



Social Service  
Providers  
Aotearoa

## **Social Workers Registration Board Consultation: Fees and disciplinary levy change proposals**

**01 December 2021**

### **Summary of SSPA's feedback on these proposals**

- a) The increases to social worker registration fees at the levels proposed will bring significant added pressure for community-based social service providers and their social worker employees. SSPA therefore recommends the SWRB reconsider the level of proposed increases (and how these can be lowered) and the timing of the increases.
- b) Yearly increases to registration fees to incorporate CPI adjustments is likely to place community-based social service providers in a difficult position, given that government funding rates for contracted social services are not always CPI-adjusted. SSPA recommends that the SWRB reconsider this approach.
- c) SSPA members are already facing a funding gap for many of the services they provide under contract to Government, as well as pay equity and workforce pressures. We continue to call on the Government to recognise these significant pressures and address them through fair and full funding, and urgent settlement of the current pay equity claim relating to people in social work roles.
- d) SSPA would like to work alongside SWRB from a community-based social sector perspective as SWRB works through this change process, and we encourage SWRB work in partnership with employers and the sector on the implementation of any changes.

### **Introduction**

1. Social Service Providers Aotearoa (SSPA) is a membership-based national peak body, comprised of over 200 community-based social service organisations from around Aotearoa, based in both rural and urban locations. Among our members are kaupapa Māori and Iwi organisations, Pacific providers, region-specific and national social service providers. SSPA members work across the full spectrum of community-based social services with a central focus on supporting the positive outcomes of children, rangatahi, families and whānau. SSPA members employ social

workers who work in the community every day with children, rangatahi, families and whānau.

2. SSPA strengthens Aotearoa's social sector through advocacy and engagement, learning and development, relationships and sector leadership. We value our relationship with the Social Workers Registration Board (SWRB) and opportunities to work together to strengthen the social work profession and workforce.
3. In preparing this submission, SSPA facilitated an online hui on 23 November 2021 with SSPA member organisations. We discussed with our members the SWRB proposals from a community-based social service organisation perspective, and this feedback has helped to inform this submission. SSPA's submission sits alongside and complementary to feedback that individual SSPA members make through SWRB's consultation process, either through the online survey or written submissions.

### **Background context**

4. For SSPA member organisations, these proposals from the SWRB come at a very difficult time given the current COVID-19 landscape in which they are operating, combined with pre-existing sector pressures.
5. The pressure on community-based social service providers due to COVID-19 and the current issues surrounding vaccination of staff and the corresponding ethical questions relating to workplaces, managing staff wellbeing, workforce pressures, worker safety and long-term fatigue for workers due to lockdowns and the uncertainty of the pandemic is felt throughout the motu.
6. On top of the changing COVID-19 environment and pressures, providers are continually having to navigate providing services to the families and whānau they work with in a fast-changing, risk-laden environment. Within communities throughout Aotearoa, existing inequity and disadvantage has been further compounded over the last two years by COVID-19, and there is growing evidence of food insecurity, poverty, mental health struggles, unemployment and family violence amongst the families and whānau providers work alongside.
7. Against this operating backdrop, the SWRB's change proposals and the timing of these have therefore come as somewhat of a shock to community-based social service providers.

### **Key issues related to the SWRB proposals**

8. There are a number of significant challenges facing the community-based social service sector, which relate to how the SWRB proposals will impact. These are:
  - funding (continued historic underfunding in many instances);
  - pay equity;
  - workforce wellbeing; and
  - workforce planning, attraction and retention.
9. The SWRB's change proposals have highlighted a number of existing inequities for community-based social service providers. These issues have also been highlighted in submissions from The Tangata Whenua Social Workers Association, Aotearoa

New Zealand Association of Social Workers (ANZASW) and New Zealand Council of Christian Social Services (NZCCSS).

10. We strongly encourage SWRB to use its channels with the Government and the Minister for Social Development and Employment to highlight these areas of concern that impact the sector, and which therefore have implications for the proposals outlined by SWRB. SSPA envisages that without a broader system shift and changes to support the proposed new fee structure, the fee increases (to the levels currently proposed) will be an additional factor placing pressure on community-based social service providers.

### **Funding of community-based social services**

11. The MartinJenkins report [\*Social Service System: The Funding Gap and How to Bridge It\*](#) (2019) found the government was underfunding social service providers by an estimated \$630 million a year: \$130 million in basic operating costs, \$300 million in wages and \$200 million in unfunded service demand. We acknowledge there has been increased investment in some areas since the publication of this report, but underfunding still needs to be addressed across the social sector. The fee increases proposed by SWRB significantly impact on community-based social service providers given that NGO's are the main employer of social workers (as reflected in SWRB's Annual Workforce Survey).
12. SSPA advocates for full and fair funding of contracted services for the community-based social service sector to address the current underfunding of the sector, with costing and pricing mechanisms that recognise the full cost of delivering services. We recommend that the work of current government work programmes such as The Social Sector Commissioning Project (commissioned by the Minister of Social Development and Employment) are strongly supported by Government and the community-based social service sector, to transform contracting, funding principles and mechanisms to address the current issues felt by providers. A substantial increase in funding for community-based social service providers is a key element of what is needed to address the funding gap.
13. SSPA believes that the SWRB's proposal of increasing social workers registration fees annually in line with CPI without consultation is a difficult proposition for the community-based social services. This is because NGO contracts are not necessarily CPI-adjusted.
14. We also note that contracts with government agencies often stipulate a requirement for mahi to be undertaken by registered social workers, but the associated costs of registration are not necessarily reflected in the overall contract funding. When mandatory social worker registration was implemented by Government, during the registration process in 2020, funding was made available to providers who were struggling to meet the requirement of registering their social work staff to meet the new mandatory registration requirements. Knowing the mandatory regime was placing strain on the community-based social service sector during the registration process, it is not surprising that SSPA members have made clear to us that the much higher cost of yearly registration proposed will have an impact on an already highly stretched sector.
15. SSPA recommends that the CPI increases proposal be reconsidered by SWRB before any implementation. We also encourage Government to explore alternatives to the cost-recovery model that SWRB operates under as a Crown Agent, so that the

cost of registration that flows through to community-based social service providers and individual social workers can be lessened.

### **Pay equity**

16. SSPA is coordinating the pay equity claim for people in community-based social work roles to achieve parity with Oranga Tamariki counterparts. The pay equity gap stems from historic underfunding of the community-based social services sector, and has been significantly exacerbated by the fact that the 2018 Oranga Tamariki pay equity settlement was not extended to community-based social work roles.
17. The SWRB's proposed fee increases will have a significant impact on a sector already experiencing an increasing pay differential. SSPA member organisations have shared that the fee increases are not affordable in the current environment characterised by ongoing funding and workforce pressures, including the pay equity situation. While some NGOs pay registration fees for their social workers, the proposed increases mean that some NGO employers are considering reviewing current practices. The reality is that if these proposals proceed at the new fee levels outlined, some employers will need to consider placing costs of registration back onto individual social work staff. Our members have shared with us that paying registration may in turn be untenable for some individual social workers, given that that they struggle based on their current salaries to cover their own and their families' costs of living.

### **Workforce capacity and development**

18. Strengthening the capability and capacity of the social service workforce is a priority for SSPA and our members. The sector needs to be able to recruit and retain a capable and experienced workforce, able to respond to the needs of the people and communities that they work in. Investment is needed in the ongoing professional development of community social workers, to strengthen the tauwhiro workforce and the social sector as a whole. The long-term impacts of fee increases raise concern for SSPA and its members. Member organisation leaders have shared with us that for staff nearing retirement age or staff considering leaving the profession, the proposed fee increases are a factor playing into decisions to leave the profession. Employers are now having to consider short-term solutions and whether roles can be done by non-qualified social workers. SSPA would like to draw attention to this issue which will have long term impact on the strength of community-based social services to meet the needs of families and whānau.
19. Mandatory registration has been an important factor in recognising and valuing the profession of social work, and in giving the public and employers assurance that staff are appropriately qualified and competent to do the important roles they undertake. SSPA is supportive of systems that enable professional development and support for registered social workers. Retention of and development for graduate social workers and developing pathways for professional development and career progression will, in the long-term, build a strong and capable workforce, improving the wellbeing and financial security for those choosing to work in the profession. Therefore, employers need to be able to give certainty to graduates about employment packages, and to be clear for new graduates as to whether the cost of registration is built into these, in line with what is offered by Oranga Tamariki, DHB's and other government employers of social workers.

## **Looking ahead**

20. Looking ahead to 2022, community-based social service providers require the support of government and professional bodies to continue their work within their communities and with children, rangatahi, families and whānau. The recent government announcement of the COVID-19 Care in the Community model has significant implications for community-based social service providers in supporting the welfare needs of families and whānau during self-isolation. It again highlights the crucial role that social workers have in identifying needs and ensuring communities are supported effectively in terms of their wellbeing and welfare through the impact of COVID-19.
21. We strongly encourage the SWRB to reconsider the level of the fees increases proposed, and the timing and phasing of implementation of any changes. SSPA is ready and available to work constructively together with the SWRB from a sector perspective, and also encourages the SWRB to work in partnership with employers and the sector on the process for any changes.

## **Contact details in relation to this submission**

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