

Submission on the Inquiry into the Operation of the Social Workers Registration Act 2003



Introduction

1. The National Collective of Independent Women's Refuges (NCIWR) is a non-governmental organisation delivering services to women and children affected by domestic violence in New Zealand. NCIWR provides support, advocacy, legal, and health services to 16,507 clients annually. 52 percent of these are women, and 48 percent are children. Last year, 2,852 women and children needed to be admitted into our safe houses to protect them from ongoing violence.
2. Please note we do not wish to appear before the Select Committee for this Bill.
3. In principle, NCIWR supports the implementation of mandatory registration. However, we do so with caveats, and acknowledge the barriers to NGOs seeking registration for their workers, the need for an additional tier of social service workers and competency frameworks for this group, and the need for Government support in facilitating the shift toward mandatory registration. For the majority of our member Refuges, the introduction of mandatory registration without accompanying support for the requirements inherent in registration would have catastrophic impacts on the recruitment and retention of our workforce, and for the financial viability of each organisation. We set out our concerns below accordingly.

Title Protection and Quality Assurance

4. Social workers are frequently given responsibility for managing situations of extreme physical, emotional, or psychological risk for vulnerable, challenging, or traumatised clients. It is therefore paramount that those identifying themselves as social workers can demonstrate a high standard of professionalism, skill, and education, and can respond to the nuanced needs presenting in each client.
5. At present, under the current system of voluntary registration, somebody without qualifications, training, or experience can label themselves as a social worker. This presents two significant risks. Firstly, attaining qualifications and professional upskilling is not incentivised because many organisations do not require registration and, correspondingly, there is no salaried difference between being qualified or unqualified. This leads to social workers' reluctance to become qualified and seek registration, because the costs of acquiring a degree or professional development are prohibitive if there is to be no subsequent change in earning capacity. Secondly, members of the public presume a level of competency based on the title, and may consequently disclose situations or expect a level of assistance that the practitioner is not equipped to provide.

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6. If clients are to put their faith in social workers to be able to manage risky or difficult situations, the title of 'social worker' should be intended to infer a high degree of competence. It is for this reason that NCIWR supports title protection for social workers, and suggest that a second-tier grouping of social service workers be established to compel the differentiation between qualified and unqualified workers. This is discussed in greater detail below in regards to competency assessments.
7. While S.13 of the Act provides for social workers who have been practising for many years to have their experience recognised as tantamount to a professional qualification, this is problematic in that competency assessments are written rather than based on observed practice, and length of time spent practising is not necessarily indicative of good or safe practice during that time. NCIWR therefore submits that practitioners applying for registration under S.13 be additionally subject to stringent observation-based competency examinations in lieu of a formal qualification involving observed assessment.

Competency and Assessment for Social Service Workers

8. Many NGOs, including some Women's Refuges, employ workers who perform practical tasks historically associated with Social Work, such as carrying out needs assessments, facilitating referrals, and providing immediate emotional support. These workers are not typically Social Workers, and as such are not subject to (or eligible to undertake) quality control measures such as competency assessments.
9. NCIWR therefore advocates for a tiered system of social work certification and registration, where a minimum standard for those working with potentially vulnerable populations (such as mental health, family or sexual violence, child protection, or older adults) is established alongside and in addition to mandatory social work registration and corresponding title protection for social workers.
10. If a secondary tier of competency assessment is established without requiring membership to a professional body, under-resourced NGOs who cannot meet the salary expectations of registered social workers or the costs involved in attaining and maintaining registration can still access opportunities to have their workers' standards of practice and core proficiencies to be assessed and certified.
11. Without this, employing educated and competent social work practitioners may be regarded as unattainable and unqualified staff employed by NGOs in their place, without the safeguards of a minimum standard of competency imposed by a second-tier assessment framework. The availability of a competency assessment process for non-social work social service workers

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would therefore provide such organisations with an optional avenue for assessing workers' competency.

12. NCIWR recognises the utility of the option to seek provisional registration with the SWRB as a stopgap measure while working toward the requirements inherent in full registration, such as achieving a recognised qualification. This is renewable every two years, to a maximum of eight years. We support this measure as a way for experienced and/or promising practitioners to achieve the minimum requirements without losing their ability to practise in the interim, and without posing sudden and unexpected costs to the individual and/or the organisation they are employed by.

The NGO Sector and Resource Constraints

13. The costs associated with applying for registration and undergoing competency assessments are disproportionately high when compared to equivalent professions such as teaching or nursing. The impact of the relative high cost of registration is exacerbated by the nature of social work employers: while the majority of employers hiring teachers or nurses are either state-funded or for-profit, a high proportion of social workers are employed by small, resource-constrained not-for-profit organisations which do not have capacity to sufficiently invest in professionalization of their workforce.
14. Census data shows that more than half of social workers are employed in the not-for-profit sector. However, 66% of social workers who are registered with the SWRB are employed in the public sector, demonstrating the constraints posed to NGOs of matching costs Government departments are prepared to pay to support their social workers' registration and corresponding professional development obligations.
15. These costs span initial registration fees, annual practising certificate fees, competency assessment fees, and the costs of attaining an appropriate qualification, including both fees and time out of/away from the workplace. Accordingly, the resourcing inherent in mandating registration for all of Women's Refuge's currently employed social work staff would place huge financial stress on the Refuges.
16. Given the high per capita costs of registering social workers, and the relative poverty of the social service organisations employing social workers, we submit that Crown should support fee reductions and the costs of attaining the requirements for registration for the voluntary sector, such as those relating to competency assessment fees, registration fees, external supervision, and professional development of staff. These will then directly benefit and provide quality control for the public service as a whole, as the voluntary sector fulfils a vital

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function in providing services to a large population that would otherwise be dependent solely on state services.

17. The Social Work Registration Board considered the costs of registration and the anticipated impacts of mandatory registration, predicting that per capita cost of registration would decrease by up to 50% if mandatory registration was introduced, as a result of the volume of registered social workers and consequent reduced contribution to the operating of the SWRB per social worker.

Conclusion

18. NCIWR largely supports the introduction of mandatory registration of social workers, on the condition that organisations are adequately resourced to support the registration of their workers, and with the addition of a secondary tier of professionalism and corresponding competency assessment for non-eligible social service workers.
19. Without due attention paid to the impacts of mandatory registration on the operating costs of NGOs such as Women's Refuge, it is likely that the calibre of employees working in this challenging specialist area will decline, and that our member Refuges will be unable to support the registration of their existing workforce.
20. We therefore request that the Committee considers these potential implications to the NGO sector, and incorporates alternatives and resource support mechanisms into any proposed introduction of mandatory registration.