

**RCN Scotland response to Scottish Government's consultation
on:
Proposed changes to SSSC registration
requirements**

[24 September 2026]

Background

Social services is one of Scotland's largest sectors, employing approximately 210,000 individuals across social work, social care and children and young people's services

As the independent regulator for the social services workforce in Scotland, it is the role of the Scottish Social Services Council (SSSC) to protect the public by registering and regulating social service workers, setting standards for practice, conduct, training and education.

This consultation seeks views on various proposed changes to registration requirements which will further strengthen the SSSC's ability to deliver their public protection functions. These changes include mandating the registration of social work assistants, workers in adult day care services and workers in offender accommodation services.

Consultation questions and RCN Scotland responses

Question 1: Do you agree that support workers, practitioners and supervisors employed within an adult day care service in Scotland should be subject to registration with the SSSC? Please note that if registered, it is the responsibility of the SSSC to determine definitions in respect of the new group, any qualification and continuous professional learning standards, and registration fees of each category of worker.

The Royal College of Nursing supports the registration of support workers, practitioners, and supervisors in adult day care services to enhance workforce professionalism and public safety. Our care/support staff members in nurse-led, non-NHS settings will be directly affected by these proposals.

We emphasise that registered nurses remain regulated solely by the Nursing and Midwifery Council (NMC) and are not subject to SSSC registration.

We urge the Scottish Government and SSSC to provide robust transitional arrangements to support existing staff in meeting new qualification requirements, including funded time for learning and completion of qualifications. We hear from members that currently opportunities for learning and development are not always readily available and there is a lack of equity of access currently, so additional resourcing will be required to enable staff to meet any new requirements. Additionally, tailored guidance and practical

support are needed for non-NHS, nurse-led providers who may face challenges in managing registration, training, and fees.

Clear role definitions and practical examples are essential to assist employers and staff in understanding these changes.

Question 2: Do you agree that practitioners, supervisors and managers employed within an offender accommodation service in Scotland should be subject to registration with the SSSC? Please note that if registered, it is the responsibility of the SSSC to determine definitions in respect of the new group, any qualification and continuous professional learning standards, and registration fees of each category of worker.

Question 3: Do you agree that social work assistants working in Scotland should be subject to registration with the SSSC? Please note that if registered, it is the responsibility of the SSSC to determine definitions in respect of the new group, any qualification and continuous professional learning standards, and registration fees of social work assistants.

Question 4: Currently, social workers can be employed in Scotland without being registered with the SSSC, if they are registered with another relevant UK regulator. Do you agree that all social workers who are employed in Scotland should be required to register with the SSSC?

Question 5: Do you agree that references made within the Regulation of Care (Social Service Workers) (Scotland) Order 2024 to the 'General Teaching Council for England' and the 'General Teaching Council for Wales' are removed and updated respectively, to reflect current position?

RCN Scotland has no comment on Questions 2 – 5.

Question 6: Please provide any further comments on the proposals set out in this consultation in the box below.

The RCN welcomes the commitment to raise workforce standards through expanded registration and qualifications. We reiterate the importance of clear differentiation between nursing regulation by the NMC and SSSC registration for care/support staff to avoid confusion.

To support a smooth transition, funding and employer support for staff undertaking qualifications and CPL should be prioritised, particularly for experienced staff without formal qualifications.

We encourage ongoing engagement with the RCN to ensure implementation reflects the realities of nurse-led, non-NHS settings and the diverse workforce within them.