

Consultation on HCPC registration fees

Analysis of responses to the consultation on HCPC registration fees and our decisions as a result.

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1. Introduction

About the consultation

- 1.1. We consulted between 24 September 2018 and 21 December 2018 on proposals to:
 - Take forward work to:
 - increase our efforts towards preventing problems arising in professional practise rather than taking action afterwards;
 - improve our registration service by updating technology to meet modern-day registrant expectations; and
 - improve the quality and timeliness of our fitness to practise performance.
 - Investigate charging models and fees for quality assurance of education programmes.
 - Increase the fees we charge for registration.
 - Reduce discounts for graduate applicants.
 - Regularly review our fees to avoid infrequent but larger increase in future.
- 1.2. We proposed a £16 increase (an increase of 17.8%) to the annual renewal fee. This would increase the renewal fee from £90 to £106 per year. We also proposed a similar level increase to most of the other fees we charge.
- 1.3. We informed a range of stakeholders about the consultation including professional bodies, employers and registrants. This included information about the consultation on our website, on social media, and in our registrant-facing newsletter. We also issued a press release.
- 1.4. Our Chair and Chief Executive met with professional bodies and trade unions to talk through the detail of our proposals.
- 1.5. We would like to thank all those who took the time to respond. You can download the consultation document and a copy of this responses document from our website.

About us

- 1.6. We are a regulator and were set up to protect the public. To do this, we keep a Register of health and care professionals who meet our standards for their professional skills and behaviour. Individuals on our register are called 'registrants'.

1.7. We currently regulate 16 health and care professions:

- Arts therapists
- Biomedical scientists
- Chiropodists / podiatrists
- Clinical scientists
- Dietitians
- Hearing aid dispensers
- Occupational therapists
- Operating department practitioners
- Orthoptists
- Paramedics
- Physiotherapists
- Practitioner psychologists
- Prosthetists / orthotists
- Radiographers
- Social workers in England
- Speech and language therapists

About this document

1.8. This document summarises the responses we received to the consultation.

1.9. The document starts by explaining how we handled and analysed the responses we received, providing some overall statistics from the responses. Our responses and decisions as a result of the comments we received are set out in section four.

1.10. In this document, 'you' and 'your' is a reference to respondents to the consultation, 'we', 'us' and 'our' are references to the HCPC.

2. Analysing your responses

- 2.1. Now that the consultation has ended, we have analysed all the responses we received.

Method of recording and analysis

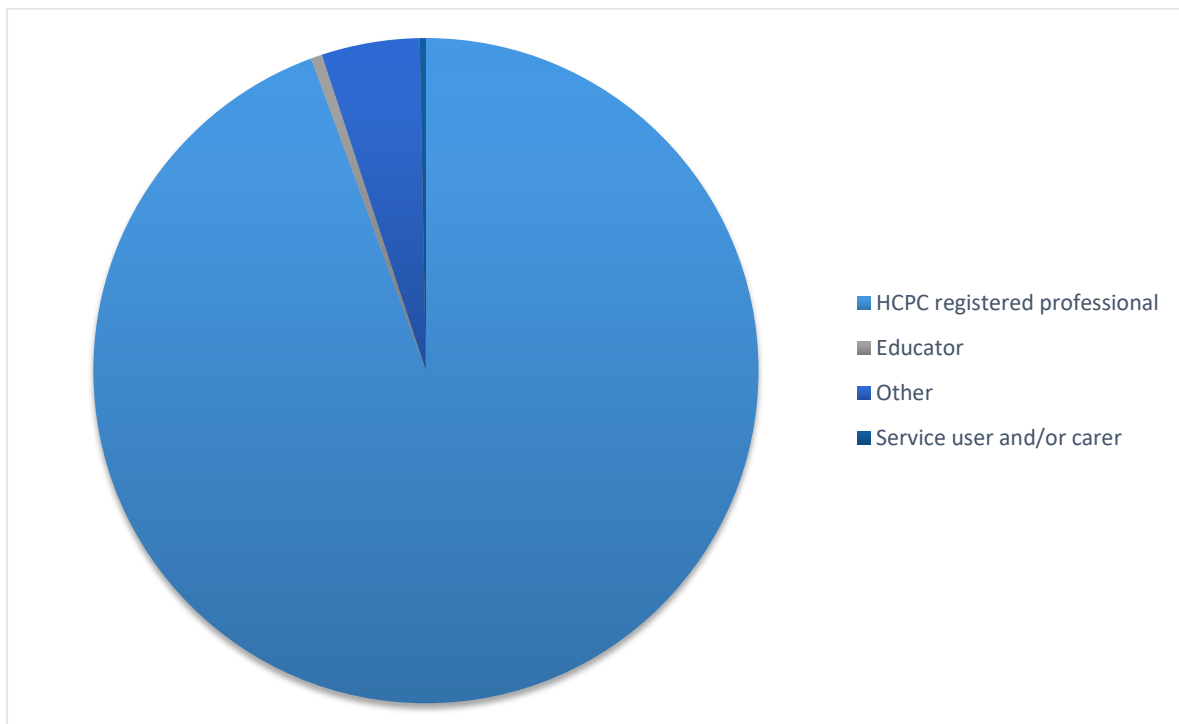
- 2.2. The majority of respondents used our online survey tool to respond to the consultation. They self-selected whether their response was an individual or an organisation response, and, where answered, selected their response to each question (e.g. yes; no; unsure)¹. They were also able to give us their comments on each question.
- 2.3. Where we received responses by email or by letter, we recorded each response in a similar format.
- 2.4. When deciding what information to include in this document, we assessed the frequency of the comments made and identified themes. This document summarises the common themes across all responses, and indicates the frequent comments made by respondents.

Statistical analysis

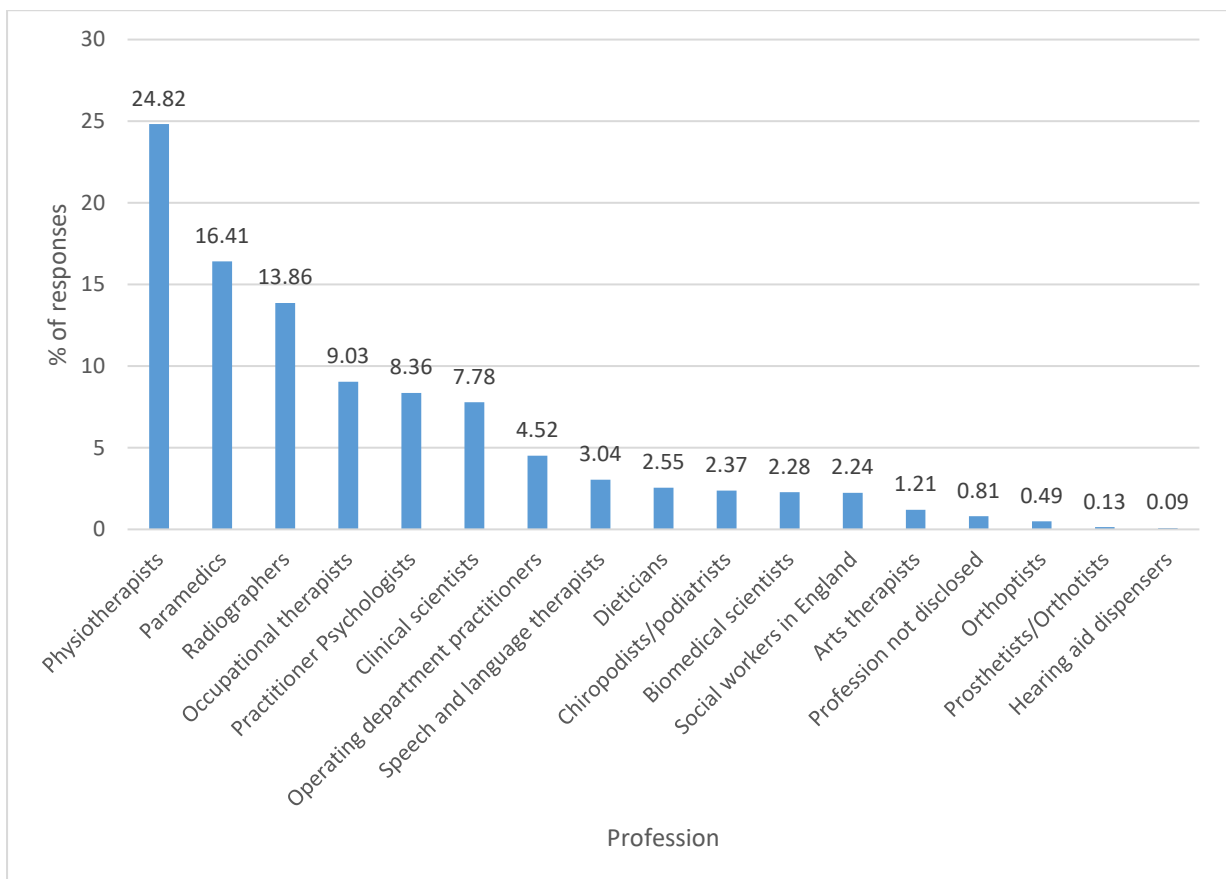
- 2.5. We received 2398 responses to the consultation document. 2349 responses (98%) were made by individuals, of which 2236 (95%) were HCPC registered professionals. 49 responses (2%) were made on behalf of organisations.
- 2.6. The breakdown of respondents and responses we received to each question are shown in the graphs and tables that follow.

¹ In a small number of cases, where appropriate, responses were reclassified from organisation to individual responses for accuracy

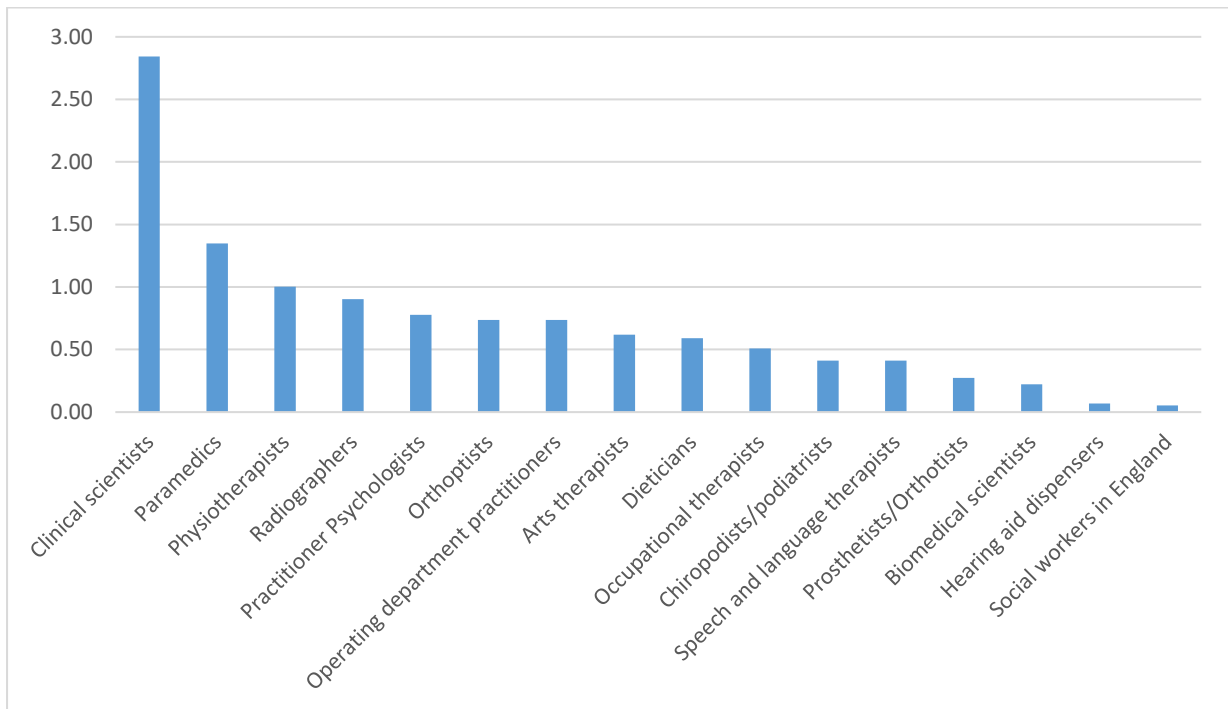
Graph 1: Breakdown of individual responses



Graph 2: Breakdown of HCPC registered professional response by profession



Graph 3: Percentage of each registrant group who responded



Graph 4: Breakdown of organisation responses

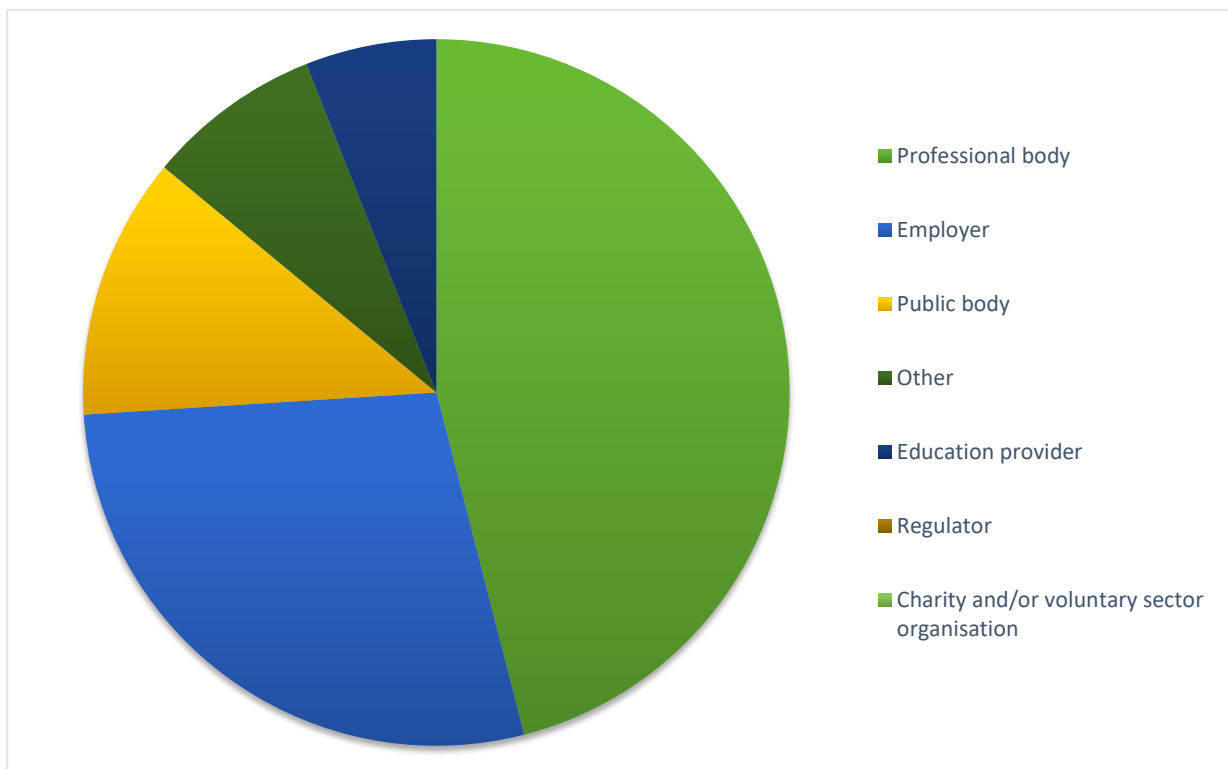


Table 1: Breakdown of responses to each question

Questions	Yes	No	Unsure
Q1. Do you agree that the HCPC should invest in preventing fitness to practise issues arising?	1,317 (57%)	611 (26%)	389 (17%)
Q2. Do you agree that the HCPC should invest in improved services?	1,167 (51%)	657 (29%)	480 (21%)
Q3. Do you agree that the HCPC should invest in the necessary resources to improve the capacity, quality and timeliness of our FtP performance?	1,158 (51%)	630 (27%)	504 (22%)
Q4. Do you agree that the renewal fee should increase from £90 to £106 to support the proposals outlined in this consultation document?	123 (5%)	2,133 (90%)	118 (5%)
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?	340 (15%)	1,653 (71%)	321 (14%)
Q6. Do you agree that graduate applicants should no longer receive a 50 per cent discount on the cost of registration?	536 (23%)	1,623 (70%)	154 (7%)
Q7. Do you agree that the restoration and readmission fees should also increase in line with the increase in our registration renewal fee?	569 (25%)	1,481 (64%)	262 (11%)
Q8. Do you agree that the international and grandparenting scrutiny fees should increase in line with the increase in our registration renewal fee?	721 (31%)	1,206 (52%)	376 (16%)
Q9. Do you agree that we should regularly review our fees to avoid infrequent but larger increases in the future?	1,451 (63%)	565 (25%)	288 (13%)
Q10. Do you agree that we should investigate additional charging models for services including charging for the approval of education programmes?	1,136 (49%)	714 (31%)	452 (20%)
Q11. Do you agree that a higher fee should be charged for those who request paper renewal forms?	1,036 (45%)	1,145 (50%)	129 (6%)
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 protected characteristics, as defined by the Equality Act 2010 and equivalent Northern Irish legislation?	355 (16%)	1,235 (55%)	669 (30%)
Question 13 invited further comments rather than a 'yes or no' answer, so is not included in the above tables. Responses to this question are included in Section four of this document			

Percentages in the table above have been rounded to the nearest whole number and therefore may not add up to 100%.

3. Responses to consultation questions

3.1. This section contains comments made in response to the questions within the consultation document.

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

Summary

- 3.2. 57% of respondents agreed that the HCPC should invest in preventing fitness to practise issues arising. 26% of respondents disagreed and 17% were unsure.
- 3.3. There was little variation between the responses we received from organisations as compared with individuals.
- 3.4. Of those respondents who disagreed with this proposal, a small number indicated that they did so because they didn't feel it was appropriate to do so by raising the registration fee.

Comments

- 3.5. The following comments were frequently made by respondents who agreed with the proposal to invest in preventing fitness to practise issues arising:
- Early intervention is vital and will have a positive impact on individuals, teams, services and service users.
 - It would result in less fitness to practise cases and hearings, improving the wellbeing of registrants, and reducing the financial impacts of these processes.
 - Prevention work should already be taking place within the HCPC.
 - Education, training, and ongoing support for registrants is key to supporting the prevention of fitness to practise concerns.
 - Collaboration with other bodies would be vital to the success of any preventative works; predominantly through liaison with employers, professional bodies and education providers.
 - Prevention is a challenging area, which will often influence conscientious registrants far easier than those of particular concern. Respondents felt that the work needs to be carefully managed to ensure sufficient impact.
 - It should be funded through cost-saving initiatives within the organisation. In particular, many respondents felt that the prevention work would reduce

the volume of fitness to practise cases, freeing resources. Others noted that there could be reductions in internal spend within the organisation; particularly on the employee Christmas party.

- More information is necessary about the approach to be taken, and how funds would be used.
- This should not be funded by a fee rise.

3.6. Many of the comments frequently made by respondents who disagreed with the proposal to invest in preventing fitness to practise issues arising were linked to any potential fee rise:

- Fitness to practise issues only affect a very small proportion of the Register, and it is therefore inequitable to charge all registrants for this.
- Registrant pay rises have been stagnant, and further fee rises will lead to them being too expensive to manage.
- Registrants have many other charges to pay, for example professional body fees and insurance and indemnity costs, and a fee rise on top of this would be unreasonable.

3.7. Other frequent comments made by respondents who disagreed with the proposal to invest in preventing fitness to practise issues arising included that:

- More detail is required around how the HCPC intends to prevent fitness to practise issues, and what the expected impacts are.
- It is not our role. There were differing views about whose role it is, but organisations cited include: education providers; employers; professional bodies and unions, and registrants themselves.
- Registrants who choose not to follow the standards will likely do so regardless of any prevention work.

3.8. Of those respondents who disagreed with this proposal, a small number indicated that they did so because they didn't feel it was appropriate to do so by raising the registration fee.

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

Summary

3.9. 51% of respondents agreed that the HCPC should invest in improved services. 29% disagreed and 21% were unsure.

- 3.10. There was some variance between responses from organisations as compared with individuals; with 67% of organisations agreeing to the proposal to invest in improved services compared with only 50% of individuals in agreement.
- 3.11. Of those respondents who disagreed with this proposal, a small number indicated that they did so because they didn't feel it was appropriate to do so by raising the registration fee.

Comments

- 3.12. The following comments were frequently made by respondents who agreed that the HCPC should invest in improved services:
- Improvements to services would have a range of benefits, particularly in enhancing support for registration applications, CPD activities and the returning to practise process.
 - Better services would provide efficiency savings to the HCPC, resulting in reductions in costs.
 - This would help improve service user safety.
 - The HCPC should be improving services already and should be working in collaboration with other organisations to do so, for example professional bodies.
 - More detail is required about the specific changes intended, and should only be taken forward if there are tangible benefits for all registrants.
 - This should not be funded by a fee rise, but through cost savings within the HCPC, particularly in relation to the employee Christmas party.
- 3.13. The following comments were frequently made by respondents who said that they disagreed that the HCPC should invest in services:
- This should not be funded by a fee rise, and should instead be funded by cost savings and contributions from the Government, education providers and employers.
 - This isn't an area the HCPC should be focused on, and should instead be taken forward by employers and professional bodies and unions.
 - The current services are adequate and don't require improvement, particularly in times of austerity.
 - No benefit felt in current services, and so they are reluctant to agree to further investment, predominantly because they do not consider they will feel a significant impact.

- More detail is required than is currently set out in the consultation document if respondents are to make an informed judgement.
- 3.14. A few respondents who disagreed with the proposal for the HCPC to improve its services raised concern that the HCPC does not promote or protect the professions it regulates, or provide CPD opportunities.

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

Summary

- 3.15. 51% of respondents agreed that the HCPC should invest in the necessary resources to improve the capacity, quality and timeliness of our FtP performance. 27% disagreed and 22% were unsure.
- 3.16. There was some variance between responses from organisations as compared with individuals; with 71% of organisations agreeing to the proposal to invest in the necessary resources to improve the capacity, quality and timeliness of our FtP performance compared with only 50% of individuals in agreement.
- 3.17. Of those respondents who disagreed with this proposal, a small number indicated that they did so because they didn't feel it was appropriate to do so by raising the registration fee.

Comments

- 3.18. The following comments were frequently made by respondents who agreed that the HCPC should invest in the necessary resources to improve the capacity, quality and timeliness of our FtP performance:
- This is particularly important to reduce the length of investigations, reducing costs and stress for all involved. Some respondents commented on the positive impact this would have on registrant mental health.
 - This could result in improved registrant performance, public protection and public confidence in the profession.
 - There should be a focus on efficiencies and cost savings rather than charging registrants higher fees. Some respondents commented that this should be something Government should pay for.
 - Consideration should be given to the investment in employee Christmas parties within the HCPC.

- It is inequitable to charge all registrants for issue relating to a small portion of the register. Alternatives suggested were to charge those undergoing fitness to practise, or to attribute higher fees to professions with higher fitness to practise numbers.
- More information is required by respondents to better understand the intended impacts of this proposal.

3.19. The following comments were frequently made by respondents who disagreed that the HCPC should invest in the necessary resources to improve the capacity, quality and timeliness of our FtP performance:

- The current approach is adequate, and it is not a priority to change this at this time.
- It is not something for the HCPC to take forward. Suggestions for alternative bodies to take this forward included education providers, employers and professional bodies and unions.
- It is unfair for registrants to pay for the minority who fail to follow the standards. Alternatives suggested included charging those who engage fitness to practise processes, or charge professions who have higher volumes of fitness to practise cases.
- This should not be funded by a fee rise, and instead should be funded by cost saving measures within the HCPC. Suggestions included: reviewing the HCPC contribution to the employee Christmas party; investing in prevention to reduce fitness to practise numbers; take account of reduced volume of fitness to practise cases following the loss of social workers; reduce legal fees; facilitate more local resolution of concerns; and streamline processes.
- More information is required by respondents to better understand the intended impacts of this proposal.

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

Summary

3.20. 90% of respondents disagreed with the proposal to increase the renewal fee from £90 to £106 to support the proposals outlined in the consultation document. 5% agreed and 5% were unsure.

3.21. There was some variation between responses from individuals as compared with organisations; with 90% of individuals disagreeing with the proposal to increase the renewal fee from £90 to £106 compared with 79% of organisations.

Comments

3.22. The following comments were frequently made by respondents who disagreed with the proposal to increase the renewal fee from £90 to £106:

- The renewal fee is compulsory for registrants, and to increase this is unfair as they have no choice but to pay. Many felt the current fee should be sufficient to fund the proposals outlined in the consultation document.
- Many registrants felt that they have yet to see any benefits from the last fee rise, and would therefore question the impact of this increase for them personally.
- Some registrants felt the fee rise was inequitable because: they don't feel they should carry the burden for the lost income from social workers leaving the register (particularly for registrants in Scotland as the HCPC doesn't regulate social workers in Scotland); they shouldn't have to pay for registrants who don't meet the standards; it impacts part-time workers heavily
- A significant number of registrants highlighted that they have had real-term pay cuts over recent years through pay freezes as the cost of living has continued to rise. Having just secured a small pay rise of 1%, many felt the 17.8% proposed increase in the renewal fee was unacceptable and indicates the HCPC is out of touch with its registrants.
- A fee rise may have an impact on workforce numbers; with limited to no pay rises over recent years and a rising cost of living, some registrants are unable to absorb any further increases to the fees they pay.
- Some respondents said that NHS staff in Northern Ireland have not received the cost of living increase awarded in other parts of the UK recently, and so an increase in the renewal fee would be even harder for Northern Ireland residents.
- The prevention of fitness to practise concerns and improvements to the resources available for the HCPC's fitness to practise performance, should be funded by employers or the Government.
- Further funding should be secured through efficiencies, primarily cost savings made through: the loss of social work fitness to practise cases; pay freezes for HCPC staff; process improvements; charging registrants in fitness to practise; moving the location of the HCPC offices; and reviewing contributions to the employee Christmas party.
- Some registrants simply felt the fee rise was just too expensive. Alternative amounts suggested ranged from £95 to £100, whilst a few registrants said that it should rise in line with inflation or wages.

- The service provided by the HCPC is poor, and requires review before any fee rise is considered.
- If better processes were in place to ensure successful prosecution of title concerns, there would be less fitness to practise issues, and the fee rise wouldn't be required.
- More information is required by respondents to better understand the intended impacts of this proposal. Many felt there wasn't sufficient justification in the consultation document to support a fee rise and that further transparency was necessary.

3.23. The following comments were frequently made by respondents who agreed with the proposal to increase the renewal fee from £90 to £106:

- The HCPC provides a vital service, and as long as the fee increase is used wisely it is appropriate and necessary.
- The HCPC should consider different fees for full and part-time workers.
- In order to be efficient and effective, the HCPC must invest in improvements.

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?

Summary

3.24. 71% of respondents disagreed with the proposal to increase the scrutiny fee for applicants from approved programmes from £63 to £74. 15% agreed and 14% were unsure.

3.25. There was little variation between the responses we received from organisations as compared with individuals.

Comments

3.26. The following comments were frequently made by respondents who disagreed with the proposal to increase the scrutiny fee for applicants from approved programmes from £63 to £74:

- The fee rise is unnecessary, the current service is sufficient and it's hard to see what would change to support a fee rise.
- The registration process poor; it's too slow and there's not enough information available. Until this is resolved, there's no justification for a fee rise.

- If the programme has been scrutinised, why does the student need to be scrutinised too. There should be no fee at all.
- This is too expensive, particularly given the low salaries available to most professions, the other costs required such as professional body fees, and the removal of bursaries. Many students would struggle to pay this, particularly those from poorer backgrounds. This may lead to issues recruiting newly qualified professionals.
- Any fee rise should be linked to inflation.
- There should be a focus on efficiencies and cost savings, for example by moving the office location, or reviewing contributions to the employee Christmas party.
- The current scrutiny fee should be maintained and offset by not giving a discount at renewal.
- More information is necessary about the approach to be taken, and how funds would be used

3.27. The following comments were frequently made by respondents who disagreed with the proposal to increase the scrutiny fee for applicants from approved programmes from £63 to £74:

- This will keep standards high.
- Necessary to support process improvements.
- This is a modest fee.
- They should be paying the same as others, so increase this fee further.
- Employers should help pay this fee.
- This must lead to an increase in quality.

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

Summary

3.28. 70% of respondents disagreed with the proposal to remove the 50% discount for graduate applicants on the cost of registration. 23% agreed and 7% were unsure.

3.29. There was little variation between the responses we received from organisations as compared with individuals.

Comments

3.30. The following comments were frequently made by respondents who disagreed with the proposal to remove the 50% discount for graduate applicants on the cost of registration.

- With increases in tuition fees, removal of bursaries, rise in the cost of living, and low starting salaries, students will be at their poorest and most vulnerable, and this is too expensive.
- Fees should not rise any higher than inflation.
- The fee should be waived for the first year and paid in full for the second year instead.
- This may result in graduates delaying registration or choosing another career, leading to impacts on workforce numbers.
- Further funding should be secured through cost savings, for example reviewing contributions to the employee Christmas party.

3.31. The following comments were frequently made by respondents who agreed with the proposal to remove the 50% discount for graduate applicants on the cost of registration.

- It is hard to justify treating one group differently to others. All registrants should be treated equally and pay the same fee. This will help ensure the renewal fee doesn't have to rise even further.
- Focus on ensuring people join the professions is misguided if it means costs are passed to existing registrants who leave the profession because they can no longer afford it.
- Fitness to practise concerns are higher in junior roles, and so they should pay equally as they may incur fitness to practise costs.
- Some employers pay these fees anyway.
- Perhaps a smaller discount could be applied. Some respondents suggested 25%.
- However, the fee should be pro-rata depending on the time in the year they join.

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

Summary

- 3.32. 64% of respondents disagreed with the proposal to increase restoration and readmission fees in line with the increase to the registration renewal fee. 25% agreed and 11% were unsure.
- 3.33. There was little variation between the responses we received from organisations as compared with individuals.

Comments

- 3.34. The following comments were frequently made by respondents who disagreed with the proposal to increase restoration and readmission fees in line with the increase to the registration renewal fee.
- This is a barrier to those returning to work and could impact on workforce numbers. The HCPC should be encouraging people to return to their profession.
 - Returning to practise costs are expensive already, and this creates a further addition.
 - This disadvantages those returning to work after having children.
 - Further funding should be secured by cost savings made through moving the location of the HCPC offices and reviewing contributions to the employee Christmas party.
 - More information is required. This rise can only be justified with evidence of a clear financial burden to the HCPC in processing these applications.
 - Increase the fees but at a lower rate. Suggestions included increases in line with inflation, or increases of 5% or 10%.
 - Some respondents noted that they don't believe the renewal fee should rise and so their response to this questions shouldn't be taken as such.
- 3.35. The following comments were frequently made by respondents who agreed with the proposal to increase restoration and readmission fees in line with the increase to the registration renewal fee.
- The increase is necessary as the process is more burdensome.
 - This is particularly important if it keeps other fees down.

- If people choose to come off the Register, then they should have to pay more to get back on.
- It should increase, but not this much. Alternative suggestions included that the fees should rise with inflation, or at a reasonable amount.

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

Summary

- 3.36. 52% of respondents disagreed with the proposal to increase the international and grandparenting scrutiny fees in line with the proposed increase to the renewal fee. 31% agreed and 16% were unsure.
- 3.37. There was some variation between responses from organisations as compared with individuals; with 61% of organisations disagreeing with the proposal to increase the international and grandparenting scrutiny fees in line with the proposed increase to the renewal fee compared with 52% of individuals.

Comments

- 3.38. Some respondents queried what the international and grandparenting scrutiny fees are, requesting further information about them.
- 3.39. The following comments were frequently made by respondents who disagreed with the proposal to increase these scrutiny fees in line with the proposed increase to the renewal fee.
- The proposed fee is too expensive and doesn't reflect the time and resources required to review these applications.
 - The consultation document does not provide sufficient justification to support the increase proposed for these fees.
 - Any increase should be more reasonable. Alternative suggestions included that they increase in line with CPI, inflation or by 3%.
 - This is a disproportionate fee for international applicants as compared with UK applicants.
 - Given the workforce and recruitment challenges currently being faced by service providers, along with the potential impact of Brexit, the HCPC should be making this process easier for these applicants, not harder.

- There should be a focus on cost saving measures within the HCPC. Suggestions included reviewing the HCPC contribution to the employee Christmas party and moving the location of the HCPC offices.

3.40. The following comments were frequently made by respondents who agreed with the proposal to increase the international and grandparenting scrutiny fees in line with the proposed increase to the renewal fee.

- International students need to be appropriately scrutinised.
- The fees for registration in other countries is far more expensive.
- These fees aren't always liked but they support registrants and prevent fitness to practise concerns so are beneficial to all.
- Should be funded by Government to ensure more professionals in the workforce.
- Should have a lower increase, no greater than inflation.

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

Summary

3.41. 63% of respondents agreed with the proposal for the HCPC to regularly review our fees to avoid infrequent but larger increases in the future. 25% disagreed and 13% were unsure.

3.42. There was little variation between the responses we received from organisations as compared with individuals.

Comments

3.43. The following comments were frequently made by respondents who agreed with the proposal for the HCPC to regularly review our fees to avoid infrequent but larger increases in the future.

- This would be easier to accept and a more appropriate approach.
- A review shouldn't necessarily mean an increase in fees; justification would still be required, and a review may lead to no change, or even a fee reduction.
- Any fee rise should not exceed CPI, inflation or wage increases.
- This flexibility would allow for more responsive regulation.

- The HCPC would still need to consider the impact on registrants.
- A transparent approach to past spending and proposed spending would be required.
- There should still be a focus on cost saving measures within the HCPC. Suggestions included reviewing the HCPC contribution to the employee Christmas party, completing effectiveness and efficiency reviews, and moving the location of the HCPC offices.

3.44. The following comments were frequently made by respondents who disagreed with the proposal for the HCPC to regularly review our fees to avoid infrequent but larger increases in the future.

- Instead of fee rises the HCPC should focus on cost saving measures, for example by reviewing the HCPC contribution to the employee Christmas party.
- Services aren't improving so fees shouldn't either.
- More transparency and clarity is required around how fees are spent and how proposed rises will impact registrants.
- There should be no fee rises until austerity ends.
- Registrant pay rises have been stagnant so fees shouldn't rise until that changes.
- The Government should pay for the cost of regulation.

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

Summary

3.45. 49% of respondents agreed with the proposal to investigate additional charging models for services including charging for the approval of education programmes. 31% disagreed and 20% were unsure.

3.46. There was little variation between the responses we received from organisations as compared with individuals.

3.47. Many comments made by those disagreeing with the proposal to investigate additional charging models for services including charging for the approval of education programmes appeared to be based on a misunderstanding of the current approach. Respondents felt that the HCPC shouldn't start involving themselves in the approval of education programmes as this isn't within its remit.

3.48. To clarify, it is part of the HCPC's statutory remit to approve education programmes, and this proposal is simply considering whether or not we should investigate charging for that service.

Comments

3.49. The following comments were frequently made by respondents who agreed with the proposal to investigate additional charging models for services including charging for the approval of education programmes.

- Given the cost of tuition fees, education providers should pay for approval of their programmes, rather than registrants.
- This will help keep fees down.
- Increases in HCPC costs should be shared across stakeholders and not be borne entirely by registrants.
- Education providers should pay for this benefit.
- All options for income generation should be considered.
- Only if this isn't passed on to students through tuition fees.
- There should still be a focus on cost saving measures within the HCPC, for example, reviewing the HCPC contribution to the employee Christmas party.

3.50. The following comments were frequently made by respondents who disagreed with the proposal to investigate additional charging models for services including charging for the approval of education programmes.

- This is likely to increase tuition fees and potentially impact workforce numbers.
- Education is key to the professions and should be left alone.
- Education programmes should be approved by professional bodies.
- Education budgets are already stretched and the HCPC shouldn't put any further pressure on them.
- Education programmes should be approved by professional bodies or NHS providers, not the regulator.
- There should still be a focus on cost saving measures within the HCPC. Suggestions included reviewing the HCPC contribution to the employee

Christmas party, completing effectiveness and efficiency reviews, and moving the location of the HCPC offices.

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

Summary

- 3.51. 50% of respondents disagreed with the proposal to charge a higher fee for those who request paper renewal forms. 45% agreed and 6% were unsure.
- 3.52. There was some variation between responses from organisations as compared with individuals; with 45% of individuals agreeing with the proposal to charge a higher fee for those who request paper renewal forms compared with 27% of organisations. 27% of organisations were unsure compared with 5% of individuals.

Comments

- 3.53. The following comments were frequently made by respondents who agreed with the proposal to charge a higher fee for those who request paper renewal forms.
- It should be mandatory to renew online to increase efficiencies, decrease costs and reduce the environmental impact.
 - Apart from when reasonable adjustments are required.
 - Or provide a discount to those who renew online.
 - But only by a modest amount (below £10) to cover things like administration, printing, stamps and envelopes.
- 3.54. The following comments were frequently made by respondents who disagreed with the proposal to charge a higher fee for those who request paper renewal forms.
- This would disadvantage older registrants and those requiring reasonable adjustments.
 - Should use nudge theory rather than sanctions, and provide discounts for those applying online.
 - Some registrants don't have access to IT services or aren't comfortable using them.
 - Paper renewals ensure registrants are reminded to renew.

- Electronic renewal documents could be hacked.
- There should instead be a focus on cost saving measures within the HCPC, for example by reviewing the HCPC contribution to the employee Christmas party.
- Don't offer paper renewals at all, only online.

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?

- Age
- Disability
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion and belief
- Sex
- Sexual orientation

Summary

- 3.55. 55% of respondents felt there weren't any aspects of our proposals that could result in equality and diversity implications. 16% felt that there were and 30% were unsure.
- 3.56. There was some variation between responses from organisations as compared with individuals. 56% of individuals felt there weren't any aspects of our proposals that could result in equality and diversity implications compared with 36% of organisations.

Comments

- 3.57. The following comments were frequently made by respondents who felt there weren't any aspects of our proposals that could result in equality and diversity implications. Whilst they didn't think that people with protected characteristics would be negatively impacted, they did believe:
- increasing fees would disproportionately affect professionals on lower salaries; and
 - introducing fees for paper renewals would disproportionately affect those with limited access to computers.

3.58. The following comments were frequently made by respondents who felt there were aspects of our proposals that could result in equality and diversity implications.

- Age:
 - Most students are younger so scrutiny fee would disproportionately impact this group.
- Disability
 - Online renewal may disproportionately impact this group.
 - Disabled registrants often work shorter hours, so fee rises would disproportionately impact this group.
- Pregnancy, maternity (and paternity):
 - Readmission fees would disproportionately impact this group.
- Sex
 - Increased fees would disproportionately impact part-time workers, who are predominantly female.
 - Because of the gender pay gap, increased fees would disproportionately impact female registrants.
- Poverty is associated with a number of protected characteristics, and so an increase in fees would affect these groups.

Q13. Do you have any further comments on our proposals

Comments

3.59. Many comments submitted under this question echoed those made throughout the rest of the consultation.

- Fees should not be increased. Instead:
 - Further funding should be secured through efficiencies, primarily cost savings made through: the loss of social work fitness to practise cases; pay freezes for HCPC staff; process improvements; charging registrants in fitness to practise; moving the location of the HCPC offices; and reviewing contributions to the employee Christmas party.
 - The HCPC should use its reserves.
 - Government should pay for regulation.
 - Employers should pay for regulation.

- Where action is taken against a registrant under fitness to practise, that registrant should pay the costs.
- Concerns were raised about the impact of large fee rises:
 - Registrants have had real-term pay cuts over recent years through pay freezes as the cost of living has continued to rise. Having just secured a small pay rise of 1%, many felt the 17.8% proposed increase in the renewal fee was unacceptable and indicates the HCPC is out of touch with its registrants.
 - Given the workforce and recruitment challenges currently being faced by service providers, along with the potential impact of Brexit, the HCPC should be taking steps to make applications easier and cheaper to facilitate recruitment of professionals.
 - With increases in tuition fees, removal of bursaries, rise in the cost of living, and low starting salaries, students will be a their poorest and most vulnerable, and proposed fee rises are too expensive for them.
 - It is inequitable to charge existing registrants because social workers are leaving the Register.
 - Low risk professions are effectively subsidising high risk professions.
 - Fee rises have a disproportionate impact on some groups with protected characteristics, those working part-time, and those from low income households.
- Alternative options to the proposals outlined in the consultation were put forward:
 - There should be smaller increases each year, rather than larger, infrequent increases.
 - Fee rises should match inflation, wage rises or CPI.
- Some respondents requested further detail about how existing money is spent, and how any future increases in income would be spent.
- Respondents suggested improvements that could be made to existing processes.
 - Monthly direct debits to be made available as an option in paying registration fees.
 - Smaller regulatory bodies with fewer registrant groups would be more efficient, supportive and cost effective.

- Registrant ID cards to be brought back.
- There was some confusion about the HCPC's role and the role of other healthcare regulators.
 - Some registrants felt that the HCPC should be promoting the profession. This is a role for the professional body.
 - Some registrants felt that the HCPC should provide professional body services, like the Nursing and Midwifery Council and the other healthcare regulators do. The Nursing and Midwifery Council and other healthcare regulators do not provide professional body services.
 - A few registrants commented on the need for the HCPC to protect function, not just title.

3.60. Additional comments made in response to this question highlighted the need to:

- publicise consultations more widely; and
- train professional leaders in how to raise concerns about registrants, providing support and advice through what is a difficult and stressful experience.

4. Our comments and decisions

- 4.1. The following section sets out our response to the range of comments we have received to the consultation. We have not responded to every individual comment, but grouped the comments we received into themes and discussed our comments and decisions in response.
- 4.2. A summary of our decisions following the consultation are set out at the end of this section.

Key themes

- 4.3. The key themes arising from the comments respondents made in their response to the consultation were that:
- they felt the HCPC should be undertaking more cost saving initiatives;
 - there are concerns about the money spent on the employee Christmas party; and
 - there is some misunderstanding about the role of the regulator, with some respondents confusing our role with that of a professional body.

Reducing costs

- 4.4. Many respondents raised concern about the proposed fee rises, particularly given that many NHS staff have seen real-term pay cuts over the last decade and are working in environments subject to significant resourcing challenges. Respondents argued that the HCPC should make cost savings to secure the funding required for it to ensure it continues to protect the public, or seek funding from the Government.
- 4.5. Our Council is sensitive to the pressures placed on NHS staff. It is committed to being an efficient and effective regulator; ensuring the income collected through fees is spent in a prudent manner which effectively discharges our statutory role in protecting the public. We are not part of the Department of Health and Social Care or the Government. We maintain our independence by being paid for entirely by registrants' fees. We receive no other regular funding from other sources.
- 4.6. Council regularly scrutinise our financial performance and seeks cost savings and productivity improvements year on year.

Recent cost-saving initiatives

- 4.7. In 2018 we undertook a detailed analysis^[1] of our income and costs to determine the financial sustainability of the organisation over the next five

^[1] <https://www.hcpc-uk.org/globalassets/meetings-attachments3/council-meeting/2018/september/enc-08---5-year-plan/>

years. This identified where we could make savings in our operations, including headcount reductions to reflect the loss of social work related activities, as well as income generation opportunities.

- 4.8. The costs savings initiatives that we have implemented over the past three years include:
- a reduction in our payroll costs, including the restructure of the senior management and communications teams;
 - using Government procurement frameworks to secure best value contracts for suppliers and services;
 - the introduction of paperless processes, including registration renewals and annual monitoring of education programmes; and
 - securing additional income by letting office space in our building to another regulator.

Ongoing efficiencies and cost saving initiatives

- 4.9. Whilst we have undertaken a significant programme of work to reduce our costs, we recognise that identifying and implementing efficiency and cost saving opportunities is a continuous process. Longer term we will be:
- Reviewing our approach to education monitoring and approval processes to ensure they are streamlined and remain fit for purpose.
 - Considering models for charging fees within education monitoring and approvals.
 - Developing our abilities to collect, store and interrogate our data; reducing the burden on staff to manage this process manually. This will better equip us to identify and act on trends, enabling us to prevent problems with registrants' practise, reducing harm to service users.
 - Improving our systems to release resources for more responsive, proactive regulation. For example, by updating our Registration system to enable us to provide faster, more effective service for Registrants.
- 4.10. However, even with these initiatives, our financial forecasts show that we would be financially unsustainable without an increase to our fees, which would ultimately impact our ability to deliver our statutory role to protect the public. This is because the cost of inflation has continued to increase, while our fees have remained the same for four years, reducing our real income. By the time every profession has paid any fee increase (November 2020), inflation will have continued to rise, further eroding our real income. We predict this will amount to around a £3m total loss over 2019/20 and 2020/21, which will not stabilise until 2021/22.

- 4.11. We would like to reassure our registrants that we will continue to establish further areas where we can improve our processes and reduce our costs. Building on our existing annual reports and accounts, we are currently developing a report which will bring together information about each of our regulatory functions; highlighting where we have invested our resources, and where we have identified further areas for development. We hope to publish the first of these in Autumn 2019, ensuring continued transparency around how we manage the funds received through registrant fees.
- 4.12. Further information about our financial performance can be found in our annual reports².

Financial impact of the loss of social workers

- 4.13. Respondents felt that as social workers represent a large portion of fitness to practise cases, that the loss of income from their fees would be offset by a lower workload for our fitness to practise department. The loss of income will be offset, in part, by a reduction in our direct variable costs, including fees and travel costs of panel members hearing social workers' cases, and a reduction in legal costs. However, these cost reductions will be significantly less than the reduction in income.

Location

- 4.14. Some respondents also commented on the location of our offices, and questioned whether a London location was appropriate. We regularly review our office requirements to ensure they reflect value for money, engaging independent consultants where appropriate.

Christmas 'party'

- 4.15. In previous years, we have hosted a Christmas lunch for all employees. This has been an opportunity to reflect on the progress we have made during the year and thank employees for their hard work and contributions. 2016 was the last year we held this lunch.
- 4.16. In 2017, we reviewed our approach and significantly reduced our costs. Instead, we held an end of year all employee gathering which cost around £800. In 2018 we held a similar event which cost around £250. Soft drinks and light refreshments are served, there is no alcohol. Departments have a budget of £25 per employee for a team Christmas lunch. However, not all employees participate and the final spend is approximately £5,000.
- 4.17. We understand the concerns raised by registrants about this, and whilst we have taken steps to ensure the cost has reduced significantly over recent years, we have listened to the feedback provided by respondents in this

² www.hcpc-uk.org/publications

consultation and have made the decision to cease expenditure of this kind in the future.

Understanding our role

4.18. Some of the comments made by respondents to the consultation evidence a misunderstanding of our role as a regulator, and the wider regulatory landscape. In particular:

- **Promoting the profession.** The HCPC has no statutory role in promoting the profession; this is a role for the professional bodies.
- **Professional body functions at the other regulators.** None of the nine health and care regulators overseen by the professional standards authority (General Pharmaceutical Council, General Chiropractic Council, General Osteopathic Council, General Medical Council, Nursing and Midwifery Council, General Dental Council, General Optical Council, Pharmaceutical Council of Northern Ireland, and HCPC) provide any professional body services. These are provided by professional bodies, Royal Colleges and Unions.
- **Supporting the profession.** Some respondents felt the fee rise wasn't appropriate as the HCPC doesn't provide services such as continuing professional development (CPD). The HCPC's role as a statutory regulator is to:
 - Set standards of competence and conduct
 - Check the quality of education and training courses to make sure they give students the skills and knowledge to practise safely and competently
 - Maintain an accessible register
 - Investigate complaints about registrants and decide if any action is required - either because of concerns about their conduct or competence.

It is not our role to determine what CPD each individual on the Register should undertake, nor to provide CPD activities (although some of our conferences and events qualify as such). We set standards to ensure individuals use their professional judgement and understanding of the role to determine what is most appropriate for them. This should take account of the nuances of their role, the stage of their career, any challenges they face, and future career plans. It will be informed by their own understanding, discussions with colleagues and their line manager, and engagement with their professional body.

4.19. We understand it can sometimes be confusing to navigate the complexities of regulation alongside the role other organisations play, such as professional bodies. We are committed to understanding views of us and the expectations stakeholders have with regard to engaging with us.

- 4.20. Last year we commissioned research to better understand stakeholder needs and views. Once we have received the final report, we will use this to inform a refreshed Communication and Engagement Strategy which will seek to highlight our role and provide for increased engagement with the professions.

Progressing our strategy

- 4.21. We are currently developing a new strategic direction for the HCPC, which takes account of the regulatory landscape, and in particular the Government's intention to reform regulation. We want to continue to improve our performance, ensuring that the organisation is fit for the future and able to anticipate and adapt to changes in the external environment. This will be underpinned by developing our ability to use data, intelligence and research to inform our work in preventing harm.

Supporting professional practise, preventing harm to service users

- 4.22. Given the support from respondents to our proposals to increase our efforts to help prevent harm to service users, we intend to take forward this work.
- 4.23. Council is seeking to rebalance our efforts away from the existing reactive model of regulation to one where we invest in activities that help to prevent problems with registrants' professional practise from arising. The intention is to put a stronger emphasis on doing more of certain activities or taking a different approach. Currently, this is improving the fitness to practise process, reviewing our approach to approving education programmes and seeking to use research evidence to help prevent problems from arising in registrants' practise.
- 4.24. To fully achieve this aim, legislative reform is needed to simplify the fitness to practise process and free up resources so they can be invested in other activities. In the short term, as outlined in our consultation, there is work that we can do to increase our focus on influencing professional practise and preventing the causes of harm. For example, engaging more with professionals to embed standards in every day practise through a professional liaison team, which we intend to progress over the course of 2019/20.
- 4.25. We will also continue our work to address the findings of the 'People like us? Understanding complaints about paramedics and social workers'³ research through the delivery of our action plan which focuses on a wide range of activities, including: providing a suite of resources to support self-referral; working with employers to explain the referral process; undertaking further in-house research looking at the characteristics of fitness to practise cases; and developing teaching and learning materials for educators.

³ <https://www.hcpc-uk.org/resources/reports/2017/people-like-us-understanding-complaints-about-paramedics-and-social-workers/>

Improving services

- 4.26. Respondents were supportive of our proposal to invest in improved services, and so we will progress this.
- 4.27. We have already undertaken a Registration transformation project to deliver a new operating model for the Registrations department, including processes, systems, and interactions with other areas around the organisation. The first stage of this was to move our continuing professional development (CPD) processes online. We completed this in 2018, and we now intend to focus on developing a new online registration system. This will bring a range of benefits including improving direct debit processes and ensuring applicants and registrants can undertake more electronically. It will also reduce print and postage costs in the longer term while improving how we engage with our registrants.

Improving the capacity, quality and timeliness of our FtP performance

- 4.28. As the consultation responses supported the proposal to improve capacity, quality and timeliness of our fitness to practise performance, we plan to proceed with this.
- 4.29. In 2018 we commenced work on our Fitness to Practise Improvement Plan following the findings of the Professional Standards Authority (PSA) annual review of our performance 2016/17). This plan has delivered measurable improvements including additional resource to manage the increase in cases, new technical specialist roles and a new approach to decision making in the early stages of investigations, which ensures that more serious and high-risk cases are prioritised and advanced through the process as quickly as possible
- 4.30. We recognise the adverse impact fitness to practise investigations can have on all involved in the process and are committed to reducing the length of time investigations take. We also intend to build on the work started, identifying and addressing areas for further improvement.

Renewal fee

- 4.31. We have decided, reluctantly, to increase the renewal fee in line with the proposal set out in the consultation document.
- 4.32. A significant majority of respondent disagreed with our proposal to increase the renewal fee from £90 to £106. Whilst we are sensitive to the concerns expressed, which include reference to our fee rise in 2015 and negligible increases in registrant pay, there was support for the improvements we proposed in the consultation document, including work on prevention; improving services; and improving fitness to practise performance.

- 4.33. The detailed financial analysis⁴ that we have undertaken shows that, despite the costs savings and income generation opportunities we have undertaken and plan to implement, we would be financially unsustainable without an increase to our fees.
- 4.34. We appreciate this will be disappointing to many of our registrants, and as outlined above, we are committed to ensuring this fee rise yields the benefits we intend and ensures we are able to continue to fulfil our statutory role in protecting the public. Furthermore, we will provide transparency about the progress in each of these areas in our annual report, which is currently being developed.

Increasing other fees

- 4.35. We have also reluctantly decided to increase the other fees we charge as proposed in the consultation document (restoration, readmission, international and grandparenting), for the same reasons as for the renewal fee outlined above. We believe it is important to apply a proportionate and consistent approach to fees to avoid substantial cross-subsidisation between the different fees.
- 4.36. However, we will not charge higher fees for registrants who request paper renewal forms.

Graduate discount

- 4.37. Given comments made in the consultation about ensuring equality across our registrant groups, we intend to remove the graduate discount for registration.

Regular fee review

- 4.38. There was support for a regular review of our fees to avoid infrequent but larger increases. We will further assess stakeholder feedback and draw up more detailed proposals around how we might approach this in due course.

Investigating additional charging models for services

- 4.39. There was support for our proposal to investigate additional charging models for services including charging for approval of education programmes.
- 4.40. We have undertaken some initial analysis of the approach taken by other organisations in this regard. There are a range of approaches which seek to recover some or all of the direct and indirect costs incurred through the delivery of education approvals and monitoring.

⁴ www. <https://www.hcpc-uk.org/globalassets/meetings-attachments3/council-meeting/2018/september/enc-08---5-year-plan/>

4.41. We will take this forward with key stakeholders to establish the most appropriate and proportionate response, taking account of the feedback provided by respondent to this consultation.

Equality and diversity implications

4.42. Some respondents considered there may be 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:

- Age.
- Disability.
- Gender reassignment.
- Marriage and civil partnership.
- Pregnancy and maternity.
- Race
- Religion or belief.
- Sex.
- Sexual orientation.

4.43. We therefore propose completing an equality impact assessment for all the proposals we plan to take forward, to further identify and address any potential inequalities.

Summary of our decisions

- 4.44. After careful consideration, the Council have reluctantly made the following decisions in response to the proposals outlined in the consultation. We recognise that these decisions will be disappointing to many of our registrants, however they are necessary to ensure we are financially sustainable and able to carry out our statutory role in protecting the public.
- 4.45. As outlined in paragraph 4.12, we are committed to ensuring transparency about the outputs arising from these changes in due course.
- The renewal fee will increase to £106.
 - The scrutiny fee for applicants from approved programmes will increase to £74.
 - The graduate discount of 50% will be removed.
 - The restoration fee will increase to £160.
 - The readmission fee £160.
 - The scrutiny fee for international applications will increase to £584.
 - The scrutiny fee for grandparenting applications will increase to £584.
 - In future we will regularly review our fees to avoid infrequent but larger increases.
 - We will investigate additional charging models for services including charging for the approval of education programmes.
 - We will not charge a higher fee for those who request paper renewal forms.
 - We will undertake an equality impact assessment of the all the changes outlined above.
- 4.46. We plan that the above will be effective from 1 October 2019. This is subject to parliamentary approval of the necessary amendments to the Health and Care Professions Council (Registration and Fees) Rules 2003.
- 4.47. Existing registrants would pay the renewal fee from their next renewal after 1 October 2019. This means that the new fee will be charged to registrants whose professions enter their renewal period after this date.

4.48. Dates when the new renewal fee would apply to existing registrants in each profession are given below.

Table 1: Dates when the proposed new renewal fee would apply to existing registrants in each profession*

Profession	Renewal period starts
Radiographers	1 December 2019
Physiotherapists	1 February 2020
Arts therapists	1 March 2020
Dietitians	1 April 2020
Chiropodists / Podiatrists	1 May 2020
Hearing aid dispensers	1 May 2020
Operating department practitioners	1 September 2020
Practitioner psychologists	1 March 2020
Orthoptists	1 June 2020
Paramedics	1 June 2020
Clinical scientists	1 July 2020
Prosthetists / orthotists	1 July 2020
Speech and language therapists	1 July 2020
Occupational therapists	1 August 2020
Biomedical scientists	1 September 2020

*Subject to parliamentary approval of amendments to the Health and Care Professions Council (Registration and Fees) Rules 2003.

For Social Workers in England, we anticipate the transfer of regulation to Social Work England to happen in 2019. If there is no change to this, the decisions in this document do not affect social workers on our Register.

5. List of respondents

5.1. Below is a list of all the organisations that responded to the consultation

Academy for Healthcare Science
Allied Health Professions Federation
Association of Educational Psychologists
British Academy of Audiology
British and Irish Orthoptic Society
British Association for Music Therapy
British Dietetic Association
British Nuclear Medicine Society
British Psychological Society
British Society of Hearing Aid Audiologists
Chartered Society of Physiotherapy
Christie hospital
City Hospital-Sunderland
City University
College of Paramedics
Council of Deans of Health
Hammersmith Hospital, Imperial NHS trust
Institute of Biomedical Science
London Ambulance Service
Medical Physics and Clinical Engineering, Sheffield Teaching Hospitals
Mid Yorkshire NHS Trust
National Community Hearing Association
NHS
Perfect Ten Podiatry and Sports Injury Ltd
Royal College of Occupational Therapists
Royal College of Speech and Language Therapists
Salford Royal NHS Foundation Trust
Society of Radiographers
Society of Radiographers (Industrial Relations Rep)
St Georges University NHS Foundation Trust
South Warwickshire Foundation Trust
The Association for Clinical Biochemistry and Laboratory Medicine
The College of Podiatry
Unison
Unite the Union
University of Plymouth, School of Health Professions