

The Rt Hon Steve Barclay MP,  
Secretary of State for Health and Social Care,  
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By email: [dhsc.publicenquiries@dhsc.gov.uk](mailto:dhsc.publicenquiries@dhsc.gov.uk)

1 February 2023

Dear Mr Barclay,

### **HCPC and potential fee increases**

The AHPF Board is writing to express its concern about potential fee increases for all Allied Health Professionals (AHPs), which are regulated by the Health and Care Professions Council (HCPC). The Council recently closed a consultation on a possible fee increase of up to 20%, which is actually above inflation and deeply out of step in the middle of a cost-of-living crisis. The AHPF has responded to this consultation but given the depth of concern across professional bodies and amongst their members, (AHPs), we are also writing directly to you with the hope that in these exceptional circumstances, Ministers will intervene.

The Allied Health Professions Federation (AHPF) represents 12 AHP professional bodies. Allied Health Professionals are the third largest workforce in the health and social care sector after doctors and nurses and deliver high quality services across health and social care. Further information about the AHPF and AHPs is in the annex at the end of this letter.

This proposal represents plans to significantly increase fees for the second year running. Issues cited as reasons for the fee increase, include the need to modernise the HCPC, ongoing reforms to regulation and updating systems. Some of the reforms are not complex but would reduce the current challenges. One example is the need to work with employers to ensure they implement local HR procedures. This would ensure appropriate referrals to the HCPC and stop many needless referrals. The cost of changing poor practice by employers should not be passed to registrants.

HCPC's issues 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 a better outcome and registrants should not be expected to pay for organisational development or regulatory reform.

There are live issues regarding the support of registrants and the HCPC's continued failure to achieve several of the Standards of Good Regulation set by the Professional Standards Authority, which show us there is much more we need to see from the HCPC before we can support any further fee increase.

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It is not appropriate to compare HCPC rates with other professional healthcare regulators that cover professions with far greater levels of earnings than Allied Health Professionals. A more meaningful comparison would be by percentage of earnings and the cost is disproportionate for those who work part time, of which there are many across the Allied Health Professions. In summary, we are at risk of losing workforce at a critical time for the NHS.

Finally, HCPC registration fees are also putting students off joining professional bodies, which will have an impact on the professionalism of the sector in the longer term. This is more acutely felt in traditionally underrepresented areas of the population. This affects decision making for potential students, students and graduates. This also exacerbates the lack of diversity in some of the AHP workforce and contributes to inequitable outcomes for population health.

We look forward to your consideration.

Yours sincerely

***The AHPF Board***

**Annex****The Allied Health Professions Federation (AHPF)**

The AHPF's vision is that the Allied Health Professionals (AHPs) workforce is positioned to improve the physical and mental health and well-being of the population.

Our mission is that Federation provides collective AHP leadership and representation to influence national policy and guidance at a strategic level.

The Allied Health Professions Federation (AHPF) is made up of twelve professional bodies:

- British Association for Music Therapy (BAMT)
- The British Association of Art Therapists (BAAT)
- The British Association of Dramatherapists (BADth)
- The British Dietetic Association (BDA)
- British Association of Prosthetists and Orthotists (BAPO)
- British and Irish Orthoptic Society (BIOS)
- Royal College of Occupational Therapists (RCOT)
- Chartered Society of Physiotherapy (CSP)
- College of Paramedics (CoP)
- Royal College of Podiatry (RCPoD)
- Royal College of Speech and Language Therapists (RCSLT)
- The Society and College of Radiographers (SCoR)

AHPs are the third largest workforce in the NHS (after doctors and nurses) and deliver high quality services across health and social care. There are over 150,000 AHPs working within a range of surroundings including hospitals, people's homes, clinics, surgeries, the justice system, local authorities, private and voluntary sectors and primary, secondary and tertiary education.

AHPs focus on consistent, person-centred, preventative and therapeutic care for children and adults. They are registered, regulated and trustworthy professionals performing a crucial function in the NHS and social care.