

Social Care Wales,
South Gate House,
Wood Street,
Cardiff,
CF10 1EW

11 October 2017

Dear Sirs,

Response to the Transforming Care in the 21st Century Consultation

Thank you for the opportunity to respond to the Transforming Care in the 21st Century Consultation, which I have the pleasure to do on behalf of the United Kingdom Homecare Association (UKHCA).

Please do get in touch with us if there is anything that you would like to discuss further or that you believe requires clarification.

Yours sincerely,



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About UKHCA:

United Kingdom Homecare Association (UKHCA) is the professional association of homecare providers from the independent, voluntary, not-for-profit and statutory sectors. UKHCA helps organisations that provide homecare services (also known as domiciliary care), which may include nursing services, promoting high standards of care. The Association represents the homecare sector with national and regional policy-makers, regulators and the public. UKHCA has over two thousand homecare providers as members across the United Kingdom.

Question 1.

Do you agree that the proposed distribution of fee levels across the different groups of workers is reasonable?

Although we recognise the part that registration can play in moving towards a professional workforce, we do have some concerns over placing the burden of fees and long term fee increases on to social care workers and social care managers.

Recruitment and retention of care workers is repeatedly given as one of the main concerns of providers of domiciliary care services. Turnover of care workers remains high, as does the vacancy rate of care worker roles.

In a highly challenged care market, providers need to be able to reliably hire enough care workers to ensure that they are able to provide consistently high-quality, safe domiciliary care. We would therefore be concerned at presenting potential entrants to care work with a financial obstacle to overcome, in addition to meeting the costs of criminal record disclosures etc.

In reality, providers recruiting care workers are competing with other local businesses, such as supermarkets, hospitality and other relatively low-paid employment, for staff. Social care employers need to ensure that care work is presented as a desirable choice. If too many disincentives are put in place for people to apply and register as care workers, there is a good chance that many of them will choose alternative work which they can start more quickly and

easily. Although the fee levels do not sound like a lot of money, it can make all the difference to someone who is looking for work, particularly given the reputation of care work as a low-paying, challenging sector.

It is also hard to justify why care workers, and social care managers, should face the burden of fee increases as a result of a Government-led drive towards full registration. If the Government feels that this is a worthwhile goal, then they should also be willing to provide the funding to ensure that registration costs are not falling onto the shoulders of relatively low-paid members of the workforce.

Question 2.

Do you think that the proposed annual fee increase to meet the fee level in 2022 is reasonable?

As previously stated, we do not feel that it should necessarily be up to the workforce to meet the costs of regulation. However, if it is decided to raise fees for care workers and social care managers, we are broadly supportive of implementing staggered increases to allow the sector to adapt. It has also been suggested, in discussion around the consultation, that providers could assist care workers in paying for registration by taking care of the upfront cost of registration and allowing the care worker to pay the cost back in instalments.

While we are supportive of offering flexibility, we would not encourage the Government to assume that providers would, or should, provide a solution. Providers also need to be careful over how these instalments are paid back by the care worker.

Directly deducting these repayments from a care worker's wages puts the provider at risk of underpaying in terms of National Minimum Wage regulation compliance.

Question 3.

Do you think that there is anything that Social Care Wales can do to help the sector adapt to the changes?

Care workers, social care managers and providers need to be made to feel that they are getting value for money out of their fees, and that registration has



tangible benefits. This could take a variety of forms including extra support to care workers in terms of career development and skills.

In our experience with other regulators in the UK, providers grow frustrated when regulators are extremely slow to complete registration or to respond to changes/queries, particularly when they are paying a fee for the services.

We would therefore recommend that process is designed to be as streamlined and responsive as possible to allow applicants to begin working as soon as possible with the minimum amount of hassle through the registration process.

Similarly, once registered, the regulator should do as much as it possibly can to make sure that it remains as responsive and flexible as possible to the needs of registered care workers. This includes being approachable, communicative and available to respond to care worker queries or problems.

Social Care Wales also has a responsibility to ensure that it is cost effective in its running, spends money responsibly and avoids waste, in the way that commercial organisations need to do in order to remain viable.

Question 4.

Do you agree with the proposal to use the qualifications listed in the existing Qualification Framework for domiciliary care workers for registration?

And

Do you agree with the proposal that, for people who do not already hold one of the qualifications listed, that the level 2 award is used?

UKHCA, as the professional association for domiciliary care providers in the UK, fully supports and understands the drive behind improving the skills of the care workforce.

However, we do have a number of concerns over making formal qualifications a pre-requisite for registration, particularly where registration is mandatory. It has to be understood that these changes are being proposed in a context where providers are finding it increasingly difficult to recruit and retain suitable numbers of care staff to cope with the rising demand for services.

Therefore, any changes to registration of the workforce, and putting further demand on applicants for care roles, need to be considered carefully.

There are several issues that need to be addressed, particularly with regards to new entrants into the social care workforce.

The social care sector as a whole (and domiciliary care is no exception) already has a major problem with the recruitment and retention of care workers and senior care workers. Providers of adult social care services often cite recruitment and retention as one of the biggest concerns for themselves as business owners, and for the care sector as a whole.

The care sector arguably already has an image problem due to the nature of the work. People may feel that care work does not offer a career path, or that it is not a valued and respected profession. Some people may be put off by the long, unsociable hours or the demanding nature of the work.

We must therefore be careful as a sector not to add additional barriers which deter entrants into the care workforce.

The care sector, in reality, is competing with other low paid sectors, such as retail, for a limited number of potential workers. If care work is seen as having too many barriers to entry, potential applicants will opt to apply to other, less demanding jobs. The application process for care workers can already be quite long, due to background checks and other complications. It is therefore a concern that, if additional qualifications are to become a mandatory requisite to registration with Social Care Wales, that this will only exacerbate the problem.

It is fair to say that many applicants to the care workforce do not have an academic background and therefore the idea of having to take additional formal qualifications discourage some potential care workers, particularly with existing WEST requirements. Qualifications (and other professional development) should be seen as an enhancement to existing abilities and career progression, rather than a barrier to entry.

For the avoidance of doubt, we support upskilling the workforce in principle, it may just be a better course to create a training pathway that can be followed once registration has been achieved and after experience has been gained in the sector.

It would be a huge waste of resources for new care workers to go through a potentially lengthy qualifications process only to discover on the job that they are not suited to a care role or that the reality of the job is different to what was expected. This would also give providers the flexibility to ensure that all training can match the care needs of the business.

With regards to existing care workers that do not have the listed qualifications, there are some similar concerns with the proposed requirements.

Current estimates within your own consultation document suggest that nearly 50% of care workers already in care roles do not have the qualifications listed in your proposals. We are concerned about the time investment that will be required to bring the workforce qualification level up to the standards proposed.

Many employers already report overstretched staff rosters, and may not be able to cope with multiple staff members taking time away from their workplace to complete further qualifications while also bearing the cost of replacement workers ("backfill costs"), as providers need to pay for cover for staff who are unable to provide care during their re-training periods.

As mentioned previously with regards to new applicants, the current workforce is not usually from an academic background, and many staff members may not be comfortable with the idea of having to sit further qualifications. This may prompt some of the existing workforce to leave the sector altogether.

Question 6:

What support do you think employers and workers will need to help them prepare for registration?

We believe it would be beneficial to make a commitment towards having a proper, manned helpline that would be available to assist both workers and employers to ensure that registration is as smooth and easy as possible.

It may also be helpful to run a series of workshops or drop-in where workers and employers can attend to get advice on any issues that they may be having with regards to registration.

Although there is currently an FAQ page for Social Care Wales, an updated and improved FAQ page solely dedicated to the registration process would be a good point of information for applicants.

We believe that it would be helpful if employers could download a template letter that can be sent to applicant care workers that explains the function of Social Care Wales, why they need to register, what the benefits are, and what information they will need to have before beginning an application. This will save a lot of time by making sure that people are up to speed and have the relevant information to hand before beginning the application process. This could also run alongside a step-by-step guide for applications that would help people to navigate the process.

Whatever materials are given to help applicants, it is vital that they are easy to find, simple to understand and are as free from jargon as possible.