



THE DONALDSON TRUST

Response to consultation on proposal to expand the
Scottish Social Services Council (SSSC) Register to include
adult day care service workers.

April 2025

About Neurodiversity

Neurodiversity describes the diversity of humans' brains and minds. A person who is, for example, autistic is neurodivergent; they are in the neuro-minority, not the neuro-'typical' majority.

Other neurodivergences include: ADHD, dyscalculia, dyspraxia, dyslexia, dysgraphia, misophonia, Tourette's Syndrome, or differences in cognitive function.

About Us

Our work is built on an understanding that neurodiversity is not a medical construct; rather, it lies at the intersection of culture, mind, identity formation, and socio-political action.

The Donaldson Trust envisages a society in which neurodivergent people are understood, accepted, treated fairly, and valued.

Though there is much work to be done, we believe there are genuine opportunities to change society for the better. We aim to be at the forefront of driving that change – and making a difference *with and for* neurodivergent people and their families.

As the *National Body for Neurodiversity*, we will seek to lead by example. We exist to strengthen the public's understanding of neurodiversity, develop excellence in practice, and help neurodivergent people find their voice.

Alongside neurodivergent people and our partners across the third sector and academia, we write, campaign, and persuade in order to shape the policies being made on the issues most important to neurodivergent people and families.

We improve outcomes and representation via *Connect*. Our training and consultancy is accessed by organisations looking to build a culture of neuro-inclusion. We continue to develop our free, online information, support, and guidance resources to neurodivergent people, families, and professionals alongside it.

We continue to support children, young people, and adults through a variety of services based at our Linlithgow campus, where we enable every neurodivergent person to realise their goals & aspirations:

- **Sensational Learning Centre (SLC)**

We offer individualised, skills-based learning to young people with Additional Support Needs, including sensory / communication differences, at our Grant-Aided Special School.

- **Vibe**

Our wellbeing service for neurodivergent people ages 12-18, Vibe offers warm, low arousal spaces for neurodivergent young people to thrive and achieve their personal goals. The service focuses on reducing anxiety, developing life skills, literacy, numeracy, and growing self-esteem / resilience.

Vibe's activities mirror the interests and skills of the young people enrolled with a wellbeing framework and personal programme of skills development.

- **Gate**

Donaldson's skills development and training offer for neurodivergent adults, Gate has been co-designed with those who benefit from it and offers a friendly environment where neurodivergent adults can relax and be themselves. Similar to other services, Gate takes an individualised approach to ensure trainees get the most from their time with us and achieve agreed goals and ambitions.

Trainees can learn skills through activities, or enrol in a vocational and accredited course, delivered by specialist staff / tutors. This includes art, cooking, and cybersecurity.

- **Treehouse**

Treehouse is a specialist wellbeing service offering bespoke, low-arousal environments to improve wellbeing and independence. Support is centred around individual studios, with the 'home-style' settings offering individualised spaces tailored to every person's needs. That allows people we support to participate in activities they co-design alongside their Wellbeing Practitioners.

--

Established in the 1850's, The Donaldson Trust (formerly Donaldson's School) has provided supported education and care throughout its history and has now established itself in the neurodivergence space.

The full range of services offered by the Trust is found here:

<https://www.donaldsons.org.uk/>

**Together, we'll
find your *voice*.**

Overview

The Donaldson Trust welcomes the Scottish Social Services Council's (SSSC) ongoing engagement with the care sector on Register reforms. As a provider of social services for neurodivergent adults (through our skills development-focused *Gate* and *Treehouse* services) we maintain an interest in one of the three proposed additional categories of registrant.

We **support** the inclusion of adult day care service employees on the SSSC's Register, in principle; however, it is vital the sector is appropriately supported (financially, and with clear guidance on SCQF qualifications and Continuous Professional Learning [CPL]) to ensure delivery of the change.

This inclusion is an important step for ensuring parity between the important roles and responsibilities taken on by both non-residential and residential / support at home provision and, if implemented correctly, will act to promote the value of day services across Scotland.

The administrative and financial burdens of implementation will, regardless of support available, be significant; however, we are keen to see this change progressed in the coming years, given the positive impact it will have on the social care workforce, professional development, and opportunities to retain a skilled workforce for the long-term.

Role Description

Extending the Worker-Practitioner-Supervisor groups already in place for all existing adult care registrants to adult day service may provide some clarity and consistency for these new registrants and for providers / charities where most social care employees do not currently require SSSC registration.

This being said, we believe adjusting the description of role and functions for Practitioner and Supervisor will help to distinguish these categories from one another, especially as an adult day Manager will already be SSSC registered and will (or should) sit in the same structure. This will be especially important

for organisations with smaller teams and ‘flatter’ management, where team leaders and practitioners are the direct reports of registered Managers.

Alternatively, the Practitioner and Supervisor categories could be merged in to one, similar to those working with children & young people. Though having these categories aligned with other adult services would be ideal, we believe having two, rather than three, types of registration should be prioritised.

In the event that these proposals are taken forward, the SSSC should publish guidance clearly outlining the relationship between existing SSSC registered service management and the newly-created categories, including rationale for required qualifications and fee levels.

Qualifications

While we support the proposed practice and supervisory qualifications (and alignment with existing registrants on both) we remain concerned about the financial, logistical, and administrative impact of these requirements for our own organisation and, we would anticipate, others – particularly in the third sector. The principle of setting an academic and practical standard that the workforce must reach is sound; however, a substantial investment is needed to see the policy come to fruition on a reasonable timescale.

The proposed changes are likely to have a substantive impact on our charity financially. This will be seen in both the necessary investments in Colleagues’ qualifications (where this applies) and in offering support to new employees such that we are able to recruit in a competitive market. One mitigation that would help to reduce the short-term impact of large numbers of employees enrolled at once (in cases where the employer takes on the costs) would be an option to split said amount over several years.

As well as the direct cost of funding courses, the indirect impact of backfilling a post held by those enrolled part-time in college would see providers – and especially charities, likely with a limited staff pool already – having to recruit additional staff on a temporary basis to cover. This would have an NI impact

on smaller providers that would amplify the impact of recent changes to the thresholds of this tax.

Given the blanket approach and substantial costs of qualifications, financial assistance for implementation of the policy (in particular, for charities rather than for-profit providers) is absolutely vital. The Scottish Government should work with charities providing adult day care, and the workforce, on preparing a package that maintains the positions of charitable providers in the market and ensures adult day care will remain an attractive proposition to potential employees – especially those who do not hold qualifications currently.

It is not clear if every Scottish college offering the relevant qualifications has the student roll capacity to meet the significant upticks in demand that their sector will see if adult day care workers are added onto this Register. Scottish Government and SSSC should take forward a programme of work looking to establish overall delivery capacity of the Scottish further education sector in respect of social care.

--

In instances where a worker holds a qualification (though not a role) placing them into a particular category of registrant, it is not immediately obvious a worker will not pay the fees associated with a more senior category, and that the fees paid are role-dependent instead. This should be made clear in SSSC guidance.

Clarity is needed on the 'grace period' for compliance. During workshops ran as part of this consultation phase, there was discussion on the time that the providers would be given to ensure that existing staff members were holding the appropriate qualifications for their role. Speculation was that there could be around three years given (from confirmation of a Register change to the deadline) to deliver. The SSSC should confirm later this year what the end of the grace period is.

CPL

The Donaldson Trust believes that a skilled workforce is essential for delivery of high-quality social care services, perhaps more than any other factor. As part of existing CPL, we continue to offer professional learning resources and opportunities relevant for social care to each service-based Colleague. That includes 17 Colleagues delivering our adult day care offers. SSSC registration would intensify this drive toward up-skilling our workforce.

Similar to other themes in this consultation, we are supportive of alignments with existing registrants in broadly similar roles. This being said, and though the quality and breadth of CPL offered is encouraging, we believe change to the SSSC's online portal for learning is necessary. Greater clarity on what the differences are between 'core', mandatory, and suggested (particularly the differences between the first two) and on how to record would be beneficial, especially given some registrants will be making use of the portal for the first time in their career. If the proposed changes to the Register are accepted, a priority of the SSSC should be a pro-active engagement with new registrants on CPL, including through workshops and visits, offering advice on CPL most suited to their role.

The opportunity to integrate recording for SSSC-related CPL into our existing learning regime is welcome. As well as lowering the administrative burden of recording, that will allow the Trust's Learning & Development Advisor to align the learning we currently offer to adult day service-based Colleagues to the SSSC requirements.

We know that neurodivergent people – especially those with a co-occurring learning disability – are more likely to access a social service, including day services; therefore, it would be appropriate for modules related to inclusion for this group to form part of CPL for all workers in the sector. Though Scottish Government officials are progressing this as part of ongoing work around a *Learning Disabilities, Autism and Neurodivergence Bill*, SSSC could work with people with lived experience and charities to develop resources about neuro inclusion in the social care sector.

Fees

We note fee increases for the rest of the decade were agreed earlier in 2025, and exceed current inflation levels. Any post-2030 increase for these groups should approximate inflation and set, following consultation, annually.

We would support the implementation of fees at the proposed levels in each of the registration categories currently proposed. The increases proposed in respect of existing registrants should be replicated at the same level for the adult day workforce. Parity between registrant groups is important, and time spent registered should not influence the fee structures, nor should the types of care provided. The SSSC should look to keep percentage increases in fees consistent between both types of service and level of roles, too, when it is the time to review fees again in 2030 >.

Given the similarities, in our opinion, of the role description of the Practitioner and Supervisor (in comparison with Support Workers or registered Manager) it is correct that the fees for these two categories be the same.

The SSSC should produce promotional material publicising to the social care workforce the tax relief that is available to them.



THE
DONALDSON
TRUST

Contact:

Address: The Donaldson Trust, Preston Road, Linlithgow, West Lothian,
EH49 6HZ

Phone: 01506 841900

Email: info@donaldsons.org.uk