

## **Independent Age response to Migration Advisory Committee (MAC) Consultation on Salary threshold and points-based system (PBS)**

November 2019

### **About this submission**

Independent Age welcomes the opportunity to feed into this consultation. We are submitting in our capacity as a charity representing the interests of older people rather than as an employer and so we have opted to submit separate evidence, not through the online question form. Our submission focuses on the impact of the salary threshold proposals on the social care workforce.

### **Context**

The UK's ageing population means that demand – both current actual demand and potential additional demand – for social care is increasing. Projections from Skills for Care show that an increase of over half a million adult social care jobs (580,000 jobs, an increase of 36%) would be required by 2035 to meet the needs of the number of people aged 65+ by this time in England (projected at 14.1 million people).<sup>i</sup>

At the same time, nearly 8% of roles in adult social care are currently vacant, equivalent to 122,000 vacancies at any one time.<sup>ii</sup> This is an increase in vacancies of 2.3 per cent between 2012/13 and 2018/19.

Currently, around 8% of the social care workforce (115,000 jobs) have an EU nationality and 9% (134,000 jobs) have a non-EU nationality. **The adult social care sector therefore has, and will continue to have, a reliance on immigration to fill vacant posts.**

The Migration Advisory Committee acknowledged in its previous report that while it was 'seriously concerned' about social care, this sector 'needs a policy wider than just migration to fix its many problems'.<sup>iii</sup> We would absolutely agree that challenges in the social care workforce around low pay, low status and poor opportunities for progression are longstanding and go far beyond issues around migration. And as the National Audit Office and others have highlighted, the lack of any updated workforce strategy for adult social care from the Department remains a significant omission. However, no strategy to tackle workforce shortages will offer a quick solution to supply issues. For example, the recent communication campaign to increase domestic recruitment, even if highly successful, will take time to have an impact. **In the short term, restrictions on the immigration of social care workers as outlined in current proposals will have a significant detrimental impact on a sector that is already in a fragile state.**

### **Impact of a £30,000 salary threshold on care workforce**

Social care is historically low-paid work. Social care was defined as a low-paying industry by the Low Pay Commission every year since 1998 up until the 'Low Pay Commission report 2018', using data from the Annual Survey of Hours and Earnings.<sup>iv</sup>

The average salary for a full-time care worker in England is around £19,000. **Calculations by the King's Fund show that 90% of social care workers would not qualify for a permanent work visa under the proposed immigration reforms, as they earn less than the proposed salary threshold of £30,000.<sup>v</sup>**

In addition, a quarter (24%) of the social care workforce is recorded as being employed on zero-hours contracts (370,000 jobs).<sup>vi</sup> Domiciliary care services have the highest proportion of workers employed on zero-hours contracts, especially among care workers (58%). Workers in this situation may struggle to work enough hours to meet any salary threshold.

### **Impact of an inadequate social care workforce**

The impact of social care support for older people cannot be underestimated. Experienced social care workers provide the most intimate of care, helping people to wash, dress and go to the toilet. They provide safety, dignity and support – often at the most vulnerable time of people’s lives.

Unmet need is a significant and growing issue that will be exacerbated by workforce shortages. Recent NHS Digital figures show that while demand for adult social care is increasing, with more than 5,425 requests for support to councils each day, access is declining: the number of people with social care needs receiving long-term care in England has fallen every year since 2015/16 (with this decline particularly driven by a drop in access amongst those aged 65 and over).<sup>vii</sup>

An inadequate social care workforce will also increase costs for the health service. We already see this in relation to unnecessary hospital stays. In 2018/19, the most common reason for delayed transfers of care (21% of delays) was that the patient was awaiting a care package in their own home.<sup>viii</sup> NHS Employers in its own response to this consultation made clear its view that ‘if the future immigration system does not allow social care employers to attract and recruit from overseas, it will be at the detriment of the NHS, impeding patient flow and adding further strain to services and staff.’<sup>ix</sup>

### **Our recommendation**

Taking these points together, we are concerned that a poorly designed migration system could significantly damage the already fragile adult social care sector.

**Independent Age therefore recommends that social care workers be exempt from minimum salary thresholds set out in MAC’s consultation, so that there remains a route for employers to recruit to the social care workforce from overseas.**

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<sup>i</sup> Skills for Care, 2019

<sup>ii</sup> Skills for Care, 2019

<sup>iii</sup> MAC, EEA migration in the UK: Final report, 2018

<sup>iv</sup> Skills for Care, 2019

<sup>v</sup> King’s Fund, 2019

<sup>vi</sup> Skills for Care, 2019

<sup>vii</sup> NHS Digital, 2019

<sup>viii</sup> NHS England, 2019

<sup>ix</sup> NHS Employers, 2019