

Title of report	Review of registration fees
Summary/purpose of report	To provide an overview of registration fee levels and to propose that members approve conducting a consultation on reviewing registration fees.
Recommendations	The Council is asked to approve consulting on reviewing registration fees
Responsible Officer and Author	Maree Allison, Acting Chief Executive
Link to Strategic Plan	<p>The information in this report links to:</p> <p>Outcome 1: Trusted People who use services are protected by a workforce that is fit to practise.</p> <p>Outcome 2: Skilled Our work supports the workforce to deliver high standards of professional practice.</p> <p>Outcome 3: Confident Our work enhances the confidence, competence and wellbeing of the workforce.</p> <p>Outcome 4: Valued The social work, social care and children and young people workforce is valued for the difference it makes to people's lives.</p>
Link to Risk Register	Risk 6: The SSSC fails to secure sufficient budget resources required to deliver the strategic plan.
Impact assessments	<ol style="list-style-type: none"> 1. An Equalities Impact Assessment (EIA) was not required. 2. A Data Protection Impact Assessment (DPIA) was not required. 3. A Sustainability Impact Assessment (SIA) was not required.
Documents attached	None
Background papers	None

INTRODUCTION

1. Since registration started in 2003, we have only reviewed registration fees once, in 2017, following a consultation in 2016.
2. In 2016 the then Minister for Early Years asked that we consider a longer-term plan for increasing fees incrementally. Work progressed on this in 2019/20 and was delayed due to COVID-19 and subsequent pressures on the registered workforce. This paper provides an overview of current fee levels, that of other regulators and proposes that we now proceed with a consultation on fee levels.

CURRENT FEE LEVELS

3. Our fees and that of the other social work regulators, who are all Non Departmental Public Bodies (NDPB) and part funded by Government:

	SSSC	NISCC Northern Ireland Social Care Council	SCW Social Care Wales (have a return to practice fee)	SWE Social Work England
Social Worker/ Manager	£80	£65	£80	£90
Supervisor/ Practitioner	£35	-	-	-
Support Worker	£25	£30	£30	-
Student	£15	£20	£15	-

4. The majority of people on the register pay the support worker fee.
5. The health regulators' fees, who are independent of government and fully self-funded:

HEALTH CARE REGULATOR	FEE Highest Fee for different registrant types
GMC General Medical Council	£433
NMC Nursing And Midwifery Council	£120
GDC General Dental Council	£690
HCPC Health Care Professions Council	£117.74

6. The HCPC increased their fees by £19.62 this year. The GDC increased their fees by £10 for 2023. The GMC increased their fees by £13 for 2023.

FEE STRATEGY

7. Fee levels are set out in our Registration Rules and any change to the Rules requires us to conduct a public consultation and then obtain ministerial consent.
8. Council Papers from when the SSSC was established in 2001 indicate that the original intention was for registration fees to cover the cost of the regulation function. The direct cost of registration is £2.3m and fitness to practise is £7.1m. The funding we receive from fees is currently £5.66m. Registration fees currently cover 63% of regulation direct costs. To achieve full funding of the direct costs for these functions would require all people on the Register to pay approximately £55.
9. Our grant in aid and fee income is currently insufficient to meet the cost of delivering our statutory functions and strategic plan and we have a £2m spending pressure in 2023/24. Fee income is an important part of our financial sustainability.
10. Our priorities in reviewing fees are:
 - Sustainable, secure funding to enable long-term planning, including the ability to invest in the development of the workforce, along with efficiencies and improvements.
 - Development of small, annual increases in fee levels.
 - Retention of tapering across the different register parts, so the lowest paid parts of the workforce pay less.

PROPOSALS TO INCREASE FEES

11. Following discussions with Scottish Government different options for annual increases were considered and the recommended proposal for consultation is suggested as:
 - 2024/25 - increase fees for social workers and managers from £80 to £90 in line with Social Work England and increase other fees by the same 12% (rounded to the nearest £).
 - 2025/26 onward – apply an increase of 5% (rounded to the nearest £) every year to give certainty to registrants and remove the need to consult regularly, although there would still be the option to review in the future.

12. If implemented the fee levels for the next five years would be:

	Current	2024/25	2025/26	2026/27	2027/28	2028/29
Social Worker/ Manager	£80	£90	£95	£99	£104	£109
Supervisor/ Practitioner	£35	£39	£41	£43	£45	£48
Support Worker	£25	£28	£29	£31	£32	£34
Student	£15	£17	£18	£18	£19	£20

IMPACT ON INCOME

13. The increase in income for a full year is set out below:

	Current Fee income	Year 1	Year 2	Year 3	Year 4
Additional fee income		£ 676,000	£ 311,000	£ 326,000	£ 343,000
Total fee income	£ 5,660,000	£ 6,336,000	£ 6,647,000	£ 6,973,000	£ 7,316,000

CONSULTATION

14. If Council approve proceeding with a consultation, we will likely start the consultation in January 2024. It would run for the recommended 12-week period with a likely report back to Council in May 2024.

RISKS

15. We have a cautious risk appetite for financial management. We have a cautious risk appetite for decisions affecting how we will be perceived by our stakeholders.
16. There is a risk to the sector that any increase in fee levels leads to an increase in people leaving the sector or a barrier to people joining the sector. There is no evidence of such an impact when we raised fees in 2017. However the financial landscape has changed.
17. In 2022 Scottish Government decided to fund fees for those employed by local authorities as part of the financial settlement with local authorities. We receive additional grant in aid from Scottish Government in respect of these fees. This decision was outwith our control but will likely be a significant factor in consultation responses.

18. If approved, the public consultation will take place as we move to implement the Future Proofing Programme. The Programme has support from the sector and there is a risk that a review of fees will affect that support.
19. There are risks to our financial sustainability if we do not take the opportunity to review fees, which have not been reviewed for six years, and the planned review has already been delayed by three years.

IMPLICATIONS

Resourcing

20. The income the proposal would generate is set out at Paragraph 13. However, as registration fee income is accrued and grant in aid is cash-based we will not account for the full amounts charged in the first year.

Compliance

21. Our power to charge fees is contained in our founding legislation and the level is set within our Registration Rules. The legislation requires us to consult on Rule changes and obtain ministerial consent.
22. Any consultation must be genuine with the results of the consultation having the ability to influence the final decision. We will comply with legislative requirements for consultation.

IMPACT ASSESSMENTS

23. We will conduct impact assessments if Members approve proceeding with a consultation.

CONCLUSION

24. It is six years since the last review of registration fees. Whilst the delay in conducting a review is understandable given the unprecedented issues of the last three years, the expectation from Ministers in 2016/17 was for a further review by 2019/20. We recommend that Members approve us conducting a consultation in the New Year with the outcome of the consultation likely reported back to Council in May.