

## Consultation questions:

Please complete the questionnaire below or [online](#)

### 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
- ☐ owner of a setting providing care
- ☐ responsible individual
- ☐ employer of social care workers
- ☐ educational professional
- ☐ member of the public
- ☐ special school residential worker
- ☐ special school residential manager

☐ other – please describe below:

**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

☐ a special school residential service

☐ other – please describe below: professional association of homecare providers

Organisation name/type of work carried out:

The Homecare Association is a member-led professional association, with over 2,300 homecare provider members across the UK. Our members encompass the diversity of providers in the market: from small to large; predominantly state-funded to predominantly private-pay funded; generalist to specialist; live-in services to visiting services and from start-ups to mature businesses. Our purpose is to enable a strong, sustainable, innovative and person-led homecare sector to grow, representing and supporting members so that we can all live well at home and flourish in our communities.

## 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:

### Registration changes for social care managers

1. Do you agree with our proposal that social care workers who don't hold the recognised qualifications but do have sufficient managerial experience and are

enrolled to complete the level 4 and level 5 qualification within 3 years of registering, can register to be a social care manager?

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Yes

☐

No

2. Do you have any other comments:

We believe that this would be beneficial compared to the current situation.

It is not clear from the document whether it is just the requirement for a Level 3 qualification that is removed. For example, could someone who has a Level 4 qualification (but not a Level 2 or 3 qualification) register? If not, does this kind of scenario also need to be considered?

### Registration renewal for social care workers

3. Do you agree with our proposal that social care workers who were required to complete the level 2 or 3 qualification listed in the [qualification framework](#) within the first three-year period of registration, will now have up to six years (over two three-year periods of registration), to complete the qualification?

☒

Yes

☐

No

4. Do you have any other comments:

This change would be a positive step as completing the qualification within three years can be challenging for some workers, particularly where they work part-time; and given the pandemic related pressures over the last three years this has been exacerbated.

However, we also believe that this leaves a broader issue unresolved. That some of those working part-time or more casual work who make a vital contribution to the sector, don't see social care as their 'career'. They might be

working alongside another job, study, care responsibilities or retirement, for example. Some of those in these roles in the sector may not wish to continue if they have to undertake a level 3 qualification as this would be an additional requirement that would make working in other sectors more attractive.

We believe that there could be an additional tier of registration which would allow people to take on certain types of role with basic induction training – allowing the more casual part of the workforce to contribute; whilst allowing those who do wish to undertake level 3 qualifications to take on the work that would benefit more from a level 3 skill level.

### **Special school residential workers**

5. Do you agree with the proposal for special school residential workers to register using the qualifications listed?

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Yes

☐

No

6. Do you agree with our proposal for special school residential workers who don't hold one of the recognised qualifications to register using the employer assessment route?

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Yes

☐

No

7. Do you think the standards and expectations for workers set out in the residential childcare practice guidance are reasonable and achievable?

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Yes

☐

No

8. Do you have any other comments:

This isn't of direct relevance to our members, so we do not wish to comment at this time.

### **Special school residential managers**

9. Do you agree with the proposal for special school residential managers to register using the qualifications listed?

☐

Yes

☐

No

10. Do you agree with our proposal for special school residential workers who don't hold one of the recognised qualifications to register using the other registration routes?

☐

Yes

☐

No

11. Do you think the standards and expectations for managers set out in the practice guidance are reasonable and achievable?

☐

Yes

☐

No

12. Do you have any other comments:

This isn't of direct relevance to our members, so we do not wish to comment at this time.

## **Effects of our changes**

13. 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?

Others may be better placed to answer this question.

14. 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?

Older and disabled people, women and those with care responsibilities are more likely to be working part time. So, in so far as the proposals support people who work part-time they are likely to improve the situation for people with some of these protected characteristics. As mentioned above, we would like to see Social Care Wales go further to support people in these groups by considering an additional tier of registration.