



Scottish Social Services Council (SSSC) 'A Register for the Future' Consultation: College Sector Response – March 2022

Introduction

Colleges Scotland is the collective voice for the college sector in Scotland, representing its interests and ensuring that colleges are at the heart of a world class education sector that is recognised, valued and available to all. Colleges Scotland, as the membership body, represents all 26 colleges in Scotland which deliver both further education (FE) and around 24% of all higher education (HE) provision in Scotland.

It is acknowledged that the college sector in Scotland regularly engages with SSSC regarding Scottish Government, employer and industry needs from the wider Care system in Scotland, thus, is keen to engage with SSSC proposals to improve and streamline the way people working in social work, social care and early years services in Scotland apply to register.

Key points

The proposals put forward by the SSSC are, in the main, positive and broadly supported. There is, however, one area of concern that will have negative consequences if not addressed at this stage; namely, 'We propose to change the qualification requirement for support workers in care at home and housing support from SVQ Social Services and Health at SCQF level 6 to SVQ Social Services and Health at SCQF level 7.' (draft 'Register for the Future' document, p.13). To reflect upon this, the text within the draft consultation (p.12) stipulates:

Housing support or care at home services

Support workers in care at home and housing support services are two of the largest groups on our Register. The current qualification requirement for support workers in these groups is the SVQ Social Services and Health at SCQF level 6 (SVQ 2).

Care home services for adults

In care home services for adults the qualification requirement for support workers is an SCQF level 6 qualification (SVQ 2) and practitioners have an SCQF level 7 (SVQ 3) requirement.

The draft document clearly and helpfully states the scale of the issue, with '**Housing support or care at home services**' noted as '... two of the largest groups on our Register.' The college sector believes that an uplift in the SCQF level required for registration will be detrimental to worker 'pipeline' supply and will, equally, diminish the attraction of the sector through an extended learner journey to achieve registration and recognition. Despite best intentions, there is a tangible risk to Care sector provision: the proposed changes introduce the potential for immediate detrimental impact, as well as

medium-to-long-term recruitment downturn in what is often a distinct vocational path that starts at SCQF Level 6 for many workers and future practitioners; it is also a priority area of economic recovery for Scottish Government.

Under the current proposal, the following areas will be diversely affected (p.7):

- social care workers
 - anyone working in:
 - residential childcare services
 - adult care home services
 - adult day care services
 - care at home services
 - housing support services

- early education and childcare workers
 - anyone working in:
 - day care or children services
 - residential school care accommodation services.

The scale of impact, noted in page 12 of the draft document and mentioned above, and the inclusion of 'early education and childcare workers' – at a time of significant increase to free childcare provision by Scottish Government – should provide sufficient pause for thought on this specific proposal and allow for amendment (or removal) of the SCQF Level 7 requirement for registration.

Context

To provide some helpful context around scale of impact, college feedback highlights the following:

- It would be extremely challenging for a Home Care and Housing Support Worker to generate the evidence to meet the requirements of SVQ 3 (SCQF Level 7+) and a subsequent level increase for registration. The tasks and responsibilities associated with these roles are more suited to the Level 2 award. There is an obvious 'upskilling' aspect here, with elements of risk and opportunity, however, there is an immediacy to the issues that deserves further consideration.
- Dealing with economic reality, organisations' pay scales are, typically, linked to qualifications. From the perspective of affordability, how would the sector finance an anticipated increase in salaries for those who move from SCQF 6 to SCQF 7? The impact on Care sector employers, having already invested significantly in training staff to SVQ Level 2, would affect funding plans if SVQ Level 3 were to be imposed?
- The Care sector already faces challenges in recruiting and retaining workers through SVQ Level 2: a higher level of qualification and/or further study requirement for entry-level work and registration will be a deterrent to gaining or retaining employment for those workers, with salaries still among the lowest in the country. Any expectation placed upon support workers to achieve first-year university level equivalency to enter and/or keep employment that remunerates at c.£10 per hour is unrealistic.
- There is no guarantee that the existing workforce would be in a position to undertake a higher level of qualification. Whilst the dedication of support care workers pre-COVID and during COVID is unquestioned, as is their ability and resilience to handle duress, the imposition of SVQ Level 3 (or SCQF Level 7) to achieve registration would introduce a threat to job security.
- Many support workers approach their occupations as vocational commitments, thus, there is a value base inherent to their unquestioned commitment that may not,

necessarily, be reflected (or be able to be reflected) in their 'academic' level. It behoves us all not to introduce vulnerability in a professional context to those who care for the most vulnerable in society.

- It is important to acknowledge that the Social Care sector exists in a competitive space alongside the Healthcare sector and works diligently to attract individuals into the caring professions. That said, the Social Care sector is at a disadvantage with regards to pay, pay scales, and opportunities to progress – to inflate the entry requirement linked to registration would remove the opportunity to actually enter the caring professions for many. Removal of the SVQ2 as the registration requirement for some social care roles would, based upon current workforce demographics, remove a layer of career entry (and progression) for many; a Care career could, in effect, become less attractive, and the retention of workers even more difficult to maintain, through the unintended consequence of introducing SCQF Level 7/SVQ Level 3 as a marker for registration.
- To expand upon this, and as your own report and data show ([Scottish Social Service Sector: Report on 2020 Workforce Data, August 2021](#)), the average age of a Housing support/care at home support worker is 46, the majority of whom work part-time (see table inserts below).

Table 13: Median age of the workforce by sub-sector and employer type, 2020

Sub-sector	Public	Private	Voluntary	All
Adoption services	49	-	51	49
Adult day care	52	50	46	50
Adult placement services	52.5	-	48	52
Care homes for adults	50	43	46	45
Central and strategic staff	49	-	-	49
Child care agencies¹²	NA	36.5	33	34
Childminding	-	48	-	48
Day care of children	40	29	37	36
Fieldwork service (adults)	49	-	-	49
Fieldwork service (children)	45	-	-	45
Fieldwork service (generic)	50	-	-	50
Fieldwork service (offenders)	48	-	-	48
Fostering services	49	-	47	48
Housing support/care at home	52	41	44	46
Nurse agencies	-	45	54.5	46
Offender accommodation services	40	-	45	44
Residential child care	48	38	40	41
School care accommodation	54	-	47	48
All	47	40	43	44

Table 22: Percentage of part time and full time workers by sub-sector, 2020

Sub-sector	Part time	Full time	Unknown
Adoption service	44	56	0
Adult day care	54	46	0
Adult placement service	32	67	1
Care homes for adults	44	56	0
Central and strategic staff	25	75	0
Child care agency	85	15	0
Childminding	35	65	0
Day care of children	44	56	0
Fieldwork service (adults)	26	74	0
Fieldwork service (children)	28	72	0
Fieldwork service (generic)	36	64	0
Fieldwork service (offenders)	24	76	0
Fostering service	31	69	0
Housing support/care at home	59	41	0
Nurse agency	74	26	0
Offender accommodation service	21	79	0
Residential child care	32	68	0
School care accommodation	38	62	0
Total	48	52	0

Conclusion

Any imposition of a registration requirement to achieve a higher qualification may result in workers leaving the sector and for a number of reasons: inability (or unwillingness) to undertake further studies, pursuit of a career elsewhere with better or equal pay, with a prospect of no requirements to achieve a SCQF level 7 qualification.

It is the college sector's position that this recommendation be rethought to allow the intended utility and flexibility of occupational crossover to take place, which will help to attract and retain those workers currently entering the Care sector at SCQF Level 6 and will prevent an unintended consequence from transpiring.

Colleges in Scotland remain committed to working closely with SSSC on providing input from educators and practitioners that helps to inform decision making. With the meaningful involvement provided through this consultation, colleges are keen to provide expertise that should assist SSSC in its plans on a 'Register for the Future' and ongoing work.

There is an element of caution required to specific aspects of the full suite of changes proposed and that has been detailed above. Colleges Scotland supports the intentions of this consultation regarding the benefits and value of being registered, the standards, skills and qualifications needed to deliver high quality care, and the role of SSSC and its stakeholders in that.

To that end, a completed consultation response – following your proposed format – is attached for review and consideration (see **Appendix**).

Colleges Scotland
March 2022

Appendix

A REGISTER FOR THE FUTURE CONSULTATION

Thank you for taking part in this consultation to share your views and feedback on the proposals.

There are two parts to the survey and as you click through you'll see each of the proposals followed by questions and space for you to comment.

You can go back to our website for information on the consultation and details of our online consultation events: <https://www.sssc.uk.com/future-register-consultation>

We won't ask for your name or other personal details but we'll ask you to include the name of an organisation or service if you are responding for them.

The consultation closes on Friday 14 March 2022.

Please answer all the questions that you can. The survey should take about 20 minutes to complete.

You can save as you go and please remember to come back and complete your response. If you have any technical problems filling out the survey, please get in touch at performanceandimprovement@sssc.uk.com

Thank you

ABOUT YOU

Questions

1. Are you responding:
 - ~~as an individual~~
 - ~~as an employer/service provider~~
 - on behalf of an organisation

[If respondent answers 'as an individual', go to Q2. If respondent answers 'as an employer/service provider', or 'on behalf of an organisation', go to Q4]

2. Are you a registrant?
Y/N

[If respondent answers 'yes' go to Q3. If 'no', go to Q4]

3. Which Register part are you on?
Drop-down list of Register parts, include 'more than one part'
4. What is the name of your organisation?
Colleges Scotland
5. What is your role/job title?
Policy Officer

PART 1

REGISTRATION

1a. The structure of the Register

There are 23 different parts the SSSC Register. Our Register parts are linked to the type of service someone is working in and the level of role someone is carrying out.

We propose changing the structure to make it straightforward to apply and easier for the public to understand.

Current structure

23 different Register parts

- Managers in Housing Support Services
- Managers of a Care Home Service for Adults
- Managers of a Day Care of Children Service
- Managers of a Residential Child Care Service
- Managers of a Residential School Care Accommodation Service
- Managers of an Adult Day Care Service
- Managers of Care at Home Services
- Practitioners in a Care Home Service for Adults
- Practitioners in Day Care of Children Services
- Residential Child Care Workers
- Residential Child Care Workers with Supervisory Responsibilities
- SCSWIS Authorised Officer
- Social Workers
- Social Work Students
- Supervisors in a Care at Home Service
- Supervisors in a Care Home Service for Adults
- Supervisors in Housing Support Services
- Supervisors of a Residential School Care Accommodation Service
- Support Workers in a Care Home Service for Adults
- Support Workers in a Day Care of Children Service
- Support Workers in a Housing Support Service
- Support Workers in Care at Home Service
- Workers in a Residential School Care Accommodation Service

Proposal

We propose changing the structure and reducing the Register to five parts. We will still record what level of role someone is working at so we can assess whether they hold the correct level of qualification. This information would be displayed on MySSSC for employers to see as well as any details of any conditions applied to a person's registration.

The five Register parts are:

- social workers
- social work students
- care inspectors
- social care workers
 - anyone working in:
 - residential childcare services
 - adult care home services
 - adult day care services
 - care at home services
 - housing support services

- early education and childcare workers
 - anyone working in:
 - day care or children services
 - residential school care accommodation services.

Questions

1. Will reducing the number of Register parts be an improvement to the current structure?

Y/N

2. How much would this change make the registration status information we publish on our website more easy or difficult to understand?

Multi choice - **Very easy**, somewhat easy, ~~neither~~, ~~somewhat difficult~~, ~~very difficult~~

3. Will the proposed new structure help to provide a more flexible approach to how care is delivered?

Y/N

4. Do the proposed five new Register parts accurately describe these workers?

Y/N

5. Does this proposal have an impact on or for equality issues?

No

6. Do you see this proposal having an impact on or for any other areas?

No

7. Do you have any other comments on this proposed change?

No comments

1b. The timescale for new starts to apply to register

The regulations say that workers should be registered within six months of starting in a new role. Sometimes this causes difficulties, if for example we need to check or investigate information on the application form.

Employers tell us they often repeatedly check MySSSC for confirmation of a worker's registration. We believe that a change to the regulations will help with this.

Proposal

We are proposing that the regulations are changed to say that a worker must apply for registration within three months of starting in the role.

Questions

8. Will changing the regulations make it easier for employers to comply with the requirements?

Y/N

9. Is three months after starting in their role an appropriate timescale to require workers to apply for registration?

Y/N

10. Does this proposal have an impact on or for equality issues?

Not known.

11. Do you see this proposal having an impact on or for any other areas?

No

12. Do you have any other comments on this proposed change?

No comments

1c. Public Register online

The Register was set up to protect the public and build their confidence and trust in the workforce. We would like your views on what the general public should see when they access and search the Register on our website.

At the moment, they see a person's:

- registration number
- full name
- town of employment
- Register part
- registration status – registered, suspended, removed.

Proposal

To change the information we make available about registrants on the public Register on our website.

Questions

13. Should the public Register on our website show the level of role someone is carrying out, such as manager, supervisor, practitioner, support worker?

Y/N

14. Should the public Register show whether someone has the qualification for their role or not?

Y/N

15. Should the public Register show fitness to practise warnings and conditions, that are currently on a separate area of the website?

Y/N

16. We are considering publicising information about additional practice qualifications registrants may hold, for example mental health officer awards and practice teaching awards. Should the public Register show if a registrant holds an additional qualification?

Y/N

17. Should any other information be shown on the public Register?

Y/N

18. Does this proposal have an impact on or for equality issues?

Not known.

19. Do you see this proposal having an impact on or for any other areas?

Not known.

20. Do you have any other comments on this proposed change?

No comments.

1d. Registration period

When a worker is registered, they are registered for a specific period usually three or five years.

Proposal

We are considering bringing in a continuous registration period which would not have an end date. This means that workers would not have to renew their registration every three or five years.

Instead, registrants would complete an annual declaration at the same time as they are paying their fees. The annual declaration would include telling us of any changes that might affect registration.

Questions

21. Will removing the need to renew registration be an improvement over the current requirements?

Y/N

22. Does this proposal have an impact on or for equality issues?

Not known.

23. Do you see this proposal having an impact on or for any other areas?

Not known.

24. Do you have any other comments on this proposed change?

No comments.

PART 2

QUALIFICATIONS, SKILLS AND LEARNING

2a. Flexible qualifications that can move with different roles

Current situation

Now, if a worker moved from a childcare setting to an adult care setting (or vice versa) or worked for a service that delivers care and support to both adults and children they must gain two different qualifications. Find out more about the qualifications we currently accept on our website: www.sssc.uk.com/qualifications

Proposal

We are proposing wider acceptance of units within SVQs which are transferable across different sector areas, so qualifications become more flexible and may be accepted for different roles without the need to do another qualification that covers similar core skills.

We propose to map SVQ units to the job functions we register to set out the combination of units an individual can undertake to allow them to register with the SSSC and move roles with the same level of SVQ qualification requirement, without having to gain additional qualifications.

We also propose that we develop a new SVQ qualification for registration that we can accept for different roles and settings.

Questions

1. Should the SSSC be more flexible and accept SVQ units gained in adult or childcare settings for registration in other roles?

Y/ N – if N, comment box for 'Please tell us why'

2. Should the SSSC develop a new SVQ qualification that would support individuals to work across different roles and settings?

Y/ N comment box ' Please tell us why.

There are sufficient crossover qualifications that could be utilised to enable this and which link to National Occupational Standards.

3. How much more or less would qualifications that are accepted for different roles support new models of care?

Multi choice - Much more support, a little more support, neither, a little less support, much less support

4. How helpful would qualifications that are accepted for different roles be to address recruitment and retention pressures in the sector, especially in remote and rural areas?

Multi choice - Very helpful, a little helpful, neither, a little unhelpful, very unhelpful

5. How much more or less attractive would a career in the sector be if qualifications were accepted for different roles?

Multi choice - **Much more attractive**, ~~a little more attractive, neither, a little less attractive, much less attractive~~

6. Taking into consideration our key principles and criteria that underpin all our qualification standards, are there any other qualifications the SSSC should consider for any of the Register parts?

No.

7. Does this proposal have an impact on or for equality issues?

Not known.

8. Do you see this proposal having an impact on or for any other areas?

Not known.

9. Do you have any other comments on this proposed change?

No comments.

2b. Adult social care qualification level

Current situation

Housing support or care at home services

Support workers in care at home and housing support services are two of the largest groups on our Register.

The current qualification requirement for support workers in these groups is the SVQ Social Services and Health at SCQF level 6 (SVQ 2).

Care home services for adults

In care home services for adults the qualification requirement for support workers is an SCQF level 6 qualification (SVQ 2) and practitioners have an SCQF level 7 (SVQ 3) requirement.

Qualifications that match the level of the role

The SSSC has role characteristics for each Register part and the qualification level is based on the SCQF level descriptors that apply most to the key functions of the role. You can find out more about the characteristics for different levels of qualifications at this link

https://www.sqa.org.uk/files_ccc/SCQF-LevelDescriptors.pdf

Proposal

The qualifications at SCQF level 7 more accurately describe the role and functions carried out by workers in housing support and care at home.

We propose to change the qualification requirement for support workers in care at home and housing support from SVQ Social Services and Health at SCQF level 6 to SVQ Social Services and Health at SCQF level 7.

Questions

10. Should the qualification requirement for support workers in housing support be at SCQF level 7?

Y/N

11. Should the qualification requirement for support workers in care at home be at SCQF level 7?

Y/N

[If N selected for either of the above, Q12 shows. If Y selected for both of the above, skip to Q13]

12. Should we introduce an additional Register part for practitioners at SCQF level 7 to allow employers to decide what level is most appropriate?

Y/N

13. How much easier or more difficult would recruiting to these roles be, if the qualification level was changed?

Multi choice - ~~Much easier, a little easier, neither, a little more difficult,~~ **much more difficult**

14. How much more or less likely would individuals be to join the workforce, if the qualification level was changed?

Multi choice - ~~Much more likely, a little more likely, neither, a little less likely,~~ **much less likely**

15. Does this proposal have an impact on or for equality issues?

Yes, the vast majority of support workers in this category are female and this proposal would have a detrimental equality impact.

16. Do you see this proposal having an impact on or for any other areas?

Yes, recruitment and retention of suitably qualified workers.

17. Do you have any other comments on this proposal change?

Please see the cover sheet attached to this consultation response for context and detailed information regarding this proposal.

2c. Timescale to gain qualifications for registration

Individuals applying to register with the SSSC who don't hold the necessary qualification will be registered with a qualification condition that they gain the relevant award within their first period of registration (up to five years).

We know that on average it takes registrants 27.6 months to meet their qualification condition and 63.9% of qualification conditions met are achieved within this period.

Proposal

We are proposing to reduce the timescale for individuals to gain the required qualification from five to three years.

Questions

18. How much easier or more difficult will this change make to ensuring individuals complete the required qualification on time?

Multi choice - ~~Much easier, a little easier, neither, a little more difficult, much more difficult~~

[If 'a little more difficult' or 'much more difficult' are chosen, go to Q19 otherwise move to section 2d]

19. Can you tell us why you think this?

No comment.

2d. Return to practice

Proposal

We are proposing to develop return to practice standards for social workers who have come off the Register for over two years and want to rejoin and for social workers who have not practised in Scotland within the last two years (or longer). Individuals will need to evidence that they have met the continuous professional learning (CPL) requirements and to demonstrate how they have updated their skills and knowledge.

Questions

20. Should there be a return to practice process for social workers?

Y/N

21. Should there be a return to practice process for other Register groups?

Y/N

22. Does this proposal have an impact on or for equality issues?

Not known.

23. Do you see this proposal having an impact on or for any other areas?

Not known.

24. Do you have any other comments on this proposed change?

No comments.

2e. Continuous professional learning (CPL) requirements

Current situation

Our current CPL requirements for registered workers provide significant flexibility about the types of training and learning individuals should undertake and at what point in their registration period.

Proposal

To make sure the workforce has the right skills and knowledge at the right time to support their professional development and equip them to be a confident skilled workforce, the

SSSC is considering introducing mandatory requirements to CPL. For example, this could include mandatory requirements for workers new into roles that will need to be achieved as part of their induction.

This would allow us to support the workforce and respond to emerging skills needs quickly when required, for example, the infection control skills and knowledge required at the start of the pandemic.

Questions

25. Should the SSSC be able to set mandatory training for CPL requirements?

Y/N

26. Should there be mandatory CPL requirements for those new into role?

Y/N

27. Should there be annual CPL requirements?

Y/N

28. Does this proposal have an impact on or for equality issues?

Not known.

29. Do you see this proposal having an impact on or for any other areas?

Not known.

30. Do you have any other comments on this proposed change?

No comments.

We are committed to equality, diversity and inclusion. The following questions are voluntary and the findings will help us to deliver approaches that meet the needs of everyone.

Questions

1. Do you want to provide information on equality, diversity and inclusion?

Y/N

[If N selected above, survey ends. If Y, skip to Q2]

2. Are your day-to-day activities limited because of a health problem or disability which has lasted, or is expected to last, at least 12 months?

Yes, limited a lot; Yes, limited a little; No; Prefer not to say

3. Do you have any of the following, which have lasted, or are expected to last, at least 12 months? Tick all that apply.

- deafness or partial hearing loss
- blindness or partial sight loss

- full or partial loss of voice or difficulty speaking (a condition that requires you to use equipment to speak)
- learning disability (a condition that you have had since childhood that affects the way you learn, understand information and communicate)
- learning difficulty (a specific learning condition that affects the way you learn and process information)
- development disorder (a condition that you have since childhood that affects motor, cognitive, social, and emotional skills, and speech and language)
- physical ability (a condition that substantially limits one or more basic physical activities such as walking, climbing stairs, lifting or carrying)
- mental health condition (a condition that affects your emotional, physical and mental wellbeing)
- long-term illness, disease or condition (a condition, not listed above, that you may have for life, which may be managed with treatment or medication)
- other condition, please write in
- no condition
- prefer not to say

4. What is your ethnic group?

A. White

- Scottish
- Other British
- Irish
- Polish
- Gypsy / Traveller
- Roma
- Showman / Show woman
- Other (please use space below to write in)

B. Mixed or multiple ethnic groups

- Any mixed or multiple ethnic groups (please use space below to write in)

C. Asian, Scottish Asian or British Asian

- Pakistani, Scottish Pakistani or British Pakistani
- Indian, Scottish Indian or British Indian
- Bangladeshi, Scottish Bangladeshi or British Bangladeshi
- Chinese, Scottish Chinese or British Chinese
- Other, (please use space below to write in)

D. African, Scottish African or British African

- Please use space below to write in (For example, Nigerian, Somali)

E. Caribbean or Black

- Please use space below to write in (For example, Scottish Caribbean, Black Scottish)

F. Other ethnic group

- Arab, Scottish Arab or British Arab
- Other, please use space below to write in (for example, Sikh or Jewish)

G. Prefer not to say

5. What term best describes your sex?

Drop-down list: Female; Male; In another way (if you would like to, please use the space below to specify); Prefer not to say

6. Do you consider yourself to be trans, or have a trans history?

Yes ; No; Prefer not to say

[If N or prefer not to say selected above, skip to Q8. If Y, skip to Q7]

7.. If you would like to, please describe your trans status (for example trans man, trans woman)

Free text

8. What religion, religious denomination or body do you belong to?

Drop down list

- None
- Church of Scotland
- Roman Catholic
- Other Christian, please write in below
- Muslim, write in denomination or school below
- Hindu
- Buddhist
- Sikh
- Jewish
- Pagan
- Another religion or body, please write in _____
- Prefer not to say

9. Which of the following best describes your sexual orientation?

Drop down list - Straight or Heterosexual; Gay or lesbian; Bisexual; Prefer not to say; Other, please write in

10. Do you look after, or give any help or support to family members, friends, neighbours of others because of either

- Long term physical / mental ill-health / paid employment, disability
- Problems related to old age.

Do not count anything you do as part of your paid employment.

- No
- Yes, 1 to 19 hours per week
- Yes, 20 to 34 hours per week
- Yes, 35 to 49 hours per week
- Yes, 50 or more hours per week

Thank you for taking part in the consultation. We will publish our analysis of the response when it is complete.