

**BASW**  
England

**SWU** Social  
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Union



# Consultation Response

Social Work England:  
Readiness for  
professional practice

**The professional association for  
social work and social workers**

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 22,000 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.

The Social Workers Union (SWU) is the only trade union to offer representation by qualified social workers who understand the complexities of the profession. With officers working across the UK, SWU provides representation at internal hearings for disciplinary and grievance procedures, and employer investigations into practice and misconduct allegations.

This is a joint consultation response from both organisations prepared by the **BASW England team** and the **BASW/SWU Advice and Representation service (A&R)**. We are pleased to respond to Social Work England's consultation on 'readiness for professional practice' on behalf of our members.

A main thrust of our feedback based on member consultation is that the development of future reforms to social work education (pre- and post-qualifying) should be an opportunity to provide clarity. To do this, they must add distinctive value and help align or otherwise articulate meaningfully with existing valued standards and frameworks affecting social work education and preparation for practice, including:

- [Professional Capabilities Framework \(PCF\)](#),
- [Practice Educator Professional Standards \(PEPS\)](#),
- [Quality Assurance in Practice Learning \(QAPL\)](#),
- [Post-qualifying standards \(PQ standards\)](#)
- [Quality Assurance Agency \(QAA\) Subject Benchmark statement](#)
- [BASW UK Code of Ethics](#)

The PCF, PEPS, QAPL, PQ standards and Codes of Ethics are all embedded frameworks to promote and uphold practice standards that have a long history in social work and were created and maintained by and for the profession with (to varying degrees) the involvement of people with experience of using social work services.

It is encouraging that the PCF and Code of Ethics are referenced in SWE's 'readiness for professional practice' consultation and their approach to social work education and training. We would like to ensure these are further embedded and that there is further alignment and clarification of new and existing learning and practice standards.

The responses to this consultation were captured via an online survey that ran for roughly 10 weeks. This is a snapshot from our membership, and we hope the qualitative feedback is helpful to the overall consultation process. The strength of responses and free text comments are interesting and convey some key issues raised by our members.

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## Summary responses to Social Work England consultation questions

### Q1

a) To what extent do you agree that the knowledge, skills and behaviours statements capture what a student should be able to demonstrate by the end of their initial education in order to meet the professional standards?

We broadly agree. The 'knowledge, skills and behaviours' statements (KSB statements) are generally consistent with the Quality Assurance Agency (QAA) Subject Benchmark statement and the PCF. However, each of the statements has a different emphasis and level of detail on some requirements than others. Please see our feedback on specific statements outlined below.

b) Please provide further information to support your answer.

It would be helpful if there was closer correlation with the BASW Code of Ethics. BASW expects this to be upheld by all our members, including students. This is grounded in internationally agreed ethical principles of the International Federation of Social Workers and the IFSW definition of social work. English social workers are part of a global profession and also often work across international boundaries. They may have qualified overseas or as non-UK citizens they may study in English universities with the intention of working in other countries (including the other UK nations).

### Q2

a) To what extent do you agree that the knowledge, skills and behaviours statements are structured in a way which is clear and easy to understand?

Generally, the statements are coherent, but the language and terminology used requires adjustment and further thought.

b) Please provide further information to support your answer.

We have listed below suggestions on how specific statements can be improved.

### Q3

a) To what extent do you agree that 'knowledge, skills and behaviours' are appropriate categories for the social work profession?

If the KSB statements are introduced, we strongly believe there should be a separate category for 'values' and 'ethics', in accordance with the PCF and IFSW definition of social work.

b) Please provide further information to support your answer.

Social work educators are accustomed to incorporating different value-based frameworks into their curriculums. It would be helpful if the Social Work England statements included 'values', as they form a key component of social work education. Also, they are not properly covered by 'behaviours'. However, we acknowledge that Social Work England's role in making decisions about 'readiness for professional practice' requires assessing social workers' behaviours and the values they demonstrate in action.

Below are some re-worded suggestions for specific KSB statements (our changes are underlined):

#### Knowledge

1.2 - 'My role as a social worker with duties and responsibilities to assist, provide support empower, advocate for, protect and safeguard people, and uphold the law'.

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1.9 - 'The importance of respecting the cultural identities of the people, families and communities I am working with, recognising the significance of culture and belief to my practice as a social worker'.

1.10 - 'How multiple and intersecting oppressions and disadvantages impact people, families, and communities, and affect the way in which individuals, families and groups come into contact with social workers or are unable or fail to do so'.

1.11 - The impact of the social context in which people live including: housing, deprivation, food insecurity, education, unemployment, poverty, homelessness, social injustice, ecological and environmental issues, asylum, migration, ethnic segregation and unequal access to justice.

1.12 - 'The impact of mental and physical ill-health, including disability, learning disability and the experiences of neuro-diverse and sensory impaired people.'

1.14 - 'The impact of trauma and loss on human development across the lifespan, and factors contributing to vulnerability including societal factors and social injustice.'

1.16 - 'How to identify and assess risk, and how to use relevant risk assessment procedures and tools to maintain my own safety and the safety of people and the wider public.'

1.23 - 'The concepts of fitness to practise and organisational deficiencies, weaknesses, incompetence and wrongdoing, and how to recognise cultures of unsafe practice.'

1.24 - 'The importance of keeping accurate and up to date records, and the role of record keeping in social work practice, including how to appropriately share records, adherence to data protection requirements and confidentiality.'

1.25 - 'Current and contemporary issues, including current affairs affecting society such as national politics and recognising the implications for social work practice.'

1.26 - 'The role of research in evidence-based practice, demonstrating an ability to reflect on and evaluate the strengths and limitations of research and how to evaluate my own and my team's effectiveness in applying research and theory to practice.'

## **Skills**

2.3 - 'Critically and creatively use and evaluate the ways in which I select the most appropriate theories, methods, research methodologies and models of practice in the different aspects of my work.'

2.5 - 'Recognise people as experts in their own lives, supporting them to exercise optimal choice and control and ensuring they are treated with respect, personalised care and dignity.

2.6 - 'Communicate my role as a social worker and the purpose of my work clearly, accurately and sensitively to the people, families, professionals and communities that I work with.'

2.16 - 'Manage my time and prioritise my workload, demonstrating specific skills in relation to caseload management and use of limited resources to ensure that people's needs are met.'

*(See our earlier comment about the consultation introduction. The implication that social workers should simply accept that resources are limiting their ability to provide a needed service should be avoided. There is a danger of making 2 different points in the same statement.)*

2.19 - 'Support people to ascertain their unmet needs, limitations, hopes and expectations, alongside their strengths, limitations and personal views about social work intervention and to ensure they fully understand their rights, entitlements and responsibilities.'

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2.20 – ‘Use a knowledge-informed approach to make impartial decisions.

*(Evidence can be seen as narrowly including research. Knowledge-informed is broader and inclusive of all aspects of knowledge).*

2.22 – ‘Use reflective practice and seek out, insist on, and be an effective user of consultation and supervision of my practice to explore concepts of uncertainty, risk, ethical dilemmas and complexity when making decisions.’

2.23 – ‘Engage in critical reflection of my practice to examine my partnership-based approach in different contexts/ circumstances to resolve different issues; practice methods used; judgements; decisions made and outcomes achieved.’

2.24 – ‘Maintain accurate, clear, objective and comprehensive records, which document decisions and actions and share them appropriately.’

2.27 – ‘Recognise my own biases and prejudices (personal and professional) and take steps to ensure that these do not impact my decision-making, to ensure that people are treated in a non-discriminatory manner.’

2.28 – ‘Recognise my own personal values, views and preferred approaches to practice and understand how they could impact on my work with people and other professionals.’

2.30 Challenge decisions, actions or behaviours which are not in the best interests of people receiving services or which lead to increased risk of harm. Understand and know how to make appropriate use of whistleblowing procedures, complaints procedures and the fitness to practice role of Social Work England.

2.32 – ‘Recognise and respond to behaviour that may indicate a lack of co-operation, or concealment of necessary information by people I work with or professionals and take action when necessary - particularly where this is linked to safeguarding concerns.’

### **Behaviour**

3.6 – ‘Demonstrate an awareness of my own personal and professional biases and prejudices, including the potential of unconscious bias to impact on my choice of approaches in different circumstances and/or the professional decisions I make.’

### **Q4**

Is there anything in the statements that you don't understand?

No, but some statements could be clearer. Please see the re-worded suggestions for specific KSB statements underlined above.

### **Q5**

Do you think that these standards could impact any persons with a protected characteristic? If so, is it positively, or negatively, and how? The Equality Act (2010) lists nine protected characteristics: age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership and pregnancy and maternity.

See our comments above regarding students entering social work training from another country.

We are unconvinced the ‘readiness for professional practice’ proposals will resolve the fact that Black and ethnic minority workers are three times as likely to fail ASYE as white colleagues and widely report ongoing

barriers to career advancement. We advocate for an Equality Impact Assessment to be undertaken as soon as is practically possible to address these evidenced inequalities.

## **Q6**

Do you have any other comments?

The feedback from our membership on these matters was diverse, but most members generally agreed the KSB statements would complicate an already overcrowded social work landscape. Our members provided the following comments about 'readiness for professional practice', the KSB proposals and Social Work England's new approach to social work education and training:

- *"As a Curriculum Lead, many Practice Educators (PE's) I speak with want to be able to register on the social work register as PE's (the same way as other specialist areas of practice) and to show that they are keeping their PEPS updated by supporting students and attending training."*
- *"Whilst the PE role remains unregulated it is always going to rely on the goodwill of employers and Higher Education Institutes (HEI's) to properly support people in their role and professional development. This issue was a hot topic throughout the PEPS review as well as the QAPL work I was involved with."*
- *"I do not see the proposals as a bad thing. I see them as a way in which we can perhaps ringfence the time and support needed for PE's to do their job in supporting and assessing students well - and be recognised for it. There are some practical problems of course, and this may lead to a decline in the number of PE's, but HEI's and employers will need to work collaboratively on that."*
- *"It is alarming that 78 new statements are being proposed, with no mention of them being preliminary or eventually scaled down at a later stage. In addition to the volume, the sheer complexity and confusion of how these new statements will intersect and interface with the PCF does not seem to have been considered."*
- *"I disagree with the KSB statements. The PCF is far better, as it encompasses the diverse sector that is social work. The KSB statements and the Knowledge and Skills statements are all limited in what they achieve."*
- *"Emotional intelligence is not mentioned. No recognition of personal self, professional self or knowledge of self."*
- *"A concern is the statements could be used to neglect employers' responsibilities or to penalise social workers suffering from stress. There is a danger of social workers being made responsible for the lack of structural funding of services."*
- *"The proposals are a gift to managers, directors and governments looking to make individual social workers responsible for policy failings."*
- *"There has been no real sector engagement in developing the KSB statements. Social Work England's closeness to government makes it difficult to know how much is influenced by social work and how much is government pressure. While we may agree with many of the KSB statements now, this approach could pave the way for a future revision of social work that departs from the profession's values and ethics."*
- *"The language used in the consultation is ambiguous in how it refers to those who use social work services. 'Clients' has been discarded, though it is still used by the legal profession and psychologists. 'Service-users' is not really appropriate for those who have services forced upon them and certainly should not be shortened to 'users'. 'People who receive services' works for many, but not all, as it is not inclusive of those who are assessed but do not then receive services. The KSB statements tend to rely on the term 'people' (not always with 'who use services'), which is vague and not always clear enough. No easy answer. Generally, the language in the KSB statements is ok, but it is sometimes rather clumsy and unspecific. Alternatives may be (as appropriate) 'family members'; 'adults and children' 'who need social work*

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services'. Perhaps Social Work England might work with the sector and those with lived experience and who receive services to agree specific terminology for different purposes?"

- "The onus of self-care is placed solely on the individual. There is a dereliction of the duty of care placed upon employers and an omission of employer accountability altogether. There seems to be an inherent lack of trust in the competence and integrity of social work professionals. The proposed regulation of social workers on social media is unclear and may restrict digital activism. The expectation to "manage your own health", seems invasive (professional/personal blurring) and places no responsibility on employers. The proposed 'statements' are extensive (78) and unwieldy. They will be confusing and off-putting for HEI's, workplaces, prospective students, actual students and social work recruitment nationally."
- "There are pros and cons to the individualisation of the proposed 'statements'. Positive in terms of personal accountability, but potentially onerous and prescriptive in practice. The agency and autonomy social workers have (or should have) is absent, which implies this is not something that is valued by the regulator."
- "The proposals seem to be aimed at advanced social workers, in terms of challenge, professional curiosity and expertise. There are high expectations for HEI's, educators and students. The impact on individuals is potentially multi-layered. It's possible fitness to practice cases will increase, which will have a direct impact on recruitment and retention."
- "The proposals should be broader in terms of the scope of the social work role, rather than reducing the role to children & families, adults, mental health etc only. There is a missed opportunity with IT, as the priority is not just monitoring and enforcement – but also about social workers developing their knowledge and skills. It's important to emphasise that the proposals are 'statements' not 'standards'. There is a danger of a 2-tier system and confusion with the PCF etc, due to the amount of detail and potential blurring with the professional standards. There is no mention of social worker's managing trauma, emotional labour, emotional intelligence or loss - only the practicalities of the role have been considered. There is no reference to organisational accountability or organisational cultures which social workers cannot influence. Surprisingly, the Local Government Association's Standards for employers of social workers in England is omitted, although in reality they lack any authority."
- "Each statement reads as though it has been excessively condensed for brevity and for the convenience of a one-line statement. This is unnecessary and over-simplifies many of the complexities and nuances unique to social work."
- "I'm unconvinced that 'knowledge, skills and behaviours' are appropriate categories for the social work profession, as we already have clear values and codes of ethics - surely this covers behaviours."
- "Social work education does need to evolve, but we also need to consider that the profession is in crisis and there is a real need to avoid increasing more bureaucratic tick-box exercises. We need to reduce the confluence of pressure on students and workers and support them all. We are struggling with recruitment and retention - we really don't want to put people off either. How can we do this collectively?"
- "The KSB statements are meaningless if students aren't provided with the right support and learning materials that universities/PE's can explain in a decipherable and practical way."
- "Readiness for professional practice should underpin social work learning and development. However, I feel that the process for evidencing that a student meets them could be streamlined or more responsibility placed on managers/social work consultant/senior social workers to evidence these through observation."
- "The KSB statements are appropriate, but the real problem is with identifying suitable placements."
- "The KSB statements are fine, but they appear to overlap with the professionalism of the PE completing the final assessment. Where there are learning issues for the student or evidence of inappropriate practice, it is the PE's responsibility to assess fully and only pass the student if they have practiced appropriately and met the professional standards."

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- *“The KSB statements are not helpful. They are further complicated by overlaps with existing frameworks. They are unnecessarily cumbersome and continue to move away from the noble aim of the profession, which used to be to do no harm, help people better their lives without making them feel “less than” and stay compliant with the prevailing laws whilst avoiding corruption. Quite literally those are the professional standards that are necessary. It’s clear there is politics at play, but both organisations (BASW and Social Work England) need to come together and agree one set of standards. The number of wasted learning hours spent finding evidence for appropriate statements/standards is severely reducing the impact of practice-based learning.”*
- *“The wording of some of the KSB statements is imprecise. In general terms, the statements align with the PCF, KSS and the QAA Subject Benchmarking Statement, but they lack the subtlety, nuance and precision of these existing frameworks. Although at times ‘values’ is included, the move away from ‘values, knowledge and skills’ to ‘knowledge, skills and behaviours’ is not welcome. I can see that, given Social Work England’s primary ‘fitness to practice’ focus, assessing behaviours is necessary - but it should be ‘values and behaviours’. ‘Values’ talk is an important part of preparation for practice. Though values are demonstrated in ‘behaviours’ - they are not synonymous. It is not clear how far Social Work England will use these statements to insist on how HEI’s use the statements in curriculum design. Full consultation with JUCSWEC, APSW as well as BASW is crucial.”*
- *“The KSB statements are too wordy and repeat themselves. Too much overlap with the PCF and other frameworks. Pick one set. Make them more concise. They should not be more than 3 bullet points per statement.”*
- *“There should be a statement about the students understanding of practicing in a trauma-aware and trauma-responsive manner.”*
- *“The statements do not on their own capture what the student needs to demonstrate by the end of their initial education (if this means qualification). This is better captured by the existing PCF. It would be better if Social Work England worked jointly with BASW to make amendments which could then enable Social Work England to adopt the framework.”*
- *“I am of the view that the number of statements (78) are too many and could be quite overwhelming for a newly qualified social worker to adhere to. This is particularly relevant when you consider that a new social worker also has to consider the KSS as part of completing their ASYE.”*
- *“There clearly needs to be raised standards, however in my view, there is no need to push for more detailed statements. It puts more pressure on, in an already overstretched, under-resourced broken system post-pandemic. It cannot be business as usual - it's unfair.”*
- *“The reduction to KSB statements is problematic from a social work perspective, and heavily reduces the focus on values, liberation, activism and collaboration - even if aspects of these can arguably be derived from the KSB statements. The language of KSB statements is clearly in accordance with government prerogatives and narratives (the same terminology used by apprenticeships, chief social workers and by politicians). This shows once again Social Work England are too close to government and are led by a desire to ensure compliance only.”*
- *“There is not enough detail in the KSB statements that relate to the breadth of social work as a career. In my experience, many managers who qualified 10+ years ago do not understand modern social work practice such as being trauma-informed, reflective, systemic or being anti-oppressive. This seems to be something they try “to do” to families as a tick-box exercise, rather than it being threaded throughout management style and social work practice.”*
- *“I had two non-statutory placements in my 170 days on placement. In all that time I have never worked with or even been in the same room as a social worker. I have not conducted any Care Act/Children Act assessments. The system has to change.”*

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- *"I have assessed many undergraduate and postgraduate students. Whilst they meet the academic criteria for a 'pass', when I've asked my teaching colleagues 'what percentage of graduates that you know would you not be happy to act for you as a social worker if you needed a social work service?', they all reply between 25% - 50% are not good enough."*
- *"Statement 1.16 puts responsibility onto social workers to adapt their practice to accommodate the deficits of employers and government. It needs rewording to include the employer standards. At times, the wording seems to require a particular approach/theory/model of practice. Statements must be general to allow for a range of accepted and relevant approaches and methods."*
- *"Statement 1.3 would benefit from a further emphasis on the importance of knowledge of social policy. BASW word this very well under the ASYE knowledge section - "demonstrate a critical understanding of social welfare policy, its evolution, implementation and impact on people, social work, other professions and inter agency working".*
- *Statement 3.6 is worded with an emphasis on how discriminatory conduct can impact on people who access our services, but it should also include an overt statement about how it's important to be aware of how discriminatory conduct can have adverse impact on our colleagues and peers".*
- *"Perhaps the extensive KSB statements need simplifying for the category of student! I worry that students and newly qualified workers are often supervised by workers who themselves struggle to understand the values and competencies required in social work."*
- *"The KSB statements are too broad, lengthy and over-complicated."*
- *"I really don't know why the KSB's are being proposed, as they bear no relation to university social work programmes or how they are run."*
- *"Some of the wording is too vague. For example, statement 1.13 refers to being able to understand "the impact of domestic abuse, and problematic drug and alcohol use", but does not clarify - the impact on what exactly? Wellbeing? Relationships? Community Engagement? I do wonder how exactly these statements, which I suspect in due course will become standards, will be measured."*
- *"I manage a team of PE's who are qualified to Stage 2. It is clear to me that improvements are needed for HEIs, student social workers, PE's and others involved in teaching and assessing student social workers so that consistency is achieved. We provide placements for students from various HEIs and in a previous role I was a course lecturer and course leader. In my experience, students are given different messages, have very different experiences and therefore have very different expectations about what social work is in practice, what their knowledge, skills and behaviour should be and how accountable they are. Feedback from students about this is that they feel underprepared to be in practice placements in the first place, they are surprised by the level of responsibility and accountability of social workers and are anxious about the expectations of them once qualified. They feel their courses set them up to fail in practice. When they arrive in placement there appears to be a significant gap in their knowledge about what to expect regarding their knowledge and how to apply this, they lack insight into what skills they possess and lack confidence in their ability to apply knowledge and skills. Much of our time is taken up promoting their confidence in their knowledge and skills and supporting them to scaffold so they become aware of these. The KSB statements would frame their education from the outset, particularly because it would be a requirement and overseen by Social Work England (or if it was interpreted as mandatory by HEI's and employers)."*
- *"There are too many KSB statements. They overlap significantly (which is another symptom of an attempt to reduce social work to knowledge, skills and behaviours), and most significantly, they add to an already overcomplicated picture. The idea that Social Work England recognises the complex climate for social workers, but then just goes ahead and adds to the pressure is justified only by their lack of control over those other frameworks. It shows a level of insecurity that social workers should be wary of from a regulator."*

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- *“The KSB statements are too long for busy social workers to absorb!”*
- *“Statement 1.19 needs to be strengthened to explicitly refer to structural economic inequality and how this negatively impacts on the life courses of people who access our services - as well as those who do not. It would be helpful and honest to acknowledge what these structural inequalities are based on (namely racism and misogyny).”*
- *“The KSB statements are necessary for our role, but they don’t have to be so extensive. As a social worker who’s been in the job for many years, I think as a profession we keep adding more and more layers of bureaucracy. This is not necessary and takes workers away from meeting people’s needs and managing risks.”*
- *“The non-regulatory frameworks have provided a valuable frame of reference and their content satisfactorily describes the social work role and responsibilities. However, it is important these frameworks are regulated, particularly because sometimes standards in student selection and education programmes can be low. Just as it is imperative to have clear learning outcomes in all teaching and training, it should be that the education frameworks are clear at the outset - in my experience that isn’t always the case. I’m therefore passionately in agreement that ‘readiness for professional practice’ is regulated by Social Work England.”*
- *“The idea of reducing social work to ‘knowledge, skills and behaviours’ I am sure makes sense from an administrative perspective, but those terms do not sufficiently capture social work as I know it.”*
- *“The objective of a placement is to ensure that the student receives a supported and quality learning experience. It is important that placement providers have a commitment to this and have a way of ensuring students are accessing positive placements. This could be done through feedback and evaluation forms which are sent to the programme organisers via QAPL. Equally Social Work England should conduct regular evaluations of placements, agency providers and student experiences.”*
- *“Care needs to be taken to ensure these proposals are promoted as a tool of support, rather than another punitive burden placed on overworked social workers.”*
- *“I was under the impression that the PCF aimed to identify the “specific skills and behaviour that are required of courses to ready students to meet the professional standards - which is already in place? I am not clear how these statements meet this requirement or change any aspect of the way courses are already delivered.”*
- *“I do not understand statement 1.29 - it is far too vague. What “impact and implications” are Social Work England referring to exactly? What forms of ‘information’ are they referring to? If this is meant to be a caution against engaging in hate speech, misinformation or bigotry online, then Social Work England should be explicit and say so. It seems to me that if this is going to be an expectation, then Social Work England are going to need to produce some guidance or support training around professional conduct online.”*
- *“The proposed statements could negatively impact on some people with intersected and protected characteristics. The introduction of yet another complex framework to the landscape will add unnecessary compliance requirements to already overstretched and overburdened social work students and educators. Those who are best able to weather this additional burden will be those who do not have caring responsibilities; who do not have disabilities; who are not going through difficult periods in their lives; those who have financial resources (not needing to work part time etc.). Also, the statements will negatively impact on students who are not on ‘fast-track’ programmes, where the resources available and provided to students are significantly better. Therefore, they are less likely to have to work part-time alongside studying. Fast-track courses have been shown to recruit a disproportionate number of male, middle class, white, no disability and no caring responsibility students, which amplifies my concerns.”*

- *“Statement 2.7 needs to be expanded upon to take account of the needs of social workers who may be neurodivergent.”*
- *“Social Work England have shown that their consultations are merely rubber-stamping exercises. I hope that BASW will be raising concerns in other places and forums besides this consultation itself.”*
- *“We are seeing some of the wider politics in society playing out in the social work profession. Universities being business models means they are more focused on numbers than suitability. Also, different generations view social work differently, as in society there are many competing demands and the systems are all stretched - Police, NHS and the voluntary sector. Social work needs improved partnership support systems in place in order to function well. Radical reform is required. More critical analysis should be taught and expected. The knowledge should include significant reference to social policy, societal structures/decisions and evaluation so new social workers are more informed about the history and context to their work - this might then help them to remain longer in their roles.”*
- *“This Social Work England consultation was an absolutely pointless questionnaire - to the point of it being offensive.”*
- *“It is clear that a much-detailed discussion is needed to develop an agreed approach to ‘readiness for professional practice’. If a simplified code or framework for ‘readiness for practice’ could be developed to replace the complicated proposals from Social Work England, this would be beneficial for students and practice educators. The KSB statements, as they stand, just add one more complexity to this issue. Social Work England need to improve the way in which they spell out the specific outcomes and potential benefits of the policies they propose.”*
- *“The existing frameworks should be enhanced, as having separate statements will just be confusing. It would be better to have one clear shared framework for social work practice.”*
- *“I am troubled by the wording of statement 1.2, specifically the reference to “uphold the law”. Given recent changes in legislation, I'm thinking of the recent Police, Crime, Sentencing and Courts Act 2022 and the creeping criminalisation of the right to protest. It is unwise to include this. Sometimes it may be necessary to breach an unjust law as a matter of conscience and may be in keeping with the social work principles of advocating for social justice. For this reason, I do not think Social Work England should include this in the statement or potentially convert it to a standard.”*
- *“Statement 2.16 – “manage my time and prioritise my caseload” must be placed within the context of staff shortages and rising caseloads. There is a risk otherwise that this statement could be used to penalise overworked staff and individualise what is in fact a structural problem.”*

Most respondents agreed with the overall objective of ‘readiness for professional practice’ and the need for social work education frameworks to be streamlined. However, respondents generally disagreed with the additional bureaucracy involved in introducing the KSB statements and the potential for confusion/conflation with the PCE. There remains a strong and undeniable commitment to maintaining the essence of the PCF in social work. BASW England fully endorses and supports this position.

#### **Feedback from Social Workers Union (SWU) and the BASW/SWU Advice & Representation Service:**

There are three topics that SWU and the Advice and Representation Service find important to address on the topic of readiness for professional practice:

##### 1. Race & Equality

The BASW/SWU Advice and Representation Service recognises that social workers from ethnic minority backgrounds are overrepresented in fitness to practice cases. We commend Social Work England’s recent efforts to record equality, diversity, and inclusion (EDI) data. However, we are only able to speak anecdotally until this vital data becomes available and shows exactly how far-reaching this issue is.

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When preparing social work students for practice, it is important that students are aware of this existing vulnerability within the field of social work that is due to ethnicity. The curriculum should cover impacts that discrimination can have on social workers, how people who experience discrimination can navigate it, how to support social workers who experience discrimination, and what is being done to address it in the long-term.

## 2. Employment resources

The curriculum should ensure that social work students are prepared for the workplace, and this includes ensuring that social workers are able to challenge employers when under stress and pressure while lacking the resources to do their job. Social workers also need to know how to challenge their employers in a way that is not negatively interpreted by the employer. There is a lack of recognition of the imbalance of power between social workers and employers.

People need to be confident in social workers, and part of this is for social workers to be resilient and able to assertively challenge employers. This consultation is very comprehensive regarding social work student requirements, but less robust on staff/employer relationships and teaching the resilience required to deal with these situations.

The government says that the average caseload for children and family social workers is 16.3. However, the BASW/SWU Advice and Representation Service has advised and supported social workers with 28-30 cases who report this is not an unusual caseload for members of their team. According to Community Care, 5,000 children and family social workers left the profession in 2021 – this has increased by 16% from the previous year and there are currently over 6,500 vacancies in this area of the profession alone - which is the highest number of vacancies in the past five years. These statistics show a struggling workforce and new social workers need to have the capacity and resilience to deal with these conditions.

SWU's campaign this year for more part-time and flexible roles in social work recognises the disparity of power between social workers and employers. The Part-Time Working campaign has connected with the Local Government Association, Association of Directors of Adult Social Services and Skills for Care who were surprised with the lack of flexibility/part-time working arrangements for social workers in local authorities. Managers seem to prefer full-time social work teams as it is more convenient for them, but part-time and flexible roles could help fill current vacancies. This type of working would be inclusive for so many social workers, including people with children, neurodiverse people, people with disabilities and people who prefer to work few hours to avoid 'burnout'.

Social work students need to know the layers of support available to them once they are in the workplace, such as: professional associations, trade unions, structured and supportive supervision, and joining/developing a supportive network. Students should be made aware of the common issues encountered in the profession – from discrimination to lack of resources – and given the information and support available to them to manage these issues.

## 3. Agency & independent social work

The BASW/SWU Advice and Representation Service and SWU have seen a trend of Newly Qualified Social Workers (NQSWS) quickly becoming agency workers. The concern is that these NQSWS's, who are at the beginning of their careers, do not necessarily have the same level of support they would receive from an employer. We recommend that 'readiness for professional practice' acknowledges the additional support that agency social workers might need. Also, we recommend that social work students are made aware of the advantages and disadvantages of being an independent social worker. Examples of this could perhaps be incorporated into their learning during their social work education.

### **BASW England conclusions, feedback & recommendations:**

The introduction to the consultation on 'readiness for professional practice' implies that social work educators, their practice partners and the existing HEI quality assurance processes are not adequately or equally engaged with by Social Work England in ensuring readiness for professional practice and public protection, which is unfortunate.

The overarching KSB statements mostly align with those of the QAA Subject Benchmark Statement that governs the award of university degrees at Honours and Post-Graduate levels. This is recognised in the consultation document as: “We understand that change processes in higher education can be complex and lengthy. We’re committed to working with stakeholders to ensure that the implementation and application of ‘readiness for professional practice’ can co-exist alongside other regulatory frameworks, such as the apprenticeship standards and the quality assurance agency’s benchmark statements for social work”. However, the tone of the first sentence can be interpreted as somewhat ‘begrudging’ and could be regarded as viewing QAA processes as something of a nuisance - rather than in the spirit of necessary shared accountability.

The consultation introduction oversimplifies the process by which agreed and existing quality standards and benchmark statements are used in the design of curricula and assessments. In recognition of the requirement for University Schools of Social Work to incorporate both sets of statements, a summary of the QAA Subject Benchmarking Statement could helpfully be incorporated in recognition of joint accountability, such as: “Qualifying degrees in social work aim to develop the student as a social scientist, a professional, and a qualified practitioner. At qualifying level, the study of social work involves the integrated study of subject-specific knowledge, skills and values and the critical application of research knowledge from the social and human sciences, and from social work (and closely related domains) to inform understanding and to underpin action, reflection and evaluation. Qualifying degree courses are designed to help foster this integration of contextual, analytic, critical, theoretical, explanatory and practical understanding in a wide range of contexts”.

Given the complexity of social work, and the wide range of knowledge, values, behaviours and skills to be assessed at the point of qualification, it is inevitable (and in some cases desirable) to allow for student choice and different course aims and student mixes, in ‘interpretation (of Social Work England professional standards and QAA benchmarking statements) the translation into course content. The aim of ‘readiness for professional practice’ is surely to ensure consistency in outcomes at the level of professional competence for a new social worker. However, the ways in which each qualified social worker demonstrates this in detail will vary enormously depending on placement experience, specialist modules followed, grading choices for dissertations and assessed assignments.

It would be helpful if somewhere in the consultation information there was acknowledgement that Social Work England does not intend on entering into the minutiae of curriculum design or stipulate in detail what is to be taught in order for the outcomes to be achieved.

There is wide-ranging empirical evidence that the working environment and working conditions for social workers are pressurised in ways that negatively impact on the practice learning of some students. This is not reflected in the ‘readiness for professional practice’ statement. This is not something course providers or students can control, other than avoiding unsatisfactory employers. It would, however, be of considerable value if Social Work England strengthened this narrative and integrated the the expected Standards for social work employers outlining the support needed for student placements/work-based trainees/apprenticeships etc - as well as for all social workers. The Standards for social work employers (endorsed by the Social Work Task Force and previous regulators) could be modernised in view of the contemporary challenges social workers face.

We recognise that the proposed KSB statements are statements and *not* standards. However, it is unclear whether the proposed KSB statements would replace or function alongside the PCF, PEPS and QAPL in practice and whether they may be interpreted as mandatory in any case. Our members (and other key stakeholders) have underlined the importance of the PCF (especially) and its value is reflected in how it is integrated into the fabric of the profession. It is worth noting, that any new concurrent frameworks would be confusing in practice for HEI’s and employers to incorporate and implement alongside the KSS, PQ standards, Social work apprenticeships and ‘fast-track’ programmes, such as Think Ahead and Frontline. We understand that Social Work England commissioned a mapping exercise of these pre-existing frameworks and we welcome the publication of the key findings and outcomes.

In the proposed KSB ‘Skills’ statement 2.2, it states: “...apply the principles of anti-discriminatory, anti-racist and anti-oppressive practice in my work”. We are in full agreement with this. However, we feel strongly that knowledge, skills *and* behaviour are *all* fundamental and integral to anti-discriminatory, anti-racist and anti-oppressive practice. Also, it is encouraging that the Social Work England’s approach to social work education and training acknowledges the necessity for anti-racist and anti-oppressive practice, but what about anti-discriminatory practice? There is absolutely no mention of food insecurity, poverty or the ‘cost of living crisis’, all of which are issues that punctuate modern

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social work and wider society. It remains unclear what supportive provisions Social Work England are able to introduce given the harsh and hostile societal context that social workers operate in and the impact on the workforce.

The KSB statements in of themselves are not necessarily problematic, but they do raise many issues in relation to process, evidence-gathering, prioritisation and volume. What process was followed in the formulation of the KSB statements? What social work input was there? What evidence are the KSB statements based on? Who decides the priorities? Social workers, educators and experts by experience were intrinsically involved in developing the PCF, PEPS and QAPL (and updating them). Therefore, as part of any integration or modernisation process, it is vital the core terminology and essence of these frameworks is maintained in accordance with the input of key stakeholders.

Partnership organisations and stakeholders, such as the Joint University Council Social Work Education Committee (JUCSWEC) have publicly stated they welcome moves to streamline the multiple frameworks surrounding social work education, but are concerned the 'readiness for professional practice' guidance may add further complexity. Vice-chair Amanda Fitchett stated in the same Community Care article: "Although we can see the need for social work programmes to have a shared understanding of what 'readiness for professional practice' might look like, we would not want to see too many additional frameworks clouding the pre-qualifying landscape. JUCSWEC would welcome the opportunity to join the advisory panel look at developments in this area to ensure the higher education institution sector is represented in discussions." These views are echoed by the National Organisation for Practice Teaching (NoPT) in the same article, who warned that the proposed guidance "could add confusion unless it complemented the PCF", which already has 'readiness for professional practice' standards.

Interestingly, the consultation guidance acknowledges the "crowded landscape" of current frameworks, but does not mention any collaborative work undertaken with relevant stakeholders and partners in navigating the landscape to arrive at a universally beneficial location for the advancement of social work. Coincidentally, the KSB statements use the terminology of the Social Work apprentice standard and is similar to the Knowledge and Skills statements, so there are valid concerns about avoidable confusion if they are implemented. Finally, the suggestion that 78 new KSB statements is workable, in addition to the existing social work frameworks and standards, seems beyond unrealistic.

The necessity for KSB statements as an imperative and immediate focus is not clearly explained within the consultation guidance. The only evidence cited in the consultation relates to Social Work England commission reports and the Narey and Croisdale-Appleby reports, which were not widely accepted when published in 2014. Interestingly, 'practice readiness' is not referred to explicitly in the Social Work England commissioned reports, but there is reference to "consultations and further the dialogue about the blended approaches used in social work education and training" - but even then, this is only fleetingly in relation to navigating the pandemic. None of the recommendations from the reports mirror what is being proposed in the KSB statements. Despite the lack of clarity on the decision-making and due process, the consultation selectively seeks to justify the course of action being taken with the statement: "We also have increasing insight to suggest that some graduates are experiencing a lack of confidence, skills or preparedness in the first years of their practice".

What is actually far more striking in one report are the criticisms of Social Work England as regulator, including a statistic that only 26% of social work academics feel supported by Social Work England. Social Work England is described as being "bureaucratic and distant"; concerns are raised about a lack of social work representation in the operations of the regulator and expressed disappointment that Social Work England is actually a government body, rather than an independent regulator" (from a Practice Educator). These views are also expressed in the comments section of recent Community Care articles in relation to Social Work England (1, 2, 3, 4, 5, 6 & 7). Another prominent theme in the same report, and one which many people would agree is a very necessary issue to prioritise efforts and focus, relates to the lack of student placements - both pre- and post-pandemic. There appears to be no recognition that this situation is exacerbated by Social Work England's own requirements on statutory placements for students. There is acknowledgment from Social Work England about the disruption the proposed reforms will cause if implemented, but this seems to overlook yet another finding from their own previous report - that qualifying programmes have experienced significant upheaval in recent years and a period of stability and restoration is required.

The concept of 'readiness for professional practice' and the need for refinement of the pre- and post-qualifying frameworks is uncontentious and uncontroversial. However, there is a lack of support and substantial challenge from

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our membership on any attempts to conflate, confuse, replicate or replace the PCF. This is a view shared by partners and stakeholders during our dialogue in preparation for this consultation.

For the reasons outlined above, the respondents to our survey are unconvinced by the KSB's, as they will exacerbate and intensify an already overcrowded social work education landscape - which Social Work England already seems to anticipate. The KSB's would create additional burdens for social workers, which would be disadvantageous for social work. There are clear benefits to Social Work England governing relevant social work education frameworks. However, it is essential that BASW and other key partners and stakeholders retain significant roles in how the frameworks evolve in future. We remain open to working in partnership with Social Work England (and other partnership organisations and stakeholders) to enhance the PCF - ensuring it encompasses all that is required of contemporary social workers.

A pragmatic and workable solution is for the PCF to be retained as a framework and governed by Social Work England going forward. Social Work England could collaborate with BASW to adapt and refine the PCF and BASW could perhaps remain the custodians of the framework. We welcome negotiation on this.

We are pleased there are plans to re-visit and review the education and training standards and supporting guidance (hopefully this includes the professional standards), which is mentioned in the guidance on Social Work England's approach to social work education and training. We hope the standards will be enhanced in terms of anti-discriminatory, anti-oppressive and anti-racist and values *explicitly* and will emphasise the importance of equality, diversity and inclusion more broadly. Unfortunately, neither the consultation guidance, nor the overview of Social Work England's new approach to education and training address the disproportionate outcomes experienced by social workers from Black and ethnic minority backgrounds. We hope attempts are made to resolve this as soon as possible. Furthermore, we hope that food insecurity and poverty is also recognised and integrated accordingly into any revised standards.

We believe Social Work England should be proactive in collecting EDI data to address known issues of inequality without delay and taking swift and appropriate action in relation to known issues of inequality. For example, the over-representation of Black and ethnic minority social workers in fitness to practise cases and the disproportionality of white adjudication panels.

We look forward to the planned future consultation on the requirement for all social workers to have 100 hours direct practice each year to maintain their registration. Our initial observations are that whilst maintaining high social work standards and continuous professional development is vital for the profession, the level of bureaucracy, coordination, cost and disruption to service delivery and the impact on professional relationships required to implement this proposal would easily outweigh the benefits. The challenges to this proposal from stakeholders is outlined in another recent Community Care article.

To reiterate, it is imperative the development of future reforms to social work pre- and post-qualifying education programmes align and correlate with the PCF, PEPS, QAPL, PQ standards and the QAA Subject Benchmark statement and uphold the values and principles held within our Code of Ethics. The PCF, PEPS, QAPL and PQ standards are flagship frameworks that have a long history in social work and were created and maintained **BY** the profession, **FOR** the profession. We recommend that an equality impact assessment is undertaken following the implementation of any changes and/or new provisions.

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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