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Via email to: consultation@hcpc-uk.org

15 December 2022

Dear John,

Re: Consultation on fees Policy and Standards Department

Thank you for the opportunity to respond to the consultation regarding the proposed fee increases for HCPC registrants.

As you may be aware, I have also signed the feedback letter co-ordinated by Sarb Bajwa, CEO, British Psychological Society.

In responding to the questions, we have used the findings of a survey of our members as well as issues we have previously raised in our meetings with you.

I understand you will be stepping down as CEO at the end of December and so I would be happy to discuss further with Andrew Smith Interim Chief Executive Officer.

I would like to take the opportunity to wish you all the best for the future.

Yours sincerely,

A handwritten signature in black ink that reads 'Kamini Gadhok'.

Kamini Gadhok MBE
Chief Executive

Appendix 1 – Consultation on HCPC registration fees – RCSLT Response

HCPC Consultation Question	RCSLT Response
<p>1. To what extent do you agree or disagree that the rationale for our proposed fee increase is clear?</p>	<p>Strongly Disagree. The RCSLT would expect that as part of any organisational development, work should be undertaken to review and improve business processes based on KPIs and feedback from registrants and stakeholders. The RCSLT would expect these aims to be part of the overall strategy and annual operational plan for the HCPC and be budgeted for.</p> <p>Along with other allied health professional bodies, over the years we have continuously raised the need to improve processes and reduce the number of inappropriate FtP referrals. We have provided potential solutions to these. Some solutions do not require more HCPC staff but rather better communications and stakeholder management. AN example would be effective communication with employers about their duties and responsibilities to staff through the appropriate use of local procedures including referral to occupational health.</p> <p>We are aware that, once a registrant is referred or self refers, they are ‘in the system’.</p> <p>This is clearly creating additional and unnecessary work and additional stress for registrants.</p> <p>If HCPC needs funding to change some of its processes and influence other stakeholders such as employers, this cost should not be passed to individual registrants but should be met by government. HCPC should be analysing the data it has on FtP cases and referral patterns from employers or registrants who self -refer because they are told to by their employer to help make a business case for additional funding.</p>
<p>2. Given the rationale set out, to what extent do you support the fee increase proposals?</p>	<p>The RCSLT strongly opposes the proposals to increase fees. 89% of the 341 respondents to the RCSLT poll indicated that either no increase (58%) or zero-5% increase would be acceptable (31%).</p>
<p>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?</p>	<p>The RCSLT agrees that graduates should continue to receive a 50 per cent discount on the cost of registration. The RCSLT has been asked by students to promote our welfare fund in the context of the cost of living crisis and as many are already struggling financially.</p>
<p>4. In the consultation we set out two areas we would like to explore to mitigate the impact of the proposed fee rise. Please</p>	<p>a. Fully support b. Fully support</p>

<p>let us know the extent to which you support these. Please also tell us about any other mitigations you think we should explore.</p> <p>The mitigations are: a: Increasing our promotion of tax relief b: Increasing the spread of direct debits payments</p>	
<p>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.</p> <p>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.</p> <p>The additional areas are:</p> <p>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</p>	<p>The RCSLT does not support such a significant fee increase as proposed in this consultation document.</p> <p>The RCSLT agrees that it is critical to focus on a preventative approach to reduce fitness to practice issues from arising.</p> <ul style="list-style-type: none"> • We have continually raised the need for the HCPC to establish effective communication channels with employers in order to: • Ensure employers understand the need to take their responsibility seriously when dealing with issues re: fitness to practice and not refer individuals without going through local procedures • Stop employers asking allied health professionals to self - refer for mental health issues when these should be dealt with in a compassionate way through systems good employers should use such as occupational health. <p>In meetings with the HCPC CEO we have been informed that this suggestion is too difficult to implement but we do not understand why this should be the case as there are organisations such as NHS Employers who could help with communications strategy.</p> <p>We look at trends in referrals to the HCPC and have taken steps to communicate to members on issues as needed. What has worked well has been the communication to the HCPC on what more they could do, for example using social media to ensure registrants are made aware of some of the behaviours that are not acceptable. It would be helpful if the HCPC could establish a more strategic approach to the analysis of data and worked with professional bodies to identify communication channels and support mechanisms to reduce the number of fitness to practice issues arising.</p> <p>The issues that need resolving are not new and it is a concern that the organisation has not reviewed its staffing structure, skills mix, and processes used as part of an ongoing approach to organisational development. It is not clear what has been done to modernise the HCPC using the finances that are already available. Simply increasing the staff will not result in</p>

	<p>a better outcome and registrants should not be expected to pay for organisational development.</p>
<p>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?</p> <p>Protected characteristics are: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation</p>	<p>With respect to the protected characteristics, the HCPC needs to conduct surveys and an impact analysis to have a better understanding of the issues facing registrants.</p> <p>The RCSLT is working with system leaders to increase diversity into the profession, including people from more disadvantaged backgrounds.</p> <p>We would hope that the HCPC shares this ambition and will consider positive actions to support this.</p>
<p>7. Do you have any suggestions about how any negative equality impacts you have identified could be mitigated?</p>	<p>It is essential that the HCPC, like all other organisations ensures that fees are reviewed on an annual basis but also looks at affordability for registrants.</p> <p>We are unsure as to how the HCPC takes account of the earning potential and cost pressures for the different professions that are regulated.</p> <p>Data from HCPC highlights that SLTs are predominantly women (96% female) and evidence shows that there is already a gender pay gap of 8.4%. Any significant increase in HCPC fees, including to restoration and readmission fees, will therefore exacerbate the financial pressures on the female healthcare workforce.</p>
<p>8. Do you have any further comments to make about the proposals and information in the consultation?</p>	<p>HCPC needs to establish a financial strategy which takes account of options for raising income.</p> <p>It is essential that the HCPC listens and responds to stakeholder feedback to reduce costs and improve efficiencies.</p> <p>In addition, there is an opportunity to share data with employers and work with them to reduce unnecessary fitness to practice referrals. We are still unclear as to why the HCPC has not worked with system leaders such as NHS Employers to achieve this change to local practices. The fee increase</p>

	<p>proposed by the HCPC will impact on the retention on the SLT profession which is already facing shortages.</p> <p>In addition, the RCSLT would like more transparency on:</p> <ul style="list-style-type: none">• HCPC data and analysis of the number of inappropriate FtP inappropriate referrals and actions taken by HCPC to reduce this <p>Actions taken to respond to stakeholders with timeframes for improvement projects.</p>
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