



Scottish Social
Services Council

Resources Committee
28 February 2018
Agenda item: 07
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Appendix G

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Scottish Social Services Council

Registration Fee Income and Debt Management Policy

[Draft revisions December 2017](#)

SCOTTISH SOCIAL SERVICES COUNCIL

Registration Fee Income and Debt Management Policy

1. INTRODUCTION

- 1.1 Part V of the Scottish Social Services Council (Registration) Rules 2016 (the Rules) sets down requirements in relation to the payment of fees. This policy sets out how the Rules are to be implemented in practice and provides clarification and guidance on specific issues. This policy is intended to ensure that the Rules relating to fees are interpreted consistently and that credit notes, provision for doubtful debt and the write off of debt are appropriately applied.

2. BACKGROUND

- 2.1 Registration and Finance staff work together to extract and check information from the Sequence registration system and then upload this to the finance system. The finance system creates invoices for issue to registrants, records receipts and generates reminder notices when fees are overdue. A debt will show against an individual registrant unless payment is received, a credit note is raised or a decision is made to write the debt off.

2.2 Credit Notes

Credit notes are created where an invoice has been issued to a registrant and it is no longer appropriate for the full amount of the invoice to be paid e.g. a registrant on the part of the Register for social workers moves to another job and therefore another part of the Register, which requires a lower fee. The credit note adjusts the amount the registrant has to pay by providing a credit to set against the invoice value. The credit may be for the full value or a proportion of the invoice value.

2.3 Debt Impairment Review

At the end of each financial year outstanding debt is reviewed for impairment. The debt figure detailed in the Annual Report and Accounts is adjusted for any impairment value. An impairment review identifies debt where it is likely that debt will not be collected. The impairment value is an accounting estimate and differs from a decision to write off debt as debt, although considered impaired, is still actively pursued and may subsequently be recovered. When a debt is written off then there is no further attempt to pursue this debt and recovery becomes very unlikely.

2.4 Debt Write Off

A debt is written off where an invoice has been properly raised (i.e. the registrant was registered on their registration anniversary date) but it has been decided that there is no reasonable expectation that the debt will be recovered. This is likely to be a decision that follows suspension or removal from the Register. Once written off the debt is no longer pursued and the write off is a cost to the SSSC.

The [Director of Corporate Services](#) has delegated power to write-off individual debt to the value of ~~£10,000~~. Sponsor Department approval is required prior to writing off debt that exceeds ~~that~~ value. Given the level of registration fee, the [Director of Corporate Services](#) has the authority to write off individual debt.

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3. APPLICATION FEE

- 3.1 Applications for registration are not processed until the appropriate fee has been confirmed as being received. Application fee invoices are raised as application fees are received. These invoices are not issued to the registrants. Application fee invoices are issued to registrants who opt to pay by direct debit. This represents their direct debit advance notice and is issued no less than 10 working days prior to the collection date. Debt recovery procedures are undertaken for any unpaid applications until payments are made or the application is withdrawn. Please refer to the Memorandum of Understanding where these timescales are detailed. The applicant is not registered until the application fee is paid. Application fees are non refundable in the event that the application is refused.
- 3.2 Where a registrant wishes to move to a different part of the register an application fee will be due if the application is received 6 months or more after the due date of their annual/renewal fee. Please note the date the application is received will determine whether the fee is due or not.

4. ANNUAL FEE

- 4.1 Annual fees are levied in respect of retention on the Register and are due on the anniversary of the date of initial registration each year. Registrants who pay by direct debit receive a notification that the fee is due and will be debited.
- 4.2 Invoices are raised and sent to registrants not less than one calendar month before the fee is due. This invoice will represent the required advanced notice for collection by direct debit for all annual fees of registrants for whom direct debit instructions are held. A reminder letter is sent approximately 14 days after the registration date if no payment has been received. If a further 14

days elapse and the debt remains outstanding the registration lapsing procedure is implemented with immediate effect.

4.3 Issue of Credit Notes (prior to date of registration anniversary)

A credit note will be issued in the following circumstances:

- If at any time it is established that the original invoice was raised in error or was raised for an incorrect amount.
- If at any time a decision is made to waive fees in accordance with Section 21 of the Rules.
- If prior to the date of the registration anniversary:
 - the registrant informs the SSSC that they wish to be voluntarily removed from the Register in writing
 - the registrant informs the SSSC that they are no longer eligible for registration and SSSC obtains confirmation from their last employer
 - The SSSC is informed the registrant is deceased
 - The registrant has been removed from the Register
When a student is awaiting confirmation of results and the fee has fallen due before results are received and the individual has been removed from the part of the Register for students.
 - The registrant advises that they require to be moved to a different part of the register. Please note the completed application and fee must be received before the annual fee is credited.

Finance will confirm via Sequence or with Registration or Fitness to Practise the position prior to a credit note being issued. Debt recovery procedures will be suppressed until the position is confirmed. Finance will review accounts where recovery action is suppressed weekly and issue reminders for accounts where fees are still due.

- N.B. Where a registrant moves from one part of the register to another, after their registration anniversary date, they must pay any overdue annual fees and an application fee if the application is received 6 months or more after their original registration date.

4.5 Write off of Debt (after registration anniversary date)

Registration fees are paid in advance for the coming year's registration. The fee due is based on all relevant information available to the SSSC on the anniversary of the date of registration. Changes in circumstances relating to events on or after the fee becomes due (the registration anniversary) do not affect the correctness of the fee charged. However, due to the relatively low value of the fees levied the SSSC must take a proportionate approach when seeking to recover overdue fees. The write off procedure can only be implemented after issue of the recovery

letters unless specifically requested. Therefore debt will be recommended for write off in the following circumstances:

- Debt will be written off in the circumstances where a registrant is deceased.
- Where a registrant has been removed from the Register.
- Where the registrant has one or more annual fee payments outstanding and their registration has been lapsed.

In all other cases where debt remains outstanding following the reminder notice details of the outstanding debt are passed to the Registration section. The debt will remain outstanding on the finance system until such time as payment is received or Registry makes a recommendation to write off the debt.

4.6 Refund of Fees

If a registrant has paid their annual fee prior to the due date and we are notified before the annual fee date that their circumstances have changed the fee would be no longer applicable for example they move to a post that is not subject to registration by the SSSC we will refund the fee.

5. RENEWAL FEES

- 5.1 Registrants are required to apply to renew their registration before their registration expires. The number of years between each application for renewal depends on which part of the Register the registrant is registered on.
- 5.2 Invoices are raised and sent to registrants at least one month before the fee due date. A reminder letter is sent approximately 14 days before the registration date. If no payment has been received by the due date, the Registration section will commence the lapsing process.

The registrant will not be renewed until payment is received.

- 5.3 Payment of a renewal fee has no status in terms of eligibility to register unless an application to renew form has also been submitted.

5.4 Issue of Credit Notes

For accounting purposes a credit note will be issued against a renewal invoice in the following circumstances:

- If at any time the registrant advises in writing that they do not wish to apply to renew their registration.
- If at any time the SSSC receives confirmation that a registrant is no longer eligible for registration.

- If the registrant is no longer eligible for registration as a result of Fitness to Practise procedures.
- If at any time the SSSC is informed the registrant is deceased.
- If at any time it is established that the original invoice was raised in error or was raised for an incorrect amount.
- If at any time a decision is made to waive fees in accordance with Rule 21 of the Registration Rules.
- If prior to the date the fee is due there has been a change to the registrant's registration (new part of the Register, registered on more than one part of the Register) that affects the fee that would be due.

Finance will confirm via Sequence or with Registration or Fitness to Practise sections the position prior to the credit note being issued. Finance will review accounts where recovery action is suppressed weekly and issue reminders for accounts where fees are still due. There are no specific debt recovery procedures as the application to renew will not be finalised until payment is made.

5.5 Write off of Debt

Failure to submit an application to renew will be a Registration matter. There should be no requirement to write off renewal fee debt.

The renewal fee debt will remain outstanding on the finance system until such time as payment is received or a duly authorised credit note is raised.

5.6 Refund of Fees

Renewal fees are non-refundable. However if a fee is received without an application form or it is established that the registrant is no longer eligible to be on the register the fee will be refunded as the Scottish Social Services Council has not carried out any work.

6. RESTORATION FEES

- 6.1 Applications for restoration to the Register are not processed until the appropriate fee has been confirmed as being paid. No invoice is raised for restoration applications and there are no debt recovery issues as the application fee paid is non-refundable in the event that the application is refused.

7. GENERAL PRINCIPLES

7.1 Income Collection and Debt Management

It is essential that the SSSC has in place an efficient and effective income collection and debt management function. The request for payment of fees is a regular recurring contact with registrants and

poor performance in the accuracy and timing of invoices or lax recording of payments received will have a significant detrimental impact on the reputation of the SSSC.

Therefore it is essential that the SSSC has the systems and properly trained staff in place to ensure that invoices are raised accurately and at the appropriate time. When a payment has been received it is essential that this receipt is promptly and accurately recorded to avoid registrants being contacted in relation to debt they have already settled.

The debt management process must ensure that all fee related communication with registrants is meticulously recorded as non-payment of fees may be considered misconduct by the Council.

7.2 Convenient Payment Methods

The SSSC has in place several methods of payment to make it as convenient as possible for registrants to pay their fees and as a result reduce the incidence of late payment and the need for debt recovery processes to be instigated. These methods include:

- Cheque
- Direct Debit
- Debit/credit card either on-line or by telephone
- Bank transfer

7.3 Debt Impairment Review

As part of the annual accounts process a debt impairment review is undertaken. The debt balance is adjusted for impairment in the annual accounts where the amount is material.

8. REPORTING ARRANGEMENTS

- 8.1 Income collection and debt management reports (including details of debt written off) will be submitted to each meeting of the Resources Committee.