

Scottish Social Services Council (SSSC) Fee Proposal

CCPS Response - December 2024



Opening Statement

The Scottish Social Services Council (SSSC) launched a consultation on 30th September 2024, setting out a proposal for increasing the fees paid by registrants of the SSSC. Given that this would entail employees in the not-for-profit social care sector having to pay higher fees over the coming years – significantly increased by 2029/30 with the predicted implementation timescales – CCPS must emphasise our strong opposition to this proposal.

The proposed fee increases represent a significant risk to the sustainability of our not-for-profit members, many of whom are already operating under precarious circumstances. This adds to the mounting challenges our sector is facing, including high vacancy and turnover rates, limited progress on Fair Work, rising national insurance contributions, and already overstretched budgets.

We strongly urge SSSC to reconsider this proposal to avoid exacerbating the difficult conditions under which social care organisations are striving to deliver essential public services and meet the ever-growing demand for care.

CCPS Response

Not-for-profit providers account for a third of social care jobs in Scotland, employing approximately 47,000 people, according to the [SSSC Report on 2023 Workforce Data](#). The proposed fee increases have the potential to disrupt the sector's ability to deliver high-quality care at a time when organisations are already struggling to meet demand. Increased costs that fall on financially stretched organisations and employees risk worsening this situation further.

Adding to our concerns, local authority employees benefit from having their fees paid, creating disparities that would only widen with the proposed increases. Not-for-profit providers are already disadvantaged in this regard, and CCPS has consistently advocated for equal treatment in fee payments across the sector. SSSC's decision to proceed without addressing this disparity raises serious concerns. We urge SSSC to join CCPS in advocating for government funding to support fee payments for the not-for-profit sector.

The timing of these increases is particularly problematic as they coincide with the proposed Disclosure Scotland fee increase, compounding the financial strain on organisations and presenting barriers to recruiting new employees. Many prospective recruits, especially those from outside the sector, may not be aware of the additional costs associated with these roles, which can deter them from entering the workforce.

CCPS held a meeting where we consulted our workforce leads to understand the impact the proposed increase would have on their organisations and the not-for-profit workforce. Evidence from our workforce leads highlight the detrimental impact these increases will have on their organisations and the sector at large.

As such, CCPS must voice our objections to the increase and implore SSSC to consider how this will affect our sector. In addition to asking SSSC to consider the following points, we urge SSSC Council Members to directly consult our workforce leads before a final decision is made on the proposed increases, which CCPS would gladly facilitate.

Financial and Operational Impact

Financial Burden on Employers

The proposed fee increases place significant financial pressure on not-for-profit employers, many of whom operate within tightly constrained budgets. Organisations that currently reimburse fees for their staff report that the combined costs of SSSC and Disclosure Scotland PVG Scheme increases will force them to reassess or cease this practice altogether. These costs are not accounted for in commissioning agreements, leaving providers to absorb them through their own limited resources. Employers unable to offer reimbursement fear the additional burden placed on staff will further exacerbate existing recruitment and retention challenges.

Financial Burden on Employees

The proposed fee increases would disproportionately affect low-paid employees in the social care sector, many of whom are women and already experiencing significant financial strain. Given that new staff have additionally needed to register for the SSSC within three months of starting their new role, the timescale for procuring money is a further compounding factor. For employees working in not-for-profit organisations that are unable to reimburse fees, this additional financial burden is particularly concerning. The fee increases may deter individuals from staying in the sector, as the costs become unsustainable for those who are struggling to meet basic living expenses. Even where employers offer reimbursement, delays in payments due to financial constraints are a recurring issue. These delays can result in deregistration, unpaid suspensions, and critical workforce gaps. The financial insecurity created by this situation undermines workforce stability and risks driving skilled staff out of the sector entirely.

Service Delivery and Recruitment

Fee increases pose a direct threat to the sector's ability to deliver high-quality care. Recruitment challenges, already significant, will be exacerbated as new entrants are confronted with additional financial barriers, such as registration and PVG fees. This issue is particularly acute in low-paid roles, where prospective employees may view the financial requirements as insurmountable. The perception that social care workers must "pay to work"

is profoundly damaging. This contrasts starkly with other sectors such as retail, where no upfront costs are required. Given that the not-for-profit sector has seen a workforce decline of 7.2% since 2020, further barriers to entry risk deepening the crisis in recruitment and worsening service delivery across Scotland.

Turnover and Workforce Planning

Turnover in the not-for-profit sector remains alarmingly high, with rates of around 24%. CCPS Members report that fee increases are already prompting some organisations to reassess their workforce plans. This includes reducing resources allocated to recruitment and professional development – decisions that may compromise the long-term sustainability of the sector. The cumulative impact of increases to fees, combined with other financial pressures, risks driving even more employees out of the sector. For organisations that currently reimburse fees, absorbing these additional costs could lead to cuts elsewhere. Without urgent intervention, these challenges could further destabilise workforce planning efforts across the sector.

Employee Strain and Retention

The proposed fee increases amplify financial pressures on employees and are likely to have a detrimental impact on retention. Many employees already feel undervalued and underpaid, and fee increases reinforce the perception that social care workers are not adequately supported. For those on tight budgets, the financial strain may become unsustainable, pushing them to seek opportunities in other sectors where these burdens do not exist. While fee increases may not immediately trigger mass resignations, they will undoubtedly contribute to growing dissatisfaction and erosion of morale. Combined with other workplace pressures, such as qualification demands and limited career progression, these issues jeopardise the retention of an already overstretched workforce.

Professional Development and Workforce Quality

Registration and Compliance Challenges

Fee increases also raise serious concerns about maintaining compliance with registration requirements. Employees facing financial hardship may struggle to pay fees on time, increasing the risk of deregistration and subsequent workforce gaps. This creates additional administrative and operational challenges for employers, who must monitor and address lapses to avoid disruptions to service delivery. To mitigate these risks, SSSC must consider introducing more flexible payment options, such as instalment plans or direct debit schemes. These measures would alleviate financial strain and reduce the likelihood of deregistration caused by payment delays.

Impact on Training and Development

Rising costs associated with registration and PVG fees are forcing many not-for-profit organisations to divert resources away from staff training and development. In 2024, 75% of

CCPS member organisations reported withdrawing staff from booked training sessions due to financial constraints. This trend undermines efforts to upskill the workforce and compromises the quality of care delivered to service users. Professional development opportunities are essential for building a resilient and skilled workforce. Without adequate investment, the sector risks stagnation, with long-term consequences for workforce quality and service standards.

Staff Morale and Engagement

Perceived Value and Workforce Morale

The fee increases represent yet another burden for a workforce that often feels undervalued and under-recognised. Many employees view registration fees as mandatory costs that offer little tangible return, fuelling frustration and dissatisfaction. Improving communication about the benefits of SSSC membership, such as career support or access to training resources, could help to address these concerns. However, without meaningful action to support the workforce, fee increases will continue to be perceived as punitive and unjustified.

Professional Recognition and Engagement

A lack of awareness about the role and benefits of SSSC membership undermines its perceived value among employees. Promoting the tangible advantages of registration, such as enhanced professional recognition and career development opportunities, is essential for rebuilding trust and engagement. Clearer communication and greater transparency about how fees are used would also help to restore confidence in SSSC's role as a regulatory body.

Broader Context and Strategic Concerns

Sector-Wide Pressures

The proposed fee increases cannot be considered in isolation. Rising costs across the sector, including Disclosure Scotland fees and national insurance contributions, have created a cumulative financial strain on organisations and employees. These pressures come at a time when the social care sector is already grappling with high vacancy rates, declining workforce numbers, and limited progress on Fair Work initiatives, while the demand for care is rising. Addressing these challenges requires a holistic approach that goes beyond registration fees. Without significant investment and support, the sector's ability to meet the needs of Scotland's most vulnerable people is at serious risk.

Workforce Sustainability and Retention

The perception of underinvestment in the workforce continues to undermine morale and retention across the sector. Fee increases are emblematic of a wider issue: a failure to adequately support and value social care workers in the not-for-profit sector. To address this, SSSC must work with government and sector partners to develop a comprehensive strategy

that prioritises pay, working conditions, and professional recognition. Without such action, the sustainability of the workforce and the sector will remain in jeopardy.

Concluding thoughts

The proposed SSSC fee increases present a serious and immediate threat to the sustainability of Scotland's not-for-profit social care sector. At a time when organisations and employees are already under immense pressure, these increases would exacerbate existing challenges, jeopardising recruitment, retention, and service quality.

CCPS strongly urges SSSC to reconsider this proposal and to:

- Advocate for government funding to cover registration fees as part of broader Fair Work initiatives.
- Implement flexible payment options to alleviate financial strain on employees.
- Take urgent steps to address the disparities between local authority and not-for-profit providers.

Without meaningful action, the proposed fee increases risk deepening the workforce crisis and undermining the sector's ability to deliver the high-quality care that Scotland depends on. Social care is a cornerstone of societal well-being, and its sustainability must be treated as an urgent priority.

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Coalition of Care and Support Providers in Scotland (CCPS) is the voice of not-for-profit social care providers in Scotland.

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