

## A Register for the future – SOSCN Response – 7<sup>th</sup> March 2022

We have responded to most of the 60 questions. Please see our answers to questions below, the insights were provided by the sector at a recent consultation event. Do please take the time to go to this link and complete your own answers to what you see as relevant to you before the deadlines of 14<sup>th</sup> March 2022.

[Consultation - A Register for the Future \(smartsurvey.co.uk\)](https://smartsurvey.co.uk)

The first 4 questions are about who you are.

### Specific questions and sections

#### The structure of the Register

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 different 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

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

- Yes
- No

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

- Very easy
- Somewhat easy
- Neither easy or difficult

- Somewhat difficult
- Very difficult

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

- Yes
- No

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

- Yes
- No

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

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

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

## SOSCN RESPONSE

We have not answered the yes or no questions above as we can see there really should have been a “maybe” option with room for comments. For example, of course for people who work in more than one care setting, e.g., adult care and daycare of children, it saves them being on the registrar twice. However, the school age childcare sector, while not a large part of the registrar, keeps losing its distinctive nature when put in with ELC and other children’s services.

The school age childcare workforce was at circa 5,000 back in 2019. It may be diminished at present due to losing staff throughout the pandemic, however there is a commitment by the Scottish Government to expand this sector a great deal in terms of meeting the needs of every family and child they identify as needing this care, play and learning, as well as a diverse range of activities, by the end of this parliamentary term. This will be free to families identified as needing the most support in the Scottish Government’s Child Poverty plan.

Therefore, to grow this workforce, (we will in later questions address the need for far more diversity and flexibility in qualifications), we both need to attract a wide range of new staff, and, many in the sector do not find it helpful to be classified as the same as staff in early learning and childcare, given the much wider age range school age childcare covers, and the different skills needed to work with older children. In fact, by having to hold lead practitioner qualifications which are the same as ELC, this has led to many services losing staff to the expansion of 1140 hours.

It is our view, and that of many in the sector, that school age childcare should have its own specific part of the registrar, matched to a much broader range of skills, qualifications and professional development training related to the needs of children and young people aged 4.5 – 16.

### **The timescale for new starts to apply to register**

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.

#### **12. Will changing the regulations make it easier for employers to comply with the requirements?**

- Yes
- No

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

- Yes
- No

#### **14. Does this proposal have an impact on or for equality issues?**

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

#### **16. Do you have any other comments on this proposed change?**

### **SOSCN RESPONSE**

At a consultation event for the school age childcare sector, service leaders pointed out that 3 months is often a two-way trial period for new starts; it was suggested that they could only begin the process (the work and fees) once they and the new start get by this period. We also understand that from experience the SSSC know too many leave it to the current six-month threshold, therefore risking not meeting the deadline set. We would suggest a different form of messaging and a bit of flexibility is required, e.g. Your new staff can apply to join the registrar at any time after you employ them, depending on your employment terms and conditions, they must apply to be registered after their trial and induction period, and it is better to do so when employed for at least three months so that they do not miss the legal requirement to be registered at six months.

## Public Register online

We are proposing to change the information we make available about registrants on the public Register on our website.

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

- Yes
- No

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

- Yes
- No

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

- Yes
- No

**20. 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?**

- Yes
- No

**21. Should any other information be shown on the public Register online?**

- Yes
- No

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

### SOSCN RESPONSE

It has an impact on equality and human rights. What other registrar can be searched by the public to identify a great deal of private information on an individual working in this field?

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

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

At a recent consultation event for the school age childcare sector, the proposed changes to the register were seen as an invasion of privacy for the individual.

**Registration period**

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.

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

- Yes
- No

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

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

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

9. Part 2 - Qualifications, skills and learning

**Flexible qualifications that can move with different roles**

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 in order 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 would be accepted for different roles and settings.

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

- Yes
- No

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

- Yes
- No

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

- Much more support
- A little more support
- Neither more nor less support
- A little less support
- Much less support

**32. 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?**

- Very helpful
- A little helpful
- Neither helpful nor unhelpful
- A little unhelpful
- Very unhelpful

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

- Much more attractive
- A little more attractive
- Neither more nor less attractive
- A little less attractive
- Much less attractive

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

**SOSCN RESPONSE**

In our recent workforce surveys and in any online events where qualifications come up, the school age childcare sector wants to see a much wider range of qualifications to be considered. The priority is Playwork qualifications, followed by Youth work and a range of qualifications for supporting children with additional support needs and disabilities. There may be an opportunity when Playwork occupational standards are reviewed again in the near future for the SSSC as regulator, to work constructively to help ensure that this could stand in its own, rather than having to take, and pay for additional units, as is the case at present.

With the vast expansion of school age childcare over the next 4 or 5 years, we face, as does the care sector as a whole, a recruitment crisis, therefore we must be open to looking at a wide and diverse range of qualifications already held by candidates and make it easier to bring in people with qualified skills in sports, arts and drama, outdoor rangers, and, especially for the mainly third and private sector services, management, HR and business skills are also badly needed.

Modern apprenticeships should expand to cover such areas where they do not already, and more marketing of such opportunities to those starting out on work, or returning to work, should happen.

We really encourage the use of university and college students to help fill the largely part time posts in school age childcare, especially for full day care during school holidays. They are people who bring knowledge from their studies but may not end up in a longer-term career in the care sector. There needs to be a common core e.g., child/ adult protection, equality and human rights, that is easy to deliver as a basic induction tool at level 6.

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

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

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

**Adult social care qualification level**

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

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.

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

- Yes
- No

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

- Yes
- No

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

- Yes
- No

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

- Much easier
- A little easier
- Neither easier nor more difficult
- A little more difficult
- Much more difficult

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

- Much more likely
- A little more likely
- Neither more nor less likely
- A little less likely
- Much less likely

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

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

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



## SOSCN RESPONSE

We do not have knowledge of these parts of the registrar, but we would be concerned if this led to a drift in changing this in terms of school age childcare, as already mentioned, this sector has lots of very part time posts – sometimes people are just employed to escort the children to the service from their schools, this may be people with many other responsibilities, other jobs, or even retired. We will always need a basic level qualification to ensure child protection etc., but for this very part time, not highly paid posts, it would be even harder to fill them if they are required to do much more academic work.

## Timescale to gain qualifications for registration

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

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

- Much easier
- A little easier
- Neither easier or more difficult
- A little more difficult
- Much more difficult

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

#### SOSCN RESPONSE

This indeed has an impact on equality issues. The majority of the care workforce are women. Whilst there are more men in school age childcare than in other daycare of children services (around 10%), this is a highly gendered workforce. During the pandemic various studies showed that it was women who took on the bulk of the childcare and home education work; and in our recent workforce survey, we have quotes from women – with caring and parenting responsibilities, working part time for low pay, then studying in their own time, about the strain of meeting the current five-year deadline.

Quotes from our recent workforce survey:

“I studied over the first 5 years of my daughter’s life and felt I missed out or was stressed due to course work.”

“Taken a lot of time out of my personal life.”

“It is a balancing act juggling work, toddler and qualification.”

“More stress as I already work 40 - 45 hours per week and am expected to do 15 - 30 hours studying per week on top of that.”

“Yes, it was a difficult time as I had to spend many late nights/early mornings fitting in the studying and I felt that my management of the service suffered in that I had to prioritise submitting essays over updating processes/policies and doing reviews with staff members, etc.”

“I managed one year doing my qualification before I had to drop out because of family circumstances. My registration was running out in July 2020... and I had to leave a job I loved doing. I have struggled massively with losing my job, not only personally but financially.

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

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

#### SOSCN RESPONSE

Across the care sector we have a recruitment and retention challenge. Whilst ELC providers and in proposals for the revamped care sector, there is guarantee of support to meet at least the real living wage, there is no such support in place for school age childcare sector. While all other sectors, therefore, will be able to offer full time jobs, at least at the real living wage, for now, the school age childcare sector cannot compete with this. Adding to the low pay and part time work a three-year limit to complete a qualification which they often work in in their own time, is once again making it harder for this sector to recruit and retain staff

#### Return to practice

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 re-join 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.

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

- Yes
- No

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

- Yes
- No

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

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

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

### Continuous professional learning (CPL) requirements

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 more quickly when required for example, the infection control skills and knowledge required at the start of the pandemic.

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

- Yes
- No

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

- Yes
- No

57. Should there be annual CPL requirements?

- Yes
- No

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

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

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

### SOSCN RESPONSE

If some aspects of CPL or induction are made mandatory, then there should be free online training courses to cover the mandatory elements. As we have pointed out the school age childcare workforce are generally part time on low pay, once again this is an equality issue,

as making some core requirements mandatory penalises those who can barely afford to pay for further training.

## 5. About You

**61. 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.**

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

- Yes
- No