPC increased fees in 2014 by 5 per cent and again in 2015 by 12.5 per cent despite 92 per cent of respondents disagreeing with the increase from £80 to £90. We hope that HCPC will this time take account of the strength of feeling demonstrated in this response from UNISON – a major stakeholder and primary representative of HCPC-regulated professionals. We believe it is no exaggeration to say that the amount of the proposed fee hike, and the way HCPC has gone about proposing it, risk severely undermining registrants’ trust and confidence. Although regulation for HCPC professionals is a statutory obligation it can only operate effectively by consent, and HCPC is in danger of losing the goodwill of registrants.

5. In drawing up this consultation response, we have consulted with our lay member committees and also drawn on the results of a survey of 1,629 HCPC-registered UNISON members.
6. In the next section we provide our response to the consultation question specifically addressing the increase in fees, drawing on the quantitative and qualitative evidence from our survey.

**Q4. Do you agree that the renewal fee should increase from £90 to £106 to support the proposals outlined in this document?**

## **UNISON registrants' survey**

**Q. Do you support the proposal that registration fees should increase from £90 to £106 per year – an 18% increase?**

An overwhelming 99 per cent of our 1,629 respondents say they do not support the £16 a year increase to the registration renewal fee. Only 1 per cent supports it.

**“It got more expensive only a few years ago. Any pay rise staff get seems to be taken straight off of them and so inflation constantly affects the individuals, who are already being affected by cost-saving restructures and potential down-banding of jobs to save money.”**

**PARAMEDIC**

UNISON believes that an 18 per cent increase is unacceptable especially over a period when HCPC registrants have seen little or no increase in their own incomes. Many registrants are suffering high levels of debt and struggling to make ends meet.

**Q. Do you believe the HCPC provides good value for the money registrants pay?**

78 per cent of respondents say they do not feel the HCPC provides good value for money.

**“Out of touch with frontline staff who have had little or no pay increase and seen little or no increase in benefits of HCPC”.**

**“Information/advice and support during re-registration process is poor and it appears a lot of money for the administration of registration”.**

**PYSIOTHERAPISTS**

**“I pay my registration fee so that my name remains on the register so that I can continue to do my job. I don't use HCPC for anything else”.**

**CLINICAL SCIENTIST**

**“Other than having to be registered to work the HCPC provide very little benefits to their members for the money they charge”.**

**BIOMEDICAL SCIENTIST**

**“I'm not really clear on what is gained from registration, other than that it is a professional requirement”.**

**PRACTITIONER PSYCHOLOGIST**

The HCPC consultation document makes reference to their fees are low compared to other regulators, but at our members report that with other regulators, such as the NMC, registrants get a lot more help with revalidation and professional issues, whereas those registered with the HCPC get little to no help at all. HCPC registrants feel like they are paying with no tangible benefits.

***Q. In a few words, please explain the impact that this fee increase would have on your current circumstances***

The survey responses showed that many registrants are already stretched financially and the increase in fees would only make this situation worse.

**“I am already struggling financially. Our pay increase doesn't cover all these hikes we keep getting Adding further debt to an already rising debt”**

**OPERATING DEPARTMENT PRACTITIONER**

**“I am a single parent and can't afford to have an increase in my monthly outgoings”.**

**“Already stretched NHS worker – would have large implications on standard of living”.**

**DIETICIANS**

**“Huge. I will be on maternity leave with reduced pay. In addition to this, they do not offer any reduced rate for professionals when on maternity leave”.**

**SPEECH AND LANGUAGE THERAPIST**

**Fee increase is too high. Unaffordable for me, I work in central London with high rental costs. Unacceptable for another increases.**

**RADIOGRAPHER**

***Q. Would you support a smaller fee increase?***

Our survey showed that 29 per cent of respondents would support a smaller fee increase whereas 70 per cent do not. Respondents did not feel that the proposed 18 per cent increase was proportionate or reasonable when compared to current inflation levels. The current increase is more than six times the current rate of inflation.

**“I’m not against proportional and reasonable increases. This is neither and is another cost for a single income household”.**

**HEARING AID DISPENSER**

***Q. Do you believe that the level of fees should vary according to your annual income?***

Respondents were more evenly split over whether the level of fees should vary according to annual income with 47 per cent saying they should and 53 per cent saying they shouldn’t.

**“I work p/t and cannot afford another increase. There is no reduction for p/t workers.”**

**I work part time and I can't afford increases like this when money is tight.**

**It would impact on my family as my outgoings are increasing in disproportion to my income.**

**ARTS THERAPISTS**

The HCPC should allow part time workers to pay a pro-rata fee and allow registrants to pay their fees monthly to help spread the cost more evenly.

The NHS is currently under enormous pressure and staff shortages are becoming increasingly apparent throughout the health professions. Many staff are choosing to reduce their hours in order to reach a better work/life balance so anything that could act as a disincentive for those wanting to join or remain in the service and those wishing to re-join on a part-time basis must be avoided.

***Q. Would this fee increase impact your decision as to whether to renew your registration? For example, if you’re planning on practising part time following retirement or if your job does not require you to be registered?***

Our survey results indicate the fee increases would negatively affect the decision of around 43 per cent of respondents when considering to renew. This should be

a cause of concern to the HCPC and careful assessment of the impact on workforce and staff shortages should be considered before increasing fees.

Many comment that they receive no benefit or professional services at all from their registration.

UNISON fears that HCPC is on the cusp of seriously breaching registrants' confidence and we believe this could have far-reaching consequences:

- Damage to registrants' willingness to co-operate with HCPC's systems and processes
- Growing unrest and resentment
- Tipping the balance for some registrants to decide not to continue to practise on reduced hours – thus depriving health and social care services of desperately needed staffing capacity
- Pushing some registrants to move to non-regulated posts/job titles and causing some registrants who work in posts where registration is not a requirement to decide not to renew. This could reduce registrant numbers and HCPC's fee income. It could also worsen the current recruitment and retention crisis in areas like the ambulance service

## **Other HCPC consultation questions**

Working preventatively to reducing fitness to practise issues and reducing the cost of unnecessary investigations should be a priority for the HCPC. We welcome the report "*People like us? Understanding complaints about paramedics and social workers*". This report demonstrated that cultural behaviours in professions and employers led to a disproportionate number of cases that did not meet the threshold for further investigation and high levels of self-referrals.

Social workers in England make up around a quarter of the those registered with the HCPC. Despite this, social workers account for more than half of all fitness to practise cases the HCPC deals with – the HCPC's single largest area of expenditure.

Consequently, when social workers leave the register in 2019, we would expect the HCPC's costs to significantly decrease.

However, we are concerned that moves to increase the registration fee at this time are being justified as a response to the HCPC's predicted loss of income when social workers in England transfer to a new regulator in 2019.

Whatever the impact, we do not feel it is appropriate for health staff to pay for political decisions about the regulation of the social work profession. We're asking the HCPC to look at how they can become more efficient rather than passing on the impact of their reduced income to the remaining professions on their register.

**Q1 Do you agree that the HCPC should invest in preventing fitness to practise issues arising?**

Yes – as above.

**Q2 Do you agree that the HCPC should invest in improved services?**

Yes – but through existing funding arrangements, not through increased fees to registrants.

**Q3 Do you agree that the HCPC should invest in the necessary resources to improve the capacity, quality and timeliness of our FtP performance?**

We agree that the HCPC should improve the capacity, quality and timeliness of FtP performance but do not agree the resource should be raised through increased fees to registrants.

**Q4 Do you agree that the renewal fee should increase from £90 to £106 to support the proposals outlined in this consultation document?**

No – see above

**Q5 Do you agree that the scrutiny fee for applicants from approved programmes should increase in line with the renewal fee from £63 to £74?**

No.

**Q6 Do you agree that graduate applicants should no longer receive a 50 per cent discount on the cost of registration?**

No. Linked to the point above about recruitment and retention of many of the HCPC professions, we believe this may act as a disincentive and a barrier to dealing with current unsustainable vacancy rates

**Q7 Do you agree that the restoration and readmission fees should also increase in line with the increase in our registration renewal fee?**

No – see answer to Q6.

**Q8 Do you agree that the international and grandparenting scrutiny fees should increase in line with the increase in our registration renewal fee?**

No – see answer to Q6.

**Q9 Do you agree that we should regularly review our fees to avoid infrequent but larger increases in the future?**

Yes, but the reviews need to recognise the impact on the registrants and the current economic position they are working in.

**Q10 Do you agree that we should investigate additional charging models for services including charging for the approval of education programmes?**

Yes. This option should be explored.

**Q11 Do you agree that a higher fee should be charged for those who request paper renewal forms?**

We would support a move to a more environmental approach to renewal processes, however, we would want to understand how much this would save and why 2% are still using paper forms. Some exploratory work would be helpful.

**Q12 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?**

Increasing fees to part time workers would disproportionately impact those workers when compared to full time workers.

**Q13 Do you have any further comments on our proposals?**

Yes. Please see above.