National Carer Organisations response to: Proposed changes to SSSC registration requirement

Introduction

The National Carer Organisations welcome the opportunity to submit a response to Scottish Government's consultation on *Proposed changes to SSSC registration requirement.*

The National Carer Organisations are Carers Trust Scotland, Carers Scotland, the Coalition of Carers in Scotland, MECOPP, Shared Care Scotland, and the Scottish Young Carers Services Alliance.

Together we have a shared vision that all of Scotland's unpaid carers will feel valued, included and supported as equal partners in the provision of care. The National Carer Organisations aim to achieve this through the representation of unpaid carers and amplifying their voices at a national level.

We believe we can deliver more for unpaid carers by working together to share our knowledge and experience, and by focusing our collective efforts on achieving improvements in areas of policy and practice that are of greatest concern to unpaid carers.

Consultation questions and response

Question 1: *Do you agree that the support workers, practitioners and supervisors within an adult day care service in Scotland should be subject to registration with the SSSC?*

Strongly agree

For unpaid carers and those they care for, adult day care services are a crucial support mechanism. Unpaid carers expect the highest standards of service in adult day care.

Many unpaid carers have expressed concerns regarding support services including day care services. According to the 2025 State of Caring report, 42% of unpaid carers did not utilise social care services including day care services, and 24% of

unpaid carers expressed dissatisfaction with the standard of care in these services[1]. For unpaid carers from minority ethnic communities, there are also often trust issues, with 76% of minority ethnic unpaid carers taking part in MECOPP research stating they do not use day care services[2].

The impact of caring can be significant and adult day care services are crucial in mitigating against certain impacts from caring, including both financial and health impacts.

Regarding the financial impact, with 48% of unpaid carers cutting back on essentials such as food and heating to make ends meet[3]. Unpaid carers from minority ethnic communities also face significant poverty, with 45% reporting household incomes of below £20,000[4]. Many unpaid carers would like to see social care charging scrapped.

In terms of health impacts, the State of Caring Report shows that 30% of unpaid carers face bad or very bad physical health and 36% face bad or very bad mental health[5]. The impact increases for unpaid carers who provide more hours of unpaid care, demonstrating the importance of services such as adult day care.

By taking an approach that strengthens the standards of service in day care services, this would improve the experiences of both unpaid carers as well as those they care for. Furthermore, it would improve the levels of trust with those services. This could improve uptake of these services which would allow unpaid carers greater opportunities to improve their own outcomes, including in health and finances.

Question 2: *Do you agree that practitioners, supervisors and managers within an offender accommodation service in Scotland should be subject to registration with the SSSC?*

N/A

Question 3: *Do you agree that social work assistants working in Scotland should be subject to registration with the SSSC?*

Strongly Agree.

As social work assistants are a key role within social work teams, ensuring they meet the SSSC standards will be welcomed by unpaid carers and those they care for. By

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[1] Carers Scotland (2025), 'State of Caring: The Cost of Caring in Scotland in 2025', https://www.carersuk.org/media/yqzk0fjv/state-of-caring-the-cost-of-caring-in-scotland-2025-web-version.pdf

[2] MECOPP (2025), 'Where are we now? Health and wellbeing experiences and supports for black and minority ethnic unpaid carers in Scotland', https://static1.squarespace.com/static/62f4f5fa696d570e19a69429/t/6840290194637d51ee04df14/1749035267474/Where+Are+We+Now.pdf

[3] Carers Scotland (2025), 'State of Caring: The Cost of Caring in Scotland in 2025'.

[4] MECOPP (2025), 'Where are we now? Health and wellbeing experiences and supports for black and minority ethnic unpaid carers in Scotland'.

[5] Carers Scotland (2025), 'State of Caring: The Cost of Caring in Scotland in 2025'.

meeting the standards expected through SSSC registration, this could improve trust in social work and also lead to improved service provision.

Question 4: *Do you agree that all social workers who are employed in Scotland should be required to register with the SSSC?*

Strongly Agree.

We would support all social workers in Scotland being registered with the one body, and it makes sense to move towards this as a national standard. For unpaid carers in Scotland, in particular, this will be welcome as it will reduce any potential complications. For instance, as all social workers will be SSSC registered, if unpaid carers need to raise complaints/concerns, this will ensure they are investigated by one body in Scotland, and lead to trust that they are dealt with appropriately within Scotland. We would argue that it is important to also reduce bureaucracy to ensxure clearer pathways to raising complaints and engaging with complex processes.

Question 5: *Do you agree that references made within the Regulation of Care (Social Service Workers) (Scotland) Order 2024 to the 'General Teaching Council for England' and the 'General Teaching Council for Wales' are removed and updated respectively, to reflect current position?*

Strongly Agree.

Question 6*: Please provide any further comments on the proposals set out in this consultation in the box below.*

While the National Carer Organisations support the changes being brought forward, it is also important that alongside increasing registration requirements, there remains a continuing focus in improving social work and social care standards across Scotland, particularly in relation to supporting unpaid carers. It must not be the case that increased numbers of registration leads to decreased standards, and we would argue that this could be an opportunity to make improvements.

Research by MECOPP of unpaid carers from minority ethnic communities raised concerns around social work[6]. Comments included:

"The social worker comes, checks on my mum, but they never ask me how I'm coping. It's like I'm just the interpreter or something. I wish they'd see me too. I'm struggling sometimes." – A female African unpaid carer

"They assume we'll manage because we're a big family. But that doesn't mean we don't need support. We just don't always ask for it." – A female African unpaid carer

"They [services] come with their own plan and don't really involve me. As his mother and carer, I know him best, but I often feel sidelined. It's frustrating. I end up feeling the service is more a stress than help." – A female Pakistani unpaid carer

[6] MECOPP (2025), 'Where are we now?'.

"I felt if I was a white Scottish carer, they might not question me as much or dismiss my concerns. It's subtle, but it's there." – A female Indo-Caribbean unpaid carer

As the above quotes suggest, for too many unpaid carers currently dealing with social work and social care services, there are concerns about lack of support, not being valued and in some cases, discrimination. This can reduce trust in social work services with unpaid carers which can lead to lower uptake of support services.

Increasing registration requirements will take steps to improve standards across greater numbers of staff across Scotland, but this opportunity must also be utilised to improve the standards of everyone involved in social work.

Submitted by James Calder, MECOPP, on behalf of the National Carer Organisations.

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