#### Health Professions Council Council – 4<sup>th</sup> October 2006 Fees consultation

#### **Executive Summary and Recommendations**

#### Introduction

The Health Professions Council (Registration and Fees) Rules Order of Council 2003 sets out the registration and scrutiny fees which the Council may charge. An amendment to these rules is therefore necessary in order to implement an increase to the fees.

Article 7 (3) of the Health Professions Order 2001 provides 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 mentioned in article 3 (14) as it considers appropriate.

Article 41 (3) further provides that:

Before making any rules under this Order, the Council shall consult representatives of any group of persons who appear likely to be affected by the proposed rules and these may include such persons as appear to it to be representative of—

- (a) registrants or classes of registrant;
- (b) employers of registrants;
- (c) users of the services of registrants; or
- (d) persons providing, assessing or funding education and training for registrants and prospective registrants.

The Council must therefore publicly consult on its proposals to change the level of the registration and scrutiny fees. A draft consultation document is attached.

It is proposed that the consultation document should be sent to each registrant and to the Council's consultation list.

#### Decision

The Council is asked to agree to consult on the proposed increase in the registration and scrutiny fees.

The Council is further asked to agree the text of the consultation document (subject to any editing changes necessary to bring it up to crystal mark standard, if possible).

The Council is asked to agree that any minor amendments which become subsequently necessary to the consultation document should be agreed by the president.

#### **Background information**

None

#### **Resource implications**

- Press release
- Posting information online
- Organising publication and mailing
- Co-ordinating responses
- Writing key decisions document

#### **Financial implications**

- Laying-out and printing of consultation document
- Mailing of document to all registrants
- Consultation analysis

#### **Background papers**

None

#### Appendices

None

Date

#### **Date of paper**

22<sup>nd</sup> September 2006

# Our fees – a consultation document

Foreword	2
The consultation process	3
How to respond	3
Introduction	4
About us	4
Who do we regulate?	4
Protected titles	5
Our proposals	6
Background to our proposals	8
Where the current fees go	
Where the money will go	9
Our financial performance	11
Inflation	11
How our fees compare to other regulators Cross-subsidisation	12
Cross-subsidisation	15
Our future fees	15
About our proposals	16
About registration and scrutiny fees	16
Renewal fee	16
Approved courses Readmission and restoration fees	16
Readmission and restoration fees	17
International and EEA scrutiny fee	19
Grandparenting scrutiny fee	20
Rule changes	22
Paying our fees	22
Tax relief	22
Our questions	23
More information	24
Appendix 1: Draft rules	
Appendix 2: Regulatory Impact Assessment	26

**Date** 2006-10-03

а

Ver. Dept/Cmte a POL

Doc Type POL

Status Draft DD: None Int. Aud. Public RD: None

# Foreword

We are pleased to introduce this consultation on the future fees that will be charged by the Health Professions Council to registrants and prospective registrants.

Registration fees are currently £60 per year or £120 for each two year registration cycle. We set our existing fees in July 2003 and they have remained unchanged since this date. Inflation during the period 2003 to 2005 has averaged 2.9% and we calculate that the value of the yearly registration fee, in real terms, fell to £54.93 by the end of 2005<sup>1</sup>

During this period we have seen a rise in our costs because of an increasing workload, in particular, the costs of managing an increasing volume of fitness to practise cases.

We propose that our renewal fee should rise to  $\pounds70$  per year.

We propose that the scrutiny fees we charge for processing applications via our international, EEA and grandparenting routes should rise, from £200 to £400. We also propose to introduce scrutiny fees for applicants who have successfully completed an approved course who are applying to become registered for the first time, and for people who are applying to come back on to the register.

Following the consultation, if the changes to our fees are adopted, this would require amendments to our rules (please see page x for more information). The changes to our fees would be effective from July 2007. 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.

<sup>1</sup> Figures are based on data from the Office for National Statistics and use figures from the Retail Price Index. Please see page x for more information.

POI

Jedated

**Doc Type** Fees consultation document - final final final

## The consultation process

We strongly believe that it is important that we engage with our stakeholders so that we can take account of their views. The Health Professions Order 2001 also says that we must consult our stakeholders every time we propose to change our fees.

We have sent this document to every registrant on our register. We have also sent it to over 300 organisations on our consultation list. This includes employers, professional bodies and education providers. You can find a list of organisations who we have consulted with by visiting our website: www.hpc-uk.org/consultation.

You can also download further copies of this document from our website or you can contact us if you would like us send 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 for three months from xx/xx/2006 to xx/xx/2007.

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

## How to respond

We ask a small 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

Date 2006-10-03

а

Dept/Cmte Ver. POL

**Doc Type** POL

Status Draft DD: None Int. Aud. RD: None

## Introduction

### About us

We are the Health Professions Council. We are a health 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 patients, clients and 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 and podiatrists;
- clinical scientists;
- dietitians:
- occupational therapists;
- operating department practitioners (from autumn 2004);
- orthoptists;
- paramedics;
- physiotherapists;
- prosthetists and orthotists;
- radiographers; and
- speech and language therapists.

We may regulate other professions in the future.

### **Protected titles**

All of the professions have at least one professional title which is protected by law. This means, for example, that anyone using the titles 'physiotherapist' or 'dietitian' must be registered with us.

It is a criminal offence for someone to claim that they are registered with us when they are not, or to use a protected title that they are not entitled to use. We will prosecute people who commit these crimes.

polated document of the

Date 2006-10-03 Dept/Cmte POL

Ver.

а

POL F

Title Fees consultation document - final final final Status Draft DD: None Int. Aud. Public RD: None

# **Our proposals**

We propose to increase our registration fees and scrutiny fees as shown in the tables below. Please see pages xx for more information about our proposals.

Our registration fees are also tax deductible for UK tax payers – see page x for more information.

Route to	Scrutiny fee £	Registration fees		
registration		Year one £	Year two £	
International/ EEA	200.00	60.00	60.00	
Grandparenting	200.00	60.00	60.00	
Approved course	n/a	30.00	30.00	
Approved course		60.00*	60.00*	
Renewal	n/a	60.00	60.00	
Readmission	n/a	60.00	60.00	
Restoration	n/a	60.00	60.00	

Table 1: Our existing fees

Route to	Scrutiny fee	<b>Registration fees</b>			ny fee Registrat	
registration	£	Year one	Year two			
		£	£			
International/	400.00	70.00	70.00			
EEA						
Grandparenting	400.00	70.00	70.00			
Approved course	100.00	70.00	70.00			
	280.00*	70.00*	70.00*			
Renewal	n/a	70.00	70.00			
Readmission	110.00	70.00	70.00			
Restoration	110.00	70.00	70.00			

Ver.

Doc Type POL

#### Key

\*Applicants who have successfully completed an approved course who have not applied to become registered within two years of completing their course.

#### **Explanation**

Each profession renews in two-yearly cycles, so the table shows the fees payable in the first and second year of that cycle.

There are 6 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 uptated documents the proposed new fees.

Date 2006-10-03

а

Ver. Dept/Cmte POL

Doc Type POL

Title Fees consultation document - final final final

Status Draft DD: None Int. Aud. Public RD: None

# Background to our proposals



## Where the current fees go

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

The chart above shows how we spent the registration fees we received over the last two financial years:

Fitness to practise includes the costs of investigating and hearing complaints about registrants as well as appeals against registration decisions and health and character cases.

**Registrations, approvals and annual monitoring** includes the costs involved in handling and processing applications for registration and in visiting education providers.

- Finance and HR includes costs related to producing accounts and recruiting employees and partners.
- Facilities includes the costs of maintaining our buildings and facilities.
- **Information technology** includes costs related to developing and maintaining our IT systems.

Date 2006-10-03

- 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 and the costs of running elections for council members.

Our largest cost is running our fitness to practise process, which accounted for 19% of our budget in 2004/05 and 24% of our budget in 2005/06.

### Where the money will go

Increasing our fees will help us carry out our duties in the following areas:

**Fitness to practise** 

We consider complaints about health professionals on our register from members of the public, employers, professionals, the police and others and take action to protect the public. This can include cautioning a registrant, placing conditions on their registration, suspending them from practice or, in the most serious cases, removing them from the register.

Our predecessor, the Council for Professions Supplementary to Medicine (CPSM) was only able to remove a registrant from the register or take no further action and because of this they only considered a relatively small number of cases each year. When we first started operating under our new legislation in 2003, we were given additional powers to deal with fitness to practise. We feel that our increased range of powers are important so that we can effectively protect the public.

The chart overleaf shows that the number of allegations received by HPC has more than doubled since our first year of operating under our new rules and procedures. This figure has in fact quadrupled since the last year of operating under the rules of our predecessor. This is because our powers mean that we are able to deal with more cases to ensure that the public are protected. It is also because we have worked hard to increase awareness of our role amongst members of the public and employers.

There are a number of different costs involved in handling fitness to practise cases. These include legal costs involved in investigating, preparing and presenting cases and costs involved in holding hearings (including venues and paying panel members). So that we handle cases as quickly and efficiently as possible, we have increased the numbers of staff involved in handling and investigating cases. In 2005/06 we held 140 public hearings.

We expect the numbers of cases we handle to increase further in the coming years.



#### Approvals and annual monitoring

An important part of our work is making sure that graduates who follow education and training courses can meet our standards for safe and effective practice. We regularly visit education providers UK-wide and assess their courses against our standards of education and training to make sure that they allow graduates to meet our standards of proficiency for the safe and effective practice of each of the professions.

We recruit and train visitors who are experienced members of the professions to assess each course against our standards. A course which meets our standards is approved – this means that someone successfully completing that course is able to apply to us to be registered.

In the last academic year we held 60 approvals visits. We will hold further visits in the coming years. We now also have an annual monitoring process so that we can make sure that courses continue to meet our standards and so that we can identify any problems.

#### Communications

We have worked over the last three years to increase public and professional awareness of our role. In particular, our activity has focused on explaining to members of the public what registration means, our powers to protect common professional titles and the importance of checking that health professionals are registered.

In the coming years, we will build on this work through proactive marketing and public relations campaigns which will run alongside continual work with referrers (eg. GPs surgeries, hospitals, patients groups) to promote and allow the public easy access to our services. We will also seek to develop and increase the ways we communicate and engage with registrants and establish ongoing dialogue with key stakeholders including government, consumer groups, employers and professional bodies.

Date 2006-10-03

а

Ver. Dept/Cmte POL

**Doc Type** POL

#### **Continuing Professional Development**

In July 2005 we agreed our standards for continuing professional development (CPD). These standards became effective from 1<sup>st</sup> July 2006. The standards mean that for the first time CPD is now linked to registration. This means that registrants must now undertake CPD and keep a record of their CPD. From 2008 we will also audit a random sample of registrants each time they renew their registration to make sure that the standards have been met.

So far, our work has been focused on developing our CPD standards and communicating them to registrants. We are now working on ensuring we have resources and effective processes in place so that we can manage the workload in carrying out CPD audits from July 2008. We will be recruiting and training a number of CPD assessors from each profession who will assess the CPD profiles we receive.

## **Our financial performance**

Although we have managed our costs carefully, we now need to increase our fees to reflect our increasing costs and workload.

From April 2002 to March 2006, we made a total recognised loss of approximately £792,000 or, on average, £198,000 per year.

In developing our fees proposals we engaged a consultancy firm, PKF, to look carefully at our costs and our forecasts for the coming years and make recommendations about our future fee levels. We have carefully set the level of our scrutiny and registration fees to reflect our costs and our workload.

We are confident that our proposed new fees, if adopted, will mean that we will have sufficient income to meet our demanding workload, so that we can continue to carry out our role to protect the public efficiently and effectively.

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

## Inflation

We also need to increase our fees because of inflation. As our fees have remained the same since 2003, their value in real terms has fallen.

Table 3: Inflation

Year	Inflation (RPI)	Registration Fee £	Registration Fee (with inflation) £
2003	2.9	60	61.74
2004	3	60	63.59
2005	2.8	60	65.37

Date 2006-10-03 Dept/Cmte POL

Ver.

а

Doc Type

POL

Status Draft DD: None Int. Aud. RD: None

#### Kev

Inflation figures are given for the years 2003 to 2005 are based on the retail prices index (RPI). Inflation figures are year end. Inflation data is from the Office for National Statistics.

The current level of registration fees was agreed in 2002 and effective from July 2003.

The table above shows the level of the registration fee in the years 2003 to 2005 if it had increased in-line with inflation. (Year-end inflation data is not yet available for 2006). We calculate that, on the basis of inflation between 2003 and 2005 and an estimate of 2.5% inflation per year between 2006 and 2008, the proposed new registration fee will be in-line with inflation by 2009.

## How our fees compare to other regulators

We regulate the members of 13 different healthcare professions. At the time of producing this document, there were x000 health professionals on our register.

This has a number of important benefits, including financial benefits. Because we regulate a number of different professions, this means the costs of regulation are proportionately lower. The fees we charge each registrant are lower because we benefit from costs savings which come from our size.

The table overleaf 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. Some regulators also charge for marking their registers to show, for example, where someone is a supplementary prescriber.

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. However, the table does show that our proposed renewal fee is lower than those currently charged by most other regulators.

Date 2006-10-03

а

Ver. Dept/Cmte POL

**Doc Type** POL

Status Draft DD: None Int. Aud. RD: None

Regulators	Registration £	Renewal £	Readmission £	
HPC*	170	70	180	
GCC	1250	1000	1250	
GDC - Dentists	408	409	509	
GDC – Dental Nurses	72	72	90	
GMC	290	290	290	•
GOC	169	169	239	J
NMC**	43	43	43	
PSNI	TBC	TBC	TBC	
RPSGB – Pharmacists	129	267	267	
RPSGB – Technicians	75	88	88	
GOsC	375***	750	750	

Table 4: Other regulators' registration fees

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.

However, where regulators charge a flat-fee, our proposed international scrutiny fee compares favourably. For example, the Royal Pharmaceutical Society of Great Britain currently charges £595 for the consideration of an application, whilst the General Chiropractic Council currently invites all international applicants to an interview at a cost of £1500 each.

#### Key

\* These are the proposed new fees. The figure given for registration is someone who has successfully completed an approved course, applying for registration within the first two years of completion.

\*\* At the time of publishing this document, the Nursing and Midwifery Council were consulting on raising their renewal fee to £80.00 per year.

\*\*\*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 first year of registration. For example, the General Dental Council charge £509 to readmit dentists to their register and this includes the first year 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 above are for practising registration (if applicable).

Date 2006-10-03

а

Ver. Dept/Cmte POL

**Doc Type** POL

Status Draft DD: None Int. Aud. Public RD: None

## **Cross-subsidisation**

We want to make sure we charge fees which are as fair as possible. We believe that it is important that someone who renews their registration is not paying for the cost of someone who registers for the first time or someone who applies to come back on to the register after a career break.

We have therefore decided that (as far as possible) there should no cross-subsidisation between different fees. This means that the fee we charge an applicant who qualified outside of the UK or a grandparenting applicant should cover our costs in processing and assessing their application. We also believe that the fees we charge someone who registers for the first time, or who applies to rejoin the register, should reflect our costs in processing their application.

Q1: Do you agree that we should set our fees to minimise cross-subsidisation between different services?

## **Our future fees**

If we increase our fees as proposed in this document, we do not intend to increase our fees any further until at least July 2009, unless there is a dramatic increase in inflation or some other significant or unforeseen increase in our expenses.

The Department of Health recently published two consultation documents looking at the future of non-medical and medical regulation. You can read our response to the consultations by visiting our website: www.hpc-uk.org/consultations. You can also find links to the consultation documents.

The document which looks at non-medical regulation suggests a number of significant changes to how health professionals are regulated which could have an impact on our costs. Some of the changes might reduce our operating costs.

However, some of the issues discussed in the documents could prove costly. For example, the document suggests that all health professionals should be subject to 'revalidation' to check that they continue to be competent whilst they are registered. If this were to be introduced this would involve a substantial increase in our costs.

We think that registrants would prefer that we consider our fees every two years rather than waiting for a longer period and having to make a much more substantial increase.

Q2: Do you agree that we should review our fees every two years?

## About our proposals

### About 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 costs of registering these different groups of people vary 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 and grandparenting routes to registration.

## **Renewal fee**

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.

We propose that the new renewal fee should be £70 per year (or £140 for each twoyear registration cycle). If our proposals are agreed, the new fee would be introduced in July 2007 and would be payable by existing registrants from the next time their profession renews.

Q3: Do you agree that the renewal fee should increase to £70 per year?

### 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 first consulted on our fees in 2002, we received many requests that we reduce our fees for this group of applicants when they first register. We decided that we would reduce their registration fees by 50% for their first two years registration.

However, the fees we currently receive from this group of applicants do not cover our costs in processing their applications. We therefore propose to introduce a scrutiny fee of £100 to cover our costs. The cost of registration would be £70 per year.

Date 2006-10-03

а

Ver. Dept/Cmte POL

**Doc Type** POL

Fees consultation document - final final final

Status Draft DD: None Int. Aud. Public RD: None

We recognise that new registrants may not yet have secured employment and because of this may have less money than existing registrants. We want to treat these registrants as fairly as possible so we have decided not to pass on the full cost of processing these applications.

We therefore propose to charge this group of applicants (who come on to the register within two years of completing their course) less for their first year of registration than registrants who are applying to rejoin the register.

If a scrutiny fee for this group of applicants is introduced as proposed, this would be effective from July 2007. The scrutiny fee is non-refundable and payable on receipt of an application.

Q4: Do you agree that we should introduce a scrutiny fee of £100 for applicants who hold an approved course who are applying to become registered for the first time, to cover our costs in processing their applications?

At the moment, someone who holds an approved course who registers for the first time two years or more after they have completed their course does not receive a discount on their registration fee. We propose that the scrutiny fee for this group of applicants should be £280.

If the fee payable by this group of applicants is increased, as proposed, this would be effective from July 2007. The scrutiny fee would be non-refundable and payable on receipt of an application.

Q5: Do you agree that we should introduce a scrutiny fee of  $\pounds 280$  for applicants who hold an approved course who are applying to become registered for the first time, who have not registered within two years of completing their course, to cover our costs in processing their applications?

### Readmission and restoration fees

The majority of registrants send us their renewal form by the due date and have their registration successfully renewed. However, presently approximately 10% of each profession fails to renew on time. We have worked very hard to improve our processes and have worked with professional bodies to explain the importance of registrants renewing on time and keeping us up-to-date with their address details.

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.

The table overleaf shows the numbers of registrants who were lapsed from the register in five professions which renewed their registration in 2005/2006. It also shows how

Date 2006-10-03

а

Ver. Dept/Cmte POL

**Doc Type** POL

Fees consultation document - final final final

Status Draft DD: None Int. Aud. Public RD: None many of these registrants subsequently applied to come back on to the register. Around 51% of registrants who lapse in each profession have not applied to come back on to the register within 150 days.

Profession	Lapsed	Readmitted %					% Stay
	0%	Within 30 days	31-60 days	61-90 days	91-120 days	121- 150 days	lapsed
Average	10.1	2.7	1.4	0.7	.01	0.0	5.2
OR	12.3	4.3	1.7	0.6	0.2	0.2	5.4
PA	13.7	6.7	2.3	0.8	0.2	0.2	3.4
CS	7.4	0.8	1.5	0.3	0.4	0	4.5
РО	7.5	1.6	2.1	0.1	0.1	0	3.7
SL	9.3	1.6	2.2	0.3	0.2	0	4.8
OT	10.6	2.6	0.8	1.3	0	0	5.8
Key:					and langue		<u> </u>

Table 5: Registrants lapsing and readmitting 2005/2006

OR: Orthoptists **PA:** Paramedics **CS:** Clinical Scientists PO: Prosthetists and Orthotists

SL: Speech and language therapists **OT:** Occupational Therapists

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.

We did not charge a scrutiny fee for rejoining the register when we set our fees in 2003. However, we believe that registrants who renew their registration should not pay for the costs of processing the applications of registrants who are applying to rejoin the register. We also believe that it is fair to introduce a scrutiny fee at this time because registrants have now become familiar with the renewal process.

We propose to charge a scrutiny fee of £110 to cover our costs in processing applications for readmission. The cost of registration would be  $\pm 70$  per year.

If a readmission scrutiny fee is introduced, as proposed, this would be effective from July 2007. The scrutiny fee would be non-refundable and payable on receipt of an application.

Q6. Do you agree that we should introduce a readmission scrutiny fee of  $\pm 110$  to cover our costs in processing these applications?

Date 2006-10-03 Ver. Dept/Cmte POL

а

POL

**Doc Type** Fees consultation document - final final final

DD: None

18 Int. Aud. RD: None

However, we know that sometimes registrants might have lapsed from the register unintentionally, perhaps because they sent us their renewal form too late or because they forgot to tell us about their change of address. We know that people in this situation often want to return to the register quickly and we would not want to unduly disadvantage this group of people.

We therefore propose that the readmission scrutiny fee should not be charged if we receive an application to come back on to the register within one month of registration having lapsed. In these circumstances, the normal registration fee of  $\pounds70$  per year would be payable.

Q7. Do you agree that we should not charge a readmission scrutiny fee if we receive an application within one month of a registrant being lapsed from the register?

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 scrutiny fee for restoration as we do for readmission.

Q8. Do you agree that we should introduce a restoration scrutiny fee of  $\pounds 110$ , to cover our costs in processing these applications?

## International and EEA scrutiny fee

In 2005/06 we received x amount of applications from individuals who qualified outside of the UK. This includes EEA applicants exercising mutual recognition rights.<sup>2</sup> 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. As we said on page x, we believe that it is important that the fee we charge for processing these

<sup>&</sup>lt;sup>2</sup> An applicant who is a national of an EEA member state and who has the right to practise in an EEA country is able to exercise 'mutual recognition rights' under the EC General Systems Directives. For more information, please see our website: www.hpc-uk.org/apply/international/.

applications reflects our costs. The fee we currently charge of  $\pounds 200$  does not cover these costs.

The scrutiny fee is currently the same for both EEA 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 be the same for both groups of applicants.

We propose to increase the scrutiny fee from £200 to £400. The fee would not include the cost of registration fees. These would be £70 per year.

If the scrutiny fee for international and EEA applications is increased as proposed, this would be effective from July 2007. The scrutiny fee is non-refundable and payable on receipt of an application.

Q9. Do you agree that the scrutiny fee for international and EEA applications should increase to £400 to cover the costs of processing these applications?

### 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 as leading to registration, 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 first 12 professions we regulated ended on 9<sup>th</sup> July 2005. The grandparenting period for operating department practitioners ended on 17th October 2006. If we regulate further professions we will open 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 an interview, where our assessors can better establish their 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. The fee we currently charge of  $\pounds 200$  does not cover these costs.

We therefore propose to increase the scrutiny fee from £200 to £400 to reflect our costs in processing these applications. The fee would be the same for all applicants and would not include the cost of registration fees. These would be £70 per year.

а

Int. Aud.

RD: None

Public

If the scrutiny fee for grandparenting applications is increased as proposed, this would be effective from July 2007. The scrutiny fee is non-refundable and payable on receipt of an application.

Q10. Do you agree that the scrutiny fee for grandparenting applications should increase to £400 to cover the costs of processing these applications?

Updated documents of the

Date 2006-10-03

а

Ver. Dept/Cmte POL

Doc Type POL

Title Fees consultation document - final final final

Status Draft DD: None Int. Aud. Public RD: None

# **Rule changes**

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

We propose to amend the The Health Professions Council (Registration and Fees) Rules Order of Council 2003 to reflect the increased level of our fees. Please see appendix 1 for the proposed amendments.

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

Q11: What are your views on the proposed amendments to our rules?

# Paving our fees

Registrants are able to pay for their registration in one payment or in instalments by direct debit. Scrutiny fees for international and grandparenting applicants are nonrefundable and payable in full on receipt of an application.

## Tax relief

The registration fee is tax deductible for UK taxpayers and may be claimed by registrants on their tax return or on application to their tax office. This means that the proposed new renewal fee of  $\pounds70$  is reduced by 22% (for standard rate tax payers), reducing the fee by  $\pounds 15.40$  to  $\pounds 54.60$  per year.

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.

# **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 questions in your response.

Q1: Do you agree that we should set our fees to minimise cross-subsidisation between different services?

Q2: Do you agree that we should review our fees every two years?

Q3. Do you agree that the renewal fee should increase to  $\pm 70$  per year?

Q4. Do you agree that we should introduce a scrutiny fee of  $\pm 100$  for applicants who hold an approved course who are applying to become registered for the first time, to cover our costs in processing their applications?

Q5: Do you agree that we should introduce a scrutiny fee of £280 for applicants who hold an approved course who are applying to become registered for the first time, who have not registered within two years of completing their course, to cover our costs in processing their applications?

Q6: Do you agree that we should introduce a readmission scrutiny fee of £110 to cover our costs in processing these applications?

Q7: Do you agree that we should not charge a readmission scrutiny fee if we receive an application within one month of a registrant being lapsed from the register?

Q8. Do you agree that we should introduce a restoration scrutiny fee of  $\pounds 110$ , to cover our costs in processing these applications?

Q9: Do you agree that the scrutiny fee for international and EEA applications should increase to £400 to cover the costs of processing these applications?

Q10: Do you agree that the scrutiny fee for grandparenting applications should increase to £400 to cover the costs of processing these applications?

Q11: What are your views on the proposed amendments to our rules?

Date 2006-10-03 a

Ver. Dept/Cmte Doc Type POL

POL

# 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 sections of our website. You can also find information about our recent fitness to practise cases as well as information about our communications activity. plated documents of the

Date 2006-10-03

а

Ver. Dept/Cmte POL

Doc Type POL

Title Fees consultation document - final final final

Status Draft DD: None Int. Aud. Public RD: None

## **Appendix 1: Draft rules**

[Will appear here]

Undated document of the

**Date** 2006-10-03 Dept/Cmte POL

Ver.

а

Doc Type POL

Title Fees consultation document - final final final Status Draft DD: None Int. Aud. Public RD: None

## **Appendix 2: Regulatory Impact Assessment**

[Will appear here]

Updated document of the

Date 2006-10-03

а

Ver. Dept/Cmte POL

Doc Type POL

Title Fees consultation document - final final final

Status Draft DD: None Int. Aud. Public RD: None