Care England submission

Earlier this month, Care England submitted its evidence to the Migration Advisory Committee. Please see below for some of the main arguments which Care England stated in its submission to the independent inquiry on future immigration policy. In particular, the inquiry is focused upon the future introduction of salary thresholds, as well as, an 'Australian' style points-based system. To see the full details of the enquiries remit, click the following link:

See below for the main extracts of Care England's response:

1. ***Do the businesses you engage with most commonly think that having a minimum salary requirement of £30,000 for an experienced full-time employee is:***

- *This is fundamentally unworkable for our sector, for example, Skills for Care's 2019 report found the following average annual salary Senior Care Workers was: £23,700 in local authority run homes and £17,600 in the independent sector. Thus, the proposed salary threshold could exacerbate the already high vacancy rates which we see around senior social care workers (5.7%).*
- *Moreover, our sectors ability to adjust wages in order to meet such thresholds is extremely limited by the current underfunding which characterises the social care sector. One member from our 2019 MAC consultation survey said the following: Any future immigration policy needs to reflect upon the specific wage realities of the social care sector in particular – considering that it is in fact very different from other sectors.*
- *Moreover, the problems associated with this high salary threshold may be made even more acute by less immigration from the European Union post Britain withdrawing from the European*

Union. Currently, 8% of the social care workforce comes from are non-British European Economic Area workers.

- *Such an arbitrary line (without being adapted for specific sectors) would prove inflexible and potentially damaging for the social care sectors ability to recruit workers.*

Similarly, our members concur, saying:

- *"The threshold of £30,000 would impinge on our ability to do this and would affect our ability to provide our services. We pay the Real Living Wage and offer a competitive package of benefits, but it is still hard to compete with other large employers, such as retailers, who can offer competitive wages."*
- *"We are worried that the Government post-Brexit immigration plans currently prioritise 'high-skilled' workers and that the government's definition of 'high-skilled' appears to be largely based on salary. In practice, a salary threshold of £30,000 will exclude a range of skilled health and social care workers"*

2. Are there any other issues we should consider? (In regard to salary threshold)

- *Firstly, the MAC should consider the inherent fragility of the care market and the potential for even minimal changes in immigration to destabilise it even further. For example, a 2018 Sector Pulse Check report found that 68% of providers envisaged having to close some parts of their organisation soon. In feedback to our 2019 MAC consultation survey, one provider said that if future immigration policy lessens providers ability to recruit "will worsen the direct impact on the company and the people we support."*
- *In addition, we obviously welcome the fact that Nursing has been added to the Shortage Occupation List and support it continuing to be on it. However, we suggest that government could mould such policies in a way that incentivises overseas nurses to join the adult social care sector once in England.*

- *Care workers are of fundamental importance to the United Kingdom's economic and social sustainability. We believe, that such occupations should be added to the Shortage Occupation List. This is accentuated by the fact that the adult social care sectors vacancy rate rose by 2.3 percentage points since 2012/13.*
- *In 2019, Skills for Care estimated that 7.8% of roles in adult social care were vacant. Changes to the immigration system which reduce the flow of migrants could compound such issues. Especially, when one considers the fact that in some parts of England 38% of the social care is made up of non-British nationals.*

3. ***In response to their question on what we believe should be considered in the event of introducing an 'Australian' points-based system, we said:***

- *Member feedback – The requirement to staff the social care sector is so acute that any form of filtering out of potential workers for issues other than legal/criminal would be counter-productive.*
- *Thus, any imposition of such a system must consider its capacity to destabilise the adult social care system and the workforce crisis that already enraptures it.*
- *The importance of workers to the future sustainability of the United Kingdom's society should be taken account, including, a consideration of the importance of migrant workers in contributing to the future sustainability of the adult social care sector. A sector which is of fundamental importance in caring for some of societies must vulnerable.*
- *Member feedback - We are worried that the point-based system will only focus on workers with a qualification above A-Levels (RQF 3-5 level) which the Government calls "high-skilled workers. While policy makers describe workers with a qualification below this level as being 'low skilled', we want to emphasise that these workers fulfil jobs which do not need an A-level equivalent education and which require significant 'soft skills' with factors such as empathy and attitudes to older people. These skills are crucial when hiring staff***.**

Members should bear in mind that the questionnaire itself was word count restricted and therefore Care England's policy team had to narrow the scope of some aspects of its submission.

Care England Press Release:

In addition, please see below for Care England's Press Release on the Migration Advisory Committee:

Workforce is our Most Important Resource

Care England, the largest representative body for independent providers of adult social care, has submitted evidence to the Migration Advisory Committee regarding its review of the salary threshold and points-based system.

Professor Martin Green OBE, Chief Executive of Care England, says:

"Social care staff are our most precious and important resource. Recruitment and retention of social care staff is a huge challenge which could be further exacerbated by the proposed rise in salary threshold. The sector's ability to adjust to such thresholds is extremely limited by the current underfunding which characterises the social care sector".

The Migration Advisory Committee (MAC) is an independent body that advises the government on migration issues. In its submission, Care England has suggested that any future immigration policy needs to reflect that we need a steady flow of immigrant workers to fill social care vacancies. The Care England 2019 conference and exhibition taking place next week will shine a spotlight on the social care workforce and the steps it's taking to meet the challenges of effective delivery in today's economic climate.

http://www.careengland.org.uk/care-england-conference-and-exhibition

Martin Green continues:

"We must not forget that care workers are front line staff and we simply cannot afford to do without them. They, together with Nursing Associates, must be added to the Shortage Occupation List as soon as possible".

Care England has urged the MAC to consider the inherent fragility of the care market and the potential for even minimal changes in immigration to destabilise it even further.

If you have any questions regarding Care England's response to the MAC, please email the following address: RWilliams@careengland.org.uk