



**UNISON Response to the Health  
Professions Council (HPC)  
Consultation on Annual  
Registration and Scrutiny Fees  
July 2008**

## **1 INTRODUCTION**

- 1.1 UNISON is the largest public sector union in health with almost half a million members employed across the service. We are pleased to have the opportunity of responding to the Health Professions Council (HPC) consultation on proposals to increase its annual registration and scrutiny fees.
- 1.2 As the largest trade union and the voice of the healthcare team, UNISON is instrumental at influencing policy at regional, national and international level. We work with Government and international unions on all aspects of healthcare provision and improvement. We work in partnership with professional bodies and collaboratively with other trade unions in the UK on healthcare issues of mutual interest. UNISON has a long history of working and campaigning with organisations and individuals in these areas of practise and care. UNISON works closely with each of the regulators to establish standards & policies in both patient care and education.
- 1.3 As part of our consultation process we have sought the views of our members, activists and regions using a variety of methods. These have included sending the consultation document to each of our relevant Health sector committees that include representatives from each of nine English regions, and from Wales, Scotland and Northern Ireland.
- 1.4 We hope that the HPC will take into account the weight of UNISON's views as a major stakeholder and representative of HPC Registrants.

## **2. EXECUTIVE RESPONSE**

- 2.1 UNISON has previously articulated our members concerns on this issue particularly over the 12% fee increase effective from June 2007. Whilst the current annual fee increase proposal (to be applied 1 April 2009) is not as high it does equate to approximately 3.33% per annum when spread over the twenty two month period that will have elapsed since the last increase. This is higher than the respective NHS pay increases for 2007/08 (2.5% staged in England) and 2008/09 (2.75%) received by the majority of HPC registrants. This is also higher than the basic increases proposed for 2009/10 (2.4%) and 2009/10 (2.25%). UNISON would argue that any HPC fee increases relating to the same period should not be in excess of these.
- 2.2 UNISON would also wish it noted that all HPC registrants will incur the cost of a £64 registration charge with the Independent Safeguarding Authority that will replace the Protection of Vulnerable Adults (PoVA) and Protection of Children Act (PoCA) arrangements in October 2009.
- 2.3 UNISON is also concerned at the inconsistency in the application date of this and previous HPC fee increases. UNISON would recommend that in future any fee revisions should be applicable from 1<sup>st</sup> April in line with current NHS pay timetables and the HPC's own annual cycle. UNISON also believes that in the interests of transparency the intended

period of application of the new fee rates or the prospective date of the next anticipated fee review is also specified.

- 2.4 UNISON is disappointed at the HPC response on page 11 of the consultation to the issue of reduced rates for part time workers. UNISON would ask that the HPC gives further consideration to the issue of fees based on ability to pay as this is often an equality issue. The majority of HPC registrants are women, many of who have caring responsibilities and therefore little option but to work part-time. An income based fees tariff for UK registrants could be simply and easily applied through scrutiny of P60's. UNISON's own rates of subscription are income based and we would be happy to work with the HPC to look at this issue in greater depth.
- 2.5 UNISON is also concerned that the HPC response in respect of part time workers indicates that a thorough Equality Impact Assessment has not been undertaken on these proposals. If this assumption is mistaken UNISON would be grateful for publication of same.
- 2.6 The above views primarily focus on affordability issues and the system of revising fee rates rather than the reasons given for increasing them. UNISON is concerned at the ever growing cost of fitness to practice matters referred to in the consultation. We are pleased to acknowledge the work that has been done in partnership with the HPC to try and address this burden through ways of reducing related administration and speeding up proceedings. We would be grateful for a commitment from the HPC to continue to examine potential opportunities for greater efficiencies including reducing the length of Fitness to Practice hearings.

**UNISON, 14 July 2008**

## HPC Fees Consultation July 2008 – UNISON Response

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

No. This will equate to an annual increase of 3.33% since the previous HPC increase in June 2007. UNISON does not believe any HPC fee increases should be in excess of NHS percentage pay increases that were 2.5% and 2.75% during the same period.

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

No – see our response in Q1 above – over two years this equates to an increase of 3.6% per annum.

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

Yes.

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

No, although equating to just under 3% per annum it is still higher than the percentage increases applied to NHS pay for the same period.

***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?***

Yes

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

No – for the same rationale outlined in Q4 above

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

No. Spread over 22 months this equates to an annual increase of 3%.

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

**No – for the same reason outlined in questions 7 and 1 above**

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

**In summary UNISON believes:**

- **In percentage terms HPC fee increases should not exceed those applied to NHS pay;**
- **The decision not to consider further pro rata fees for part time staff or a system based on registrants' income levels should be reconsidered;**
- **In any event Equality Impact Assessments on all aspects of the proposals should be undertaken and published.**

**Any queries on this UNISON consultation response should be addressed to:**

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