



## **Apprenticeship levy: Employer owned apprenticeship training (October 2015)**

This response is from the Scottish Social Services Council (SSSC). The SSSC is a Non Departmental Public Body (NDPB) and was established by the Regulation of Care (Scotland) Act 2001. We are responsible for registering people who work in social services, regulating their education and training and the collation and publication of data on the size and nature of the sector's workforce. We are also the Scottish partner in Skills for Care and Development, the Sector Skills Council for the care sector in the UK.

Our work increases the protection of people who use services by ensuring that the workforce is properly trained, appropriately qualified and effectively regulated. We aim to protect people who use services, raise standards of practice, strengthen and support the professionalism of the workforce and improve the outcomes and experience of people who use social services. The social service workforce provides care and support for some of the most vulnerable people in Scottish society. The sector employs approximately 200,000 people<sup>1</sup> in Scotland (SSSC, 2015). These workers deal with complex care needs and make a real difference to peoples' lives. As of September 2015 we have registered approximately 90,000 social service workers. By 2020 approximately 63% of the social service workforce will be registered with and regulated by the SSSC (Scottish Government, 2015).

The SSSC's vision is that our work means the people of Scotland can count on a trusted, skilled and confident social service workforce. Our purpose is to raise standards and protect the public through regulation, innovation and continuous improvement in workforce planning and development for the social service workforce.

The SSSC has a number of concerns about the proposals set out within the consultation paper on the skills levy. The first of these regards what appears to be a lack of clarity within the paper about the scope of the levy. For example the consultation paper states that the skills levy, "...will be collected from larger employers, both public and private, in the UK." (p7). On that same page the paper refers to engineering and construction as being the two sectors for which a UK-wide skills levy already exists. However, on p11 in its discussion of employers it focuses on those "operating across the UK" but in particular on their "England operations". It makes no reference to larger employers that don't operate in England. As a result, it is not clear to us from these statements if the levy is intended as being on all larger employers wherever they operate in the

---

<sup>1</sup> There are a number of groups of workers not captured by this data. These include childminding assistants and personal assistants employed by individuals in receipt of a direct payment (Scottish Government, 2015).

UK or only those larger employers who operate in England (but who may also operate in one or more of the devolved nations).

If it is the former (i.e. it applies to all larger employers whether they operate in England or not) then the lack of clarity regarding how the monies would be used within the devolved administrations is concerning. Not least it makes it difficult to provide informed comment on the proposal. In addition, we would have concerns about the impact of the levy on the existing system of modern apprenticeships in Scotland which we feel works reasonably well for employers in our sector.

If it is the latter (i.e. it applies only to those larger employers operating in England but who may also operate in one or more of the devolved nations) then the above concerns disappear. However, a separate concern arises regarding the possible impact on those employers' operations within the devolved nations. There are a number of larger employers that provide care services in Scotland that also provide similar services in England. We believe that any levy on such employers must be applied proportionately and as such should only apply to the workforce they employ for their England operations. One implication of this is that the definition of "larger employer" must be based on the numbers of staff employed to operate in England and should not include data on those not working in England. Failure to do this could undermine the operations of such employers in the devolved nations in particular the ability of those employers to provide or obtain the training that their staff need.

Scottish Social Services Council  
October 2015