

Response to the HCPC's consultation on changes to fees



For further information:

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

The Royal College of Podiatry (RCPod) are not in agreement that the HCPC need to increase registrant fees by 20%, at a time when the CPI rate of inflation is at 10.7%.

Whilst the RCPod understand and support the need for regulators to invest in prevention, we are not convinced that such a steep increase in fees is justified, especially over a period when podiatrists and other AHPs have seen little or no increase in their own incomes. Margins within the independent sector are reducing, as costs for materials, fuel, and rent increase exponentially. Our members' patients are also feeling the effects of the current cost of living crisis, they are, therefore, unable to pass the costs on to them. The majority of our members in the NHS are on lower bandings, and their pay increases have been behind inflation for the past 8 years.

Whilst all professions pay one blanket fee, the HCPC may wish to look at the reducing the fee for those registrants who work part time, and whose wage is below an agreed threshold.

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

The RCPod do not support the HCPC fee increase. We cannot feasibly support such an enormous increase at any time, but especially cannot support this during a cost of living crisis.

Approximately 75% of registered podiatrists are female, and many of these registrants work part time, whilst juggling caring responsibilities, yet have to pay the same flat fee as those who work full time. We do not believe that it is relevant to compare other healthcare regulators fees, particular when certain healthcare professions average earnings far exceed that of podiatrists and other AHPs average earnings.

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?

The RCPod would wish to see the 50% discount for new UK graduates increasing. We would also wish to see this extended to those who join our workforce from outside the UK.

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

The RCPod do not believe that the two mitigations mentioned are especially innovative. We would welcome the HCPC looking at how they are able to reduce the pressure on their registrants and encourage people to maintain their registration.

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

The RCPod believe the main function of the HCPC is to protect the public and ensure that healthcare professionals can train, practice, and develop safely throughout their careers. We believe that if learning from all fitness to practice cases were disseminated through professional bodies to their members, this would help to improve knowledge about safe practice amongst registrants.

Of the current nine health regulators in the UK mentioned in the consultation document (not including the four devolved Social Work regulators) there is clearly a need to rationalise these into a much smaller number. This would allow services to be more streamlined and produce greater economies of scale.

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.

The Government in England removed bursaries in 2017 for all AHP, Nursing and Midwifery students, which reduced the opportunity of a health career for many people from vulnerable and underrepresented backgrounds. Despite the Government partially reinstalling a £5,000/year bursary for those healthcare students, many people who would wish to undertake a healthcare degree are unable to due to their financial circumstances. We would support the HCPC in working collegiately to address this inequity.

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

The RCPod would welcome the HCPC looking into reducing the registration fee for those whose annual income sits below an agreed threshold. Approximately 75% of podiatrists are female, many of whom are part time workers due to caring responsibilities.

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

The RCPod would be interested to know if the HCPC have done an analysis of their Fitness to Practice costs since social workers left HCPC registration, and whether this has freed up any resource.