



HCPC consultation on changes to fees

About us

The National Community Hearing Association (NCHA) is the professional representative body for community hearing care providers in the UK. We exist to improve hearing care for all and work with the NHS, health and social care bodies and policymakers to make this happen.

Our members include individual HCPC registrants and employers of HCPC registrants. Together we are the largest membership body representing primary care audiology in the UK.

Our response

Individual or Organisation

Are you responding to this consultation on behalf of an organisation? *

- ☒ Yes
☐ No

Organisation Respondents Details

Please tell us the name of your organisation? *

National Community Hearing Association (NCHA)

Please select the category below that best describes your organisation. *

- ☒ Professional Body
☐ Public Body
☐ Employer
☐ Education Provider
☐ Lawyer / Legal Provider
☐ Other (please specify):

Where is your organisation active? *

- ☐ England
☐ Northern Ireland
☐ Scotland
☐ Wales
☒ UK-wide

- ☐ International
- ☐ Other (please specify):

Please tell us the contact email for your organisation *

healthpolicy@the-ncha.com

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

- ☐ Fully agree
- ☒ Partially agree
- ☐ Neutral
- ☐ Do not agree
- ☐ Strongly disagree

Comments:

The NCHA recognises and supports improvements that the HCPC has made in recent years to control costs. We also acknowledge that the HCPC, having frozen fees between 2015 and 2021, now does have to correct fees.

The HCPC is right to state that even after this significant uplift in registration fees, the cost per registrant will still be significantly below the rate other regulators charge. This lower registration fee, however, is in part one of the major advantages the government has identified of a multi-professional regulator like the HCPC. It is therefore important to continue to manage costs and keep fees at a fair and affordable rate.

The reason we have not answered fully agree is because we feel more could be done to set out plans to improve fitness to practise (FTP) efficiencies. At this stage, FTP still accounts for 52% (£17m) of operating expenditure and although the HCPC has made significant improvements in this area, our experience – having worked with the GOC and HCPC – is that there are further efficiencies the HCPC could implement here to further control costs. For example, through an improved triage process.

At the same time, we understand the HCPC, by virtue of its size and scale of FTPs, will take time to implement such changes. As a leader in regulatory defence across eye and hearing care, we would be happy to share our experience of working across regulators if this would be helpful.

Question 2. Given the rationale set out in our consultation document, to what extent do you support the fee increase proposals? *

- ☐ Fully support
- ☒ Partially support
- ☐ Neutral
- ☐ Do not support
- ☐ Strongly oppose

Comments:

As set out in our response to question one, we understand the need for this increase.

It is, however, the sharp increase of 20% (£19.62) that presents a challenge for those who pay these fees, be it individual registrants or their employers. This is more problematic because the impacts of inflation are already putting unprecedented pressure on these fee payers.

We acknowledge, however, the impact of this increase is likely to be mitigated by the staggered renewal process at the HCPC and will therefore allow most fee payers (individuals or their employers) time to plan for this increased cost.

Question 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? *

☒ Fully agree

☐ Partially agree

☐ Neutral

☐ Do not agree

☐ Strongly disagree

Comments:

We support this proposal, as graduates who pay their own fees often earn less early in their career, and employers who pay this fee for their employees often have significantly higher overheads when training new graduates.

Mitigation Preferences

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.

Question 4a. Please tell us the extent to which you support our proposal to increase our promotion of tax relief. *

☒ Fully support

☐ Partially support

☐ Neutral

☐ Do not support

☐ Strongly oppose

In our experience, many registrants do not know they can claim this tax relief, and this is further validated by the research shared in Annex B of the HCPC consultation document.

The NCHA already promotes tax relief to HCPC registrants that pay their own registration fees for this reason, and we would strongly support the HCPC doing more on this, especially as registrants live through a cost-of-living crisis.

To support this, we would ask the HCPC to consider:

- Including in all correspondence on fees, a direct link to the HMRC website page which enables registrants to do this by post, online or by phone
- Informing registrants who have not done this in previous years to consider doing so. For example, it would be helpful if the HCPC could remind registrants that it might still be possible to reclaim overpaid tax in past years and provide a direct link on how to do so.

Question 4b. Please tell us the extent to which you support our proposal to increase the spread of direct debit payments. *

- ☒ Fully support
- ☐ Partially support
- ☐ Neutral
- ☐ Do not support
- ☐ Strongly oppose

With the proposed increase in fees, the option to spread payments is a positive proposal. We would assume that if most registrants sign up to this payment method, the HCPC can also reduce operating costs associated with chasing registrants for outstanding fees and other processing related costs in the future.

Question 4c. Please also tell us about any other mitigations you think we should explore.

We note that the HCPC has explored offering a low-income discount rate but that this would be too costly to administer at this stage. We note, however, the General Optical Council (GOC) offers registrants on a low income (which it classifies as less than £16,000) the option to pay a low-income fee. It would be helpful to understand whether that process is onerous/costly and whether it could be read across to the HCPC in an economically viable way.

Consultation Document Questions: Service Improvements

In the consultation document 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.

Question 5a. Please tell us the extent to which you support our proposals on working with employers to secure better protected CPD time. *

- ☒ Fully support
- ☐ Partially support
- ☐ Neutral

- ☐ Do not support
- ☐ Strongly oppose

NCHA membership includes employers of HCPC registrants – e.g., our members employ a large proportion of hearing aid dispensers across the UK.

The NCHA policy team would welcome a discussion with the HCPC on this, including sharing our experience across the primary care professions and how protected time is funded and how this might vary in primary care audiology.

Question 5b. Please tell us the extent to which you support our proposals on improving communications and engagement with registrants and stakeholders. *

- ☒ Fully support
- ☐ Partially support
- ☐ Neutral
- ☐ Do not support
- ☐ Strongly oppose

We strongly support this for reasons the HCPC sets out in the consultation.

We would also welcome a discussion with the policy team about the HCPC's current approach to stakeholder engagement, which we note is much more restrictive than other regulators like the GOC. In our view, this approach currently risks missing opportunities to engage with a more representative sample of key sector stakeholders, and the benefits this brings at all levels, including improved patient care.

Question 5c. Please tell us the extent to which you support our proposals on developing further a compassionate approach to regulation. *

- ☒ Fully support
- ☐ Partially support
- ☐ Neutral
- ☐ Do not support
- ☐ Strongly oppose

Question 5d. Please also tell us about any other areas you think we should prioritise.

The NCHA provides legal defence support, which helps our members with HCPC-related matters.

We fully support the HCPC developing its compassionate approach to regulation, as the current fitness to practise (FTP) process is still complicated, costly and can cause avoidable stresses and strains for HCPC registrants.

The NCHA team, and our legal advisers, also have experience of working with other healthcare regulators and would be happy to meet the HCPC FTP team and share feedback. By working together, we also believe there are opportunities to further

improve efficiencies with the triage process and reduce FTP-related costs, which we understand still account for more than 50% of the HCPC's operating expenditure.

Consultation Document Questions - Equalities Impacts

You can find details of our assessment of how we believe the proposals will affect people with protected characteristics in our Equalities Impact Assessment.

Question 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?

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

The Equal Impact Assessment (EIA) seems to capture most scenarios and acknowledges groups which might be impacted more because they are on lower incomes – e.g., people who are working less as they approach retirement (and are older) or for other reasons (raising a family, living with disabilities etc). We note the EIA balances these impacts against the impacts of the HCPC not being able to operate effectively.

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

We understand the methodology in the EIA but as per our response to 4c, we do still think it is worthwhile revisiting the viability of a different rate for people on lower incomes, as the EIA acknowledges the group on lower incomes is probably more likely to include a disproportionate number of people with protected characteristics.

We would think there are broadly two possible outcomes for 2023:

- a. The HCPC is not able to fund the system required to offer the option of a low-income registration fee for 2023.
- b. The HCPC can undertake some research into the viability of a low-income registration fee for 2024. For example, run a survey across registrants to establish possible thresholds for a low-income fee and collect data on the proportion of registrants that might apply for this, and then use that data to assess the impact on future forecast. This might, for example, result in the ability to offer a low-income rate as early as 2024, or give the HCPC data it needs to set future fees for higher earners at a slightly higher rate in order to be able to make concessions for those on lower incomes.

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

As the HCPC acknowledges in this consultation, it is important to work with all stakeholders, including employers, in order to deliver effective regulation and to support registrants throughout their careers. We look forward to meeting the HCPC

policy and FTP teams in 2023 to discuss how the NCHA can contribute to many shared goals to protect the public both now and in the future.