

Consultation analysis on the SSSC registration fees increase

Introduction

The consultation on registration fees opened on 10 August 2016 and closed on 2 November 2016.

Anna Fowlie emailed 91,587 registrants and employers on 10 August 2016 to encourage them to have their say. We also highlighted the consultation to the same 90,000 registrants and employers through our ebulletin in September and October. We received 3813 responses to the consultation. This consultation was the shortest one we have ever sent out with two 'yes or no' questions.

The consultation had three sections. In addition to two sections relating to the respondent and equal opportunities, there were two main questions in the consultation:

1. Do you agree that the proposed changes to the fee structure, which are in line with other regulated professionals, is reasonable?
2. Do you agree that we should have different fee levels for different groups of workers?

For each of these questions, we left space for respondents to comment.

Summary of key messages

- Most responses came from individuals.
- Social service workers were the largest group represented.
- Public sector workers were the largest sector represented.
- Social workers and managers were most likely to respond.
- Most respondents do not agree that the proposals are reasonable.
- Respondents said that the sector is generally low-paid and the proposed increases do not reflect this.
- Respondents thought that the increases were too high and/or being implemented too quickly.
- Respondents indicated that the proposals would drive people out of the profession and/or discourage others from joining.
- Respondents often view the fee as a form of taxation.

- Respondents are not always clear on what the SSSC's role is and what services we provide.
- Some respondents recognised the value that registration and the SSSC provide.
- Most respondents agree that there should be different fee levels for different roles.
- Respondents believed that age and pregnancy/maternity were the protected characteristics most likely to be impacted by the proposals.

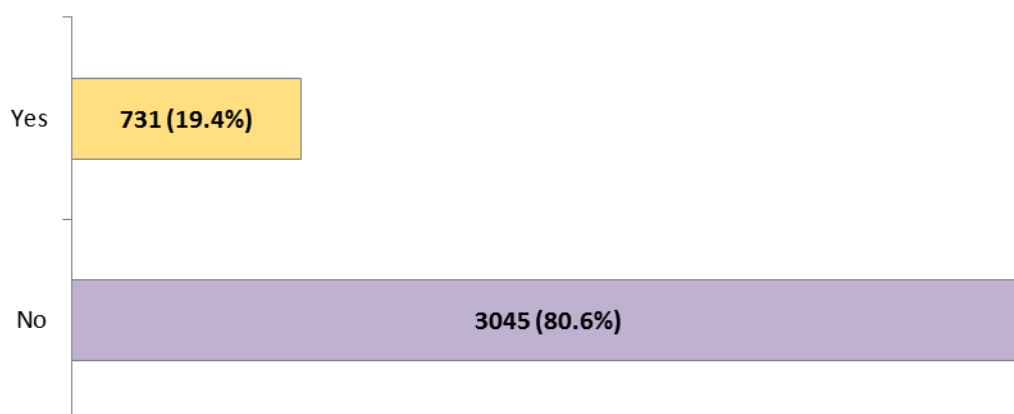
CONSULTATION ANALYSIS

We received 3,813 responses to the survey. Not all respondents provided an answer to each question.

We also received 200 comments on an article we posted in August on SSSCNews¹. These responses were not included in the total above. The comments left by people on the article are in line with the overall responses from the consultation.

Please note that percentages given may not add up to 100% due to rounding, or because no response was given to that question.

Q1: Do you agree that the proposed changes to the fee structure, which are in line with other regulated professionals, is reasonable?

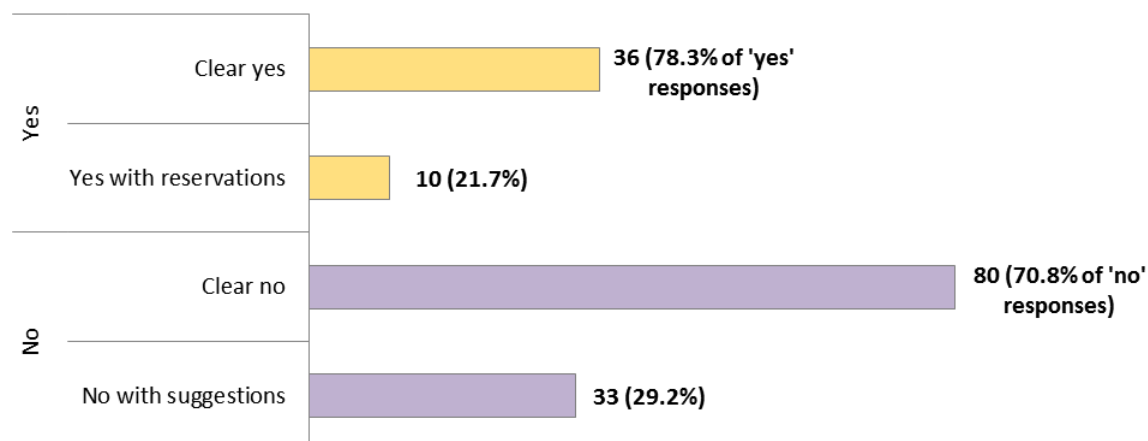


Most respondents do not agree that the proposed changes are reasonable. This proportion was steady throughout the period of the consultation.

37 respondents (0.9%) did not answer this question.

¹ <http://ssscnews.uk.com/2016/08/10/sssc-reg-fees-consultation/>

Respondents frequently clarified their response by leaving a comment. We looked at the 159 responses left by those who identified themselves as responding on behalf of an organisation. Analysis of these comments to identify how strongly respondents felt in one direction or the other found the following:



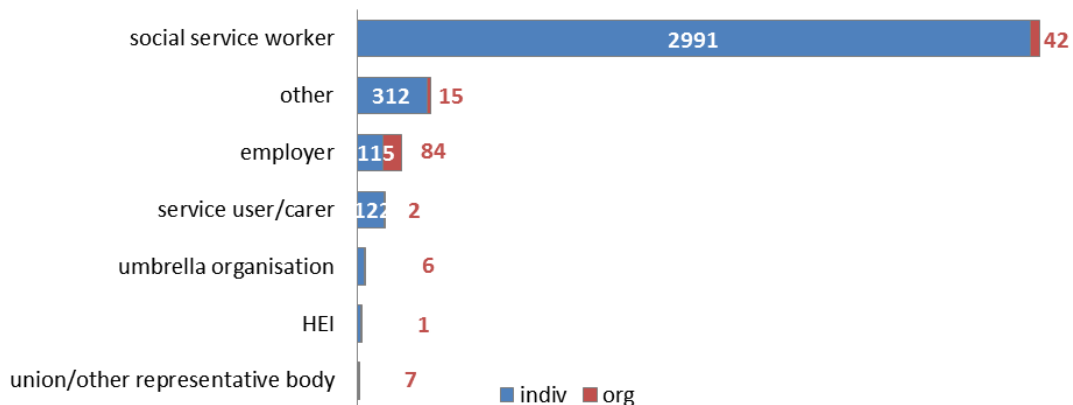
While 'no' responses amongst organisations clearly outnumber 'yes' responses, the proportions of those who were clear in their position are broadly similar.

Some 'yes' respondents indicated that in principle they agreed with increases but only for some groups, or only if increases were staggered or reduced. The 'no' responses with suggestions included looking again at the proposals to take into account inflation and part-time workers.

The responses above came from people who stated they were responding on behalf of an organisation – however on reading the responses in detail, it would appear that some are the personal opinion of the respondent and not in fact an organisational response. Similarly, there are a large number of respondents who stated they were doing so as an individual but provided work email addresses or other contact details. It is therefore not always clear whether or not someone has actually provided an organisational response.

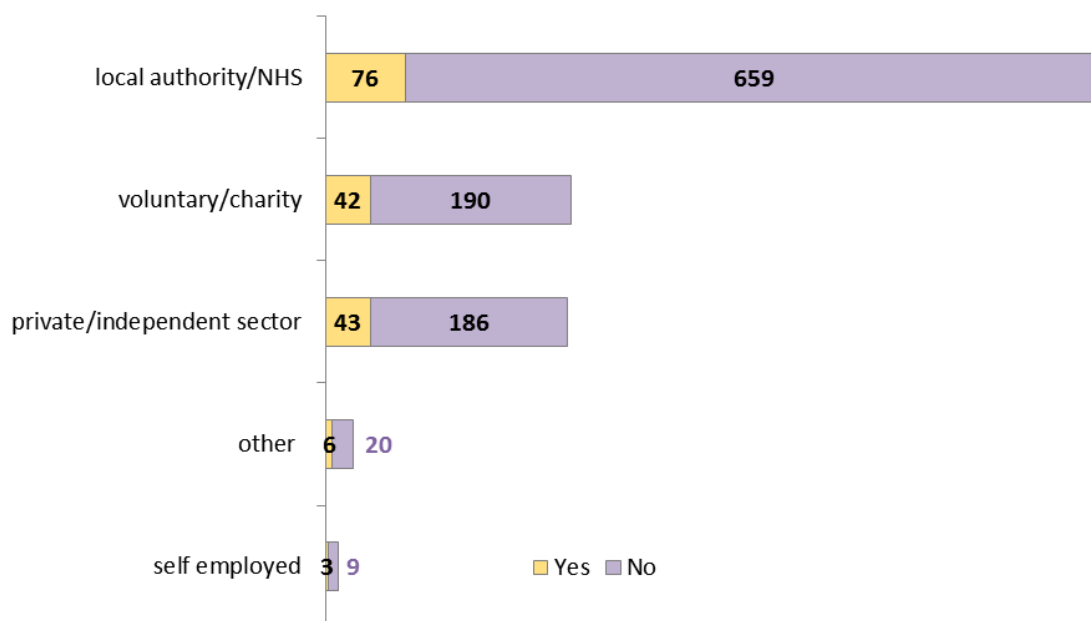
Demographics of respondents

We asked respondents to define their role as one of the following:

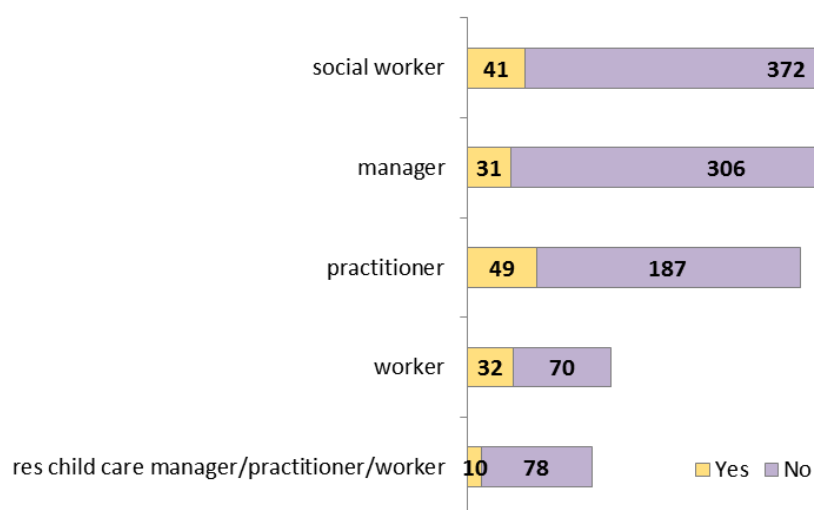


A breakdown of the type of role specified by those who answered 'other' is included in the appendix.

Most responses came from those working in the public sector – either local authority or NHS. The number of responses from private and voluntary sectors was very similar.



We also asked which of the following best described the respondent's job:



Social workers and managers provided the greatest number of responses, and both groups were the most likely to disagree with the proposals (only 9.2% of managers, and 9.9% of social workers, agreed). These two groups, along with residential child care staff (who provided the lowest response rate), have the greatest proposed increase (to £80).

Workers were most likely to agree with the proposals – 31.3% of those identifying themselves as workers agreed with the increases.

Themes from positive responses

Despite a relatively low number of comments in this group, there were some clear themes.

Respondents recognise the value of the SSSC and the service we provide. They also recognise the need to provide increased funding so that we can continue to provide this service. Some did comment that they would expect to see an improved or increased level of service if their fee was to increase, including providing a more comprehensive service to all groups of registrants. (**"Costs of all support have risen and money can only be stretched so far. SSSC helps to ensure that those who work in the care sector are qualified to do so, and this work has to be funded."**)

Respondents also noted that the fees had not changed since 2003, and also that while the current fees are low, the new fees remain low in comparison to other regulators. Some respondents see the cost as reflective of the drive towards a professional workforce across social services, and is comparable to other regulatory bodies.

Although this group agreed with the proposed changes, they did comment on the sudden increase which would have a potentially disproportionate impact on lower paid workers. Some respondents suggested an incremental approach with various figures over various time periods. (**"I do agree that it is reasonable but think the short time frame in which you are proposing a considerable hike in fees is not. If you are going to raise fees from £30.00 to £80.00 I would suggest a longer time frame to implement this."**)

Some respondents saw the increase to £80 for some workers as disproportionate when compared to the smaller percentage increases for other groups.

Other suggestions included introducing a direct debit or similar monthly payment scheme as well as changing the fee structure to link it to salary levels.

Themes from negative responses

There are very clear themes from respondents who did not agree with the proposed changes.

By far the most common issue raised is the disparity between the proposed increases and wages. There are numerous comments relating to the generally low wages in the sector, restrictions on public sector pay and low levels of pay in the private and voluntary sectors. While respondents recognise that fees have not increased since 2003, a large number disagree with raising fees when their wages have not gone up in a number of years. Respondents also note that the proposed rises are not in line with inflation.

Respondents indicated that the proposed increases are too high. This was the case even when some respondents agreed in principle to a rise in fees. (**"I appreciate the need for fees to be paid to a statutory regulatory body, and would have no issue with reasonable incremental annual increases in the fees in line with inflation and other factors."**) Workers affected by the proposed increase from £30 to £80 were most vocal in their responses. Some respondents did not see why the increase in this group was so much higher than other groups. This was the case regardless of the role of the respondent. Discrepancies between roles and structures between public, private and voluntary sectors were highlighted, as were the differences in pay between social workers, managers and the other roles included in this group, such as residential child care workers.

Some respondents took issue with the description of the proposed increases as 'modest', particularly when looking at the percentage increases and taking the potential tax relief into account.

It is clear from a number of responses that a large proportion of respondents feel that the SSSC does not provide any form of service or benefits to them other than registering and potentially investigating them if there is a fitness to practise issue. Respondents do not know where their fee goes or what we use the fee for, and feel that the current levels of service are not worth the fee as it stands.

Respondents indicated that the SSSC could make efficiencies including amongst salaries and by focussing on 'core' work only. A few responses mentioned issues with timescales in relation to fitness to practise cases. Respondents often saw the SSSC as an inefficient or unhelpful body, and also queried why the upcoming increase in the roles we register would not cover our increased costs. Some respondents did not feel that the SSSC provided much for their particular role or in their area (for example, workers in more rural areas outwith the central belt).

It is also clear from some responses that a number of people do not understand what the SSSC's role actually is – some responses talk about paying a

'membership' or asking what the SSSC does to help increase wages or 'stand up for the rights' of workers.

Respondents described comparisons to other regulators as irrelevant or unfair in light of the perceived benefits those bodies provide to their registrants and also the disparity between salaries and terms and conditions in a number of the professions.

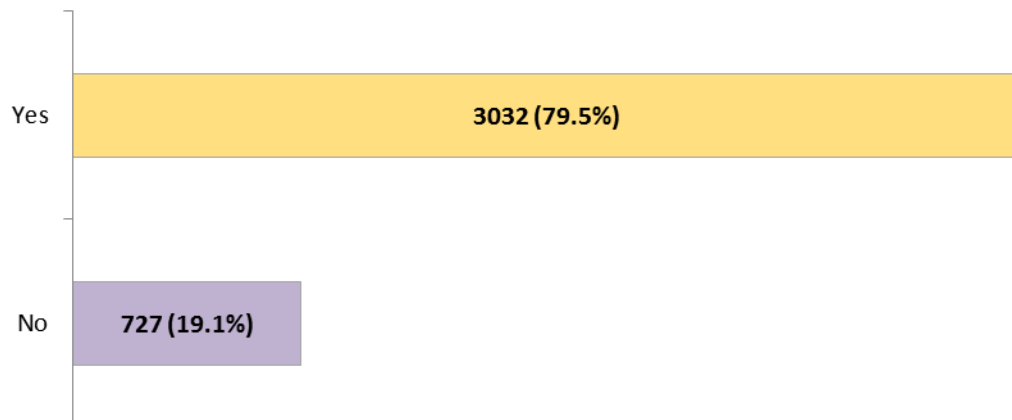
Respondents indicated that the proposed increases, while too high in any event, should not be implemented in full in one year. A number of alternatives were proposed but in general respondents would have preferred a phased or staggered model of increases to the fees over a number of years, or by allowing direct debit payments each month. (**"Yes, i do understand that fees may have to change from time to time, but i would ask please that this is looked at carefully and conducted fairly for all members in a scaled way, perhaps with a starting increase of £5 and going up to a maximum increase of £30."**)

Respondents stated that the proposed fees do not take into account differences in working patterns ie for part-time staff. A number of respondents would prefer to see the fees linked to salaries.

Some respondents were concerned that increasing the fees would damage the workforce by causing people to leave for jobs with higher wages and no registration (ie Tesco) and higher fees would simply add another barrier to encouraging people into a traditionally lower paid workforce (**"I notice I would be paid more working in a supermarket or hotel than as a support worker. Making me pay for the privilege of registering to work in an industry which pays poverty wages is appalling. There should be no registration fee."**). Some respondents went as far as to say that if the fees were to increase they would refuse to pay and some said that they would leave the profession entirely. One respondent stated that this was the 'end of the road' and they had submitted their resignation.

There were some comments disagreeing with the principle of paying a fee, regardless of the cost. Some people saw the fee as a 'tax' on working and felt they were forced to pay to work. With this in mind, some respondents also stated that the current fee was already too high and they would not support an increase. Some respondents thought that as the SSSC provides a public service, then funding should come in full from government or alternatively that employers should cover the costs of the fees. (**"The fees are effectively a tax imposed on the workforce to pay for services which should be the sole responsibility of the government. It is for them to ensure that properly trained and qualified staff are in place and are subject to regulations governing their behaviour. The idea that we should pay for our own regulation is absurd, and the suggested increases breathtakingly extreme."**)

Q2: Do you agree that we should have different fee levels for different groups of workers?



54 respondents (1.4%) did not answer this question.

Most respondents agreed that we should have differing fee levels.

Among those who did not agree, the most frequent reason given was that the SSSC doesn't provide different levels of service for different groups and that everyone has to work to the same code of practice irrespective of their role.

Q3: Do you have any other comments to make on the proposed changes?

Comments left in this section echoed those in the previous two questions.

Section 2 – About you

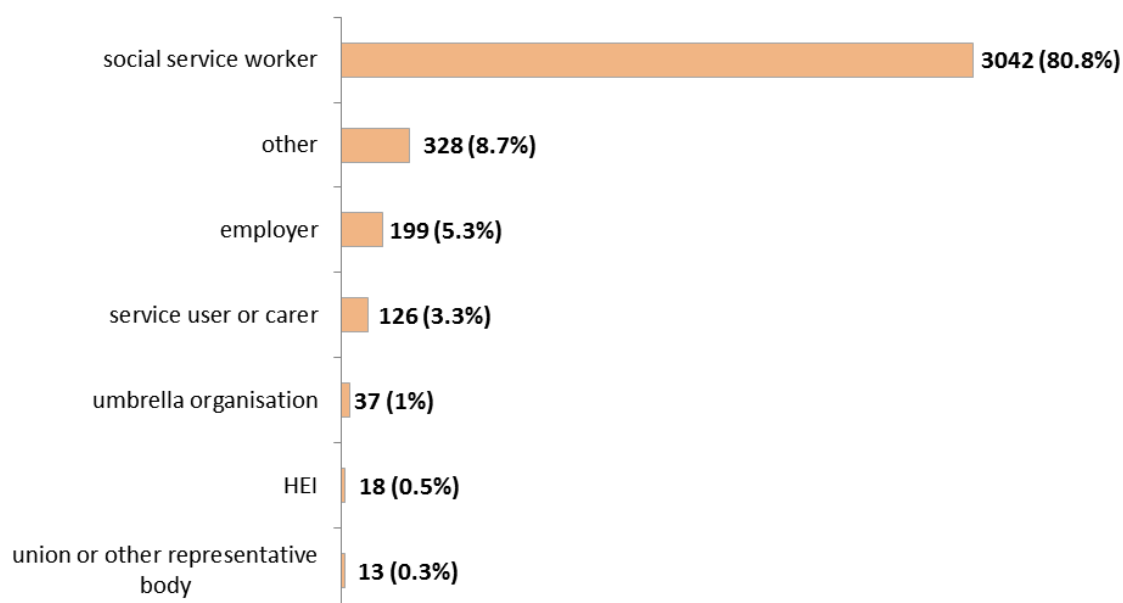
This section gives a summary of the total number of responses per group. As not all respondents answered each question, the percentages shown are of the total number who responded to the particular question, and not the total number of survey responses.

We asked respondents to tell us whether they were responding as an individual or on behalf of an organisation. 3,775 respondents answered this question (99% of all respondents).

Are you responding as an:

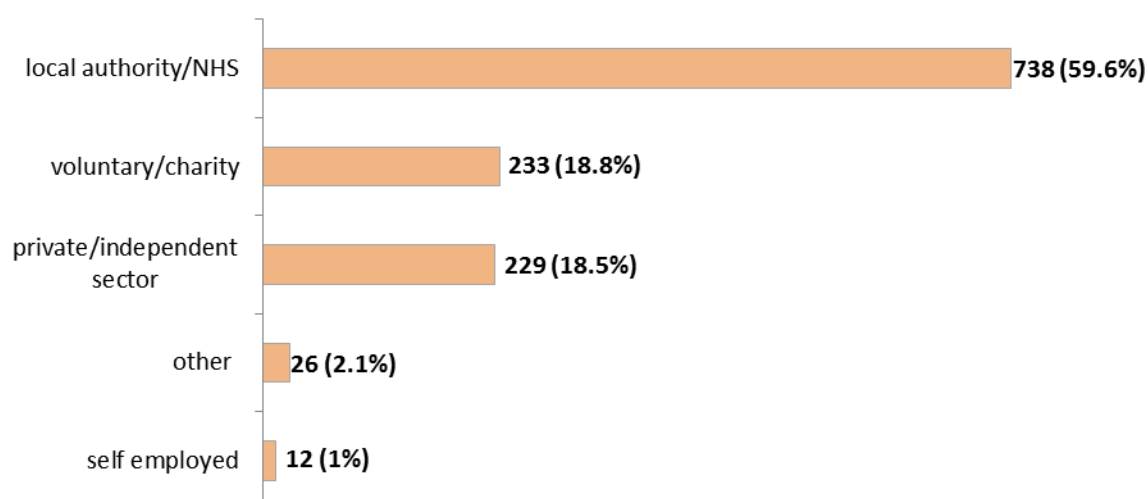


When we closed the survey, there were around 95,280 people on our register. 3,042 survey responses came from people who identified themselves as a 'social service worker' and therefore are potentially on our register. This equates to around 3.2% of registrants responding to the consultation.

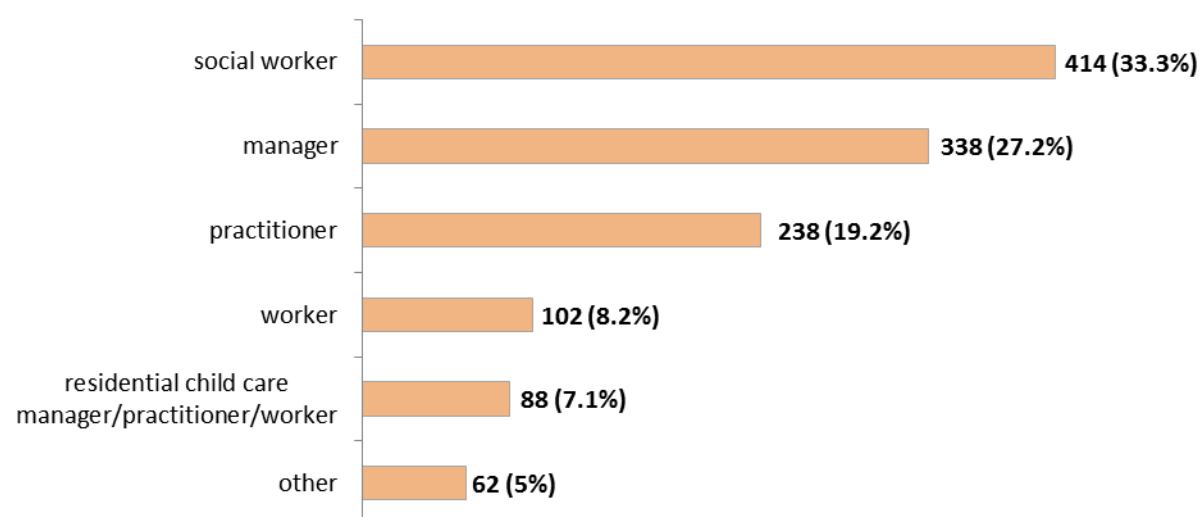


After the consultation had opened and some responses received, we added two questions on the sector and role where the respondent worked. Due to this, the majority of respondents did not have an opportunity to answer these. By the time the consultation closed, 1238 respondents told us what sector they worked in (32.5% of all responses received) and 1242 told us what role they held (32.6%).

Please tell us the sector you work in:

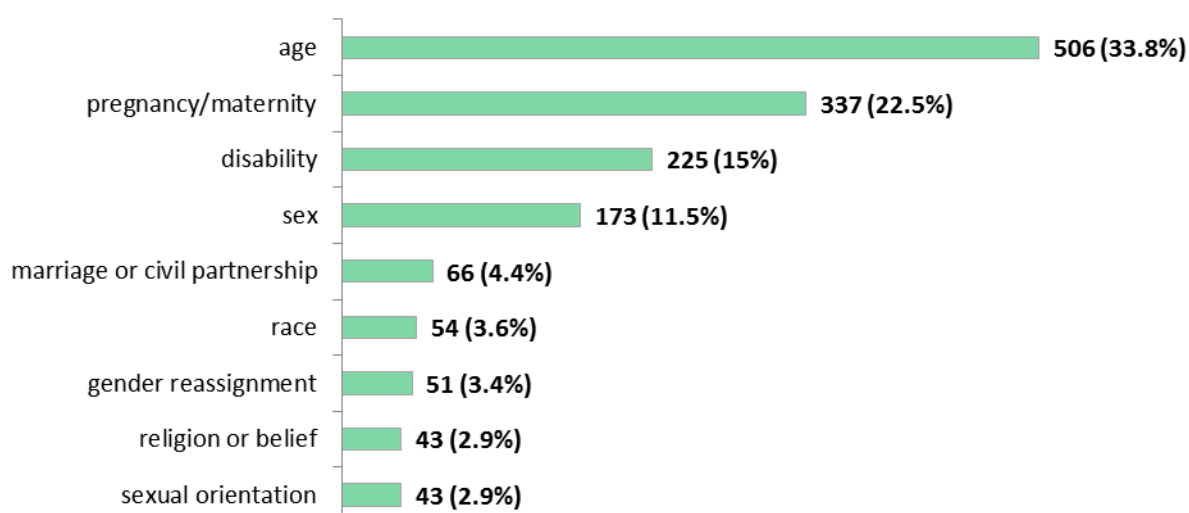


What is your role?



Section 3 – Equalities

Do you think that any changes as a result of this consultation (ie an increase in fees) will have an impact on any group of people in terms of the protected characteristics?



The most frequently mentioned characteristics were age and pregnancy/maternity.

Some frequent comments highlighted younger workers in particular as potentially affected disproportionately due to the low wages they earn in roles such as early years, and also those under 21 earning below the full national minimum wage. Other comments highlight the potential impact on workers nearing retirement age who may choose to leave the service early rather than pay an increased fee.

The impact on parents who are on maternity pay was also mentioned frequently – the reduction in salary at that time was noted as a concern. Some respondents were unclear about whether or not they had to pay fees while they are taking maternity leave – and if they did have to pay, some suggested waiving the fee for this group in future.

One issue early on in the consultation period was that the question format did not allow respondents to choose more than one of the protected characteristics, despite the question stating that they could. We changed this when we identified the problem – however there were a number of comments related to this.

List of roles specified by respondents who gave 'other' as their role, and the frequency these were mentioned

Role	No. of responses
Administrator for a Partner Provider nursery	1
Advanced pupil support worker	1
care assistant	3
Care assistant in a nursing home.	1
Care Assistant in care home	1
Care assistant/ support worker	1
care inspector	2
CELCIS	1
Chair	1
Child care practioner	1
Child care service	1
child development officer	2
childcare practitioner	1
Childcare worker	2
Children's Services Worker	1
Compliance team	1
due regard member on conduct sub - committees.	1
Early Education and Childcare	1
Early education practitioner	1
early year practioner	1
Early year worker	1
early years education	1
Early Years Practioner	2
Early years practitioner	6
early years worker	1
Education Early years practitioner	1
Employee manager catagory	1
ex practitioner	1
eyo	1
EYP	2
Head of Centre (Early Years)	1
I am a social worker, not a social services worker. Social worker has protection of title.	1
Independent Practice Educator in Social Work	1
Independent Practice Teacher	1
integrated manager in health and social care partnership	1
Joint manager of a voluntary charity registered playgroup	1
Lead Learning Practitioner within nursery class	1

Manager	2
Manager of a daycare setting	1
Manager of Care Home	1
New graduate	1
Nursery assistant	1
nursery manager	4
Nursery nurse	2
Nursery nurse in a school	1
Nursery Nurse within a playgroup	1
Nursery practitioner	2
Part time play worker	1
Pastoral care in Boarding house	1
Play worker	1
Play worker at out of school club	1
playgroup practitioner	1
playworker	1
Practitioner	1
Private individual	1
PSA	1
Pupil Support Assistant	1
Pupil support assistant level 2	1
Pupil Support Worker	2
pupil support worker in a primary school	1
Relief support worker	1
Residential support worker in a residential school.	1
retired local government worker	1
retired social services worker	1
Retired social worker	1
Retired Social Worker Sessional Worker	1
Self Employed SW.	1
social care assistant	1
Social Work Student	3
social worker	1
Social worker student and social services worker with local council	1
Society of Personnel and Development Scotland (SPDS) - Scottish Local Authorities	1
Strategic partnership group representing Early Learning and Childcare in Aberdeen	1
student social worker	1
Supervising social eorker	1
Support assistant/worker	1
Support for Learning Assistant	1
Support For Learnining Assistant	1
Support Worker	3

SVQ Assessor for Level 2,3,4, PDA's and LMC (RGN)	1
Unemployed	1
Wasn't sure what i was from the list above!! I am a Playworker in a Kids Club	1
Work for an early years organisation	1
working in social care as central support to services	1
Writing on behalf of my mother who is a social care worker	1
You don't even have us on the list. To start with	1