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Dear Caroline

**Consultation on the Qualification Requirements for Registration with the
Scottish Social Services Council
Managers of Care at Home Services
Response from Community Care Providers Scotland**

Community Care Providers Scotland (CCPS) is the national association of voluntary organisations providing care and support services across Scotland. CCPS members employ approximately 36,700 staff, supporting around 220,000 people and their families across the country.

CCPS hosts the Voluntary Sector Social Services Workforce Unit, and many CCPS members are also members of the Unit's Policy Advisory Committee, Executive Committee and Workforce Development Network. As such, this response reiterates and endorses the points raised by the Unit in its response; for information, the Unit's response is copied on the following pages.

Should you have any questions on this, please don't hesitate to contact me.

Yours sincerely

Kirsten Gooday
Policy and Development Manager, CCPS

1. Consultation question on the functional definition of Manager of Care at Home Service.

The proposed functional definition is:

“A Manager is a worker who is responsible for managing the direct day to day provision, supervision, and quality assurance of care provided in Care at Home Services.”

A Care at Home Service is a service which provides support in a person’s own home.

Do you agree? **No**

The Workforce Unit would welcome further clarification of the definition of “Manager”. Voluntary sector representatives have expressed concern as to whether the proposed functional definition provides a clear enough steer for organisations to identify exactly *who* should register as a manager. As the proposed definition is relatively broad, there is a danger that job roles such as team leader or co-ordinator within some organisations may fall within this functional definition of manager.

If team leaders were to be required to register as managers, this could have significant financial (and practical) implications for voluntary sector providers, particularly given that the evolving policy of individualism and personalisation is likely to lead to an increase in small teams of staff dedicated to supporting one individual. For example, for an organisation with 3 managers who each manage 6 team leaders this could mean the difference between registering and qualifying just 3 people within the manager category or being required to register all 21 as managers. This could pose problems for the development of more personalised services, and create extreme financial problems for voluntary sector service providers.

2. Consultation question on the functional definition of Manager of Housing Support Services.

The proposed functional definition is:

“A Manager is a worker who is responsible for managing the direct day to day provision, supervision, and quality assurance of care provided in Housing Support services.”

A Housing Support Service is a service which provides support, assistance, advice or counselling to a person who has particular needs, with a view to enabling that person to occupy residential accommodation as a sole main residence.

Do you agree? No

The consultation proposes the redefinition of Housing Support Managers from the current general description of “workers who manage a housing support service and are responsible for the supervision of other workers” to the more specific “worker who is responsible for managing the direct day to day provision, supervision and quality assurance of care provided in Housing Support Services...”. Voluntary sector providers are concerned that the proposed definition could be interpreted to include posts such as team leaders, and could therefore significantly increase the number of workers required to register within this category. This would inevitably have serious resource implications, with increasing numbers required to achieve SVQ 4 level qualifications. As the continued development of more personalised services is also likely to lead to an increase in team leader posts managing small teams of workers, inclusion of this part of the workforce within the manager category would be particularly difficult for organisations.

3. Consultation question on the qualifications criteria for Managers of Care at Home Services.

It is proposed that the following qualifications are set as registration requirement for Managers of Care at Home Services.

- Honours degree in Social Work or equivalent qualification.
- S/NVQ level 4 in Health and Social Care.
- S/NVQ level 4 in Care
- Degree or diploma in Community Education or equivalent, as recognised by the Standards Council for Community Learning Approvals Committee.
- A qualification meeting the registration requirements of the General teaching council, Nursing and Midwifery Council, General Medical council, the following professional groups regulated by the Health Professional Council:
 - Occupational therapists
 - Arts, Music and Drama Therapists
 - Physiotherapists
 - Speech and Language Therapists.
- A qualification meeting the requirements for chartered registration with the British Psychological Society in the divisions listed in appendix 1.

PLUS one of the following

- SVQ Level 4 Leadership and Management for Care Services.
- SVQ Level 4 Registered Managers in Health and Social Care.
- Any award in management of 60 credits at or above SCQF level 8 that is mapped against the Leadership and Management for Care Services National Occupational Standards.

Do you agree that these qualifications should be included?

Yes

Given that many voluntary sector organisations provide both Housing Support and Care at Home services, and that managers may wish to develop their career within a different part of the service, it would be helpful for the qualifications requirements for these two parts of the register to be similar.

The proposed Care at Home Manager qualifications list does not include a number of qualifications listed as suitable for registration as a Housing Support Manager, and could therefore create a barrier for staff wishing to move between services. SVQ 4 Management, in particular, could be usefully included on the Care at Home Managers list.

The Workforce Unit is concerned that the requirement to map management qualifications (60 credits at SCQF level 8 or above) against the Leadership and Management for Care National Occupational Standards may effectively limit the variety of awards suitable for registration, and put a significant administrative burden on both service and training providers to provide evidence of mapping for both old and new awards.

Voluntary sector providers fear that if the variety of management qualifications suitable for registration is to be (effectively) limited, this will have an impact on the

sector's ability to attract managers from outwith the sector, and go against the original idea of offering a larger range of qualification types and thereby welcoming a diverse range of learning styles, experience and academic ability. Organisations who have already put staff through qualifications (such as SVQ 4 Management, or units of an MBA) are concerned that staff may face problems in the recognition of their awards.

It would be helpful if the SSSC could publish a list of exactly which management awards of 60 credits at SCQF level 8 or above are currently being accepted for registration (and have already been mapped), and clarify whether 'old' awards will need to be mapped retrospectively.

4. Updating qualifications for Managers of Housing Support services.

Since agreeing qualifications for registration in 2005, the qualifications for managers of a housing support service are still generally applicable for the sector. However there are some awards including vocationally related awards that have altered or are no longer available to the sector. It is now proposed that these awards are removed from the list of qualifications for registration as a manager of a housing support service.

Are you in agreement with this proposal?

No

As the consultation does not state exactly which qualifications it proposes to remove from the Housing Support Managers list, we are unable to comment on the proposed changes.

However we are pleased to note that the SSSC would continue to accept qualifications removed from the list from registrants who have already achieved these awards or who, at the time of this consultation, have started one of these awards.