

## **Unite the union response to the consultation on proposals to increase the Nursing & Midwifery Council (NMC) registration fees**

### **Introduction**

This consultation response is submitted by Unite the union - Britain and Ireland largest trade union. Unite's members work in a range of industries including manufacturing, transport, financial services, print, media, construction, not-for-profit sectors and public services.

Unite is the third largest trade union in the NHS and represents 100,000 health sector workers. This includes seven professional associations – the Community Practitioners and Health Visitors' Association (CPHVA), Guild of Healthcare Pharmacists (GHP), Medical Practitioners Union (MPU), Society of Sexual Health Advisers (SSHA), Hospital Physicians Association (HPA), College of Health Care Chaplains (CHCC) and the Mental Health Nurses Association (MHNA) – and members in occupations such as allied health professions, healthcare science, applied psychology, counselling and psychotherapy, dental professions, audiology, optometry, social work, building trades, estates, craft and maintenance, administration, information and communications technology (ICT), support services and ambulance services.

Unite also has 80,000 members in local authorities and 50,000 in the voluntary and community sector many of whom work in services directly involved with or linked to health and social care.

The following response was submitted via the NMC online survey that was available for completion between 3 November 2025 and 26 January 2026 via:

<https://www.nmc.org.uk/about-us/consultations/fees-consultation/>.

### **Consultation response**

**Are you responding as an individual or on behalf of an organisation?**

Individual

Organisation

**Please tell us the name of your organisation:** Unite the union

**Please tell us your name:** David Munday

**Please select the options that best describe the type of organisation you are representing.**

**Please select all that apply**

Government department or public body

Local authority  
Regulatory body  
Professional organisation or trade union   
Employer of nurses, midwives and/or nursing associates  
Agency for nurses, midwives and/or nursing associates  
Education provider  
Consumer or patient organisation  
Charity/voluntary sector  
Other

**Does your organisation officially represent the views of nurses, midwives or nursing associates and/or members of the public who share any of the following protected characteristics? Please select all that apply**

Older (i.e. 65 years and over)   
Younger (i.e. under 18 years of age)   
Disabled (including mental health)   
Ethnic minority   
Gender-based difference   
Lesbian, Gay and/or Bisexual   
Trans/gender diversity   
Pregnancy/maternity   
Religion or belief   
Other  
None of the above

**Where is your organisation based?**

England  
Northern Ireland  
Scotland  
Wales  
Across the UK   
Within the European Economic Area (EEA) / European Union (EU) but not in the UK  
Outside the UK and the European Economic Area (EEA) / European Union (EU)  
Prefer not to say

**Financial context**

**Considering the information we've shared in our consultation document and above, how far if at all, do you understand the financial context in which we are now operating?**

I have...

Complete understanding

Good understanding

Some understanding

Very little understanding

No understanding

Not sure / don't know

### **Proposal to increase the main registration fee**

**Given the information we shared with you about the financial context we are now operating in, to what extent do you agree or disagree that the proposal to increase the main registration fee is reasonable?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not sure / don't know

**You said you "Disagree" that the proposal to increase the main registration fee is reasonable. Please give a reason for your answer. This question is optional. You may leave it blank if you do not wish to respond.**

Please see additional information provided.

### **Proposal to increase overseas application fees**

**Given the information we shared with you about the financial context we are now operating in, to what extent do you agree or disagree that the proposal to increase the overseas application fees is reasonable?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not sure / don't know

**You said you "Disagree" that the proposal to increase the overseas application fees is reasonable. Please give a reason for your answer. This question is optional. You may leave it blank if you do not wish to respond.**

We cannot see any information as to why there is justification to increase the overseas application fee in the consultation document apart from 'the NMC needs more money'. This appears to be a major omission. The current premium paid by overseas applicants is set at £33. Does this cover the extra costs for this type of applicant? The fee is planned to increase to £39, does this new fee cover the cost of the extra work required? Is there a cross subsidy with overseas applicants paying more to support the costs of UK applicants or conversely, do UK registrants subsidise overseas applicants?

The NMC appears to have also made no assessment on the impact that increasing the overseas fee, or in fact its current level, could have on the number of overseas professionals that may see the UK as a destination to come and work. In its most recent registration data report<sup>i</sup>, the NMC reported that the growth in the register has more than halved (between April and September 2024 versus April and September 2025). The NMC reports that this 'slowdown' is due 'mainly to a sharp fall in the number of internationally educated professionals joining the Register for the first time. In the last six months, 6,321 international professionals joined. That's a 49.6% fall compared to the 12,534 international joiners between April and September last year. It is also the lowest six-monthly intake of international professionals for five years.'

There are likely a range of factors that impact on people's decisions to move to the UK, or another country outside of their own, to practise in an NMC registrant profession but making this an even less attractive option is counterproductive. We know that migrants keep the NHS and care services running and without these workers, the NHS and care sectors would face severe shortages<sup>ii</sup>. We also know that the range of costs associated with coming to work in the UK are increasing so this will increase the financial burden placed on these individuals and their families.

Reducing the number of registrants also has an impact on the NMC itself. The lost income to the NMC of 6,213 less registrants over those 6 months was over £950,000 in initial first registration fees. If the increased fee dissuaded 1,008 or more overseas applications, this would in effect wipe out the benefit of any increase in fee to the NMC.

Reviewing the NMC's Annual Fitness to Practise Report (2024–2025<sup>iii</sup>) it also seems to suggest that overseas/EU registrants also have a lower rate of FtP concerns versus UK registered addresses (3% of total concerns whilst making up 6% of the register). However, this information may be limited in its applicability.

**Proposal to increase additional qualification fees**

**Given the information we shared with you about the financial context we are now operating in, to what extent do you agree or disagree that the proposal to increase the additional qualification fees is reasonable?**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not sure / don't know

**You said you "Disagree" that the proposal to increase additional qualification fees is reasonable. Please give a reason for your answer. This question is optional. You may leave it blank if you do not wish to respond.**

As with the overseas registration fee increases, the consultation makes no comment on why these increases are needed, relying on the overall issue that 'the NMC needs more money'. It is impossible to assess whether this increase is justifiable in terms of increased costs to the organisation to administer such updates to the register.

**We are keen to understand your views on where the NMC is focusing its investment and resource following this consultation. To what extent do you agree or disagree that the NMC should continue to invest in the following areas:**

Strongly agree

Agree

Neither agree nor disagree

Disagree

Strongly disagree

Not sure / don't know

- **Investing in how we handle fitness to practise cases to ensure clarity, fairness and reasonable timeframes** - Not sure / don't know
- **Updating our Code and standards so that registrants, students and educators know what's expected of them and they can provide the best possible care and advice** - Not sure / don't know
- **Assuring high-quality training and education that properly prepares nurses, midwives and nursing associates and maintains high standards of safety** - Not sure / don't know

- **Investing in our work to make sure we promote equality, diversity and inclusion across our regulatory processes to ensure they're fair for all registrants and others involved** - Not sure / don't know
- **Investing in the right technology and data systems at the NMC to work efficiently and best support registrants, stakeholders and our teams** - Not sure / don't know

### Implications of our proposals

When thinking about the proposed changes to fees, can you identify any potential impacts – positive or negative – on some individuals more than others based on their protected characteristics? By protected characteristics we mean age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and sexual orientation.

Yes

No

Don't know/ unsure

Prefer not to say

**You said you think the changes to fees could impact either positively or negatively on individuals based on their protected characteristics. Which protected characteristics do you think this could impact? Please select all that apply**

Age

Disability

Gender reassignment

Marriage and civil partnership

Pregnancy and maternity

Race

Religion or belief

Sex

Sexual orientation

Prefer not to say

**What impact/s could it have? This question is optional. You may leave it blank if you do not wish to respond.**

We are concerned that the NMC has arrived at a fee rise position before any equality impact assessment has been considered. We do not believe it is suitable or sufficient to have made that decision and then wait till after the consultation to produce an EQIA until spring 2026. Further, we feel you have disadvantaged people responding to this consultation by only

looking to produce an EQIA after the period of consultation has closed. We have therefore highlighted that we have concerns in all protected characteristics.

It is well documented that some registrants, dependent on their protected characteristic(s), are disadvantaged in terms of career progression and therefore income. This would therefore mean that the increase in fees will impact different registrants disproportionately. Data from The Institute for Fiscal Studies (2024<sup>iv</sup>) showed:

- Younger nurses are promoted faster to Band 6+ than older nurses: In a November 2012 cohort, 71% of nurses who started aged 20–24 were in Band 6+ by August 2021 conditional on remaining a nurse in an NHS trust, compared with just 45% of nurses who started aged 45+.
- Male nurses are promoted faster to Band 6+ than female nurses: Among nurses at the lowest point of Band 5 in November 2012, 75% of the men were in Band 6+ by August 2021 compared with 64% of the women, conditional on remaining a nurse in an NHS trust. This may reflect differences in working patterns.
- There are substantial differences in progression to Band 6+ by ethnicity: Of nurses at the lowest point of Band 5 in November 2012, 67% of White nurses were in Band 6+ by August 2021 compared with 60% of Black nurses and 52% of nurses of Asian ethnicity (and 66% of nurses of Mixed or Other ethnicity), all conditional on remaining a nurse in an NHS trust.

**When thinking about the proposed changes to fees, can you identify any potential impacts – positive or negative – on either the promotion of the Welsh language or on Welsh speakers?**

Yes

No

Don't know/ unsure

Prefer not to say

**You said you think the changes to fees could impact either the promotion of the Welsh language or Welsh speakers. What impact/s could it have? This question is optional. You may leave it blank if you do not wish to respond.**

We have answered 'yes' as this was the only answer that would trigger this following question. We wanted to make the point that we could only answer 'no' if we can be assured that the NMC would continue to engage with registrants in Wales through the recognised language of their choosing.

**Thank you for your time sharing your views on our proposals. Is there anything else you would like to share on proposals to increase our registration fees that was not covered in**

**the previous questions? If you would like to share any attachments or other information, please upload them below or send it to [consultations@nmc-uk.org](mailto:consultations@nmc-uk.org)**

The following information was provided supplementary to our survey response.

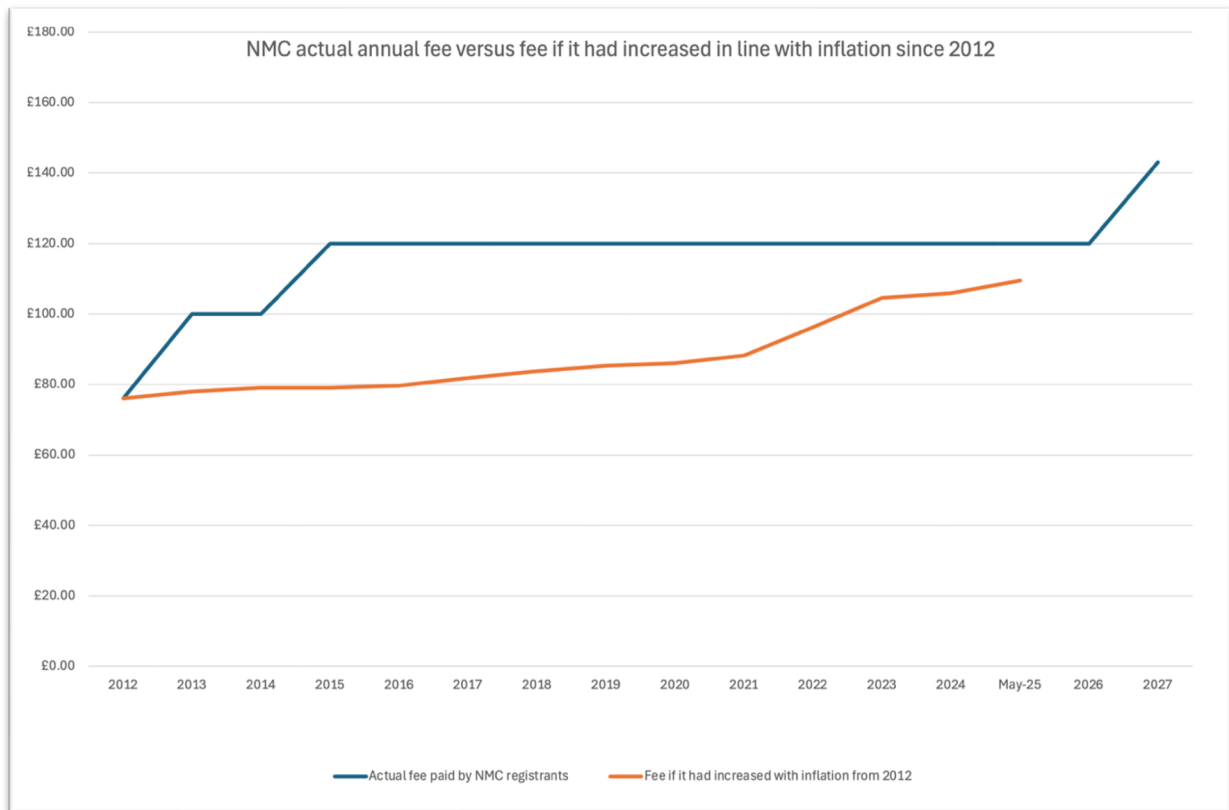
**In relation to the question: How far if at all, do you understand the financial context in which we are now operating?**

In an early question in this consultation, the NMC asks 'Considering the information we've shared in our consultation document and above, how far if at all, do you understand the financial context in which we are now operating?' We have answered 'Some understanding' as we believe the NMC has been at best highly selective about the information it has shared with the public, and at worse exceptionally disingenuous, both through the consultation and in questions asked of it both at Council meetings and in other fora.

In the consultation, the NMC has only provided the context of the current planned fee rise in comparison with the last time the fee was increased, in 2015.

Once the NMC has imposed it's planned 19% increase, it is correct that new annual fee of £143 would be £23.10 below the £166.10 it would have been if the 2015 fee had increased in line with inflation (between 2015 and May 2025 using the Bank of England Inflation calculator<sup>v</sup>).

This however ignores the fact that in 2015 the NMC fee had received two massive inflation busting increases in very quick succession. In 2012 the NMC fee was £76/year and in 2013 it was £100/year. If you therefore use the same argument that the NMC is using to justify its current demands on registrants, if the 2012 fee had risen in line with inflation, the annual fee today would be £109.52. Further, an NMC registrant who has paid the annual fee since 2012 has paid £362.70 more than if the fee had gone up in line with inflation since then. This highlights the cynical suggestion from the NMC that it has protected registrants from 'cost of living pressures' and has in fact done the direct opposite.



The NMC has also argued that a reason for its need to increase fees is that there has been an expansion in the register which has resulted in increased demands on its services. The consultation identifies that since 2015 the register has increased by over 166,000 registrants or 24.3%. However, over the same time, the increase in fitness to practise referrals has reportedly ‘only’ increased by 21% (as per Open Council (Extraordinary) 21 October 2025 papers<sup>vi</sup> – page 3, point 6). As the consultation document states, the vast majority (97%) of the NMC’s income comes from registrant fees. This expansion in the register has brought in over £20 million extra income/year but from its own data has not had a similar rise in demand to its FtP processes.

The extraordinary Council meeting papers also highlighted that the NMCs workforce more than doubled between 2016-17 to today. As we have highlighted above, this increase in staffing happened at a time following the increase in fees registrants faced between 2012 and 2015 where the registration fee increased by 58%.

In its 2012 consultation on increasing fees<sup>vii</sup>, the NMC stated that if the fee rise was not implemented it would have a significant implication for its ability to fulfil its statutory duty to protect the public and that the organisation would have to scale back on its number of fitness to practise hearings resulting in the organisation ‘never’ being able to eliminate its

historic fitness to practise cases. It was argued that with the rise in fees, that was implemented, it would allow it to meet the ‘unpredictable demands of increasing fitness to practise referrals by providing an effective and efficient fitness to practise process’. It is of note that many of the same arguments that we are seeing used in the 2025 consultation mirror the promises made in 2012. However, we still find ourselves today in a situation where the FtP historic backlog was never eliminated as promised.

Another area where the consultation remains resolutely silent is where the NMC has had to increase its expenditure and endured increased costs due to both outside and inside, of the organisation, failings.

### **Failings by a private company resulting in extra costs to the NMC and the organisations failure to gain compensation**

In 2023, the NMC became aware of anomalies in the data of a third-party testing centre, the Yunnik Technologies Test Centre in Nigeria. The decision was taken to invalidate all tests taken at the site affecting 1,995 individuals and where the NMC had concerns that someone had achieved their test score fraudulently, further action was necessary. 49 professionals on the register were referred to an independent panel and 669 applicants required referral to an Assistant Registrar (NMC’s Annual Fitness to Practise Report (2024–2025<sup>viii</sup>). Despite making regular requests to current and past chief executives and Council chairs that the private company be pursued for costs incurred, (questions to NMC Council meeting on 2 July 2025<sup>ix</sup> and 21 October 2025<sup>x</sup>) we have had no assurance that this has happened. Further, when asking that information be provided as to the cost impact of these serious failings that information has been denied. We believe it is wholly unacceptable that NMC registrants are now having to bear the cost of these failings.

### **The cost of cultural failings**

Following concerns raised about a “deep seated toxic culture” at the NMC, which included racism and fears of speaking up, it commissioned an independent review<sup>xi</sup>. This review, published in July 2024, whilst making exceptionally troubling reading, confirmed many of the concerns that had been raised, both through prior reviews and reports and concerns raised by stakeholder organisations. This first report made 36 recommendations.

Further independent reviews were commissioned which then had extensive delays which then resulted in the need for the NMC to re-commission them before they were eventually published in 2025.

Throughout this time, we have asked that the NMC both detail the cost of these organisational failings, the delays to the reviews and their re-commissioning and how much it will cost the organisation to put the necessary steps in place to remedy the organisations

toxic culture. Whilst very limited information has been provided, for example stating that the NMC Council agreed in March 2024 to a £30 million investment in an 18-month plan<sup>xii</sup> associated with the review, our repeated requests for more information, and critically that this information being included in this fee consultation, so registrants could understand that this has been a major cause of why the NMC needs to increase fees so dramatically, has been rebuffed. The most recent response to our requests stated: 'We do not include this level of detail on costs in our fee consultation material but we have been or will be transparent about these costs once we have the ability to do so... The work in response to the [Independent Culture Review] is ongoing and so a summative figure is not available.' (Ref: questions to NMC Council meeting on 21 October 2025<sup>xiii</sup>).

**To what extent do you agree or disagree that the NMC should continue to invest in the following areas...**

The NMC has asked to what extent to you agree or disagree that the NMC should continue to invest in the following areas:

- Investing in how we handle fitness to practise cases to ensure clarity, fairness and reasonable timeframes
- Updating our Code and standards so that registrants, students and educators know what's expected of them and they can provide the best possible care and advice
- Assuring high-quality training and education that properly prepares nurses, midwives and nursing associates and maintains high standards of safety
- Investing in our work to make sure we promote equality, diversity and inclusion across our regulatory processes to ensure they're fair for all registrants and others involved
- Investing in the right technology and data systems at the NMC to work efficiently and best support registrants, stakeholders and our teams

We consider this question to be meaningless when it is not combined with any robust analysis as to how continuing to invest in these areas or to reduce investment would impact registrants, the ability of the organisation to carry out its statutory functions nor the costs/benefit analysis of increasing, decreasing or maintaining the current levels of expenditure.

For example, in respect of 'Investing in how we handle fitness to practise cases to ensure clarity, fairness and reasonable timeframes', the NMC is failing to achieve its key performance indicators (KPIs) in several areas related to its fitness to practise work with its current income and staffing levels. That is even though the annual cost of fitness to practise has gone up by £15.8 million, or 29.7% in one year (2024-25 versus 2023-24) (NMC FtP Improvement Programme Update, 2026).

With the increase in registration fees, it is suggested that the current overspend would then be manageable, however the organisation is also planning on cutting staff head count by more than 10%<sup>xiv</sup>. The organisation has also spent millions of pounds on private consultants which is money that is now lost to the organisation versus if this money had been invested in the skills and expertise of staff employed.

In respect of 'Updating our Code and standards so that registrants, students and educators know what's expected of them and they can provide the best possible care and advice', this work is already happening. It is not clear how much the organisation believes this work will cost nor how it could realistically stop 'investing' in this area. However, if the NMC did state that if they stopped investing in updating the Code it would mean that the fee rise would not be required, or it would be dramatically reduced, it would be interesting to know how many registrants would feel this would be a better option.

**26/01/2026**

**This evidence was submitted on behalf of Unite the union by:**

**Richard Munn  
National officer, Unite the union**

**For further information, please contact:**

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<sup>i</sup> <https://www.nmc.org.uk/about-us/reports-and-accounts/registration-statistics/>

<sup>ii</sup> <https://www.uniteunion.org/media/nb2hyoe1/righttostay-mythbuster.pdf>

<sup>iii</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/annual-reports-and-accounts/2025-annual-ftp-report/annual-fitness-to-practise-report-20242025.pdf>

<sup>iv</sup> <https://ifs.org.uk/publications/progression-nurses-within-nhs>

<sup>v</sup> <https://www.bankofengland.co.uk/monetary-policy/inflation/inflation-calculator>

<sup>vi</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/councilpapersanddocuments/council-2025/open-council-extraordinary-21-october-2025.pdf>

<sup>vii</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/consultations/reports-of-consultation-findings-from-alpha-research.pdf>

<sup>viii</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/annual-reports-and-accounts/2025-annual-ftp-report/annual-fitness-to-practise-report-20242025.pdf>

<sup>ix</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/councilpapersanddocuments/council-2025/open-council-23-july-2025.pdf>

<sup>x</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/councilpapersanddocuments/council-2025/open-council-26-november-2025-website.pdf>

<sup>xi</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/independent-reviews/2024/nmc-independent-culture-review-july-2024.pdf>

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<sup>xii</sup> <https://www.nmc.org.uk/about-us/nmc-culture/shaping-our-culture/independent-reviews/>

<sup>xiii</sup> <https://www.nmc.org.uk/globalassets/sitedocuments/councilpapersanddocuments/council-2025/open-council-26-november-2025-website.pdf>

<sup>xiv</sup> <https://www.nmc.org.uk/news/news-and-updates/nmc-proposes-changes-to-its-structure-to-ensure-it-is-a-strong-and-independent-regulator/>