



RCN Policy and International Department
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The Nursing and Midwifery Council consultation on Introducing Powers to Allow Payment of Registration Fees by Instalments

RCN Policy and International Department
020 7647 3723
policycontacts@rcn.org.uk
www.rcn.org.uk/policy

Introduction

The Nursing and Midwifery Council (NMC) would like to allow registrants to pay their annual registration fees by instalments. Currently, registrants must pay the whole sum in a single annual payment. In order to make payment by instalments possible, the NMC will have to change the legislation which governs its processes. The NMC is currently consulting with registrants about these proposed legislative changes and to gauge registrants' opinions on registration fee payment options.

Background

The annual fee for individual nurses and midwives to remain on the NMC register is currently £100. This is paid once a year, at the point of renewal of registration. The NMC notes in the consultation document that there has been increasing demand from registrants in recent years for the option to pay the registration fee by instalments – and corresponding frustration that the current legislation does not allow the NMC to make this option available.

The rules and regulations governing the remit and operations of the NMC are contained in the following pieces of legislation: the Order¹, the Registration Rules² and the Fee Rules³.

Action required from the NMC to introduce payment by instalments

The first step the NMC needs to take in order to make payment by instalments possible is to seek the required change to legislation which would allow the organisation to offer flexible payment options. The NMC will also need to develop an IT system which is capable of managing payment by instalments.

The NMC believe they should be ready to facilitate payment by instalments from 2016.

In summary, the proposed legislative changes are as follows:

- Make provision for payments to be made by instalments (rather than upfront and in full for the year, which is the current position)
- Introduce direct debit as a payment method, but not specify the frequency of the direct debit payments. The NMC further propose that they would 'future proof' this update to the legislation to ensure that any future technological advances in payment options would be covered, without the need to further consult on and amend the legislation in the future.

¹ The Nursing and Midwifery Order 2001 (as amended)

² The Nursing and Midwifery Council (Education, Registration and Registration Appeals) Rules 2004 (as amended)

³ The Nursing and Midwifery Council (Fees) Rules 2004 (as amended)

- If an instalment is missed, a notice would be issued requiring payment within 14 days. If the payment is not received, the Registrar may then remove the individual from the register.

Consultation questions

- Question 1: to what extent do you agree or disagree that the ability to pay registration fees by instalments would be a good idea?
- Question 2: to what extent do you agree or disagree with the legislation changes outlined above?
- Question 3: [for NMC registrants] If the NMC were to introduce payment by instalments as described above, how likely would you be to choose to pay your fee this way if the payment frequency was...

...two six-monthly payments?

...four quarterly payments?

...12 monthly payments?

RCN position

The RCN supports any action from the NMC which will make the payment of the registration fee more efficient and less financially burdensome for individual nurses. This is particularly important given that nurses have endured a prolonged period of pay restraint in recent years.

The RCN notes that during this difficult financial time, the NMC also raised the annual fee to £100 per year. Earlier in 2014, when the NMC issued a consultation which proposed to raise the fee to £120, the RCN was clear in our response that we believe this to be an unfair and unacceptable rise.

Therefore the proposals to facilitate payment by instalments, whilst welcome, must not be seen as a 'sop' to nurses in exchange for a further increase in registration fees. Instead, payment by instalments will help nurses to better manage an already unacceptably high fee.

There are a risks associated with payment of registration fees by instalments, such as the increased risk to registrants in relation to IT failures. The NMC will need to develop the IT infrastructure necessary to mitigate these risks and to provide the required assurance to registrants that payment by instalments does not raise unreasonable risk to the maintenance of the register.

Responding to the consultation

The deadline to respond to the NMC is 3 October 2014 at 12pm.

You can find the consultation document and more information on the NMC website:

<http://www.nmc-uk.org/Get-involved/Consultations/Introducing-powers-to-allow-payment-of-registration-fees-by-instalment/>

The RCN will be providing a corporate response to this consultation. If you would like to provide comments or feedback to us, please contact Alexandra Callaghan in the Policy and International team on alexandra.callaghan@rcn.org.uk