



THE DONALDSON TRUST

Response to the Scottish Government consultation on proposed changes to Scottish Social Services Council (SSSC) requirements on registration.

September 2026

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

The Donaldson Trust envisages a society in which neurodivergent people are understood, accepted, treated fairly and valued. As the National Body for Neurodiversity, we will seek to lead by example. We exist to strengthen understanding of neurodiversity, develop excellence in practice, and help neurodivergent people find their voice.

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 this change – and making a difference with and for neurodivergent people.

Alongside neurodivergent people and our partners, we look to shape the policies being made on issues most important to neurodivergent people and families.

We improve outcomes and representation via Connect; our training and consultancy offer. Connect is accessed by organisations looking to increase their knowledge around neurodivergence, support neurodivergent colleagues, and embed neuro-inclusive cultures.

We support neurodivergent children, young people and adults in services based at our Linlithgow campus, where we offer space and support needed to help them to realise their own goals and aspirations:

- **Sensational Learning Centre (SLC)**

We provide Individualised, skills-based learning (with a focus on laying a foundation of good wellbeing and communication) to young people with Additional Support Needs, including sensory and social-communicatory differences, at our Grant-Aided Special School.

- **Vibe**

Our wellbeing service for neurodivergent people ages 12-18 not in full-time mainstream education, Vibe focuses on reducing anxiety, developing life skills, and growing self-esteem and resilience. The low-arousal spaces enable young people to thrive and achieve personal goals, enabling them to re-engage with learning opportunities. Vibe's activities mirror the interests and skills of the young people enrolled, built within an evidenced wellbeing framework.

- **Gate**

A 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. Like our other services, Gate takes an individualised approach to ensure trainees achieve agreed goals and ambitions, often through a wide range of vocational / accredited courses.

- **Treehouse**

Treehouse has a focus on developing communication skills, offering bespoke, low-arousal environments that enabled improved wellbeing and greater independence. A practitioner works with the supported person to tailor activities to interests and needs.

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Having been founded in the 1850's, The Donaldson Trust has provided education and care throughout its history – and has now established itself in the neurodivergence space.

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



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The Governors of The Donaldson Trust is a registered charity in Scotland, number SC017417.

Overview

In April 2025, The Donaldson Trust responded to the Scottish Social Services Council's (SSSC) consultation on 'New Registered Groups'. Our feedback was focused on the proposed inclusion of 'adult day care service employees' on the SSSC's Register. This reflects our service provision; we offer skills development-focused day services for neurodivergent adults.

Our response on this Scottish Government consultation reflects what we shared previously with the SSSC.

Q1 –

Registration of support workers, practitioners, and supervisors in adult day care service in Scotland

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.

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 our skilled colleagues long-term.

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.

While we support the proposed practice and supervisory qualifications set out by SSSC in 2025, 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, substantial investment is needed to see this policy come in successfully.

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 a qualification 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.

Q6 –

Additional Comments

We appreciate that responsibility for implementation of the changes rests with SSSC; however, we believe it important to restate the comments that we made in our 2025 submission.

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Role Descriptions

Adjusting the description of role and function for Practitioner and Supervisor can help to distinguish these two 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 a team leader or practitioner is a direct report of that service's registered Manager.

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.

The SSSC should publish guidance clearly outlining the relationship between current SSSC registered service management and new categories, including the rationale for the required qualifications and fee levels.

Financial Impact

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 them 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.

'Grace Period'

Clarity is needed on the 'grace period' for compliance. During workshops ran as part of the SSSC consultation phase, there was discussion that a provider would be given time to ensure that existing staff members were holding the appropriate qualifications for their role. Speculation was that there could be three years allowed (from confirmation of Register changes to the deadline) to deliver.

Learning

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.

Fees

We note that fee increases agreed last year exceed current inflation. A post-2030 rise should approximate inflation and be set, following a 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.



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