



## Consultation on HCPC Fees

### GMB Submission

Submitted: 14<sup>th</sup> June 2024

#### 1. To what extent do you agree or disagree with the rationale we have set out for increasing our fees by the minimum necessary amount?

Strongly Disagree.

If you would like to give reasons for your answer, or suggest alternative options or mitigations, you may do so here.

GMB, represents over 500,000 workers across public and private services, over 35,000 of whom are employed within the NHS, across all professions. GMB is the largest union in the ambulance service.

GMB strongly disagrees with the rationale given in the consultation document for increasing HCPC registrant fees.

Firstly, we need to understand the following statement given in the consultation document:

*“Maintaining delivery of our statutory registration, fitness to practice, education and other regulatory responsibilities within existing performance standards, taking account of unavoidable cost pressures, including a 114% increase in FTP volumes (based on 504 new FTP cases received by the HCPC in 2023-24 compared to the original budget assumption of 236), in line with the experience of most other healthcare registrants.”*

This is a significant increase and GMB has concerns as to why this has occurred. We have previously raised concerns about the culture within the ambulance service specifically, where Paramedics are informed unnecessarily to report themselves regarding incidents. GMB would like to enquire about the details of the issues which have led to these increased cases, specifically where they may be linked to the launch of the NHS Sexual Safety Charter without sufficient training for employers and union representatives.

GMB is also aware of different arrangements across employers, where lawyers may be brought in to deal with the cases by the HCPC. This appears to be applied inconsistently and there is little detail as to where these costs lay.

Secondly, further rationale given for the increase was:

*“Making essential further improvements over the next three years including...improving the quality of our data to contribute to workforce planning.”*

It is unknown and unclear how HCPC are interacting with workforce planning arrangements across the NHS and ambulance services.

Thirdly, we are concerned about the breakdown of expenditure for 2024-25. Specifically, the £9.6 million on ‘corporate functions’ and what the specific details are to reach this figure. The note given alongside states:

*“Corporate functions include Finance, HR and IT, Governance, Communications and other functions which provide essential support for our regulatory and improvement activity.”*

GMB would like clarity on ‘communications’ on what costs are linked with this.

## **2. Given the rationale, to what extent do you support the fee increase proposal?**

Strongly Disagree.

If you would like to give reasons for your answer, or suggest alternative options or mitigations, you may do so here.

GMB members who are HCPC registrants are not supportive of the proposed increase and enquire as to what the value of money is for them. Many registrants would not choose to be a registrant of HCPC were it not compulsory and feel that the of the HCPC is for punishment only.

The FTP increase referenced in previous question is one area of interaction that registrants have with the HCPC, but what other services that are available in return for the registration are largely unknown. Registrants money should be spent on investments in them, such as CPD, and not on ‘corporate functions’ expenditure.

Feedback from GMB members regarding this consultation was that they feel largely unsupported by the HCPC in comparison with other registration bodies and that if they did feel there was value for money, GMB would not be opposed to the proposed increase on this occasion.