



**BIOS** | BRITISH AND IRISH  
ORTHOPTIC SOCIETY

## Consultation on HCPC registration fees

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The British and Irish Orthoptic Society is the professional body for orthoptists and was founded in 1937. It is also a registered charity and a company limited by guarantee. BIOS is affiliated to the Allied Health Professionals Federation, a group made up of 12 bodies representing more than 158,000 workers in the UK. BIOS is also a member of the International Orthoptic Association and OCE. BIOS members in the UK are also automatically trade union members of the British Orthoptic Society Trade Union (BOSTU).

### Question 1

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

Preventing fitness to practise issues from arising should clearly be a key goal for HCPC and one that would be welcomed by our members. However the consultation document provides no clear indication of how increased fees will be used to achieve this. Many of the investments, such as a closer liaison with employers and professional representatives, should not require significant investment. Indeed, as this investment should result in a reduction in costly FtP hearings over time, the HCPC should be looking to offset this investment over time.

### Question 2

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

The HCPC should continue to invest in order to improve its services however, again, it is unclear how the proposed investment would require a significant rise in fees. Many of the planned investments reflect capital spending in systems and technology rather than in ongoing costs. This should result in increased efficiencies over time and therefore we are unconvinced that a permanent increase in fees is an appropriate way to fund this investment. We do not consider that the reconciliation of the advances in capital and IT systems and the last fee increase has been communicated effectively to members as the same terminology is being used in this consultation.

### 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?**

The HCPC should certainly look to improve the capacity, quality and timeliness of their FtP performance. In particular, we would encourage investment to ensure consistency in the quality of solicitors investigating FtP cases for HCPC. Ways for the process to be streamlined should also be identified, such as the addition of deadlines for complainants and employers to comply with information requests, or by looking at how technological solutions could reduce travel and subsistence costs. However it is not clear from the consultation document how this significant increase in fees will be used to increase quality or efficiency.

Furthermore, the figures presented seem particularly unclear in the context of social workers ceasing to be the responsibility of the HCPC. Currently, according to HCPC figures, social workers account for 51%

of all FtP cases<sup>1</sup> despite representing only approximately 26% of registrants<sup>2</sup>. 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 accounts<sup>3</sup> 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.

#### **Question 4**

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

We do not agree that the fee should increase from £90 to £106, as we do not feel that the consultation document gives a clear justification for this level of rise. While we recognise the importance of increasing fee levels to match rising costs, this increase, alongside the increases in 2013 and 2015, represent an increase significantly above-inflation over seven years (approx. 40%).

Again, the justification given in the consultation document is closely tied to the departure of social workers from HCPC's responsibility and the resultant loss of efficiencies and cost-savings that come with having higher numbers of registrants. As explained above, the departure of social workers from HCPC's responsibility should arguably reduce FtP costs, given their disproportionate representation in FtP cases. Furthermore, registration costs represent the second largest area of expenditure for the HCPC after FtP (at around 12% of spend<sup>4</sup>) and one would also expect this to be able to reduce once social workers depart.

The details of HCPC's five-year plan document highlight that the option to 'defer', which includes a 9% increase in fees, would require significant reductions in staffing and resourcing, with knock on impacts on services, despite expenditure only falling by 16% between 2018 and 2021.<sup>5</sup> We would argue that any significant increase in the renewal fee should only be considered following a much clearer commitment to improve efficiency.

#### **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.**

We do not feel that the scrutiny fee for applicants from approved programmes should increase in line with the renewal fee. As outlined above, we feel that the HCPC have not provided a clear justification for how this fee has been arrived at or how it is to be spent.

#### **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 a strong argument has been made for the removal of the 50% discount on the cost of registration for graduate applicants. While we recognise the anomaly identified in the consultation document, that the HCPC do not offer discounts to other groups that could benefit, such as those on parental leave or long-term illness, we would argue this is not a justification for removing discounts from graduates who are typically the lowest earning members of our profession. Rather, we would encourage the HCPC to consider whether these discounts should be extended to others to address the inconsistency.

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<sup>1</sup> <https://www.hcpc-uk.org/globalassets/resources/reports/fitness-to-practise/fitness-to-practise-annual-report-2017-2018.pdf> p 18

<sup>2</sup> <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report---key-financial-information-2016-17.pdf> p12

<sup>3</sup> <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report-and-accounts-2016-17.pdf> p44-45

<sup>4</sup> <https://www.hcpc-uk.org/globalassets/resources/reports/hcpc-annual-report/annual-report---key-financial-information-2016-17.pdf> p10

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

### **Question 7 and Question 8**

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

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

As with the other proposed increases, we do not feel that a clear justification has been made for why any of the proposed increases are needed or beneficial.

### **Question 9**

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

We would certainly be in favour of a regular review of HCPC fees to avoid the infrequent but larger increases we have seen in 2013 and 2015 and are being proposed for 2019. This would be beneficial as it would increase the transparency of the process for setting fee levels for our members and create a clearer link with 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 do not agree that there should be a charge for the approval of education programmes. We feel that a working relationship between the regulator and the professional body should be encouraged, given the reliance of HCPC, as a multi-professional regulator, on professional bodies to support its education approval role. Charging would not be conducive to this relationship, impacting on the quality assurance of education programmes that in turn lead to eligibility for admission to the register, therefore putting the HCPC's fulfilment of its public protection role at risk.

### **Question 11**

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

While we agree that online renewal should be encouraged as both more cost effective and less burdensome on natural resources, there may be registrants with specific challenges who therefore legitimately require a paper copy. We do not feel that these registrants should be charged and therefore would therefore question how cost effective it would be to implement a process to distinguish 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?**

The proposal by the HCPC to remove the discounted fee for new graduates highlights potential equality and diversity implications of all registrants being required to pay the same. For example 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.

### **Question 13**

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

We would encourage the HCPC to further explore other ways of producing efficiency savings or streamlining their processes before committing to a substantial increase in registration fees. Indeed, the consultation document identifies investment in greater efficiencies, particularly in relation to preventing FtP cases from arising. We would argue that these costs, particularly where they are capital, one-off costs, should not be funded through a permanent increase in fees.

Further, much of the need for an increase in registration fees seems to stem from the HCPC losing their responsibility for social workers. While the consultation document highlights a potential decrease in efficiency that comes from a lower number of registrants, it is not at all clear how a larger reduction in expenditure will not result from the significant reduction in the costs from registration and FtP cases.