

Equality Impact Assessment

Section 1 : Project overview

What are the intended outcomes of this work?

To ensure adequate funding for the effective regulation of 15 health and care professions¹ in order to maintain public safety in professional healthcare practice by increasing fees levied.

The model of funding for professional healthcare regulation in the UK is reliant on registrant fees. Funding is not provided by employers, the NHS or other health bodies or by government.

A full public consultation and supporting stakeholder engagement programme will be carried out to inform this work. This will include a 12-week consultation on increasing the fees charged to registrants. The proposal being consulted on is that fees should rise by around £20 per year (£19.62) with a phased introduction between July 2023 and June 2025. Other HCPC fees paid by registrants would rise by the same proportion and be introduced at the same time as the renewal rise, in July 2023.

Who will be affected?

- The public, including service users and colleagues in health and care;
- Registrants and potential registrants, including students or trainees;
- Education and training providers;
- Health and care providers, professional bodies and consumer groups; and
- HCPC employees and partners.

Section 2: Evidence and engagement

What evidence have you considered towards this impact assessment?

1. HCPC registrant database which provides information on the breakdown of protected characteristics across our current registrant population.²
2. NHS pay scale information³.
3. Pay gap information from Office for National Statistics (ONS) covering: sex/gender⁴, disability⁵, ethnicity⁶ and low pay⁷.
4. Registrant survey on use of tax relief carried out between 15 and 23 August 2022.

These proposals are also informed by internal discussions, including with the HCPC's Council.

1. HCPC Regulates 15 professions: Arts therapists, Biomedical scientists, Chiropodists / podiatrists, Clinical scientists, Dietitians, Hearing aid dispensers, Occupational therapists, Operating department practitioners, Orthoptists, Paramedics, Physiotherapists, Practitioner psychologists, Prosthetists / orthotists, Radiographers, Speech and language therapists.

2. <https://www.hcpc-uk.org/resources/reports/2021/diversity-data-report-2021/>

3. <https://www.nhsemployers.org/articles/pay-scales-202223>

4. [Gender pay gap in the UK: 2021 - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-in-work/pay-and-earnings/gender-pay-gap)

5. [Disability pay gaps in the UK: 2021 - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-in-work/disability-and-employment/disability-pay-gaps)

6. [Ethnicity pay gaps: 2019 - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-in-work/ethnicity-and-employment/ethnicity-pay-gaps)

7. [Low and high pay in the UK: 2021 - Office for National Statistics \(ons.gov.uk\)](https://www.ons.gov.uk/people-in-work/pay-and-earnings/low-and-high-pay)

How have you engaged stakeholders in gathering or analysing this evidence?

1. The HCPC registrant database is held within HCPC, populated by information provided by registrants.
2. Pay data has been sourced from the NHS using publicly available information.
3. The HCPC's registrants have been invited to complete the survey on tax relief which was promoted to all registrants via the HCPC's registrant newsletter.
4. Proposals have been informed by early meetings with professional bodies and trades union, with a view to better understanding any issues that they may see arising from the proposals.
5. A full 12-week public consultation will be carried out. The consultation will ask respondents, who we anticipate will primarily be registrants or students in their final year of study, to help provide additional evidence about their sense of the likely impacts from the fee rise. The impacts will likely relate to respondents themselves, those they work with, or those to whom they provide services. The consultation will specifically ask for additional information about the potential positive or negative equality impacts of these proposals and for information about potential mitigations to any identified negative impacts on those with protected characteristics.
6. We will seek feedback on our consultation proposals from the HCPC's Equality, Diversity and Inclusion (EDI) Forum. Members of the Forum are external stakeholders with expertise in EDI and lived experience. Membership includes registrants and EDI professionals in relevant stakeholder organisations. We will also seek feedback from patients and service users.
7. Proposals have been discussed with the HCPC's Council, which includes both registrant and lay members.

Section 3: Analysis by equality group

Summary

This equality impact assessment identifies possible positive and negative impacts of our proposals. Any proposal to increase our fee is likely to have greater negative impact on those registrants who are more likely to be lower paid, such as younger professionals, who may be more likely to be at the start of their careers, women, registrants from ethnic minority backgrounds and those with more than one of these characteristics. Proposals could contribute to some registrants deciding to leave the workforce.

The impact on younger workers is mitigated by a 50% graduate discount, which we are proposing to retain. This discount reduces the cost to first time student joiners to the Register, for one registration cycle (2 years). If a new graduate joins the Register less than six months before the start of the next professional year, they also receive the remainder of the period free of charge (the 'free period').

Further mitigations of the financial impact of this fee rise include promoting tax relief and exploring the feasibility of increasing the spread of direct debits.

The positive impact of our fee rise proposals is that it secures the future of HCPC regulation, which performs a vital function supporting the delivery of safe, effective and high quality health and care services across the UK. The fifteen professions we regulate provide a range of health and care services to the whole population, and importantly to people at greater need of care because of their protected characteristics, such as disabled people relying on physiotherapy services, children and young people relying on psychological services or older people relying on audiology services.

Reductions in the HCPC's regulatory activity would negatively impact across the population as a whole, including these groups, and on people who have more than one protected characteristic, such as pregnant women from some ethnic communities or older people living with a disability or a long-term health condition. Such people could be particularly affected. Without adequate funding, the HCPC could not, for example, take effective and timely action where Fitness to Practise issues arose. If the HCPC is not able to perform its functions effectively, patient safety is likely to be compromised. This would likely have a negative impact on registrants, as well as on patients and the general public. A lack of adequate funding could also negatively impact on the HCPC's ability to consider the needs of people with protected characteristics and promote and drive equality more widely.

Age

Registrants

Younger registrants are generally more likely to be at the start of their careers so on lower incomes than other registrants; any proposal to increase our fee is likely to have greater negative impact on registrants who are lower paid. A proposal to increase fees may contribute to younger registrants, or older registrants who may be nearing retirement, deciding to leave the regulated health and care workforce.

The impact on younger workers is mitigated by a 50% graduate discount, which we are proposing to retain. This discount reduces the cost to first time student joiners to the Register, for one registration cycle (2 years). If a new graduate joins the Register less than six months before the start of the next professional year, they also receive the remainder of the period free of charge (the 'free period').

Conversely, all registrants are likely to be negatively impacted if their regulator is not adequately funded to carry out its functions effectively. As well as their practice and public confidence in their profession being negatively impacted by reductions in patient safety, registrants engaging with their regulator are likely to see diminishing service levels. This could disproportionately negatively impact older or younger registrants who may require more support to engage with the HCPC, for example in relation to access to online processes for older registrants or a lack of familiarity with processes for younger registrants.

General public

Should the fee rise have a significant impact on numbers of HCPC registrants in the health and care workforce, this could reduce the availability of health and care services, which is likely to disproportionately impact older adults, young people and children, and most especially those with complex health and care needs.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public

safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient harms. Any such negative consequences could disproportionately impact those, such as children or older people, who may be more likely to access health services or be more vulnerable to harm.

Disability

Registrants

The national disability pay gap is estimated to be 13%⁸ suggesting that disabled registrants are likely to be lower paid (for example, working part-time), and therefore are more likely to be negatively impacted by the fee rise.

Conversely, registrants with disabilities may be more likely to be negatively impacted if their regulator is not adequately funded to carry out its functions effectively. For example, registrants with some disabilities may require more support to engage with the HCPC or to access our processes, so reductions in the HCPC's ability to provide good service levels could disproportionately negatively impact these registrants.

General public

Should the fee rise have a significant impact on numbers of HCPC registrants in the health and care workforce, this could reduce the availability of health and care services, which is likely to disproportionately impact people with disabilities, most especially those with complex health and care needs.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation to safeguard public safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient harms. Any such negative consequences are likely to disproportionately impact on those with disabilities who may be more likely to access health and care services, have more complex needs or be more vulnerable to harm.

Gender reassignment

Registrants

Registrants transitioning may be negatively impacted by the fee rise if it reduces the funds they have available to use for managing their needs during the process, for instance if they need to work fewer hours during their transitioning and so receive less income.

Conversely, registrants transitioning, who may need additional advice or support from their regulator, may be negatively impacted by any diminished service levels which may be caused by inadequate funding.

8. [Disability pay gaps in the UK: 2021 - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

General public

Should the fee rise have a significant impact on numbers of HCPC registrants in the health and care workforce, this could reduce the availability of health and care services, which may disproportionately impact those going through gender reassignment if it impacts on the specialist services they need, such as psychological services that support people with complex health and care needs.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient harms. Any such negative consequences are likely to disproportionately impact on those who may be more likely to access health and care services, have more complex needs or be more vulnerable to harm. This could include those going through gender reassignment.

Marriage and civil partnerships

Registrants

No differential impacts have been identified relating to registrants who are married or in civil partnerships. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General public

Any reduction in the availability of health and care services may impact those couples seeking regulated health and care support related to their relationship, e.g., from psychological services. However, adequately funded health and care regulation is likely to positively impact this same group by supporting high quality professional practice and maintaining patient / service user safety.

Pregnancy and maternity

Registrants

Registrants who are pregnant or who have childcare responsibilities may be negatively impacted by the fee rise if, for instance if they need to work fewer hours and so receive less income. Such registrants may decide to leave the regulated workforce for childcare purposes and stop paying their registration fees. We are mindful that, if they decide to return, they would need to pay the readmission fee so an increase in this may be more likely to impact on them.

Conversely, registrants who are pregnant or who have childcare responsibilities, who may need additional advice or support from their regulator, may be negatively impacted by any diminished service levels which may be caused by inadequate funding.

General public

Should the fee rise have a significant impact on numbers of HCPC registrants in the health and care workforce this could reduce the availability of health and care services, which may impact on services available to support pregnant women and those who have recently given birth.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient or service user harms.

Any such negative consequences are likely to disproportionately impact on those who may be more likely to access health and care services, have more complex needs or be more vulnerable to harm. This could include pregnant women and those who have recently given birth.

Race

Registrants

Available evidence indicates that people from some ethnic minority groups are more likely to be on low incomes and so likely to be more negatively impacted by any fee rise.⁹

Applicants joining the register from overseas may well be joining from countries with significantly lower average pay than the UK. These groups already pay a greater set of fixed costs to begin working in the UK (e.g., International English Language Testing System (IELTS) costs, relocation costs, etc). An increase in fee levels, including application fees, may therefore disproportionately impact this group of registrants.

Conversely, international applicants, who may need additional advice or support from their regulator, may be negatively impacted by any diminished service levels which may be caused by inadequate funding.

General public

Should the fee rise reduce the numbers of HCPC registrants in the health and care workforce, this may impact on the ability of services to meet the needs of specific ethnic groups, for instance those needing language support or wishing to have care provided in a culturally sensitive manner, e.g., with chaperones.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient or service user harms. Any such negative consequences could disproportionately impact those from some ethnic minority groups who may need additional support.

9. [Ethnicity pay gaps - Office for National Statistics \(ons.gov.uk\)](https://ons.gov.uk)

Religion or belief

Registrants

No clear differential impacts have been identified relating to registrants in relation to religion or belief. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General public

No clear differential impacts have been identified relating to the general public in relation to religion or belief. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

Sex

Registrants

The national gender pay gap is 7.8%, suggesting that female registrants are likely to be lower paid (for example working part-time) therefore more negatively impacted by the fee rise. Available evidence also indicates that women are more likely to be carers (children, relatives, partners with ill-health or disabilities) so a reduction in income may also have greater impact.

As set out above (see pregnancy and maternity), registrants who are pregnant or who have childcare responsibilities may be negatively impacted by the fee rise if, for instance, they need to work fewer hours and so receive less income. Such registrants may decide to leave the regulated workforce for childcare purposes and stop paying their registration fees. We are mindful that, if they decide to return, they would need to pay the readmission fee so an increase in this may be more likely to impact on them.

Conversely, registrants who are pregnant or who have childcare responsibilities, who may need additional advice or support from their regulator, may be negatively impacted by any diminished service levels which may be caused by inadequate funding.

General public

As previously noted, should the fee rise reduce the numbers of HCPC registrants in the health and care workforce, this may impact on services available to specifically support women, including those related to fertility and maternity care, such as diagnostic, physiotherapy and psychological services.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient or service user harms. Any such negative consequences could disproportionately impact specialist women's health services.

Sexual orientation

Registrants

No clear differential impacts have been identified relating to registrants in relation to sexual orientation. We are seeking feedback on equality impacts in our consultation and will ensure any identified impacts are considered in our analysis and response.

General public

As previously noted, should the fee rise reduce the numbers of HCPC registrants in the health and care workforce this may reduce the overall availability of health and care services, which may impact on services available to specifically support people from the LGBTQ+ communities, such as psychology services.

Conversely, the general public, including patients and service users, are likely to be positively impacted by the proposals which are designed to ensure strong regulation which safeguards public safety. Patients and service users are likely to be significantly negatively impacted if their regulator is not adequately funded to carry out its functions effectively which could lead to an increase in patient or service user harms. Any such negative consequences could disproportionately impact specialist LGBTQ+ services.

Other identified groups

Registrants

Those registrants on lower pay are a key group to be considered, as they are most likely to be negatively impacted by a fee rise.

This group contains registrants from all the groups above, although women, people from ethnic minority backgrounds, disabled people, younger workers and those working part-time or irregular hours (e.g., due to having caring responsibilities) are most likely to be within this group and are therefore most likely to be negatively impacted by a fee rise.

As set out above, the impact on younger workers, who are more likely to be lower paid as they are at the start of their career, is mitigated by a 50% graduate discount, which we are proposing to retain. This reduces the cost to first-time student joiners to the Register, for one registration cycle (2 years). If a new graduate joins the Register less than six months before the start of the next professional year, they also receive the remainder of the period free of charge (the 'free period').

Further mitigations of the financial impact of this fee rise are proposed in the consultation, including promoting tax relief and increasing the spread of direct debits. These initiatives could be of most benefit to those who are lower paid.

Four countries diversity

We will be engaging stakeholders across the UK nations to seek their feedback on our proposals. Any issues identified through our consultation and engagement process that are specific to any of the UK nations will be carefully considered and responded to.

Section 4: Welsh Language Scheme

How might this project engage our commitments under the Welsh Language Scheme?

Our proposals can be provided in Welsh on request.

Section 5: Summary of analysis

Summary

This equality impact assessment identifies possible positive and negative impacts of our proposals. Any proposal to increase our fee is likely to have greater negative impact on those registrants who are more likely to be lower paid, such as younger professionals, who may be more likely to be at the start of their careers, women, registrants from ethnic minority backgrounds and those with more than one of these characteristics. Proposals could also contribute to some registrants deciding to leave the workforce.

The impact on younger workers is mitigated by a 50% graduate discount, which we are proposing to retain. This reduces the cost to first-time student joiners to the Register, for one registration cycle (2 years). If a new graduate joins the Register less than six months before the start of the next professional year, they also receive the remainder of the period free of charge (the 'free period').

Further mitigations of the financial impact of this fee rise include promoting tax relief and increasing the spread of direct debits.

The positive impact of this proposal, including in relation to equality impacts, is that it secures the future of HCPC regulation, which performs a vital function supporting the delivery of safe, effective and high quality health and care services across the UK. The 15 professions we regulate provide a range of health and care services to the whole population, and importantly to people at greater need of care because of their protected characteristics, such as disabled people relying on physiotherapy services, children and young people relying on psychological services or older people relying on audiology services.

Reductions in the HCPC's regulatory activity would negatively impact across both the population as a whole and specifically these and many other groups and those who have more than one protected characteristic, such as pregnant women from some ethnic minority communities or older people living with a disability or long term health conditions. Without adequate funding, the HCPC could not, for example, take effective and timely action where Fitness to Practise issues arose. If the HCPC is not able to effectively perform its functions, patient or service user safety is likely to be compromised. This would have a likely negative impact on registrants, as well as on patients and the general public. A lack of adequate funding could also negatively impact on the HCPC's ability to consider the needs of people with protected characteristics and promote and drive equality more widely.

Section 6: Action plan

Summarise the key actions required to improve the project plan based on any gaps, challenges and opportunities you have identified through this assessment.

Include information about how you will monitor any impact on equality, diversity and inclusion.

Summary of action plan

A full 12-week public consultation on our proposals will be carried out, supported by ongoing stakeholder engagement. The consultation will ask respondents, who we anticipate will primarily be registrants or students in their final year of study, to help provide additional evidence about the likely impacts from the fee rise; for example, on themselves, those they work with, or those to whom they provide services. The consultation will specifically ask for additional information about the potential negative or positive equality impacts of these proposals and for information about potential mitigations to any identified negative impacts on those with protected characteristics.

As set out above, we are proposing and seeking views on the following:

1. Our proposal to retain the two-year 50% graduate discount
2. Further measures we could take to mitigate the financial impact of this fee rise, including:
 - a. promoting tax relief, and
 - b. exploring the feasibility of increasing the spread of direct debits.

In addition, we will seek feedback on these proposals from the HCPC's Equality, Diversity and Inclusion (EDI) Forum. Members of the Forum are external stakeholders with expertise in EDI and lived experience. Membership includes registrants and EDI professionals in relevant stakeholder organisations. We will also seek feedback from patients and service users.

We will carefully consider and reflect on all feedback to our consultation before making any decision.

How will the project eliminate discrimination, harassment and victimisation?

Maintaining the HCPC's ability to be an effective regulator is key to ensuring that registrants and members of the public needing and receiving healthcare are not subject to discrimination, harassment and victimisation, either by prevention or through our work registering and supporting our registrants or our Fitness to Practise powers.

How will the project advance equality of opportunity?

Maintaining the HCPC's ability to be an effective regulator is key to ensuring that registrants are able to provide healthcare services equitably and based upon patient need, and that members of the public are able to access effective and appropriate healthcare services in a timely manner.

How will the project promote good relations between groups?

The HCPC's regulation, through our standards and our promotion of our standards, promotes equality in the round. This supports good relations between groups.

