Changing thinking, Changing Practice, Changing Lives

ARC NI RESPONSE

NISCC
Consultation on the Review of Registration Fees

October 2026

Introduction

ARC NI welcomes the opportunity to respond to the Northern Ireland Social Care Council (NISCC) consultation on the review of registrant fees. As a membership organisation representing organisations that provide support to people with a learning disability across Northern Ireland, we recognise the important role NISCC plays in regulating, supporting and developing the social care workforce and the need for a sustainable approach to funding this work.

Question 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 share your views on the fee structure being comparable with other regulated professions.

ARC NI supports the principles of fairness, proportionality and sustainability and recognises that registration fees have not increased since 2016. We also recognise the significant increase in the size of the Register and the pressures this creates for the Social Care Council.

However, we would caution against placing too much emphasis on comparisons with other regulated professions when determining affordability. The employment and remuneration context of social care in Northern Ireland must be central to the assessment.

Social care is well documented as a low paid role and practitioners are not directly comparable with other hsc roles such as nursing, social work, or allied health professions simply because all are regulated. Salary levels, career structures, employment conditions and the extent to which professional fees are reimbursed can differ substantially.

The consultation itself appropriately recognises that comparisons should take account of the employment context of social care in Northern Ireland.

ARC NI therefore believes that affordability relative to earnings should be given at least as much consideration as comparison with the headline fees charged by other regulators.

Question 2

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

Response: YES.

ARC NI supports the principle of differentiated fees where these genuinely reflect different levels of professional responsibility and accountability.

However, differentiation should be transparent, evidence-based and proportionate. Registrants should be able to understand why their category attracts a particular fee and how this relates to the costs of regulation and/or differing regulatory responsibilities.

We would particularly welcome further explanation of the rationale for the substantial difference proposed between social care practitioners (£40) and social care managers (£127 from 2028).

While managers clearly carry greater levels of responsibility and accountability, the proposed manager fee would be more than three times the practitioner fee. The increase for Registered Managers will bring their cost close to that of a Social Worker but there is clear difference in the rates of pay for these two groups. ARC NI would welcome evidence demonstrating how this differential has been determined.

Question 3

Do you consider the proposed fee levels for your registration category to be fair and proportionate? What impact would the proposed changes have and what alternatives would be appropriate?

ARC NI represents organisations employing both social care practitioners and social care managers and therefore wishes to comment on both categories.

For social care practitioners, the increase from £30 to £40 represents a 33% increase. While £10 may appear relatively modest in cash terms, social care includes a substantial number of comparatively low-paid employees and registration is mandatory. ARC NI is greatly concerned and would strongly advocate the impact should therefore be considered in the context of workforce earnings and the wider cost of living pressures facing the general public.

We also have concerns about the proposed social care manager fee. An increase from £65 to £120 in 2027 represents an increase of approximately 85% in one year, rising further to £127 in 2028. This is a significant increase in a mandatory professional cost.

ARC NI recognises that the Council requires sufficient resources to fulfil its regulatory functions. We also note the Council's evidence that its Register has grown by 102% since 2016, Fitness to Practise referrals have increased by 40% over five years, and pressures have resulted in waiting lists which the Council acknowledges can create an unsatisfactory experience for registrants and employers. We acknowledge the NISCC budget proposed for 2026-27 faced similar cuts that are to be applied across the rest of the statutory hsc system. These cuts impact the community and voluntary sector equally. We also acknowledge from the Annual Report that a better than breakeven budget was achieved in 2025-26. That said, we question whether the financial resource received by NISCC is being utilised in the most cost-effective way. For example, with multiple NISCC staff attending most meetings, we question whether NISCC could consider sending one representative.

Before applying increased costs to social care employees, we would welcome clearer evidence explaining how the proposed fee levels have been calculated, and advocate any increased contribution from registrants should also be accompanied by transparent and measurable improvements in regulatory performance.

Question 4

Should fee increases be introduced in a single year or phased over more than one year?

Response: OTHER – phased over a longer period.

ARC NI strongly feels the increase in registration for social care workforce should not happen and that these increases are too much.

However if going ahead we would strongly advocate a phasing approach. ARC NI would highlight that in recognition of the poor salaries, a number of social care organisations cover the cost of NISCC registration. In order to continue to pay this benefit, organisations would absolutely need a phased lead in. However, the proposed two-year arrangement provides relatively little protection for social care managers because the majority of the increase occurs immediately: £65 to £120 in the first year.

We would therefore encourage the Council to consider a longer transitional period, particularly for social care managers. A three-year phased approach, for example, could reduce the immediate financial impact while still moving towards a sustainable fee level. This would also provide employers and employees with greater opportunity to plan for the change.

Question 5

What are your views on introducing different fees for practitioner social workers and 'senior leader – social worker'?

ARC NI does not have a strong objection to the principle of differentiating fees according to responsibility and accountability, provided the distinction is clear, equitable and capable of being applied consistently across sectors.

However, we would caution against relying on Agenda for Change structures when determining equivalence outside the statutory sector. The consultation proposes Band 8a or above, or equivalent in other sectors, as the threshold for the new senior leader category.

Voluntary, community and independent organisations rarely use Agenda for Change structures. Clear guidance will therefore be required on what constitutes an "equivalent" senior leadership role to ensure that registrants working outside HSC Trusts are treated consistently and fairly.

Question 6

Should fees increase annually in line with inflation?

Response: NO.

ARC NI understands the rationale for avoiding another lengthy period without review followed by substantial increases however we do not support an automatic annual increase based on inflation. This sector's workforce, and their pay largely relies on public funds availability. Annual uplifts to service contract budgets can be inconsistent, sometimes non-

existent. As well documented, urgent reform is required to utilise resource better across hsc systems as there is insufficient money to meet the growing needs of the NI population.

The Council itself identifies a wider range of relevant factors, including changes in the Register, regulatory costs, efficiencies achieved through digital systems and business process improvement, public protection requirements, Department of Health funding and the financial impact on registrants. We believe these factors should continue to be considered.

ARC NI strongly advocates therefore that an automatic annual inflation measure could be considered only when efficiencies, increased government funding or other changes reducing financial pressures and stabilising the social care workforce has been achieved. These should also be considered when reviewing the fee.

Question 7

Should a formal review of fees take place regularly?

Suggested response: YES.

ARC NI supports regular formal reviews. A predictable review cycle would provide greater transparency and could avoid the need for substantial increases following lengthy periods in which fees remain unchanged.

We suggest a formal review every three years, with meaningful engagement with registrants, employers and representative bodies. The review should consider regulatory costs, performance and service improvements, efficiencies, government funding, workforce pay and affordability, recruitment and retention pressures, and the cumulative financial impact on registrants.

Question 8

Who currently pays your registration fee?

Across ARC NI members, arrangements vary. Registration fees may be paid directly by individual employees, reimbursed by employers or supported in other ways. Any assessment of the proposals should recognise this variation and ensure that no variant is unfairly impacted.

Question 9

Would annual Direct Debit assist?

ARC NI supports introducing Direct Debit as an additional payment option but would encourage the Council to go further. An annual Direct Debit changes the payment mechanism but does little to address affordability. The greater benefit for lower-paid employees would be the ability to spread the cost through monthly or quarterly instalments, without additional charges.

ARC NI would therefore encourage the Council to investigate instalment-based Direct Debit alongside annual payment. Clear information should also be provided about tax relief. The consultation confirms that eligible taxpayers can claim tax relief on Social Care Council registration fees.

Question 10

If you are an employer, what impact would the proposed fee changes have on your organisation?

ARC NI is responding as a representative body for organisations employing significant numbers of registered social care workers. Although registration fees are formally payable by individual registrants, the proposals could have direct and indirect consequences for employers.

Some organisations pay or reimburse registration fees, while others do not. Significant increases could create additional financial pressures for employers that currently meet these costs and could increase requests for reimbursement among employers that do not.

For organisations employing large numbers of registered workers, relatively modest individual increases can translate into significant cumulative costs. This is particularly important for voluntary, community and independent social care providers delivering publicly funded or commissioned services. These organisations often have limited ability to absorb additional workforce costs or pass them on to commissioners, however they would argue strongly that they have been doing so for many years.

There is also a potential workforce impact. Registration fees will not in themselves determine recruitment or retention, but they add to the cumulative pressures facing a sector already experiencing workforce challenges. This has been well articulated in the recent work undertaken by the Department of Health's Fair Work Forum, of which NISCC are a member.

ARC NI therefore recommends that the Council assess and monitor the sector-wide employer impact, alongside considering the impact at individual registrant level.

Question 11

What period of reasonable advance notice is necessary?

ARC NI strongly feels the increase in registration for social care workforce should not happen and that these increases are too much.

However if proceeding with revised fee rates, ARC NI recommends at least 2-3 years before these take effect in social care. This would allow individual registrants to budget for the change and employers to consider the implications within annual workforce and financial planning.

Where employers reimburse registration fees, sufficient notice is particularly important because budgets and commissioned service costs will have been agreed considerably in advance.

Question 12

Are there alternative approaches that should be explored?

Response: YES.

ARC NI suggests that the Council consider a combination of measures rather than relying primarily on substantial increases to registration fees.

These should include a longer phased introduction for categories facing the largest increases; regular evidence-based reviews rather than automatic inflationary increases; monthly or quarterly payment options; continued identification of efficiencies through digitalisation and business process improvement; and continued engagement with the Department of Health regarding an appropriate balance between public funding and registrant contributions.

We would also welcome greater transparency regarding the actual cost of regulating each part of the Register and how this has informed the proposed fee differential.

The Council currently receives its largest share of funding from DoH, with approximately one third raised through registration fees. The balance between these funding sources should remain part of the discussion about long-term sustainability.

Equality and Human Rights

Question 13

Are there adverse impacts on Section 75 groups that have not been identified?

Yes. I think ARC NI does not believe the EQIA fully captures the cumulative and intersectional impact of a fee increase on the social care workforce, particularly where Section 75 characteristics intersect with low pay, part-time working and caring responsibilities.

We welcome the fact that the EQIA recognises that the social care workforce is predominantly female, that people with disabilities and people from minority ethnic backgrounds may be disproportionately represented among those on lower incomes, and that those with dependants may experience greater financial pressures. However, we do not believe the assessment fully captures the cumulative impact where an individual falls within several of these groups simultaneously.

ARC NI is also concerned that age may warrant further consideration rather than being assessed simply as a low impact. The EQIA shows that 25% of social care practitioners are aged 30 or under. Younger workers may be at an earlier point in their career and therefore more likely to occupy lower-paid roles. We would therefore welcome analysis of the

proposed fee as a proportion of actual earnings, rather than considering the cash amount of the fee alone.

There may also be an impact on workers with dependants and unpaid caring responsibilities which is greater than currently reflected. The EQIA recognises that those with dependants may find an increase more difficult to fund and that the impact will be greater for single-family units and women in lower-paid roles. Given the predominantly female composition of the workforce, ARC NI considers this intersection warrants particular attention.

Similarly, the EQIA identifies that up to 14% of registrants are from minority ethnic groups and that these registrants are largely within social care. ARC NI would welcome further consideration of whether internationally recruited workers may experience additional financial pressures, particularly where they are concentrated in lower-paid social care roles.

Question 14

What action could reduce or eliminate adverse impacts?

ARC NI recommends a combination of mitigations: a longer phased implementation where increases are greatest; monthly or quarterly instalment options; sufficient advance notice; clear promotion of available tax relief; consideration of affordability alongside regulatory costs when fees are reviewed; and ongoing equality monitoring following implementation.

The Council should also consider whether there are practical mechanisms to mitigate disproportionate impacts on registrants working limited hours or experiencing particular financial hardship, while ensuring that any arrangements remain administratively workable.

Question 15

Other comments regarding the EQIA or consultation generally?

ARC NI welcomes the opportunity for employers, employees and representative organisations to contribute to the review. We recognise the need for a sustainable and effective regulator. The consultation presents evidence of considerable growth in the Register, increased regulatory demand and reduced Department of Health funding. These pressures cannot be ignored.

At the same time, the sustainability of regulation cannot be considered separately from the sustainability of the workforce being regulated.

Social care practitioners and managers provide essential services, and registration is a mandatory requirement. The cumulative impact of registration costs, workforce pressures, pay and employment conditions should therefore remain central to the final decision.

If fees increase substantially, particularly for social care managers, ARC NI believes there should be clear transparency about what the additional income will deliver. This should include measurable improvements in areas such as Fitness to Practise timescales,

registration processes, communication with employers and registrants, and registrant experience.

We would also encourage the Social Care Council and Department of Health to consider the implications for commissioned social care providers. Where additional workforce costs arise from regulatory requirements, providers need these costs to be recognised and funded.