

AG/501

1st February 2000

Kit Wyeth
Scottish Executive
Community Care Division
James Craig Walk
Edinburgh
EH1 3BA

Dear Kit

THE REGISTERED ESTABLISHMENTS (FEES) (SCOTLAND) ORDER 1995

Many thanks for the opportunity to comment on the above document.

CCPS appreciates that registration fees must rise occasionally; nevertheless it is unfortunate that the increase is so significant on this occasion. It may have been preferable if the fee were to have been increased annually in line with inflation, as some care providers will no doubt have difficulties accommodating the scale of the increase.

More fundamentally, though, CCPS believes that the way in which registration is funded - through fees from providers - is misconceived, particularly in relation to voluntary organisations which, as you know, operate on a not-for-profit basis. Voluntary sector providers will undoubtedly seek to increase their own funding from local authorities to take account of the increase in registration fees; this additional funding will then be paid straight back to the authority. The transaction costs involved seem to us to be inimical to the concept of the 'community care £' promoted in *Modernising Community Care: An Action Plan*.

We believe that the forthcoming establishment of the Scottish Commission for the Regulation of Care offers an opportunity to rethink the way in which registration is funded, so that public money is not passed from one body to another, with attendant loss of its worth, in the future.

Yours sincerely

ANNIE GUNNER
Development Co-ordinator