

AG/JH/613

16 June 2004

Miss Anne Jarvie  
Chief Nursing Officer  
St Andrews House  
Regent Road  
EDINBURGH  
EH1 3DG

Dear Miss Jarvie

**CONSULTATION ON THE REGULATION OF HEALTH AND SOCIAL CARE STAFF**

I write in connection with the above document, recently received in this office. I am aware that this is a very early response: I am seeking some clarification about the terminology in the document before submitting detailed comments on the proposals.

CCPS is the national association for care service providers in the voluntary sector. Our members provide a very substantial proportion of the social care and support services regulated by the Care Commission, and employ a similarly substantial proportion of the staff to be registered by the Scottish Social Services Council in Phases 1 and 2, including managers and support staff in residential care for adults and children, and managers of day care services.

Beyond the staff categories outlined in Phases 1 and 2, CCPS members employ a significant number of additional staff providing direct care and support to service users. These include care at home staff, housing support staff and day services staff. These staff may have one or more of a range of professional and/or vocational qualifications, or no qualifications at all.

We are not at all clear whether the present document, in discussing the regulation of “social care support staff”, includes these staff categories. It would initially seem so: the document states (on page 5, paragraph 21) that the proposals relate to “those staff who have a direct impact on patients and service users and who are not currently covered by existing regulatory arrangements”.

We must profess ourselves somewhat baffled by this, because we had understood that these staff would be registered and regulated, in future timetabled Phases, by the Scottish Social Services Council, in accordance with the very comprehensive proposals set out in the Regulation of Care (Scotland) Act 2001 and associated policy documents. The current consultation, however, appears to suggest that registration by the Scottish Social Services Council is only one option among several others.

If however the.../cont.

If however the term “social care support staff” does *not* include these staff, then we are equally puzzled as to those categories of staff that are in fact indicated.

It would be very helpful therefore if you could clarify exactly what is meant by “social care support staff”, so that we can consider the matter appropriately.

Many thanks.

Yours sincerely

**ANNIE GUNNER**

Director

C.c. Geraldine Doherty, Registrar, Scottish Social Services Council  
Kate Vincent, Director of Policy Co-ordination, Scottish Executive