Response ID ANON-9J4Q-4K8M-C

Submitted to Social Care Council - Registration Fees Review Consultation - 2026
Submitted on 2026-11-09 15:23:26

Introduction

Section 1 -Your views on the proposed fees review

1 It is proposed that the fee structure should be based on regulatory costs, equity and proportionality that is comparable with other regulated professions across the UK. Please use the comment box below to share your views on the fee structure being comparable with other regulated professions

Views on a fee structure comparable with other UK regulated professions:

Comparing fee structures with other regulated professions is unlikely to capture the nuance and variation of support, training, pay levels and professional accountability that will exist between separate professions. A fee structure for an unrelated profession should not be used to justify a fee structure for social work and social care.

However, we recognise that there are four regulators for social work and social care within the United Kingdom; therefore, it would be appropriate to consider fees across the UK. In doing so, it is important to also consider the variations in the role of regulation in UK nations, pay levels and the varying local expectations and differences facing registrants. The different regulators, while providing the same core functions, have slightly differing additional roles, such as providing training and workforce wellbeing support. There are, as pointed out in this consultation document, different funding arrangements with respective UK nation governments.

Additionally, comparisons need to capture different payment arrangements; for example, in Scotland statutory workers employed by local authorities have their fees paid for them, as will some other employers across the UK.

So, while comparisons may be useful, they should also be approached cautiously.

2 Do you agree that different fee levels should be retained for different parts of the Register?

Yes

Please give reasons for your response and provide alternative suggestions if appropriate:

The proposed fee changes could use the flexibility described in the consultation document to greater effect. The aim of any tapered or tiered system should be to ensure that:

Those with the greatest ability to pay are asked to pay the most

Fees are kept as low as possible for new entrants to the register

The percentage of income paid is as closely matched as possible across tiers, with lower fee brackets for those paid less.

3 Do you consider the proposed fee levels for your registration category to be fair and proportionate?

No

Please tell us about any impact the proposed changes would have on you or your organisation, and suggest any alternative levels you would consider more appropriate.:

We believe that the large jump in fees is an unreasonably sudden increase over the course of one year. We would urge any increase in fees to be staggered and brought into line with a tiered approach to fees that recognises seniority, pay level and ability to pay fees.

We recognise the fiscal position NISCC is in and understand the need to balance the budget. However, we are calling on the Executive in Northern Ireland to review funding for the regulator. Budget reductions and long-standing stasis of fees are cited as the reason for these proposals. We have calculated that, if inflation alone were being addressed, the social worker fee would increase to £92.61 annually to match the 2016 real terms rate. Therefore, we assume that the additional £34.39 increase proposed is due to budget cuts NISCC is managing.

4 Please indicate on the grid below, the timescale you feel is most appropriate for phasing in the proposed fee increases

Other timescale (please provide more detail in the comment box below)

Please use this comment box to give reasons for your response and to provide details of 'other' timescales if appropriate:

We have significant concerns over the ability of the workforce to absorb fee increases of this scale. We are calling on the Executive to review funding to NISCC to ensure any fee increases are fair, proportionate and that they can be introduced in a considered and staggered manner. We are also asking NISCC to consider what alternatives are plausible, and how increasing the staggering of introductions and bringing in more tiered rates could help.

5 What are your views on the introduction of a different fee level for practitioner social worker and 'senior leader - social worker'?

Views on different social worker fee levels:

We support a tiered approach to fees, but we urge NISCC to go further in this regard. The proposed fee changes could use the flexibility described in the consultation document to greater effect. The aim of any tapered or tiered system should be to ensure that:

Those with the greatest ability to pay are asked to pay the most

Fees are kept as low as possible for new entrants to the register

The percentage of income paid is as closely matched as possible across tiers, with lower fee brackets for those paid less.

Considering the above, we suggest that a form of fee taper for social workers linked to Agenda for Change pay grades should be considered, most likely along the lines of:

Student and AYE (student and first year qualified)

Practitioner level (entry-level grades)

Advanced practitioner level (experienced practitioners likely higher up pay bands, or with extra responsibility or specialism training)

Lower management level (approximately team leader level)

Senior management level (approximately service manager level)

Leadership level (sectoral leadership level)

The aim of any such changes should not be to increase the top tier significantly but to spread the level of cost amongst lower tier to ensure that registration costs increase with ability to pay.

6 Do you agree on the principle that fee levels should increase annually in line with inflation?

No

Please give reasons for your response on annual fee levels review and suggest any alternative approach you would consider more appropriate.:

We would suggest that fee increases should be reviewed biannually but not be linked directly to inflation. We consider that annual increases will create an administrative burden regarding implementation and uncertainty amongst the workforce over future fees. As we have seen in recent years, inflation can be unpredictable and costly to the public. Our members, and their colleagues, should not have to rely on the whims of international banking to know they can afford their registration fees.

However, we understand the reasoning behind the idea, and we are supportive of a more regular and structured fee increase review period, with consultation built into it.

7 Do you have any comments on the principle that a formal review of fees should take place regularly?

Yes

Please use this comment box to share your views and suggest any alternative approach you would consider more appropriate:

We are supportive of a more regular and structured fee increase review period, with consultation built into it. Our members and their colleagues would benefit from a structured and clear approach to fee increases and wish to retain consultation over increases as part of that process.

8 Who currently pays your registration fee?

Other fee arrangement (please provide more detail in the comment box below)

Please use this comment box to describe the 'other' arrangement for your fee payment:

Not applicable.

9 While the Council is currently unable to offer alternative methods for the payment of fees, if you pay your own registration fee, in whole or in part, would the option to pay by annual Direct Debit assist?

Yes

Please use this comment box to give reasons for your response and provide alternative payment options if appropriate:

Adding as much payment flexibility as possible to the process would be hugely beneficial to registrants. We encourage the exploration, and where possible, the adoption of payment options such as direct debit, with monthly and/or quarterly options and payroll deduction. We would also urge clear guidance for employers on how to create easy payroll and HR function options for employees, such as salary sacrifice and pay-and-claim back routes, to make fees more manageable and efficiently utilise HMRC tax support.

10 If you are an employer, please describe the impact the proposed fee changes are likely to have on your organisation. If you are not an employer, please skip this question.

Employer views on impact of fee changes:

N/A

11 What period of reasonable advance notice do you consider necessary between the announcement of any change to fee levels and the date on which those new fees take effect?

6 months

Please use this comment box to give reasons for your response:

Registrants need to have the ability to pay any increase; failing to consider this could lead to a lapse in registration, damaging careers and adding undue stress on registrants, which would in turn put additional pressure on the system and could affect service safety. What is a reasonable time largely depends on when and how registrants are to be expected to pay. No one should have less than 6 months to plan and save for an increase in fees.

Employers who support their registrants with fees may also need additional time and potentially a new fiscal year to budget for any changes.

12 Are there any alternative approaches to revising the registration fees that have not been considered in this consultation document that we should explore? Please be as specific as possible.

Yes

Please use this comment box to provide details of the alternative approaches that should be considered:

These suggestions are also above, but repeated for clarity here:

Fee structures:

We support a tiered approach to fees, but we urge NISCC to go further in this regard. The proposed fee changes could use the flexibility described in the consultation document to greater effect. The aim of any tapered or tiered system should be to ensure that:

Those with the greatest ability to pay are asked to pay the most

Fees are kept as low as possible for new entrants to the register

The percentage of income paid is as closely matched as possible across tiers, with lower fee brackets for those paid less.

Considering the above, we suggest that a form of fee taper for social workers linked to Agenda for Change pay grades should be considered, most likely along the lines of:

Student and AYE (student and first year qualified)

Practitioner level (entry-level grades)

Advanced practitioner level (experienced practitioners likely higher up pay bands, or with extra responsibility or specialism training)

Lower management level (approximately team leader level)

Senior management level (approximately service manager level)

Leadership level (sectoral leadership level)

The aim of any such changes should not be to increase the top tier significantly but to spread the level of cost amongst lower tier to ensure that registration costs increase with ability to pay.

Review periods for increasing fees

We would suggest that fee increases should be reviewed biannually but not be linked directly to inflation. We consider that annual increases will create an administrative burden regarding implementation and uncertainty amongst the workforce over future fees. As we have seen in recent years, inflation can be unpredictable and costly to the public. Our members, and their colleagues, should not have to rely on the whims of international banking to know they

can afford their registration fees.

Flexibility over payment timescales and methods

Adding as much payment flexibility as possible to the process would be hugely beneficial to registrants. We encourage the exploration, and where possible, the adoption of payment options such as direct debit, with monthly and/or quarterly options and payroll deduction. We would also urge clear guidance for employers on how to create easy payroll and HR function options for employees such as salary sacrifice and pay-and-claim back routes, to make fees more manageable and efficiently utilise HMRC tax support.

Section 2 - Equality and human rights considerations

13 Are there any adverse impacts in relation to any of the Section 75 equality groups that have not been identified in the EQIA Consultation document?

No

Please use this comment box to please tell us which group(s) have not been included and why, and provide any evidence or information that supports your view.:

14 Please tell us what action (if any) you think could be taken to reduce or eliminate any adverse impacts in revising the registration fees?

Details of actions to address any adverse impacts of the revised fees:

EQIA highlights several significant impacts, specifically on:

Gender, noting the workforce is over 82% female, ethnicity, disability, dependent status, and income. However, the proposals would still be hugely harmful to these groups if implemented in the way they are outlined. A primary driver in improving the proposals in the ways we have suggested and for the Executive in considering funding for NISCC, should be around mitigating the impact on these groups.

15 Are there any other comments you would like to make in regard to this EQIA or the consultation process generally?

No

Please use this comment box for any other feedback you would like to make in regard to this EQIA :

Section 3 - Your role/interest in social care

16 Respondent role. I am responding as:

A representative of an organisation

17 Please indicate your interest in social care (tick all that apply)

an employer or representative body

Please use this comment box to describe your 'other' interest in social care as indicated above:

18 If you are responding as a registrant, please tick the sector you work mostly in. If you are not a registrant, please select N/A.

N/A (I am not a registrant)

19 If you are a registrant, which of the following generic options reflects your role? If you are not a registrant, please select N/A.

N/A - I am not a registrant

20 Your contact details (this section is optional)

Name:
George Hannah

Job title/Organisation:
Policy and Public Affairs Advisor British Association of Social Workers, Northern Ireland

Address - line 1:

Address - line 2:

City:
Teams

Postcode:

Email address:
george.hannah@basw.co.uk

Daytime telephone number:
07799537678