



**BIOS** | BRITISH AND IRISH  
ORTHOPTIC SOCIETY

# Consultation on changes to fees

## Response from the British and Irish Orthoptic Society to the Health and Care Professions Council

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The British and Irish Orthoptic Society (BIOS) 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).

BIOS are opposed to the planned increase in annual registration fees for HCPC registrants. Such a large increase, at almost twice the current rate of inflation, will be deeply unpopular with our members at a time when many are struggling with the cost-of-living crisis following many years where wages have fallen behind inflation. Added to this, many of our members have reported concerns with the service offered by the HCPC in recent years. We would need to see effective action to address these shortcomings before we could support such a significant increase.

### 1. To what extent do you agree or disagree that the rationale for our proposed fee increase is clear?

While we understand that inflation over time has made an increase in fees necessary, it's far from clear why this necessitates such a large increase, which at 20% is almost double the current rate of inflation. We would value greater detail on how these costs are spread between activities relating to different professions and what trends there are, particularly given the HCPC no longer regulate social workers.

Further, we would like to see the rationale incorporate the effect on healthcare professionals and the resultant effect on services. As discussed in more detail below, an increase in fees could make healthcare professions, such as Orthoptics less desirable, leading to individuals leaving the profession or to lower recruitment at a time when services are already stretched.

### 2. Given the rationale set out, to what extent do you support the fee increase proposals?

We strongly oppose the proposed fee increase, as the amount is not only disproportionate and excessive, but is deeply out of step in the middle of a cost-of-living crisis.

The 20% increase in fees is double the current rate of inflation and will therefore have a significant impact on our members when they are already forced to cope with the current cost of living crisis. This is likely to be extremely unpopular with our members and could have a significant impact on recruitment

and retention of staff at a time when services are already stretched, particularly in eye care. Some professional bodies are already reporting the proposed increase in fees being the last straw, leading to AHPs leaving the profession.

We are also concerned about the impact this may have on professional body membership, as our members struggle to balance their finances. This is likely to be increasingly the case for current students and early-career orthoptists who may decide not to join, having a long-term effect on professionalism and standards within the sector.

The timing of the increase is also likely to be unpopular with our members due to the recent issues that many have experienced in dealing with the HCPC. We wrote to the HCPC to report concerns raised by our members, particularly in relation to the renewal process. This included extremely poor communication with registrants, with long waits on the phone and a failure to respond to emails, as well as considerable delays in renewals being confirmed, leading to heads of service not knowing as late as the 31 August whether orthoptists would be registered to practise the following day. We received assurances at the time that these issues had been addressed, however we know from communications with other professional bodies that there remain live issues. While improvements in services have been identified as targets for the HCPC, the failure to already address these issues may undermine faith that the increased fees will be value for money.

### **3. To what extent do you agree or disagree that we should retain the 50% UK graduate discount for the first two years of registration?**

We welcome the plan to retain the 50% UK graduate discount for the first two years of registration, as this will reduce the burden on early career orthoptists. However, around 13% of our HCPC registered members are at Band 5, many of whom have been practising for longer than two years, and individual circumstance means that the length of registration does not necessarily make them better able to manage the proposed increase in fees. Indeed, decreasing real terms wages over many years within the NHS has reduced the impact felt by our members even as they do move to higher pay bands. The HCPC have previously noted the anomaly that there are no similar discounts for other low paid groups, such as those on parental leave or long-term illness, but this could be countered by keeping fees low across the board.

### **4. In the consultation we set out two areas we would like to explore to mitigate the impact of the proposed fee rise. Please let us know the extent to which you support these. Please also tell us about any other mitigations you think we should explore.**

*The mitigations are: a) Increasing our promotion of tax relief; b) Increasing the spread of direct debits payments*

We would support both these mitigations in principle. As a professional body, we promote claiming tax relief on HCPC fees as well as our own membership fees and would welcome moves by the HCPC to promote this further. This could also be helped by work to make the information on the process of claiming this relief both easier to find on the website but also easier to understand for registrants.

We also offer our members the opportunity to pay by monthly direct debit for the membership fees, which is by far the most common payment method. Enabling the payment of HCPC fees to be spread out would help registrants to manage their finances, by reducing the amounts but also by ensuring the payments are consistent alongside monthly budgeting.

However, these are both services that we feel the HCPC should be delivering anyway and therefore do little to mitigate the concerns we have with the rise.

**5. In the consultation we set out how the proposed fee rise will enable us to improve our core regulatory activities, including customer service and fitness to practise, developing our data analytics and improving our efficiency through legislative reform.**

**We also set out additional areas that we would like to prioritise, based on stakeholder feedback. Please let us know the extent to which you agree with these. Please also tell us about any other areas you think we should prioritise.**

*The additional areas are: a) Working with employers to secure better protected CPD time; b) Improving communications and engagement with registrants and stakeholders; c) Developing further a compassionate approach to regulation*

We would agree with the areas identified as areas where improvement could be made for the HCPC. In particular, as already noted, there are significant issues with the current customer service received by registrants, and we are also concerned by the continued backlogs of fitness to practice cases. While a move towards more compassionate regulation, to balance the at times alarming legal nature of the letters and the process in general, is welcome, the delays in dealing with cases would continue to have a significant negative impact on the wellbeing of registrants.

We can see significant benefits in the other additional areas identified, such as working to secure better protected CPD time, but there is much more we would like to see towards addressing their existing issues before we can support such a significant increase in fees. BIOS would be willing to work further with the HCPC to find solutions to provide more cost-efficient regulatory services for our members.

**6. In addition to those equality impacts set out in the consultation document, do you think there are any other positive or negative impacts on individuals or groups who share any of the protected characteristics?**

*Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.*

Any increase in the cost of registration has a disproportionate affect on those from disadvantaged backgrounds, who are more likely to see this as a barrier to entry to the profession. When we should be pushing to have a profession that better reflects the population it serves, this is likely to have the opposite effect.

More specifically, this will have a much greater impact on those working part-time, which disproportionately impacts the female workforce.

**7. Do you have any suggestions about how any negative equality impacts you have identified could be mitigated?**

These negative impacts could be partially mitigated through more targeted reductions, such as reduced fees for new graduates from disadvantaged backgrounds to enable them to enter the workforce or for those who work part-time.

**8. Do you have any further comments to make about the proposals and information in the consultation?**

We welcome the opportunity to provide feedback non these proposals and have encouraged our members to respond directly, as well as feeding into our process. We are happy to discuss further anything we have raised in our response.