10 October 2016

To: Social Work Registration Board

**SSPA feedback on draft Programme Recognition Standards**

Thank you for the opportunity to comment on the draft Standards and for supporting the participation of 3 SSPA National Executive members in the workshop discussion.

The attached feedback reflects the further views of the workshop participants, together with input from other National Executive members, some of whom were able to test out key issues with groups in their workplaces.

Our feedback is in two parts:

* General comments
* Detailed feedback on some of the draft standards – shown against the relevant section. (We have deleted the others standards where we have no comment, for ease of reading.)

We are happy to provide any clarification required and look forward to the next stage of work on these Standards.

Brenda Pilott

National Manager

Email: [manager@sspa.org.nz](mailto:manager@sspa.org.nz)

Ph: 04 805 0885 / 027 430 6016

# **General Comments**

## Comments on process

While we appreciate the efforts made to consult on the draft Standards, we do not believe the process has been sufficient nor has it demonstrated a strong partnership approach between the SWRB, tertiary institutions and service providers. Intentionally or not, it has seemed that the tertiary providers are dictating the Standards and NGO providers (and potentially providers from other sectors) appear marginalised in the process. This is unacceptable to providers and, we assume, to the SWRB too.

NGO providers are a key part of the overall social worker training framework, not least of all in providing and supporting fieldwork placements. As NGOs, we are liable for complying with the regulations and meeting the costs involved. We expect to be seen as an equal and contributing partner in this process, which, unfortunately, has fallen short of our expectations. Representatives of Māori NGO providers have expressed their serious concerns in this area.

The governance Standard makes no reference at all to NGO providers – we make a specific recommendation on this in the following section. Standard 1.2 is particularly unacceptable as currently written. Assigning “full control” to tertiary providers for all aspects of the curriculum including field education negates the critical role of those providing fieldwork placements, such as local social service providers. It does not currently reflect the partnership approach we had expected to see. Similarly, NGOs and other providers are not referred to as stakeholders in programme review and development in Standard 5.1.

## Supervision

It is our view that the programme standards blur the lines between supervision to support the development of social work identity and supervision on placement that meets organisation requirements. Students need both. They need to have at least fortnightly supervision with a qualified social worker who can support their social work identity. It is standard for most professions that the supervisor of students can only be from their profession eg counselling, psychology. It is also our view that the tertiary provider is responsible for providing this (and paying for it). For some NGO providers, these supervision arrangements would be aspirational and would present a challenge to fully implement. We make further comments about how supervision should be provided in the section below.

Draft Standards

SSPA comments are shown in the right hand column. We have included only those Standards where we make comment.

|  |  |  |  |
| --- | --- | --- | --- |
| **Standard 1: Governance** | | | |
| **No** | **Draft Standard** | **Change** | **SSPA comment** |
| 1.2 | The tertiary education institution responsible maintains full control of all aspects of the curriculum including the field education and assessment. | Minor wording change | The Standard is unacceptable as it stands. We recommend an amended or additional Standard to state that local social service providers will be involved in the governance overseeing the programme standards.  This could read:  “The tertiary education institution works with key stakeholders such as placement providers to ensure the quality of all aspects of the curriculum including the field education and assessment.” |

|  |  |  |  |
| --- | --- | --- | --- |
| **Standard 2: Curriculum** | | | |
| **No** | **Draft Standard** | **Change** | **SSPA comment** |
| 2.4 | The curriculum will be strongly focused on social work practice, located within the New Zealand and international contexts, informed by research, theory and indigenous knowledge and cognizant of the imperative of the Te Tiriti o Waitangi Articles in social service provision. | Previous 2.2. Addition of indigenous knowledge | We recommend Te Tiriti o Waitangi should have its own Standard and be an overarching goal for the curriculum. This would be one way to recognise the importance of indigenous knowledge, frameworks and practice and also acknowledges the current context of social and economic disadvantage.  Social work practice needs to be informed by local and current contexts so that the curriculum is relevant to current day issues. We recognise the importance of theory but suggest current context and issues be given strong weighting in curriculum design. |
| 2.5 | The curriculum will be designed to ensure graduates will be competent to practise social work:  (a) with Māori, whānau, hāpu and iwi – Change to as discussed in the forum  (b) with different ethnic and cultural groups in New Zealand, and  (b) across the lifespan, with individuals, families, groups and communities; in any given context. | Integrates Previous 2.4 , 2.5 and 2.8  Minor wording changes | We strongly endorse the need for the curriculum to support competent practise with tangata whenua. |
| 2.8 | Distance programmes will have a minimum of 20 days face to face on campus teaching over the course of the programme. These teaching days may not be considered as replacement for placement requirements. | Previous 3.8 | We recommend further consideration be given to the definition of ‘campus’ (which we assume also includes wananga – this should be clarified), in particular to consider the important role that noho on a marae can play in a learning environment that encourages Māori practitioners, their learning styles and studies. |
| 2.9 | Credit transfer and recognition of prior learning criteria and processes will be clearly articulated and transparent.   1. Normally no credit transfer or recognition of prior learning will be awarded for successful study that took place more than 5 years prior to the date of first enrolment in the programme. 2. Credit transfer or recognition of prior learning will not normally be awarded for more than 50% of the programme unless the transfer is from a current SWRB recognised programme. | Previous 6.7 and 6.8  No Change | This does not enable adequate recognition of prior learning for those that may have years of social work service. SSPA would like to see full RPL for those embarking on a formal social work qualification after lengthy social work experience. |

|  |  |  |  |
| --- | --- | --- | --- |
| **Standard 3: Field Education** | | | |
| **No** | **Draft Standard** | **Change** | **SSPA comment** |
| 3.2 | Field education will be delivered through a collaboration of the education institution, the agency, and practitioners supporting the students in the field education. | New Clause | This collaboration will require the development of partnership relationships with provider stakeholders. |
| 3.5 | The programme will have an effective process for evaluating agencies providing field education experiences. | New Clause | NGOs with Government contracts are subject to rigorous audits and accreditation processes from funders who deem our organisations to be fit for purpose. Any additional evaluation process needs to take account of these existing processes and not add unnecessary compliance requirements.  This Standard could be amended to say that field work placements need to be with government agencies or with accredited organisations that have contracts with any government agency that has an accreditation or other form of quality assurance programme. We suggest wording such as: “The programme will have an effective process for organisations to evaluate field educators overseeing the field education experience, taking into account existing audit and accreditation requirements from external agencies for the field educators’ organisation.”  We also make a wider point about evaluation and recommend the Standards reflect a more broad-based approach to evaluation that includes the student evaluating their practice experience. Further, it is not clear how the tertiary providers will be evaluated with respect to the field education component. Both points could be encompassed by an overarching statement such as “The programme will have an effective process for evaluating agencies, students and the tertiary institution involved in the field education experiences and will provide for student evaluation of their field education experience”. |
| 3.13 | Students will be exposed to at least two potential fields of practice in differently structured settings. | Previous 2.10.5 amended |  |
| 3.14 | A student will undertake no more than one field education experience within the student’s place of work. | Previous 4.1 from practicum guidelines | This blanket restriction would limit the ability of employees of larger organisations that have multiple services and sites to access a broad range of experience without financial disadvantage. We recommend this be reframed to allow for the possibility of more than one field education experience within the student’s place of work, where it can be clearly demonstrated the student will have a sufficiently varied field education experience. |
| 3.17 | All field education experiences will have supervision, of a minimum of 1 hour per week, or equivalent, provided by a social worker with full registration and a current Annual Practising Certificate. | Previous 5.1 in Practicum Guidelines | We caution that there is a significant risk that NGOs will decline to provide field placements if this requirement around supervision does not have more flexibility.  We have two concerns about this Standard:  Firstly, while one hour of supervision per week is ideal, it is likely to be a challenge for some NGOs. One hour per fortnight as a minimum may be more realistic.  Secondly, requiring supervision to be provided by a fully-registered social worker with a current APC is likely to be a challenge, and not just for NGOs. Placements are already often hard to find and making supervision by a registered social worker a requirement is likely to be unmanageable at this point, where there are insufficient numbers of registered social workers in either CYF or NGOs to provide supervised placements.  We are aware that in some cases in NGOs the line manager is not a social worker but is tasked to provide supervision to all staff and students. Ideally, the organisation providing the placement will have a registered social worker to provide supervision. If they do not, and the placement is agreed on that basis, it should not be the responsibility of the provider to secure the services of a registered social worker for this purpose. In many cases, the supervision provided by senior member of staff should suffice.  We suggest rewording this standard: “In consultation with the provider the minimum requirement of supervision is a minimum of 1 hour per fortnight or equivalent, provided by a senior member in the organisation with experience in social work supervision.”  We also recommend the Standard be amended to ensure that the tertiary institution will take responsibility for providing and funding supervision if the agreed field placement does not have a suitable supervisor. In circumstances where the supervisor is external to the field placement, the provider will offer 1 hour per fortnight of line management to support the student to get the best practice experience within the organisation. The line manager may be from any relevant discipline. |
| 3.18 | At least one field education experience will be supervised on site by a social worker with full registration and a current Annual Practising Certificate. | Previous 5.3 in Practicum Guidelines | This clause appears to overlap with clause 3.17. If 3.17 is amended as we recommend, this clause is redundant. |
| 3.19 | The social work academic staff member overseeing the student while on field education experience will not be the supervisor of the student for that field education experience. | New Clause from Practicum guidelines | We agree this is a helpful Standard, as it protects the student from having to deal with any boundary issues that educators may have about being required to undertake supervision. The educator is able to challenge for growth and development outside of supervision space. As well, this reduces the power dynamic from supervision. |

|  |  |  |  |
| --- | --- | --- | --- |
| **Standard 5: Professional and Stakeholder Collaboration** | | | |
| **No** | **Draft Standard** | **Change** | **SSPA comment** |
| 5.1 | Collaboration in programme development and review will include the profession, other stakeholders - including users of social services, students and the tertiary education provider. | Previous 4.1 amended | While we are pleased to see users of social services included as stakeholders to collaborate in programme review and development, it is extraordinary that local social service providers are not specifically named as stakeholders in this context – the final version of the Standards should remedy this. |
| 5.2 | Each programme will have a stakeholder engagement plan which ensures that all stakeholders receive accurate and timely advice on programme initiatives and student achievement; have regular meetings with programme staff; have appropriate opportunities to give feedback; and that stakeholders views are sought and considered. | Previous 4.2 No change | We suggest a rewording of this Standard:  “Each programme will have a stakeholder engagement plan, identifying all social service providers that are engaged with the programme, and providing for regular meetings with them to: provide accurate and timely advice on programme initiatives and student achievement and meet with programme staff; provide feedback to programme staff and discuss solutions and opportunities to enhance the student’s learning experience.” |

|  |  |  |  |
| --- | --- | --- | --- |
| **Standard 6: Staffing resources** | | | |
| **No** | **Draft Standard** | **Change** | **SSPA comment** |
| 6.1 | The programme will be allocated the number and quality of teaching staff with the skills and experience to deliver an effective programme that enables the students to meet the core competencies. | New Clause | We recommend that it be a requirement that a proportion of academic staff are required to have recent social work practice experience. |