Consultation on HCPC Registration Fees

Response from the Society of Radiographers, December 2018

**Introduction**

The Society of Radiographers (SoR) is the professional body and trade union for radiographers and other non-medical staff engaged in diagnostic imaging and radiotherapy services in the UK. We have almost 30,000 members, including a considerable majority of all radiographers registered with the Health and Care Professions Council (HCPC).

SoR is pleased to have the opportunity to contribute views in this consultation process.

In making this response, we have chosen not to use the questions provided as we felt that the format of questions was not helpful in conveying the points that we wish to make on behalf of our members.

**Contextual Statements**

The SoR supports statutory regulation of health professionals. Furthermore, we support multi-professional regulation by one agency, as operated by the HCPC.

The SoR appreciates a constructive and open dialogue at UK Council level with the HCPC and is keen to collaborate with the regulator wherever appropriate.

The SoR recognizes the need for any organization to cover costs and to plan for changes.

We also appreciate that the HCPC operates under a degree of legal constraint in terms of managing income from registration fees.

The SoR believes that the costs of provision of statutory regulation for health professionals should not be wholly met by registrants.

**Consultation Response**

The SoR does not support any of the proposals for increases in registration fees.

In over three years since the SoR last responded to an HCPC consultation related to fees, registrants have seen no progress in terms of improving dialogue and understanding between the HCPC and its principal stakeholders. At the time of that consultation, the Professional Standards Authority (PSA) changes to funding for regulation were widely condemned by the health professional community. The SoR called at that time for the HCPC and registrants (via their professional bodies) to work more closely together to understand and promote professional regulation.

It is unsurprising that registrants in general and SoR members in particular, when now faced with a proposal for a further fees increase, are voicing very strong opposition.

Rather than developing a collaborative relationship between regulator and professionals to ensure safe professional practice in the public interest, the HCPC seems as remote and disengaged from its registrants as ever. The failure of the HCPC to engage directly with its registrants over this proposed fees increase is in our view diagnostic of a complacent and insulting attitude to the professionals that provide the funding for all HCPC activity. Questions raised by registrants over discretionary spending by the regulator and which have recently re-surfaced on social media serve only to emphasise the distance that health professionals perceive exists between regulatory bodies and the front line in health care. The SoR believes that this is not only regrettable but also impedes the process of public protection which should be characterized by partnership between professionals and the HCPC.

SoR recommends that the HCPC takes the opportunity presented by this consultation to listen to the feedback from registrants. We would like to see adjustments in the fee increase proposals that will indicate that the regulator takes its funders seriously as key stakeholders.

Two major areas of context for the proposed fees increases are worthy of comment:

* **Service improvements, including the need for improved processes for fitness to practice performance (FtP).**

It is well known that the HCPC is required to improve performance in conducting FtP procedures.

We believe that in general registrants might be sympathetic to some investment in ensuring these improvements. Similarly, the suggestion of developments such as smarter regulation and improved services might be given a sympathetic hearing by registrants.

However, we feel that the structure of questions on these matters in the consultation document appears to entrap registrants rather than engaging in a reasoned discussion about why investment might be desirable. It is particularly disappointing to note that there doesn’t appear to be mention of evidence that all processes have been reviewed in order to ensure and demonstrate that all efficiencies have been made before embarking on the proposed increase.

This is a serious failure to recognize that the funders of the HCPC deserve an open and honest approach when consulting on their contributions.

* **The forthcoming changes as Social Workers in England move to a specific regulator.**

The consultation document clearly acknowledges that the transfer of regulation of Social Workers in England from 2019 will impact the operations and income of HCPC. It is obvious that the loss of such a numerous group of registrants implies a considerable reduction in income for HCPC. However, registrants are also aware that this group is responsible for a disproportionately large amount of activity by the regulator. In our view it appears disingenuous to assume a net financial and business impact from these changes that plays into the reasoning for a fees increase ahead of the change taking place.

Within the “Other proposed changes” section of the consultation document, we wish to comment specifically on the notion that charges might be introduced for the approval of education programmes.

We appreciate that this stops short at this stage of being a firm proposal and note the likelihood of a review in this area. SoR would support a full review of the HCPC role in education programme approval and we will seek to contribute to this process when the time comes.

For the purposes of this response, we wish to indicate concern over the idea that fees could be charged to education institutions in connection with approval of their programmes.

We feel that respondents to the consultation may well not be aware of the synergistic relationship between the professional bodies and the HCPC which is necessary to ensure that standards for education are appropriate for each profession that is regulated. It is clearly important that this relationship is maintained.

We feel that the potential introduction of fees for HCPC approval , which essentially would become a mandatory charge, would have the effect of dis-incentivising education providers from seeking the (voluntary) approval that is offered for a fee by professional bodies. The current situation allows education institutions to choose to pay for a more detailed professional body approval as a mark of quality over and above the necessary regulatory approval. This in turn supports the professional body in its work alongside the HCPC. We believe that this fine balance and helpful relationship could be damaged by education institutions being effectively forced to direct their resources away from the professional bodies.

**Summary**

The format and timing of this consultation has made it hard for SoR to present a constructive response.

The SoR does not support any of the proposals for increases in registration fees.

The only proposal with which we can agree unreservedly is implied in question 9. In our view, any system where more regular, small increases are made, as opposed to irregular large increases in fees will be preferable to registrants.

We recommend that the HCPC makes every effort to listen to the views of registrants and to demonstrate this by reducing the level of fee increase applicable in 2019.