

Attention: Royal Commission into Domestic, Family and Sexual Violence (DFVSV)

From: Social Workers Registration Board South Australia (SWRB)

Date: 16 Sept 2024

Regarding: Importance of workforce capacity in the sector.

Purpose

The purpose of this submission to the Royal Commission into Domestic, Family and Sexual Violence (DFVSV) is to highlight the up-coming requirement of registration for social workers, first in South Australia and then nationally. Such regulation will shape the DFVSV workforce in two significant ways:

- Social workers will have to register from 1 July 2025.
 - There is a fee attached to this registration.
 - Continuing professional development and supervision will be required.
- The definition of social work services undertaken in the social work scope of practice is currently being discussed.
 - Such definitions will influence who can and cannot undertake functions and activities of a social worker. Functions and activities undertaken in the DFVSV field may be impacted.
- Regulation enables the Social Workers Registration Board (SWRB) to approve accreditation standards of university social work qualifications, which is an important lever to influence education standards and content specifically related to DFVSV.

This paper highlights these three issues but also outlines possible strategic alignments to other influencing factors that are crossing social work and the DFVSV field.

Introduction

The Commission has been asked to inquire into four key areas. This submission contributes specifically to: Response.

- How South Australia can ensure best practice response to domestic, family, and sexual violence through the provision of services and supports.

The Terms of Reference also recognises the need to have regard to the importance of workforce capacity in the sector.

This submission intends to support the Commission to examine existing policies, legislation, administrative arrangements, system structures and funding levers in South Australia so that the Commission can develop recommendations about what needs to change in terms of supporting the growth, quality, and expertise of the workforce.

Background

The Social Workers Registration Act 2021 (the Act) was passed in the South Australian Parliament. The commencement date for the Act is 1 July 2025¹.

The Act protects the title of 'social worker' (S38) and stipulates that the SWRB sets the qualifications and experience which can lead to the requirement to register as a social worker, (s25). When the SWRB registers a person as a social worker, they are registered as a social worker within a scope of practice as articulated by the SWRB. The SWRB must also define those social work services which can only be undertaken by a registered social worker (s20 & S24).

Diverse practices exist in the employment of people across the social service sector (including the DFVSV field), and these practices will be impacted by social worker registration. Currently the sector can employ people doing work similar to social work, sometimes which is high risk, without being suitably qualified, experienced, or accountable.

The SWRB is continuing to seek advice and feedback about the definition of work which only social workers can do, as required by the Act. In light of its unique position as the first state in Australia to require social workers to be registered in order to practice social work, the SWRB is undertaking a phased approach to its implementation. This will allow the sector to feedback to the SWRB, and the SWRB to learn from its first few years as a regulatory body in South Australia. Other professions do not seem to have the same blurred edges to their work (law, nursing, clinical psychology, teaching, occupational therapy etc) mainly because they do not have a history of allowing unqualified people to use their titles.

Impact

With this current context in South Australia, the impact of the legislation is the following –

From 1 July 2025:

- Only registered social workers may call themselves a social worker, and employers must not refer to non-registered people as social workers.
- The SWRB must prescribe the qualifications and/or experience which can lead to a person being able to register as a social worker.
- When a person is registered as a social worker, they are registered to work within a scope of practice. Because at this time the SWRB is creating one broad scope of practice, this will cover all social work.

In the future, the SWRB will define and Gazette the social work services that can only be undertaken by social workers. It will continue to gather information about this in the interim.

Much of DFVSV work is in the social work scope of practice and may, once defined, fall within the definition of social work services that can only be performed and managed by a registered social worker (noting this has not yet been defined).

¹ As per the Social Workers Registration (Commencement) Amendment Act 2023.

As such, we would welcome a conversation about the definition of social work services and the possible impact on the future DFVSV workforce. There are also Offences (Part 6) listed in the Act, whereby a person must not hold themselves out as a social worker or permit another person to do so, unless the person is registered under the Act.

Opportunity

The Royal Commission aims for best practice responses to domestic, family, and sexual violence through the provision of services and supports; hence recognises the need to have regard to the importance of workforce capacity in the sector. The registration of social workers provides the following opportunities-

1. The purpose of registration of social workers is to continuously raise the standard of social work services, giving the SA community and clients of social work services confidence that they will be served by qualified social workers, receiving ongoing continuing professional development and supervision, and backed by a robust regulatory scheme. There is an opportunity to leverage the new registration requirements to contribute to a DFVSAV workforce with clear education and practice standards, accountabilities, and professionalism.
2. DFVSV work is diverse including responses to those experiencing such violence, particularly women and children, responses for perpetrators, responses where families wish to stay together, and navigating structural and systemic factors that constrain work such as housing shortages. Social workers already play an important role in fulfilling these responses across the spectrum of DFVSV work.
3. There is an opportunity to leverage accreditation standards set by the registration of social workers, with the SWRB having future authority to set education standards, content, and appropriate knowledge and skills to practice (to be inclusive of DFVSV knowledge and skills), as well as approving social work programs and qualifications. This provides a long-term pipeline to educate and grow the DFVSV workforce, with a regulatory system providing consistency and accountability.
4. Section 25 of the Act states that a person is eligible for registration as a social worker if they have a qualification prescribed by regulation or has sufficient practical experience in practising social work. The SWRB is required to determine a practice experience pathway for registration. The practice experience pathway will be open to many working within the current DFVSV field without qualifications if they have extensive history of working in this field. The eligibility and criteria of this pathway is still to be determined at this time.

National factors

National employers have been briefed on Social Work Registration, as their social workers providing social work services in South Australia will need to register, highlighting the need for National Registration.

Furthermore, the Review of Regulatory Complexity of the National Registration and Accreditation Scheme (NRAS), 'the Complexity Review', commenced in April 2024, with Ms Sue Dawson appointed as independent reviewer, aiming for completion in April 2025.

The SWRB will be submitting to the NRAS Complexity Review to advocate for the national registration of social workers.

The Australian Association of Social Workers (AASW) will also be submitting to the NRAS advocating for national registration of social workers.

There is continued advocacy from key stakeholders to have national registration. South Australia is the first state to embark on this journey.

AASW

Following the Victorian Royal Commission into Family Violence, the AASW prioritised the creation of a specific Family Violence Credential with the input of sector knowledge leaders and practitioners.

Social workers play a critical and leading role in supporting people affected by Family Violence. The Family Violence Credential was created to help the community and other stakeholders distinguish social workers who possess specialist skills and experience in the complex and highly sensitive area of family violence. This is evidence of social work and DFVSV work intersecting with each other.

Victoria

The Framing the Future: Second rolling action plan focuses on workforce. Actions from the plan seek to develop more specialisation in career pathways. They also aim to remove barriers for professionals who want to move between different service types to develop in their careers.

The Framing the Future group are looking to reforms within education, training and skills to contribute to achieving objectives for the DFVSV workforce and for building capability among broader workforces.

The Victorian DFVSV sector stated the need to:

- retain skilled and experienced workers by supporting wellbeing and improving pay and conditions
- attract new workers who reflect the communities they serve
- address the workforce supply challenges for rural/regional services
- improve entry pathways and work readiness, as well as specialist practice skill development
- improve mobility between community services sectors
- collect and analyse workforce data to inform investment and workforce planning
- make clearer pathways through vocational and tertiary education to job roles
- develop our highly skilled and diverse workforce over time.

Social Work registration will also intersect with these ambitions.

Critical points for discussion

Any recommendations regarding the future of the DFVSV workforce needs to take into consideration the registration of social workers in South Australia and in the near future, national registration. Social Work registration can be used as a lever to increase quality of practice in DFVSV and offer career pathways. Furthermore, it can influence education standards and content in terms of DFVSV knowledge, and skills.

The commencement of the Act will have the following impacts:

- From 1 July 2025, individuals who use the title of social worker will need to register or cease using the title.
- From 1 July 2025, individuals who hold a social work qualification but use another title, and work within the social work Scope of Practice, will need to register. If they do not register, they must not hold themselves out or be held out as a social worker. From 1 July 2025, provisional registration will be available in some situations, for example for people who are going through the experience pathway or who are undertaking higher education in order to register. Criteria will apply.
- In coming years, anyone providing social work services (yet to be defined) will need to be registered as a social worker.

Registration will have specific impacts on Aboriginal and Torres Strait Islander employees, who bring valuable cultural knowledge and practices to their service provision. The SWRB seeks to value the work and knowledges of Aboriginal and Torres Strait Islander people, while also ensuring that the title and work of social work is protected. It is exploring how to do this and encourages feedback on this point.

Furthermore, from July 2025, the principal pathway to registration as a social worker in South Australia will be through a prescribed social work qualification from one of the domestic tertiary education providers. All graduates of these social work programmes will be deemed to be competent to practise social work through their qualification.

The SWRB will prescribe qualifications only where it is confident that the educational programs adequately prepare students for professional practice in social work. The SWRB will therefore be involved in the accreditation process, to ensure that social work degree programs provide the necessary education and training to prepare graduates for effective and ethical practice in the field.

The SWRB have benchmarked the approach that other regulators take, including the Teachers Registration Board and AHPRA whereby the Board approves social work qualifications.

Recommendations

A DFVSV workforce that is adequately social worker trained and registered to align with and leverage national standards and expectations of regulated professions is an important tool in building workforce capacity and expertise to ensure a domestic, family and sexual violence system that will deliver improved outcomes.

The SWRB recommends the following-

- The sector/peak bodies to work with the SWRB in the short term to enable current DFVSV workforce to gain appropriate practice experience pathway registration and/or social work qualification registration where appropriate.
- The sector/peak bodies to work with the SWRB to determine knowledge, skills and professional attributes to safely practise in the field of domestic, family and sexual violence, which can then inform accreditation and educational standards of social work qualifications.
- The sector/peak bodies work to with the SWRB to determine definitions of social work services that impact on domestic, family and sexual violence work, which in the future only registered social workers will be able to perform.

Your sincerely



Professor Sarah Wendt

Director, Social Workers Registration Board.

