



CHCC COLLEGE OF HEALTH CARE CHAPLAINS



SSHA SOCIETY OF SEXUAL HEALTH ADVISERS



Unite the Union Response to:

NMC Consultation on proposed fee increase

This response is submitted by Unite. Unite is the UK's largest trade union with 1.5 million members across the private and public sectors. The union's members work in a range of industries including manufacturing, financial services, print, media, construction, transport, local government, education, health and not for profit sectors.

Unite represents in excess of 100,000 health sector workers. This includes eight professional associations - British Veterinary Union (BVU), College of Health Care Chaplains (CHCC), Community Practitioners and Health Visitors' Association (CPHVA), Guild of Healthcare Pharmacists (GHP), Hospital Physicists Association (HPA), Medical Practitioners Union (MPU), Mental Health Nurses Association (MNHA), Society of Sexual Health Advisors (SSHA).

Unite also represents members in occupations such as allied health professions, healthcare science, applied psychology, counselling and psychotherapy, dental professions, audiology, optometry, building trades, estates, craft and maintenance, administration, ICT, support services and ambulance services.

Executive Summary

- The proposed fee rise is inappropriate, will cause increased financial hardship to already struggling hard working professionals and is opposed by 98% of our NMC registered members.
- The process of consultation has been undermined by the assertion from the NMC that nothing has changed since the assumptions made in 2012 and therefore the fee needs to be increased to £120.
- Unite urges the NMC to 'press pause' on implementing such a fee hike.

1. Introduction

- 1.1. Unite welcomes the opportunity to respond to the *Consultation on the proposed fee increase*.
- 1.2. As part of this response, Unite has used its ongoing routes throughout the organisation to hear back the views of members who are registered with the NMC and these have informed our response.
- 1.3. We would like to highlight Unites response in August 2012 to the previous consultation on the proposed fee increase, available on our website¹. To inform this response we again conducted a short survey of our NMC registered members. This was carried out between 27 June and 9 July 2014, with members invited to take part by email, direct contact and through our social media sites. From this it is clear that the views of our members have not changed since our 2012 submission but what has changed is the strength of feeling against the fee increase as demonstrated by a 75% increase in response rate to the repeat survey.
- 1.4. Some of comments made by our members in the survey are shown in italics.

2. The consultation process

- 2.1. We reiterate our concerns about the consultation process stated in our 2012 consultation response.
- 2.2. Unite acknowledges that the NMC has a duty to consult. This is laid out under article 7(3) of the order to consult with representative of any group of persons considered appropriate combined with Article 7(2) of the order requiring registration fees to be set out in rules, and Article 47(3) requiring consultation with representative of any groups of persons who appear likely to be affected by any proposed changes to the rules. Unite would, however, question whether the NMC has entered in to this process understanding that consultations should not have a set end point. The NMC has made clear that from their point of view there is no other option but to implement the proposed fee rise².
- 2.3. In the Chief Executives report for July Council (Item 6, NMC/14/66) it is stated that to date there have been 4,329 responses to the consultation compared to 22,131 responses to the

¹ http://centrallobby.politicshome.com/fileadmin/epolitix/stakeholders/2012-08-24_Unite_Consultation_Response_to_NMC_Fee_Rise.pdf

² <http://www.nmc-uk.org/media/Latest-news/NMC-comment-on-fees-e-petition/>

2012 consultation. Rather than assuming this may indicate registrants are not as strongly opposed, we would suggest there are a number of explanations for this;

- 2.4. Our members share our view of the consultation process and may therefore be reluctant to take part;

What was the point of the NMC doing a consultation? They always intended to put the fee up!!!

I am unhappy about the NMC consultation process.. They asked registrants their opinion and despite the majority being against the fee rise, they put it up anyway!

- 2.5. An online petition was conducted with over 100,000 signatures so registrants consider they have already shared their views.
- 2.6. Registrants have responded to survey's undertaken by their representative bodies and again consider they have shared their views.

NMC consultation questions

- 3. Based on the above, do you agree or disagree that the registration fee should be increased to £120 from March 2015? Please give a reason for your answer.**

3.1. Disagree.

3.2. When asked whether NMC registrants agreed with the proposal to increase the fee to £120, 98% of respondents said they did not, 0.5% stated they agreed and 1.5% stated they did not know.

3.3. When asked whether any increase in fees should be linked to inflation, 39% agreed, 52% disagreed and 9% did not know.

3.4. Our members are still reeling from the 58% increase in their fees in 2012. Since that time their terms and conditions have been eroded still further with little or no pay rise, increased pension contributions, reductions in unsocial hours payments, down banding and the amount they have to pay to work has increased (car parking charges, DBS checks, PLI). A further increase will add to this and will cause real hardship to already struggling, hardworking registrants. This poses a potential threat to the professions of nursing, midwifery and specialist community public health nursing with a surprising number of members indicating they would consider leaving their job if the increase goes through. In particular those members who are eligible for early retirement indicate they will take this option rather than remain in their profession as they consider this to be the final insult to years of dedication.

It seems that everything is going up except our wages; we pay to practice, to have indemnity cover and to park!

I can't afford to be a nurse anymore!

I haven't had a pay rise for years! Can't even survive, can't feed my family and now a rise in fees again!

As a single parent of two children working part time, term time only as a school nurse, I find this fee crippling financially!

The fee rise means that I will not renew my registration and resign from my local NHS staff bank!

4. Do you think that the fee should be kept at £100? Please give a reason for your answer.

4.1. Yes.

4.2. Item 7 (NMC/14/67) *Progress against KPIs* to be presented at the July Council meeting indicate that the free reserves in June were £9.8 million, £2.2 million more than the restated budget due to lower expenditure and yet predictions are that this will not be sustained. The NMC is working hard to improve efficiency which is clearly achieving results. With further measures still to be implemented in the fitness to practise processes that will positively impact on costs, we would suggest an increase in fees is premature. The forecasts also show that the minimum reserve policy figure will be reached in nine months after the fee increase to £120, presumably earlier given the higher than expected free reserves. We would question the need to go above the minimum requirement at a time of austerity in particular given the hard ship that such an increase will present for registrants.

We are both nurses and £40 extra is a lot of money, it's a week's worth of fruit and veg!

5. Do you favour another option (whether mentioned in the document or not)? If so explain it here.

5.1. We consider there are a number of options our preferred one being for the NMC to press pause on any proposed increase for the reason previously presented.

5.2. The consultation states that the volume and complexity of fitness to practise cases is the main driver for the proposed increase in fees. When asked who should cover the costs of fitness to practise, 38% of our members thought this should be employers, 34% the government, 16% the NMC, 6% registrants and 6% other.

5.3. There is concern among members that fees will only continue to rise due to the costs of the increasingly legalistic fitness to practise system and questioned the fairness of the majority who practise safely, paying for the minority who do not! It is suggested by many members that an option would be for employers to have to meet the cost of the hearing where it is found there is no case to answer as this suggests it is something that did not need to be referred. In addition a number suggested the option of the registrant themselves making a contribution if the case against them is proven. Members also urge the NMC to look for efficiencies and alternative ways of delivering its fitness to practise responsibilities. In particular it is suggested that a priority for the NMC and the government must be to investigate the reason for the increase in referrals.

I don't think there should be an increase in registration fee until the outcome of the change in legislation which will reduce costs is implemented- at that point there should be a review to see if it is justified.

The NMC had a huge hike in fees last year-nurses were expected to absorb the cost without a rise in pay- we cannot keep on absorbing costs. If the government is increasing costs to us to work they need to increase pay!

There have been so many cases of forms for renewal going missing that I sent mine by recorded mail last week, more cost to me!!

5.4. The NMC has stated that the failure by government to implement the Law Commission recommendations that would have enabled them to become an 'efficient and effective

regulator¹ is disappointing. When asked whether the government should put the Law Commission recommendations in place now, 84% of our members said yes, 1% said no and 15% said they don't know.

Why should nurses have to pay for an inefficient organisation?

My experience of the NMC is of an organisation that is administratively disorganised leading to long delays in dealing with straight forward issues. It is not an efficient service; I see no reason to increase fees

We would therefore suggest that as government failed to address an issue that potentially would reduce the cost of regulation for nurses and midwives, another option would be for them to provide the additional funding required by the NMC.

Whilst we accept that other fee level options were looked at in 2012, we would contend that the financial position has in fact improved since that time and therefore a final option would be to reconsider a £5, £10 or £15 increase.

6. Are you responding as an individual or on behalf of a group or organisation?

6.1. Organisation

25 July 2014

This response is submitted on behalf of Unite the Union by:

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Response submitted via the on line survey

Submitted by: Jane Beach

¹ <http://www.nmc-uk.org/media/Latest-news/NMC-hugely-disappointed-that-revolutionary-bill-is-not-included-in-the-Queens-Speech/>