

Council, 27 March 2008

Fees rise consultation document

Executive summary and recommendations

Introduction

Article 7 (3) of the Health Professions Order 2001 requires that:

'Before determining or varying any fees mentioned in paragraph (2) the Council shall consult the Education and Training Committee and such of those persons in article 3 (14) as it considers appropriate.'

A draft copy of the fees consultation document is attached. The document was considered by the Finance and Resources Committee on 6 February 2008 and the Education and Training Committee on 26 March 2008.

The Executive will update the Council verbally with any amendments suggested by the Education and Training Committee.

A short explanation of the proposed method of consultation is also appended.

Decision

The Council is invited to:

- agree the text of the consultation document (subject to minor editing changes prior to being published on the HPC website); and
- agree the method of consultation as outlined in the attached paper.

Background information

- The consultation is planned to take place between April and July 2008.
- The results of the consultation will be considered by the Finance and Resources Committee, Education and Training Committee, and the Council in September 2008.
- Please note that in the attached consultation document the effective date for any fee rise subsequently agreed is 1 April 2009 rather than 1 July 2009. The proposed go live date for the fee rise presented to Council in December 2007 was 1 June 2009. Since then further planning highlighted the need for the fee rise to take effect from 1 April 2009, so the fee rise could be effective before the start of the renewal cycle and also avoid the busy processing time for UK graduates applying to join the register.

Resource implications

- Editing and laying out of finalised document
- Organising mail out to consultation list
- Analysis of consultation responses

Financial implications

- Laying out and publication of the consultation document
- Mail out to c.300 contacts on the consultation list

Appendices

None

Date of paper

17 March 2008

Consultation method

The fees were last consulted on between 6 November 2006 and 6 February 2007. The consultation took the form of a consultation document sent to all registrants (c.175,000 at that time) and to the consultation list (c.300 contacts).

In response to the consultation, a number of respondents commented on the cost of producing and sending a consultation document to each registrant. In the key decisions document approved by the Council on 29 March 2007, we said the following:

Whenever we propose increases in fees which are broadly in line with inflation we will consult our stakeholders by:

- *writing to registrants with a summary of our proposals;*
- *sending a copy of our consultation document to our consultation list; and*
- *making copies of our consultation document available on our website and on request.*

If we propose a significant increase or a substantial change to the overall structure of our fees, we will consult as we have done this time round.¹

Proposal

As we are not proposing a significant increase or substantial change to the overall structure of the fees, the Executive proposes that it is not necessary to send a consultation document to each registrant.

As the proposed new fees would be broadly in line with likely inflation, the Executive suggests that this is a relatively minor change, and that a mail out letter to all registrants is also unnecessary.

The approximate cost of mailing a one page letter to all registrants (currently c.180,000) including printing, envelopes, postage, data cleansing, sorting and folding, would be £43,000.

The approximate cost of mailing a one page letter and a copy of the consultation document (printed double-sided on A4 sheets) to the consultation list (c.300 contacts) would be around £500.

The Council is invited to agree that the consultation will be publicised as follows:

- A copy of the consultation document will be sent to the consultation list.
- The consultation document will be published online, and available on request.
- A press release will be issued and a news item published on the website.
- The consultation will also be highlighted via articles in the HPC electronic newsletter.

¹ <http://www.hpc-uk.org/assets/documents/10001A69ourfees-keydecisions.pdf>

**Our fees – consultation document
2008**

Foreword	2
The consultation process.....	3
How to respond	3
Introduction.....	4
About us	4
Who do we regulate?.....	4
Our proposals.....	5
Paying our fees	6
Tax relief.....	6
Background to our proposals.....	7
Our financial performance	8
How our fees compare to other regulators	9
About our proposals	11
Registration and scrutiny fees	11
About renewal fees.....	11
About approved courses.....	12
Readmission fee.....	13
International and EEA scrutiny fee	14
Grandparenting scrutiny fee	15
Rule changes	16
Further comments.....	16
Our questions	16
Our questions	17
More information	18

Foreword

We consulted between November 2006 and January 2007 on proposals for changes to our fees. Following the consultation we agreed a new renewal fee of £72 per year and changes to the structure and level of other fees we charge.

The changes to our fees became applicable from 1 June 2007. Existing registrants paid the new renewal fee the next time they renewed their registration.

During the consultation, we asked whether we should review our fees every two years. The majority of those who responded said that they would prefer that we review our fees every two years, so that any increases were incremental and more manageable.

Having now reviewed our fees, we propose in this document small increases in our fees so that we can continue to function effectively as a regulator.

Following the consultation, if the changes to our fees are adopted, they would require amendments to our rules (please see page x for more information). The changes to our fees would be effective from 1 April 2009. Existing registrants would pay the new renewal fee when their profession next renews its registration.

In this document we set out our proposals in full. We explain the reasons behind our proposals and invite the comments of our stakeholders.

The consultation process

We have sent this document to over 300 organisations on our consultation list. This includes employers and professional bodies.

You can also download further copies of this document from our website or you can contact us if you would like us to send you a copy. Please contact us if you would like us to send you a copy of the document in an alternative format.

The consultation will run until **day/month/year**.

Once the consultation period is completed, we will analyse the responses we receive. We will also publish a document which details the comments we receive and explains the decisions we have taken as a result. This will be available on our website.

How to respond

We ask a number of questions about our proposals throughout the consultation document. You can also find a summary of these questions on page xx.

We would welcome your response to this consultation, in whatever format is convenient for you. However, if you address the questions in this document, that would be helpful to us.

If you would like to respond to this consultation document, please send your response in writing to:

Fees consultation
Health Professions Council
Park House
184 Kennington Park Road
London
SE11 4BU

E-mail: consultation@hpc-uk.org
Fax: 020 7820 9684

Introduction

About us

We are the Health Professions Council. We are a regulator and our job is to protect the health and wellbeing of people who use the services of the health professionals registered with us.

When we say health professional, we mean a person whose work is concerned with improving and promoting the health and wellbeing of their service users in a variety of different ways and in a variety of different settings.

To protect the public, we set standards that health professionals must meet. Our standards cover health professionals' education and training, behaviour, professional skills, and their health. We publish a register of health professionals who meet our standards.

Health professionals on our register are called 'registrants'. If registrants do not meet our standards, we can take action against them which may include removing them from the Register so that they can no longer practise.

Who do we regulate?

The health professionals we regulate at the moment are:

- arts therapists;
- biomedical scientists;
- chiropodists / podiatrists;
- clinical scientists;
- dietitians;
- occupational therapists;
- operating department practitioners;
- orthoptists;
- paramedics;
- physiotherapists;
- prosthetists / orthotists;
- radiographers; and
- speech and language therapists.

We may regulate other professions in the future.

Our proposals

We propose to increase our registration fees and scrutiny fees as shown in the tables below.

Please see pages x to x for a full explanation of the proposed increases to our fees and specific questions on our proposals.

Table 1: Our existing fees

Route to registration	Scrutiny fee £	Registration fees	
		Year one £	Year two £
Approved course	50	36	36
Renewal	n/a	72	72
Readmission	n/a	182	72
Restoration	n/a	182	72
International/ EEA	400	72	72
Grandparenting	400	72	72

Table 2: Our proposed fees

Route to registration	Scrutiny fee £	Registration fees	
		Year one £	Year two £
Approved course	53	38	38
Renewal	n/a	76	76
Readmission	n/a	191	76
Restoration	n/a	191	76
International/ EEA	420	76	76
Grandparenting	420	76	76

Explanation

Each profession renews its registration in two-yearly cycles, so the tables show fees payable in the first and second year of that cycle.

There are six different 'routes to registration' shown in each table. Please see pages x to x for more information about these routes to registration and an explanation of the proposed new fees.

Paying our fees

Registrants are able to pay for their registration in one payment or they can spread the cost by paying by direct debit every six months. Scrutiny fees are non-refundable and payable in full on receipt of an application.

Tax relief

Registration fees are tax deductible for UK taxpayers and may be claimed by registrants on their tax return or on application to their tax office. Standard rate tax payers benefit from a 22% discount in their renewal fee.

This means that the proposed new renewal fee would be reduced by £16.72 to £59.28.

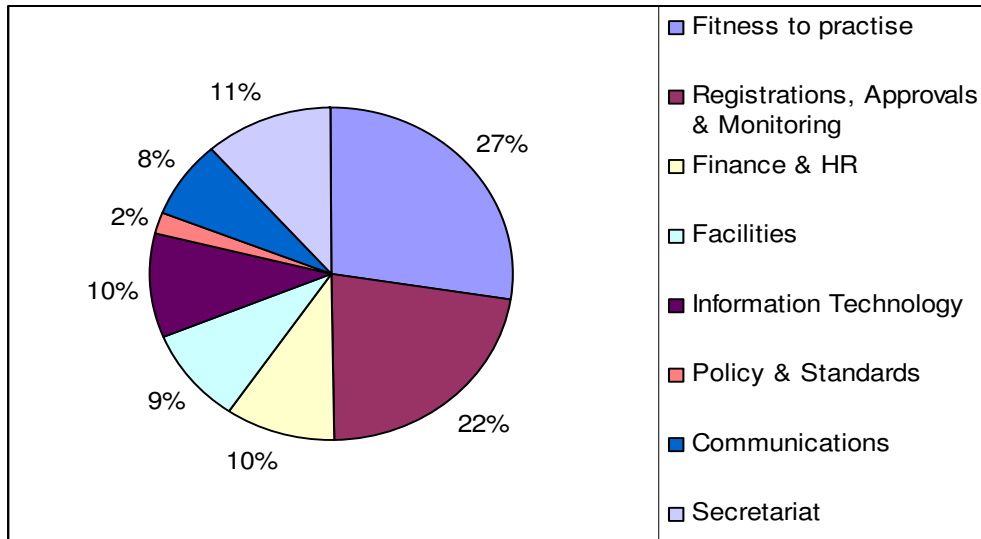
There are three different ways in which registrants can claim back tax relief on their registration fees:

- by providing details of the payment on their tax return;
- by writing to their tax office, including their national insurance number and details of the payment; or
- by obtaining form P358 from their local tax enquiry office and sending the completed form to their tax office.

You can find out more information about our fees and about tax relief by visiting our website: www.hpc-uk.org/registrants

Background to our proposals

Where the money will go



On page x we explained our role of protecting the public. We spend the fees we receive in a number of ways to achieve this.

The chart above shows how we spent registration fees received in the 2006/07 financial year.

- **Fitness to practise** includes the costs of investigating and hearing complaints about registrants, health and character cases, and appeals against registration decisions.
- **Registrations, approvals and monitoring** includes the costs involved in handling and processing applications for registration, and in visiting education providers to approve and monitor education programmes.
- **Finance and human resources** includes costs related to producing accounts and recruiting employees and HPC 'partners'.
- **Facilities** includes the costs of maintaining our buildings and facilities.
- **Information technology (IT)** includes costs related to developing and maintaining our IT systems.
- **Policy and standards** includes the costs of publishing and reviewing standards and the costs involved in running consultations.
- **Communications** includes costs involved in advertising, publicity and holding stakeholder events.
- **Secretariat** includes costs of holding Council and committee meetings.

Our largest cost is running our fitness to practise processes, which accounted for 24% of our budget in 2005/06 and 27% of our budget in 2006/07.

Our financial performance

The proposed changes to the level of our fees outlined in this document are broadly in line with inflation. The changes are necessary to ensure that we continue to function effectively as a regulator.

Our financial performance is regularly scrutinised by our Finance and Resources Committee. The papers considered by the Committee and minutes from their meetings are available on our website.

You can also find out more information about our financial performance by looking at our annual reports. These are available from the 'publications' section of our website: www.hpc-uk.org/publications

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How our fees compare to other regulators

The table below shows the registration fees charged by the nine UK healthcare regulators. This includes information about the fees they charge for registering, renewing registration and for coming back on to the Register.

Fee structures vary between regulators and this can make direct cost comparisons difficult. This is because there are differences between what different regulators are allowed to charge for, whether they have practising or non-practising registration, and how they handle the income they receive from fees.

A comparison of the fees charged by the nine UK regulators of health professionals is given below.

Table x: Other regulators' registration fees

Regulators	Registration	Renewal	Readmission
	£	£	£
HPC*	91	76	191
GCC	1,250	1,000	1,250
GDC - Dentists	438	438	548
GDC – Dental Nurses	96	96	120
GMC	390	390	390
GOC	169	169	239
NMC	76	76	76
PSNI**	457	345	457
RPSGB – Pharmacists	191	395	395
RPSGB – Technicians	176	130	130
GOsC***	375	750	750

[n.b The fees listed above may be subject to change and will be fully checked prior to publication of the document]

It is more difficult to compare the fees that other regulators charge for considering international and grandparenting applications. This is because some regulators will charge a flat-fee for processing an application, whilst

others charge fees for attending interviews or undertaking examinations. Most other regulators do not presently have grandparenting arrangements.

Key

* Proposed new fees. Figure for registration is for someone registering for the first time within two years of completing an approved course. This includes the proposed scrutiny fee of £53 and the first year of registration, £38. Readmission fee includes the first year of registration.

**Fees for the Pharmaceutical Society of Northern Ireland are proposed fees for 2008/2009. The figures for registration and for readmission include a £112 application fee.

***The General Osteopathic Council currently charges £375 for the first year of registration, £500 for the second year of registration and £750 for every subsequent year.

HPC: Health Professions Council

GCC: General Chiropractic Council

GDC: General Dental Council

GMC: General Medical Council

GOC: General Optical Council

NMC: Nursing and Midwifery Council

PSNI: Pharmaceutical Society of Northern Ireland

RPSGB: Royal Pharmaceutical Society of Great Britain

GOsC: General Osteopathic Council

All figures given in this table are correct at the time of publication.

Explanation

The figures given for registration and readmission above include any fees for processing applications and the cost of registration. All figures are for a full year of registration.

Some regulators have practising and non-practising registration. The fees given in the table on the previous page are for practising registration (if applicable).

About our proposals

In this section we explain our fees proposals. We ask a small number of questions on our proposals. We would be happy to receive any comments you might have in response to the specific questions, and on any other aspect of our fees proposals.

Registration and scrutiny fees

We charge fees when someone first becomes registered, when they come back on to the Register after a break, and when they renew their registration.

The cost of registering these different groups of people varies because of the amount of information we need to process. For example, when someone first applies to become registered they need to complete an application form including health and character references. When an existing registrant renews their registration we need less information from them and because of this the time and costs involved are lower.

Registration fees pay for all our running costs, including the costs of our fitness to practise process.

We currently charge scrutiny fees to reflect our costs in processing applications via our international/EEA and grandparenting routes to registration.

About renewal fees

Each profession renews its registration in two-yearly cycles. We send each registrant a renewal form and ask that they sign their professional declaration and return the form to us with payment of their fee (or a direct debit authorisation) by their renewal date.

Part time workers

When we last consulted on our fees, some registrants asked whether we would consider a discount for part time workers.

We decided at that time not to introduce a discount for part time workers, and we make no proposals for a discount in this consultation. This is because our costs in undertaking our role as a regulator are the same, whether someone is working full or part time hours. We also believe that running a system where we would need to check whether a registrant was working part time would be too costly.

Our proposal

We are proposing that the renewal fee should rise by 5.6% from £72 to £76 per year.

If the change to the fee is agreed following this consultation, this would be effective from 1 April 2009. Existing registrants would pay the new renewal fee the next time that they renew their registration after this date.

Q1. Do you agree that the renewal fee should rise from £72 to £76?

About approved courses

Most of the people we register for the first time have successfully completed an 'approved course'. An 'approved course' is a course we visit and approve so that someone successfully completing that course is eligible to apply to us for registration. We sometimes refer to this as the 'UK approved course' route.

When we last consulted on our fees, we decided to introduce a scrutiny fee for this group of applicants. This was because the fees we were receiving from this group of applicants did not cover our costs.

The scrutiny fee covers some of our costs in visiting education providers to approve their education and training programmes. The scrutiny fee also covers costs we incur in processing applications.

However, we recognise that new registrants may not yet have secured employment and because of this may have less money than existing applicants. We decided that this group of applicants would receive a 50% discount on their registration fee for up to the first two years of registration.

Our proposal

We are proposing that the scrutiny fee charged to applicants who have successfully followed an approved course should rise by 6% from £50 to £53. The scrutiny fee is non-refundable and payable on receipt of an application for registration.

We propose that this group of applicants would continue to receive a 50% discount on the cost of registration for the first two years. This would rise by 5.6% from £36 to £38 per year for each of those years.

The discount on the cost of registration only applies to someone who registers for the first time within two years of completing their course.

If the changes to these fees were agreed, they would become effective from 1 April 2009.

Q2. Do you agree that the scrutiny fee for applicants from approved courses should rise from £50 to £53?

Q3. Do you agree that applicants from approved courses should continue to receive a 50% discount on registration fees for the first two years?

Readmission fee

Registrants come off the Register, and subsequently seek to rejoin the Register for a number of reasons. These might include career breaks or because they fail to return their renewal form to us on time. When someone comes off the Register because they have failed to renew, we say that their registration has 'lapsed'.

When a registrant wants to come back on to the Register, they need to complete readmission forms, including providing us with a health and character reference. This means that our costs in processing an application to rejoin the Register are higher than our costs in renewing someone's registration.

After we last consulted, we introduced a scrutiny fee, including the first year of registration, for those applying to come back on to the Register. We recognise that sometimes registrants might lapse from the Register unintentionally, perhaps because they forgot to send us their renewal form, or because they forgot to tell us about a change of address. We agreed that the new readmission fee would not be charged if we received an application to come back on to the Register within one month of registration having lapsed.

Our proposal

We are proposing that the fee charged to applicants applying for readmission should increase by 5.5% from £182 to £191. This includes the first year of registration.

We are proposing that we should continue not to charge the higher readmission fee to those who apply to come back on to the Register within one month of lapsing.

If the change to the readmission fee was agreed, it would be effective from 1 April 2009.

Q4. Do you agree that the readmission fee should rise from £182 to £191?

Q5. Do you agree that we should continue not to charge the higher readmission fee if we receive an application for readmission within one month of a registrant being lapsed from the Register?

Restoration fee

When a registrant is struck-off the Register, they can apply to us to be registered again after five years. If a panel decides that they can be registered again, they need to fill in registration forms and pay the appropriate fee. We call this process 'restoration'.

We propose to charge the same fee for restoration as we do for readmission.

If the new restoration fee was agreed, it would be effective from 1 April 2009.

Q6. Do you agree that the restoration fee should rise from £182 to £191?

International and EEA scrutiny fee

We can accept applications from applicants who have qualified outside of the UK via our international route to registration. This group includes applicants exercising European Community (EC) mutual recognition rights.¹ We look at each application individually so that we can decide whether the combination of an applicant's education, training and experience means that they meet our standards for safe and effective practice.

A registration officer checks and processes each application. Each application is then sent to two registration assessors who are experienced members of the profession. They look at each application against our standards of proficiency and make a decision about whether we can register the applicant. We think that it is important that we look at each application individually so that we can make sure our standards are met and that we only register people who are fit to practise.

There are therefore many costs associated with handling these applications. They include the costs of recruiting and training registration assessors and paying them for their work, and the resources involved in processing applications.

The scrutiny fee is currently the same for both applicants exercising mutual recognition rights and all other applicants. As our costs in processing these applications are the same, we propose that the scrutiny fee should stay the same for both groups of applicants.

Our proposal

We propose to increase the scrutiny fee by 5% from £400 to £420. This does not include the cost of registration. This would be £76 per year.

¹ An applicant who is a national of an EEA (European Economic Area) member state, or Switzerland and who has the right to practise in one of those states is able to exercise 'mutual recognition rights' under Directive 2005/36/EC on the mutual recognition of qualifications. For more information, please see our website: www.hpc-uk.org/apply/international/.

If the scrutiny fee for international and EEA applications is increased as proposed, this would be effective from 1 April 2009. The scrutiny fee is non-refundable and payable on receipt of an application.

Q7. Do you agree that the scrutiny fee for international and EEA applications should rise from £400 to £420?

Grandparenting scrutiny fee

'Grandparenting' is a transitional route of entry to our register. It allows individuals to register who do not hold a qualification approved by us, but who can demonstrate certain criteria for the practise of their profession. This route to registration is only open for a limited time period when a profession first becomes statutorily regulated.

The grandparenting period for the all of the professions we currently regulate has closed. However, if we regulate further professions there will be a new grandparenting period for these professions, which will open for a fixed period of time, before closing.

We handle each application in a similar way to international applications. Each application is assessed by two registration assessors from the profession who decide whether the criteria and standards have been met. If we feel that we can't make a decision on the basis of the application we receive, we invite the applicant to a test of competence (normally an oral interview with two assessors), at which our assessors can better establish the applicant's skills, knowledge and experience.

The costs involved in handling grandparenting applications are similar to those involved in handling international applications. They include training and paying registration assessors and costs involved in setting up and holding interviews.

Our proposal

We propose to increase the scrutiny fee by 5% from £400 to £420. The fee would be the same for all applicants and would not include the cost of registration fees. These would be £76 per year.

If the scrutiny fee for grandparenting applications is increased as proposed, this would be effective from 1 April 2009. The scrutiny fee is non-refundable and payable on receipt of an application.

Q8. Do you agree that the scrutiny fee for grandparenting applications should increase from £400 to £420?

Rule changes

If the proposals set-out in this document are adopted, they would require amendments to our rules.

We propose to amend The Health Professions Council (Registration and Fees) Rules Order of Council 2003 to reflect the increased level of our fees.

You can also find copies of our existing rules in the publications section of our website: www.hpc-uk.org/publications/ruleslegislation

Further comments

We would be happy to receive any further comments you might have.

Q9. Do you have any further comments on our proposals?

Our questions

We have asked a number of questions in this document. The questions are repeated below. It would greatly assist us if you could address these specific questions in your response.

Q1. Do you agree that the renewal fee should rise from £72 to £76?

Q2. Do you agree that the scrutiny fee for applicants from approved courses should rise from £50 to £53?

Q3. Do you agree that applicants from approved courses should continue to receive a 50% discount on registration fees for the first two years?

Q4. Do you agree that the readmission fee should rise from £182 to £191?

Q5. Do you agree that we should continue not to charge the higher readmission fee if we receive an application for readmission within one month of a registrant being lapsed from the Register?

Q6. Do you agree that the restoration fee should rise from £182 to £191?

Q7. Do you agree that the scrutiny fee for international and EEA applications should rise from £400 to £420?

Q8. Do you agree that the scrutiny fee for grandparenting applications should increase from £400 to £420?

Q9. Do you have any further comments on our proposals?

More information

You can get more information about us and our role from our website at:
www.hpc-uk.org

You can download copies of our annual reports and fitness to practise annual report from the publications section of our website.

The papers considered by our Finance and Resources Committee and Council are also available from our website.

You can also find information about our recent fitness to practise cases as well as information about our communications activity.

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