

**BASW**  
England

**SWU** Social  
Workers  
Union



# Consultation Response

Social Work England:  
Continuous professional  
development

The British Association of Social Workers (BASW) is the professional association for social work in the UK with offices in England, Northern Ireland, Scotland and Wales. With over 20,000 members we exist to promote the best possible social work services for all people who may need them, while also securing the well-being of social workers working in all health and social care settings.

BASW is the custodian of the Code of Ethics and the Professional Capabilities Framework (PCF) for social work in England. All social workers in the UK should follow the professional code of ethics which is based on the global code of ethics and definition of social work. The PCF is the overarching framework for social work learning, development and excellence at all levels from student to strategic social worker. It was developed and is used by the social work profession as a whole in England.

Social Work England's standards provide an essential threshold for public protection. They must neither contradict the code of Ethics nor qualifying any level of the PCF. As social workers develop through their careers, their professional development should reflect the PCF levels. Social Work England's standards for professional development should state that social workers use the PCF as a framework for continuing professional development.

In 2018, BASW refreshed the PCF in conjunction with representatives from across our sector. The relationship between the PCF and the Chief Social Workers' Knowledge and Skills Statements was confirmed in a joint letter between BASW, the Department for Education and the Department of Health and Social Care.

This consultation response was completed in conjunction with the Social Workers' Union (SWU) and representative of their membership. SWU is the only UK trade union for, and run by, qualified and registered social workers. SWU works in partnership with BASW to protect social work professionals in their workplace. Having a professional association and trade union working together is important for the social work profession. Therefore, this response should be considered as the official views of both organisations.

BASW England and SWU welcome Social Work England's consultation on the Continuous Professional Development (CPD) of social workers. After consultation with our membership, our response is as follows:

**To what extent do you approve of Social Work England's approach to CPD?**

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Whilst we value the importance of CPD, the demands placed on social workers should be routinely considered when their CPD is evaluated and not left to discretion. It is widely acknowledged that social workers are overworked (with high caseloads and user-unfriendly computer systems) and endure poor working conditions, as highlighted in these weblinks:

<https://www.basw.co.uk/resources/uk-social-workers-working-conditions-and-wellbeing-august-2018>

<https://www.basw.co.uk/8020-campaign-relationship-based-social-work>

The proposed incremental approach seems reasonable. However, it would be useful for the CPD guidance to outline what types of evidence are acceptable or provide examples. Also, it is unclear whether CPD evidence is required to be uploaded annually for just the first year or every year.

We believe it is positive the regional the engagement leads will be working with local social workers and employers, but further details on the strategy for embedding the new CPD process and promoting employer support is needed.

It is pleasing to read the online CPD accounts will have a function that has both structured and free text template options with the ability to upload a variety of file types. It would be useful to have screenshots of the online templates in the guidance. Also, what if registrant is unable to access the online portal? Can they submit their evidence in other ways?

There is no distinction drawn between social workers in terms of: career stage; private/public/voluntary sector; independent social workers; academics or other existing training pathways (for example Assessed and Supported Year in Employment).

There is no reference to the Professional Capabilities Framework or Knowledge and Skills statements for social workers (KSS). Social Work England's standards provide an essential basis for social workers CPD. However, it is unhelpful for standards to not include the PCF or KSS. As social workers develop through their careers, their professional development should reflect the PCF levels. Social Work England's standards for professional development should state that social workers use the PCF as a framework for continuing professional development.

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- Historically, employers held the responsibility to ensure qualified social workers attended mandatory and optional training courses and received regular supervision. This was sufficient to ensure compliance with employer and regulatory standards. If for any reason a social worker was assessed as incompetent or unprofessional, the employer dealt with the matter and the regulator was rarely involved. This new approach appears to transfer the burden of responsibility to social workers and enables employers to relinquish their training responsibilities. This point should be cross-referenced with the BASW England response to the consultation on Fitness to Practice guidelines, where we state: "the current system of no accountability for employers is fundamentally flawed. If the current system continues it will deepen 'blame culture', harden the negative perceptions of social workers and exacerbate existing recruitment and retention issues within the profession."
- One of our members commented: "Good social workers already exceed the requirements – when their employers allow them to."
- Another member commented: "Regulation of this type does not properly consider experience, good practice or sound informed decision-making. It risks turning quality practitioners into bureaucrats, unable to actually make a positive difference through direct interventions because of the multiple levels of administrative tasks and accountability that must be completed – of which this is just one more."
- Another member added: "It would be good to have CPD engagement/involvement from experienced frontline social workers, who are now in other roles - as their experience is so very valuable and often never properly replaced. Development supports retention."

### What is important for Social Work England to consider when developing an evaluation process?

- We believe it is important that Social Work England does not duplicate existing systems or create more work for already busy social workers.
- Involving a wide range of employers, social workers and service-users in the evaluation process would promote a holistic and thorough approach.
- We believe it is imperative that social workers have the autonomy and flexibility to be able to provide a range of evidence to demonstrate their compliance with the CPD standards and this should not become prescriptive.
- The proposals for the new online portal and the increased frequency of renewals does beg the question of how much will all this extra regulation cost? Without being cynical, it seems fair to construe the registration fee will soon be increased yet again.

## Do you have any other comments?

We believe it would be useful to incorporate how evidence from people with lived experience and peers can be used to demonstrate CPD.

We believe it is important the regulator monitors that CPD is being undertaken and the professional standards are complied with. However, CPD should go beyond the regulator's interest in public protection. The regulator's work on this should happen in partnership with BASW, the professional body, for several important reasons:

- Excellence in practice is firstly an individual professional and ethical responsibility that needs to be fostered by the profession.
- An understanding of what excellence is comes from research, service-user perspectives and professional experience coming together to create an evidence base – this needs input from the profession.
- Regulation checks up on people's competence at a particular moment in time, whereas professional excellence needs to exist at all times. Again, this is fostered by the profession itself.
- Monitoring is costly and needs to be proportionate – it is useful to link into work that is already happening with the professional body.
- Regulation needs to be supported by the profession and this trust is enabled when there is involvement with the professional body.

## BASW invites Social Work England to work with us to consider how best to interlink our activity around CPD. As the professional body, we already:

- Develop, gather and share evidence that supports excellent practice – in partnership with sector improvement organisations.
- Hold and continue to develop an overarching framework for CPD for all social workers, with diverse pathways, through the PCF.
- Support social workers to meet CPD standards, for example through education, mentoring and supervision from other social workers.
- Support social workers to gather evidence of meeting CPD standards, for example through reflection, and learning and development opportunities.
- Promote CPD as a professional requirement.

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## BASW can and does:

- Advise the regulator on what should be expected in CPD in terms of amount and quality to ensure public protection.
- Provide guidance on what is needed for re-registration.

BASW are also able to provide peer-led recognised and accredited training programmes for specialised areas of social work - as other professional bodies do.

Social Work England would like to know if you think that the CPD proposals will impact on people based on protected characteristics positively, neutrally or negatively. Please choose the characteristics you think will be affected by our proposals.

Having considered the proposals for CPD, our members indicate they do not believe they will impact differently on their protected characteristics. However, how a profession is regulated will not necessarily always have a measurable or predictable impact on specific registrants. In reality, this is too broad a question, with many complex dimensions and implications. A Quality Impact Assessment to examine how the standards may affect different groups post-implementation would be useful.

We hope this feedback is helpful and received in the constructive spirit with which it is intended.

For further information please contact:

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