

## RCN Scotland response

### Scottish Social Service Council: A register for the future Consultation

#### Introduction

1. The Royal College of Nursing (RCN) is the world's largest professional organisation and trade union for nursing staff, with members in the NHS, independent and third sectors. RCN Scotland promotes patient and nursing interests by campaigning on issues that affect members, shaping national health policies, representing members on practice and employment issues and development opportunities. With around 40,000 members in Scotland, the RCN is the voice of nursing and as such a key stakeholder in shaping the outcomes of this consultation on pensions.
2. The RCN welcomes the opportunity to respond to the Scottish Social Service Council (SSSC) consultation on proposed changes to the register, to its processes and to the qualifications it accepts for registration. Our submission is based upon the views of RCN members, who expressed these during a dedicated RCN engagement event in March 2022 and was drawn from professional practice expertise that exists within the RCN.
3. The RCN hopes that the SSSC will find this submission helpful. We would be pleased to supply any further information that may be relevant.

#### Responses to questions

##### The structure of the Register

#### 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?**

RCN Scotland agrees with the proposal to simplify and streamline the registration process for registrants to be as easy and smooth as possible. At the same time, we are not expressing a view for or against this being done by using job roles as key categories but would recommend adding job levels to make it clearer to staff and employers what is needed to progress to the next level. This would help giving registrants a potential roadmap or clearer view of how to develop their career and provide employers with the confidence for recruiting staff with the right qualifications and where not, to put in place plans for staff training and development. In turn, this will contribute to professionalising working in the social and care sector further.

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

**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?**

RCN Scotland members noted that reducing the period when registration should commence to three months is not advisable as many new registrants may only have just taken up employment and will therefore still be within their probationary period. Many may also not have completed relevant qualifications in accordance with their role. The earliest that should be considered is from six months onwards.

**Public Register online**

**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

**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?**

### **Registration period**

**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?**

On balance, RCN members would be in favour of introducing a continuous registration period so that renewal after three or five years becomes superfluous. However, it was noted how easy it is for registrants to miss renewal dates, and as such welcomed the idea of identifying a marking point via an annual declaration when also paying their membership fee and consider it a useful way of addressing that issue. RCN members also emphasised the opportunities this continuous two-way process and simplified registration in combination with a greater onus on learning and development is likely to offer to staff.

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

**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?**

**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?**

RCN Scotland agree with the proposal for SSSC to be more flexible and to accept SVQ units gained in adult care settings for registration in other roles. The issue members pointed out was on the completion of single units that staff may find difficult to complete often as part of a full SVQ, but without they can't fulfil their role or can't progress to a more senior role. Although it is in the staff member's interest, circumstances like no access to a computer, no dedicated time for learning or working predominantly day or night shifts may make it challenging for staff to complete their qualification. Employers need to be accountable to facilitate and cultivate a learning environment that flexibly supports their staff both at managerial and practice level that should actively contribute to overcoming challenges, including additional costs from staff undertaking single SVQ units.

Relatedly, members made the point that there doesn't need to be a set a period of time between completing SVQ level 2 and commencing level 3, but they would recommend setting a fixed period of time to finish each of these levels also to allow for better consolidation of learning.

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

RCN members generally support the proposal for developing standardised SVQ units that would be transferrable and recognised across the sector. It would be a step towards:

- professionalising the care sector,

- reducing duplication of effort so that staff don't need to repeat training when changing employers, and
- would create a baseline of skills, knowledge, and qualifications that both staff and service providers could trust in meeting the necessary requirements.

What is missing however between the provision and undertaking of training to meet the needed requirement of qualifications are supervision, support and consolidation of learning. On the latter, RCN Scotland members believe SSSC need to include the need for registrants to demonstrate how their learning has made a difference to their practice so that for example nurse managers can delegate safely, and staff have the necessary confidence in all areas of their role. One option would be to set a fixed period of time after completing a course or qualification where this should be evidenced.

### **Adult social care qualification level**

**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?**

The level of qualification should be at a level which is achievable and in line with other similar posts. A minimum should be set to attract staff into these roles in the first place.

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

### **Timescale to gain qualifications for registration**

**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?**

**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?**

RCN Scotland members agree with the proposal to limit the period of time by which a qualification should be gained, however, they did not specify whether this should be reduced to 3 years. However, having an annual declaration point would help focus staff and align it with other registers' processes like that of the NMC's revalidation and would allow staff to move more seamlessly between the NHS and the social care sector.

### **Return to practice**

**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**

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

- Yes

- No

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

- Yes
- No

**58. Should there be annual CPL requirements?**

- Yes
- No

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

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

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

CPL should be an integrated part for both managerial and practice level staff in all settings. It should be aligned to individual training needs based on robust learning assessments during supervision meetings. Employers need to be accountable for providing the time and resources for staff to be assessed and undertake learning regardless of their wish to progress or to remain at the same level of job. The focus should be on recognising and valuing both. Ultimately, we hope the registration process supports staff to quantify their experiential learning and be able to demonstrate their skills, knowledge and insight they gained through work and relevant qualifications to current and future employers.