



**UNISON Scotland response:
SSSC Consultation on
Expanding the Register**

April 2025

Introduction

UNISON is the trade union for all social work staff. We represent front-line workers in all areas of social work, all grades of staff, and all roles including social care workers, social work paraprofessionals, occupational therapists and administrative staff as well as qualified social workers.

This response reflects the views of UNISON social work paraprofessional members with whom we engaged in preparing it.

1. Scope

First, we would like to highlight the potential for the proposed job role to unintentionally draw into scope Occupational Therapy Assistants. This would be problematic from the point of view of the OT workforce and could cause unintended complications in terms of the planned National Social Work Agency (NSWA).

OTs, because of their separate registration arrangements with the Health and Care Professions Council (HCPC) are not in scope for the NSWA. Although it should be noted that UNISON believes OTs should be included. OT Assistants, meanwhile, are currently unregistered, but as they fit within the general remit of the proposed SWA role they are likely to be pulled into the Register expansion. From consultation with members working in local authorities we have learned that some OT Assistants are employed with a generic Social Work Assistant job role but working on Occupational Therapy tasks and assessments.

Two main unintended consequences could arise from this. First it would divide the local government OT workforce, part of which would be registered with the HCPC and the other with the SSSC. This division could subsequently also apply for NSWA purposes, with OT Assistants included in its scope, but OTs excluded. Another unintended consequence of this is that OT Assistants would be included in the workforce planning, training and CPD remit of the NSWA, which may not be entirely suitable or relevant to their posts and duties.

It is UNISON's view that OT Assistants should be included and that OTs, and Assistants, should be included in the scope of the NSWA.

Second, through our engagement with the earlier scoping work, we are aware that the term 'Social Work Assistant' is being used in this context to refer to the full range of social work paraprofessional roles such as family support workers, social care workers and throughcare workers. However, this is not made clear anywhere in the consultation materials. It would be unfortunate if this gives a misleading impression of the workforce in scope so limiting participation in the consultation.

2. Proposed job role & functions

At present in practice the distinction is unclear between the role of a qualified social worker and that of a paraprofessional. This is an issue across local government. Due to shortages of QSWs, the trend has been for an increasing amount of the QSW workload to be passed to paraprofessionals to carry out and for there to be increasing overlap between the roles, often described as ‘social work on the cheap’.

We believe this is an opportunity to resolve this situation. We do not think the current proposed job role & functions provide the clarity that is needed. Further work is needed to achieve this. It is vital this happens because the alternative is that, with the introduction of a qualification requirement and registered professional status, paraprofessionals will be regarded as qualified workers and, as such, expected to do even more, especially at a time when social work is under such huge pressure.

For this reason, it is also important that arrangements are put in place to monitor and enforce the distinction between the two roles, whether by the SSSC or the Care Inspectorate. We would like consideration to be given to this proposal and responded to in the report of the consultation.

View of the proposed job role

It is the clear view of social work paraprofessional members nationwide that the job profile doesn’t begin to approach the existing level of responsibility in their roles; neither the degree of independent working, the level of risk directly carried, or the extent of personal caseload management.

Regarding the proposed job role, our paraprofessional members particularly take issue with the statement that they are ‘likely to always work under the direct supervision and guidance of a qualified social worker and supervising manager.’ It is the common experience of paraprofessionals across many local authorities that they are supervised and work under the guidance of paraprofessional team leaders (seniors) with a qualified social worker only as a second or third tier line manager.

Paraprofessionals say they are directly responsible for conducting assessments, developing care plans and writing reports, working autonomously and with minimal supervision, rather than ‘contributing to’ and ‘under the supervision of’ QSWs. It is generally felt that paraprofessionals are required to work at the same level as a QSW, to the exclusion only of those statutory tasks that must only be carried out by a QSW.

Clarification of and enforcement of the role

It is imperative further work is carried out to clarify the distinction in practice between the paraprofessional role and the role of a QSW. For example:

- What does ‘contribute to’ mean in practice? What can’t SWAs do - write statutory reports, make risk assessments?
- What determines what cases a SWA can carry and what they can’t? At what point does a case need to be handed over to a QSW?
- Who is ultimately accountable for cases?
- What can SWAs expect in terms of professional supervision? How are social workers to be given protected time for this role?

Our concern is that unless these matters are addressed as part of this process, then the proposed job role and functions along with registered professional status is likely to exacerbate the existing situation in which paraprofessionals are vulnerable to being asked to undertake work that should be

done by a QSW, and with minimal supervision. In this context registration brings personal risks for paraprofessionals placed in vulnerable positions who will now be subject of a fitness to practice regime.

3. Proposed qualification requirements

The professional recognition achieved through registration comes with a training requirement. In some local authorities this requirement already exists, often following regrading. Paraprofessionals will need time and space to achieve these qualifications. Given the financial situation in local government, members are sceptical that the necessary time and resources will be allocated by employers to facilitate this.

The additional costs for employers to implement the proposals is acknowledged in the SSSC's Impact Assessment on Employers (pp26-27).

There must be a common set of requirements for employers to match those proposed for employees, and with the additional costs fully funded by national government. These common requirements should include not only the provision of support for achieving qualifications for the paraprofessional role but having in place a supported pathway for paraprofessional staff to achieve a social work qualification while working.

The Impact Assessment for Employers states there "will be a phased approach to the registration of the new Register groups to support employers to carry out workforce development activities and ensure their employees gain the necessary qualifications within the relevant timeframes." However, no assessment of the additional costs of workforce development or of providing employees with the support they need to gain qualifications, nor any common set of requirements/expectations for employers in relation to this. The variation between local government employers needs to be addressed, in terms of study time and other support provided to enable staff to achieve required qualifications while working.

Finally, jobs will need to be re-evaluated to take account of the qualification requirements and an assessment of the potential cost impact for local authorities as a result of this is needed.

Equalities impact

The Equalities Impact Assessment acknowledges the additional pressures and concerns that may be caused for workers. These are minimised with reference to the flexible approach taken by SSSC to support people to meet these conditions.

A key concern for many paraprofessional members is about the onerous time commitment over and above working hours to achieve the academic qualification, with an HNC potentially taking 2.5 years to achieve while working. They need clarification as to what types of flexibility or support will be provided that takes account of their protected characteristics and/or personal circumstances.

Age: There are concerns from staff approaching retirement. The EqIA says a flexible approach will be taken to support people ... therefore we do not believe this proposal will disproportionately impact on people based on age." What approach will be taken to older workers approaching retirement?

Sex: Concerns about the time pressures created by the qualification requirements have been raised with us by female paraprofessional workers who are lone parents, have family/care commitments, or are part-time staff with other employment or care commitments. It is surprising that based on scoping work the EqIA registers no likely impact on women workers. The anticipated negative impacts are expressed in these comments from paraprofessional members.

“I am a mother, a carer and work part time as a SWA. I would absolutely need appropriate time and funding to undertake any necessary qualifications. In the past my council has not supported staff with time or funding.”

“I had to study every weekend then work all week. But that was before I became a parent and carer. I am not prepared to take that on again.”

4. Proposed CPL requirements

We want to flag again the issue that could potentially arise if OT Assistants are drawn into the scope of the SWA job role and required to be SSSC registered. There is potential for them to find themselves subject to training and learning pathways which might not be relevant to their posts and duties.

Unless the CPL requirements are relevant and meaningful they can lead to workers feeling that they are doing training to meet the requirements rather than because the training is helping them develop to provide the best quality service, which is the experience of many social workers.

5. Proposed registration fee

UNISON would expect local government employers to meet the cost of registration for this group.

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