

21<sup>st</sup> December 2018

**For the urgent attention of the Home Secretary**

Dear Home Secretary,

**Immigration White Paper 2018**

You will no doubt have seen extensive media coverage on the concerns about recent announcements for amendments to the Immigration rules in preparation for Britain's exit from the European Union.

The signatories to this letter between us represent and/or engage with the 21,200 organisations providing social care in England. We are compelled to write to you to ask for your consideration of the impact on the social care sector of the draft legislation currently before Parliament.

Adult social care in England is provided primarily by independent (private and voluntary sector organisations) who between them employ 1.47 million colleagues. Projections based on the NMDS-SC managed by Skills for Care are that based on demographic changes, the sector will need to create a further 650,000 job roles by 2035. Yet the sector has a major issue with recruitment and retention for a variety of reasons, not least we contend, because of the low status and image of working in the sector and continual reference to it being a low wage, low skill sector. Regrettably, it is largely a low wage sector with people providing direct care and support, often referred to as care workers, earning an average of £15,700 per annum (compared to an NHS Healthcare Assistant who will earn on average £17,600 per annum and employer contributions to an NHS pension). The data shows that 94% of the 1.47m people working in adult social care earn less than the proposed salary threshold of £30,000.

People working in the sector are however, highly skilled, providing a wide range of care and support to people from the age of 18 upwards with a significant breadth of complex needs. Our first ask therefore is that the policy is genuinely based on skill requirements, not salary level or if salary level is the determinant, that either funding is made available to increase salaries in the sector or exception is made for adult social care. Otherwise our ability to recruit the future workforce including colleagues from other parts of the globe will be destroyed.

We understand that the Migration Advisory Committee will be making recommendations about shortage occupation lists which is to be welcomed and will be helpful in relation to regulated professionals working in our sector, ie social workers, nurses and occupational therapists. However, there is no qualification entry requirement for people joining social care, nor indeed any requirement to achieve a qualification throughout the duration of an individual's career in the sector. Whilst we encourage achievement of qualifications, currently around 50% of the workforce has a qualification at Level 2 or above. Therefore, the MAC shortage occupation list will not be of assistance to the issues we are raising either.

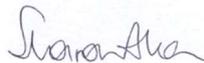
We would point out that 8% (104,000) of the current workforce are EU nationals. This of course is not uniformly spread across England and as you would expect, the greatest reliance on workers from the EU (and other parts of the world who make up a further 10%) is highest in areas of lower unemployment, predominantly London and the South East. In these parts of England, the proportion of our workforce originating from the EU is nearer 15%.

Turnover rates in the sector are alarming, running at an average of 30% and having seen an increase each year since the data began to be collected and analysed some ten years ago. There are 110,000 live vacancies in the sector on any one day. Whilst the National Recruitment Campaign being led by DHSC is to be welcomed, we are seriously concerned at any measures that will hamper the sectors ability to recruit people with the right values to work in social care.

We understand that social care is one of the sectors highlighted as potentially benefiting from proposals to enable workers to have a twelve-month work visa. We have to advise you in the strongest possible terms that this is not a solution for our sector. Social care is a relationship-based sector where the value of long-term relationships between people working in the sector and those they support is at the heart of high quality, person-centred care. One of the main causes of distress for people, many living with dementia, mental health issues and/or complex learning disabilities and/or autism, is discontinuity in people coming in to their homes to provide the most intimate care and support. Building in further turnover and change for citizens is completely at odds with what the sector is seeking to provide. Social care is not a seasonal role, it is about supporting people in our communities to achieve fulfilling lives, supported by skilled and caring people.

We urge to you engage with us in ensuring that social care will be able to continue recruiting and retaining colleagues with the right values to provide high quality, relationship-based care. Would it be possible for us to meet with you early in the New Year to discuss the issues raised in this letter in more depth please?

Yours sincerely,



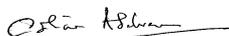
**Sharon Allen, OBE**  
**CEO of Skills for Care**



**Michael Voges,**  
**Chair of Care Provider Alliance**



**Mark Lever**  
**Co- chair of the Care and Support Alliance**



**Caroline Abrahams**  
**Co-chair of the Care and Support Alliance**



**President of ADASS**