# Consultation questions:

## About you/your organisation

Are you responding to this consultation:
**a) as an individual**

**If you're responding as an individual, are you a/an:**

☐ person who uses care and support

☐ early years worker

☐ social care manager

☐ social care worker

☐ social worker

☐ social work student

☐ other – please describe below:

☐ owner of a setting providing care

☐ responsible individual

☐ employer of social care workers

☐ educational professional

☐ member of the public

**b) on behalf of an organisation**

**If you're responding as an organisation, is the organisation:**

☐ central or devolved government

☐ a local authority

☐ a social care employer

☐ a learning provider

☒ other – please describe below:

    a professional association of homecare providers

**Organisation name/type of work carried out:** Homecare Association

## About our proposals

We welcome your views about our new proposals and would be grateful if you could take the time to answer these questions:

| 1. **Do you agree with our proposal that social care workers who do not hold the recognised qualifications should register using a list of competencies assessed by their employer?** | | | |
|---|---|---|---|
| Yes | ☐ | No | ☐ |

| 2. **Do you agree with our proposal to reduce the time social care workers have to register from 12 months to six months, once the employer assessment model is introduced?** | | | |
|---|---|---|---|
| Yes | ☐ | No | ☒ |

| 3. **Do you agree with our proposal to reduce the amount of CPD social care workers have to do to renew their registration, from 90 hours to 45 hours?** | | | |
|---|---|---|---|
| Yes | ☒ | No | ☐ |

| 4. **Do you agree with our proposal to move towards an outcome-focused approach to CPD in the future?** | | | |
|---|---|---|---|
| Yes | ☐ | No | ☐ |

5. **Do you have any comments about our proposals?**

   Please comment in the space below:

On question 1 – We'd appreciate further detail on whether this is exactly the same as the confirmed competence route and what the operational implications of this would be in practice. In theory a competency-based assessment would be welcome. Would it be possible, for example, for the new route to be introduced without removing the Principles and Values route and to seek feedback from managers on both routes before replacing one with the other entirely?

On question 2 – We are concerned that the shortening of deadlines will be difficult for providers to manage now, given the pressures that they are currently facing. The staffing situation remains acute. We understand the concerns about the transparency of the register and support a 6 month registration period in the long-term but we do not think the situation has improved to the point where it is appropriate to remove this exceptional measure.

On question 3 – We would be pleased to see a reduction from 90 to 45 hours due to the impact that the 90-hour requirement can have on part time staff in particular, who may feel that this is disproportionate to the hours that they work. There are ongoing and significant

pressures due to workforce shortages and part-time staff play a valuable role, are needed and should be supported.

On question 4 – We would broadly support the concept of an outcomes focused CPD approach. However, what is critical is how this actually works in practice. There is not enough detail in the proposals being consulted on to inform a decision about whether we would support this or not. For example, even if there is agreement about the importance of being reflective, there may be concerns around whether the documentation of the reflection elements typical of outcome-based CPD could generate a significant increase in the requirements for time, paperwork and oversight at a time when the sector is under significant pressure. How can we make sure this is simple but effective?

## Effects of our changes

6. **What effects will our proposals have on the Welsh language, specifically on:**

    **i) opportunities for people to use Welsh**

    **ii) treating the Welsh language no less favourably than the English language.**

**How could we increase the positive effects or reduce the negative ones?**

Please comment in the space below:

7. **What effects will our proposals have on people with protected characteristics, specifically on:**

    - age
    - disability
    - gender reassignment
    - marriage and civil partnership
    - pregnancy and maternity
    - race
    - religion or belief
    - sex
    - sexual orientation.

**How could we increase the positive effects or reduce the negative ones?**

Please comment in the space below:

Women, disabled people, older workers and those with care responsibilities may be more likely to seek part-time employment. We have previously raised concerns that the SCW registration process is more aligned with the idea of a full-time professional careworker and may not account for those who do undertake valuable work in the sector on either a part-time or a more casual basis. The reduction of CPD hours will be beneficial for part-time employees who have found the 90-hour requirement disproportionate to the number of hours that they are able to work. In itself, it does not completely address the question of the inclusion of part-time and casual staff in the registration process.