

NSPCC Cymru/Wales

Response to:

**Linking the Continuing Professional Education and Learning
(CPEL) Framework and Registration as a Social Worker**

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NSPCC Cymru/Wales, Diane Englehardt House, Treglown Court,
Dowlais Road, Cardiff, CF24 5LQ

Tel: 02920 108 081 Email: Vivienne.Laing@nspcc.org.uk



About us:

The National Society for the Prevention of Cruelty to Children (NSPCC) aims to end cruelty to children in the UK by fighting for their rights, listening to them, helping them and making them safe.

We share our experience with governments and organisations working with children so together we improve the protection of children and we challenge those who will not learn and change. We campaign for better laws and we educate and inform the public to improve understanding about child abuse.

We provide national services such as ChildLine and our Helpline for concerned adults to enhance support for all children. Our local services focus on the most acute forms of abuse and the groups of children who are most vulnerable to abuse, providing help, advice and treatment to children at risk or those who have been abused.

Introduction

The NSPCC welcomes the opportunity to comment on the proposed linking of the Continuing Professional Education and Learning (CPEL) Framework and registration as a Social worker in Wales.

The NSPCC in Wales currently employs 47 Social Workers¹; 35 who work in front-line roles delivering services; 9 in management posts; and 3 in training, consultancy and research. Working alongside our Social Work staff we also have midwives, counsellors, former probation officers and play therapists.

Our practitioners deliver services to vulnerable children/young people and their families in three Service Centres across Wales in Cardiff, Swansea and Prestatyn. The NSPCC Strategy to 2016 has identifies the following priority themes:

- Sexual abuse
- Neglect
- Physical abuse in high risk families
- Children under one
- Looked After Children (LAC)
- Minority Ethnic Children (MEC)
- Disabled children
- Online exploitation and safeguarding

The NSPCC is an independent charity that works to improve the safeguarding and protection of children from abuse and neglect. The Children Act 1989 gives the NSPCC the power to make certain applications to the family court to safeguard the welfare of children at risk of significant harm. The NSPCC is the only charitable organisation with this power in England and Wales (we also have similar powers in Northern Ireland).

¹ Our Social Workers are spread over three service centres: (i) 18 in Cardiff (four in management roles and two in consultation and research roles); (ii) 9 in Prestatyn (two in management roles); (iii) 15 in Swansea (three in management roles and one in a training role).

Question 1 – Do you agree that creating a link between the CPEL Framework and registration as a Social Worker will contribute to improvements in Social Work practice (see part 2 of the consultation)?

NO - The NSPCC does not support the linking of CPEL Framework to registration on the Social Care Workers Register for the following reasons:

- Registration should be about fitness to practice and there are multiple ways of demonstrating this, it should not just be restricted to CPEL.
- We are concerned that failure to complete CPEL may result in deregistration even when there are no concerns about a professionals practice.
- We would urge the Care Council to consider how the diversity of the Social Work profession could be better reflected in their training requirements and opportunities

Previously the NSPCC welcomed the introduction of national standards for the Continuing Professional Education and Learning (CPEL) of Social Workers. The NSPCC does, however, have considerable concerns about the linking of CPEL to Social Work registration. These concerns are detailed below:

- **Purpose of the register** - The introduction of the Register of Social Care Workers under the Care Standards Act 2000 was greatly welcomed by the NSPCC. The purpose of the register is, as noted by the Care Council², to make sure that those registered are suitable for work in social care meaning that they:
 - have the necessary qualifications
 - are physically and mentally fit
 - are of good character
 - agree to comply with our Code of Practice for Social Care Workers

These requirements are supported by the NSPCC and we would strongly agree that there is a need for the education and learning opportunities for Social Workers to be reviewed and improved. Despite this, we are concerned that failure to undertake and/or complete CPEL may result in deregistration even when there are no concerns about a professionals practice. Education and learning are vital to the development and professionalisation of Social Work however, it is important that the circumstance of the individual Social Worker be considered when establishing if they have undertaken an appropriate level of training and development.

- **Flexibility and diversity of CPEL** - Section 2.6 and 2.7 of the consultation describes the Care Councils desire to use CPEL to support the regulating of fitness to practice and a strengthening of post registration training and learning. We strongly agree that much could be done to expand on the existing requirements for Social Workers to undertake fifteen days of training over a three year period. However, we feel that the proposed CPEL framework may not be the best way to support these aims.

The current requirements for Social Workers to undertake training allows them the flexibility to choose education and learning that is most relevant to their work. We are concerned that by linking CPEL to registration Social Workers will be obligated to

² Care Council for Wales (2014), *Registration*, Available at <http://www.ccwales.org.uk/registration/> (Accessed 29.08.14)

undertake certain forms of training and development that may not be best suited to their needs and wants. For example, therapeutic interventions such as Cognitive Behavioural Therapies may be of particular importance to some Social Workers but these would not be recognised under CPEL framework. Social Workers and their employers should be free to choose training that best suits their needs.

- **Impact on wider education and learning** - Linking CPEL to registration potentially risks devaluing other forms of training and development. The time and resources needed to facilitate CPEL may discourage or hinder Social Work employers from investing in other forms of training and development. Social Work is a diverse profession and this needs to be recognised by giving practitioners the opportunity to undertake a variety of forms of training. We would urge the Care Council to consider whether a system of accredited courses on a diverse range of topics might better meet the needs of such a varied and wide ranging profession like Social Work.

The structure of proposed CPEL framework focuses heavily on career progression (i.e. Senior Practitioner and Consultant Social Worker). There are many practitioners who are keen to remain Social Work practitioners and do not wish to become Senior Practitioners or Consultant Social Workers. Those staff not wishing to advance beyond the proposed Experience Practitioner status may find their training curtailed compared to those continuing with CPEL training. Social Workers may also wish to become specialists in particular areas or therapies and this would not be recognised under the CPEL framework.

- **Career and service delivery structure(s)** - Section 2.5 of the consultation suggests that the CPEL framework will support the implementation of the national career pathway for Social Workers. The proposed structure under the CPEL framework is largely orientated towards a service delivery/career structure used in statutory services. This model does not translate well into the voluntary sector where many organisations have different service delivery/career structures. For example, the NSPCC does not employ, nor does it have any current plans to recruit, any consultant Social Workers in Wales. In short the CPEL career development approach could implicitly compel non-statutory organisations to adopt a career/service delivery structure that is similar to that used in the statutory sector. This may reduce the flexibility of such organisations to meet the needs of children/young people and their families.

Those organisations that do not adopt the career structure of the CPEL framework may find it difficult to recruit or retain staff who wish to progress to Senior Practitioner or Consultant Social Worker. In addition to this, it may hinder the opportunities for Social Workers to move freely between sectors.

Question 2 – Do you agree that the Consolidation Programme for Newly Qualified Social Workers is made mandatory for all Social Workers qualifying from 2015 onwards (see section 3.2 of the consultation)?

YES - We support the Consolidation Programme being made mandatory for Newly Qualified Social Workers (NQSW)³ from 2015 onwards for the following reasons:

³ NSPCC Cymru/Wales currently has Social Workers who are undertaking the NQSW programme.

- **Promotes support for newly qualified Social Workers** – Supporting NQSWs is particularly important and we feel that mandating the CPEL framework will help to strengthen the support given to those in the early stages of their career. Previously recommended, but not compulsorily, schemes have been unevenly implemented and vary dramatically in quality. Making this a mandatory obligation will highlight its importance to both NQSWs and employers. For this scheme to be a success NQSW employers must ensure that they give NQSWs the time and resources needed to undertake this training. The Care Council should impress the importance of this on employers and work with the Care and Social Service Inspectorate for Wales (CSSIW), and other appropriate bodies, to make sure that NQSWs have appropriate workloads.
- **Helps to bridge the gap from student to Social Work professional** – The first year in practice is a transition period where Social Workers find themselves moving from students to fully fledged practitioners. We feel the NQSW would help to ease the transition.
- **Encourages a culture of ongoing training** – Promoting a culture of ongoing training and development is highly important for the profession. Mandating a Consolidation Programme for NQSW will help to foster this culture at the inception of Social Work careers.

We would urge the Care Council to impress upon Social Work employers that they have a duty to provide staff with sufficient time to complete the NQSW programme. It is also important that the cost of the NQSW programme not be set at such a level that the employment of NQSWs becomes prohibitive for Social Work employers.

Question 3 – Do you agree that the position in relation to experienced Social Workers is kept under review and, when the Programme is accessible to relevant Social Workers, completion of the Experienced Practitioner Programme becomes mandatory (see section 3.3 of the consultation)?

NO - The NSPCC does not support the Experienced Practitioner Programme becoming mandatory for Social Workers. Our reasons are as follows:

- **Impact on service delivery** – We find ourselves in an area of unprecedented economic constraint in public services expenditure⁴. The proposed CPEL framework will necessitate staff being able to dedicate increased amounts of time to training and development. Whilst we welcome this we are also highly conscious that services are already stretched. We would strongly urge the Care Council to carefully consider the impact of mandating CPEL training on service delivery.
- **Cost of facilitating CPEL** – In addition to strain being placed on already stretched services, we are concerned that the cost of CPEL will be prohibitively high for Social Workers. Social Work employers will not only have to find funds for cost of services but will also need to consider the costs associated with freeing up staff to undertake training and study. In addition to this there are likely to be travel expenses and other

⁴ Welsh Government (2013), *Local Authority Funding Announced*, Available at <http://wales.gov.uk/newsroom/localgovernment/2013/131016-local-authority-funding/?lang=en> (Accessed 29.08.14)

costs which mean the true cost of such training is considerably more than just the fees.

- **Alternative training** – The proposed Experience Practitioner Programme appears to be highly prescriptive. We are concerned that this means Social Workers may not have the opportunity to develop skills in areas such as therapeutic interventions. The diversity of the Social Work profession needs to be reflected in the training available. This is something that we are concerned would not be promoted in the proposed CPEL framework.
- **Account for different types of learning** - There is an implicit assumption that training will automatically improve the practice of Social Workers. While we largely agree with this assumption it is important to remember that not all Social Workers are necessarily academically inclined. The CPEL framework seems to be primarily orientated towards an academic curriculum. Social Workers should be allowed to undertake training that is relevant to the role and that matches their learning style.
- **Emotional wellbeing of Social Workers** – Social Workers often do exceptional work in complex and difficult situations. There is a plethora of evidence exploring the stress faced by Social Workers⁵, and we also know that on average Social Workers only spend on average eight years in practice⁶. To mandate training with deadlines and a potential risk of deregistration may be detrimental to retention of professionals.

In summary the NSPCC does not support the mandating of the Experience Practitioner Programme. We are concerned that the costs may be unsustainable in a period of economic constraint and that the programme does not permit sufficient flexibility to reflect the diversity of the Social worker role.

Question 4 – Do you agree that the 3 core modules of the Experienced Practitioner Programme (Children and Families or Adults; Mental Health and Well-being and Enabling Others) are entry requirements for Senior Practitioner and Consultant Social Worker Programmes (see section 3.3 of the Consultation Document)?

NO - As previously indicated the NSPCC has reservations about the proposed CPEL framework. Bearing this in mind, we have only limited comments to make on the proposed core modules identified in the Experienced Practitioner programme. Our queries and concerns are as follows:

- **Transitioning between adult and children and families services** - Would Social Workers who had undertaken a core module in Adults and subsequently moved to

⁵ Evans, S., Huxley, P., Gately, C. Webber, M., Mears, A., Pajak, S., Medina, J., Kendall, T. and Katona, C. 2006. Mental health, burnout and job satisfaction among mental health social workers in England and Wales. *British Journal of Psychiatry*, **188**(1), pp. 75-80

Tham, P. 2007. Why are they leaving? Factors affecting intention to leave among social workers in child welfare. *British Journal of Social Work*, **37**(7), pp.1225-1246

Tham, P and Meagher, G. 2009. Working in Human Services: How do experiences and working conditions in child welfare social work compare? *British Journal of Social Work*, **39**(5), pp. 807-827

⁶ Curtis, L., Moriarty, J. and Netten A. 2010. The expected working life of a social worker. *British Journal of Social Work*. **40**(5), pp. 1628-1643

Curtis, L., Moriarty, J. and Netten A. 2012. The costs of qualifying a social worker. *British Journal of Social Work*. **42**(4), pp. 706-724

work in Children and Families services be obligated to take the Children and Families module prior to their Senior Practitioner training (or vice versa)?

- **Promoting the rights and needs of children and young people** – We would ask that the Enabling Others programs and the Mental Health and Well-being modules give specific attention to the needs, rights, legislation and policy surrounding children and young people.

Question 5 - Do you agree that completion of the Senior Practitioner Programme is mandatory for Social Workers taking up post as a Senior Practitioner from 2015 onwards (see section 3.4 of the Consultation Document)?

NO - We have the following reservations about the Senior Practitioner Programme being mandatory for those taking up posts as Senior Practitioners from 2015:

- **CPEL career structure** – As noted in our response to question one, the CPEL framework commits organisations to a career structure that may not suit their needs.
- **Impact on wider training opportunities** – See response to question one.
- **Recognising different forms of learning** – See response to question three.

The ability of Senior Practitioners to undertake a piece of work into a specialist area of interest is welcomed. This flexibility helps to recognise the diversity of the Social work profession. Ideally this would be included in both the NQSW and Experienced Practitioner programmes.

Question 6 - Do you agree that completion of the Consultant Social Worker Programme is mandatory for Social Workers taking up post as a Consultant Social Worker from 2016 onwards (see section 3.5 of the Consultation Document)?

NO - The NSPCC has reservations about the Consultant Social Worker Programme being mandated. Please refer to points made in responses to questions 3 and 5.

Question 7 - Do you have any comments on the Important Considerations of creating a link between the CPEL Framework and registration as a Social Worker (see section 3.7 of the Consultation Document)?

YES - We do not support the linking of the CPEL framework and registration as a Social Worker. The proposal to sub-divide the register under 3.7.2 of the consultation is not felt to be desirable or helpful. We are concerned that many service users, and potentially other professionals, will not understand the difference between an Experienced Practitioner and a Senior Practitioner. It also calls into question the purpose of the register. Currently the register validates that a person is registered with the Care Council as a Social Worker. Essentially this creates a clear list of people who are legally entitled to call themselves Social Workers and undertake roles that are associated with the profession. To divide the register risks confusing service users and other professionals.

Any subdividing of the register would also include increased amounts of bureaucracy and expense for registrants and the Care Council. These are two factors that we would be keen to avoid.

In addition to this the proposal to have a subcategory for those in non-Social Work roles (section 3.7.5 of the consultation) is unhelpful and potentially problematic for the following reasons:

- If those in non-Social Work roles had occasion to use their Social Work status, would this prove problematic with their registration?
- How would the Care Council account for those who undertook part-time roles in both Social Work and non-Social Work roles?
- Would those undertaking short periods of time in Social Work roles, such as agency work or temporary posts, be obligated to switch their registration for the duration of these roles (even if only for a matter of weeks)?
- Would those in non-Social Work roles moving back into a Social Worker role automatically join at the level (e.g. Experienced Practitioner, Senior Practitioner, Consultant Social Worker) at which they departed?

Question 8 – Do you have any other comments on the proposals for linking the CPEL Framework and registration as a Social worker?

YES - The NSPCC has the following additional concerns about CPEL programme and any possible linking of CPEL to Social work registration:

- **Interface between CPEL and Team Manager Development Programme** – We remain unclear about the interface between the CPEL framework and the Team Manager Development Programme⁷. It is not clear if it would be necessary to complete the CPEL framework (i.e. be a Consultant Social Worker) before you could progress to a management programme. We would strongly discourage the Care Council the Social Services Improvement Agency (SSIA) and the Association of Directors for Social Services (ADSS) Cymru from making completion of CPEL into the management programme. Instead we would urge that management posts and training be open to Social Workers of all levels and continue to be based on merit.
- **Education and learning opportunities for non-Social Worker social care professionals** – The CPEL framework is specifically designed for Social Workers and their needs. We would ask that the Care Council also consider the needs of the numerous social care professionals who work alongside Social Workers and are often instrumental in supporting service users.
- **Opportunities for those in non-Social Worker roles to undertake CPEL** – The diverse nature of the Social Work affords Social Workers the opportunity to work in roles that do not place them in contact with service users. For example, those in training, consultation and research roles may be away from direct practice and may find it difficult to find opportunities to evidence their work. We would urge the Care Council to consider how those in roles where they have no direct contact with service users can continue to undertake training in the CPEL framework.
- **Cost and sustainability of CPEL** – We are concerned that the CPEL framework will be expensive and potentially unsustainable. The cost of the CPEL framework extends

⁷ Social Service Improvement Agency (2013), *Evaluation of the Team Manager Development Programme: Final Report*, Available at http://www.ssiacymru.org.uk/resource/m_h_TMDP_evaluation_stage_1_report_FINAL.pdf (Accessed 29.08.14)

beyond the initial course fee. It will be necessary to free up staff to undertake training and study taking them away from their front-line roles. In addition to this, there are likely to be travel expenses and other costs which mean the true cost of such training is considerably more than just the fees. This risks placing additional stress on already highly stretched services. We remain particularly concerned as we are unlikely to see a return to 2011 spending levels until at least 2020⁸.

Question 9- Have you replied to this consultation

X	On behalf of an organisation?
	On behalf of a service or team?
	As an individual?

Question 10 – What is your interest in responding to this consultation?

	Social worker
X	Employer of Social Workers
	Individuals using services
	Carer
	Education provider
	Organisation representing Social Workers
	Other (please specify)

⁸ Welsh Government (2014), *Devolution, Democracy and Delivery: White Paper – Reforming Local Government*, Available at <http://wales.gov.uk/docs/dsijlg/consultation/140725-white-paper-consultationv2-en.pdf> (Accessed 29.08.14)