

A response from the Care Providers Alliance to the Care Quality Commission's proposed fee increase 2015-16

Introduction

The Care Providers Alliance (CPA) brings together all the main representative bodies for independent adult social care providers. The CPA aims to ensure a coordinated response to the major issues that affect the sector, which includes our strategic approach to working with the Care Quality Commission (CQC). For further information about the CPA please visit careproviders.org.uk

The Care Quality Commission are consulting on a nine per cent increase in its fees from April 2015. This is a proposal the CPA strongly oppose. In addition to this collective CPA response we recognise the strong representations being made by representative bodies themselves as well as their own members. Adult social care providers are standing together and objecting to CQC's approach to, and proposal for, setting fees at nine per cent from 2015-16.

Our analysis

* The CPA welcomes the positive changes CQC has been making to modernise its regulatory framework and the efforts to engage with adult social care providers. We also appreciate the regulator needs sufficient resources to undertake its functions.

* There has been a long and continuous increase in fees for the adult social care sector. In 2013 CQC published, Our strategic approach to fees for 2013 to 2016, with plans to link charges to costs incurred and to use fees to incentivise improvements in care quality. CQC's own figures have consistently demonstrated adult social care is contributing more towards the costs of regulation than any other sector. The most recent figures from CQC show adult social care is operating at 67.6% cost recovery (compared with primary care at 31.9% for example).

* The methodology CQC adopts to justify its current proposal is far from clear and, in many respects is neither robust nor defensible. A weak methodology means the CQC has been unable to calculate detailed costs of regulation as differentiated by sector – this is a position the CPA find wholly unacceptable. As a consequence CQC's approach is inherently inequitable, not transparent and very difficult to defend. It is unfortunate that CQC is falling short of the very principles it seeks to uphold as an organisation.

* Our concerns are compounded by the non-strategic application of ideas as well as the lack of business insight contained within CQC's proposal. Adult social care providers are operating within a harsh economic climate where funding has reduced year on year. Providers have agreed their budgets and the current proposal could serve to push the financial sustainability of some over the edge. CPA urge CQC to approach financial matters in a more considered and business like way. CQC needs to move away from its casual and knee jerk approach to setting fees to one that is intelligently based on a long-term view.

* CQC has yet to make a step-up improvement to the quality of its service for adult social care providers. The service improvements CQC have promised have still to be delivered consistently,

and there is no evidence the regulator is making its own efficiencies. For example the aim of delivering a report from inspection to receipt of 50 working days is far too long and, in any case, CQC is falling short on this target for many adult social care providers.

* Through this consultation response the CPA recognise that our individual members have made a number of positive recommendations and we would welcome the opportunity to agree a mutually acceptable way forward. As things stand, however, CQC's current proposal leaves the CPA with no option but to firmly oppose any fee increase for 2015/16.

Ends