



RESPONSE TO CONSULTATION ON THE SCOTTISH SOCIAL SERVICES COUNCIL REGISTRATION FEES

October 2016

CELGIS (Centre for excellence for looked after children in Scotland), based at the University of Strathclyde in Glasgow, is committed to making positive and lasting improvements in the wellbeing of Scotland's children living in and on the edges of care. Taking a multi-agency, collaborative approach towards making lasting change, CELGIS works alongside leaders, managers and practitioners to break down barriers and forge new paths in order to change thinking and ways of working with everyone whose work touches the lives of vulnerable children and families. We welcome this opportunity to contribute to the consultation on the Scottish Social Services Council (SSSC) registration fees, a matter which directly impacts the workforce with whom we collaborate, and the children and young people we work on behalf of.

There are approximately 15,500 looked after children in Scotland.¹ The social service workforce continues to grow, and there are currently 5,690 workers in children's fieldwork settings, and 7,650 in residential childcare services.² Looked after children, their parents and carers, and care leavers will have regular contact with professionals registered with the SSSC, including social workers, residential care workers, support workers, managers and social work students. Registration of the social service workforce with the SSSC brings an assurance to service users that the people working with them are properly qualified and follow the SSSC Codes of Practice. For registrants, it brings increased confidence, learning and development opportunities, a stronger professional identity and the credibility of recognition as a regulated professional. As such, SSSC registration fee arrangements must be such that this continues, and service users are protected and supported to the highest standards.

Q1: Do you agree that the proposed changes to the fee structure, which are in line with other regulated professionals, is reasonable?

Yes. Registration fees are the financial contribution of the social services workforce to support the aims of the regulation of social service workers. As noted in the consultation document, these aims include: to increase public protection and confidence in the sector; improve the skills, qualification and professionalism of the workforce; and improve the experience and outcomes of the people who use social services.³

The registration fee payable by the social service workforce has remained static since its introduction in 2003; however the size of the Register continues to grow. There are currently over 90,000 registrants, and by 2020 it is anticipated this will increase to approximately 140,000 as requirements to register extend to new service areas.⁴ It is recognised that the workload of all three functions of the Register have grown as a result of its expansion. Firstly, the registration of workers with different roles, conditions and requirements means the registration function becomes more complex as numbers grow. Secondly, due to an increase in numbers, there are likely to be increases in the number of 'Fitness to practice' investigations. Thirdly, and for the same reasons, the complexity of the work of the qualification function is increasing. We recognise the workload associated with the growth of the Register, and for fees to remain unchanged may indeed no longer be a viable option.

SSSC receives Scottish Government funding which the consultation document states in 2015/16 accounted for 87% of costs. An increase in fees could afford SSSC the opportunity to provide additional resource to the workforce and allow the regulatory body greater independence.

The proposed increase to £35 (for practitioners and supervisors) and £80 (for managers) are within the range of fees paid by other regulated professionals⁵ with a range of salary levels.⁶ Therefore we agree the proposed changes are reasonable.

Q2: Do you agree that we should have different fee levels for different groups of workers?

Yes. We welcome the efforts made for fee increases to minimise the impact on the lowest paid parts of the workforce.

Registration for residential child care workers is a proposed fee increase from £20 to £35 per annum. We understand this on the basis that the table included in the [consultation document](#) states proposed fees for a 'supervisor/practitioner' are £35, and those for 'social worker/manager' are £80. The information provided in Table 3 of the '[proposed fees comparison](#)' document attached to the consultation is confusing, and appears potentially to contradict that in the consultation. Our understanding is that it is proposed **managers** of residential child care workers pay fees of £80 per annum, but a possible reading of this table is that it is proposed that residential child care workers themselves will pay this level of fee. Greater clarity is required to avoid any confusion.

Our view is that fees paid by professionals should align with comparable salary levels. As such, the alignment of fee levels for residential child care managers with social workers is supported as it broadly reflects comparable salary levels. Information gathered from a number of our partners in residential child care settings (from both local authorities and independent providers) indicate a range of salaries across employers, at both 'qualified' and 'unqualified' pay grades. There is significant difference in the salaries paid to 'unqualified' residential child care workers^a, to the salaries of social workers. The salaries of 'qualified' residential child care workers fall mainly in between the two^b. Our view is that practitioners should be expected to pay a level of fee comparable to others on similar salaries, so payments of £80 (paid by social workers who receive a higher salary) should not be applied to residential child care workers.

The impact of a fee increase should be thoughtfully considered. In particular for part time workers, introducing a sliding scale which takes annual salary into account could be usefully considered, although it is recognised this may prove cumbersome and resource intensive.

^a Information supplied by 8 partner organisations, including six local authorities and two third sector providers indicate a range from approximately £19.5k to £23.5k.

^b Information supplied by 8 partner organisations, including six local authorities and two third sector providers indicate a range from approximately £22.5K to 28.5k.

Q3: Do you have any other comments to make on the proposed changes?

The rise in cost for registrants on parts of the Register where the fee increases substantially, in particular from £30 to £80 (a 167% increase), could be implemented incrementally over a three year period. Alternatively, options to make payments by instalments could be considered, a system operated by the Nursing and Midwifery Council.

Irrespective of the level of increase in fee, it is vital for all members of the social service workforce to be provided with clear information detailing what their additional payments will be funding, and what they will expect from the SSSC in the future.

Thank you for providing us with this opportunity to respond. We hope the feedback is helpful; we would be happy to discuss any aspect in further detail.

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¹ Scottish Government (2016) [Children's Social Work Statistics Scotland 2014/15](#), Edinburgh: Scottish Government.

² SSSC (2016) Scottish Social Service Sector: Report on 2015 Workforce - <http://data.sssc.uk.com/images/WDR/WDR2015.pdf>

³ SSSC (2016) Consultation on the Scottish Social Services Council registration fees - <http://www.sssc.uk.com/consultations/consultations/current-consultations/consultation-on-the-scottish-social-services-council-registration-fees>

⁴ SSSC (2016) A trusted, skilled and valued social service workforce, Dundee: SSSC <http://www.sssc.uk.com/about-the-sssc/multimedia-library/publications?task=document.viewdoc&id=2445>

⁵ General Teaching Council for Scotland - Initial fee of £65 and then £50 annually (<http://www.gtcs.org.uk/registration/registration.aspx>); Nursing and Midwifery Council- £120 annually (<https://www.nmc.org.uk/registration/staying-on-the-register/paying-your-fee/>)

⁶ Royal College of Nursing NHS Pay Scales (2016) - <https://www.rcn.org.uk/employment-and-pay/nhs-pay-scales-2015-16>