

**EMBOLDEN SA INC.**

**SUBMISSION TO THE SOCIAL WORKERS REGISTRATION  
BOARD CONSULTATION ON SCOPE OF PRACTICE & SOCIAL  
WORK SERVICES**

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## Introduction

Social workers play a vital role in the domestic, family and sexual violence (DFSV) services sector. As the peak body for the DFSV sector in South Australia, Embolden supports the professionalisation of the workforce and the protection of the social work qualification that registration is likely to provide. However, the DFSV sector is also strengthened by the diverse qualifications, skills and experience of its workforce.

The DFSV sector faces significant workforce challenges and Embolden is concerned about the lack of clarity in several areas of the Social Work Registration Scheme (the Scheme), including the proposed scope of practice and experience pathway, and the potential for the Scheme to adversely affect the capacity of the sector to continue to deliver critical services. Embolden cannot endorse the proposed scope of practice and social work services while these critical elements are unclear or still under development. While Embolden understands that the Australian Services Union has been consulted by the Social Workers Registration Board (SWRB), Embolden will share our response to this consultation with the ASU and discuss the potential impacts of the Scheme for the specialist DFSV workforce.

## Key Issues

In response to the proposed scope of practice and social work services, Embolden would like to highlight the following issues:

1. The scope of the functions and activities is very broad, and greater clarity is required around what specific work should *only* be performed by registered social workers.
2. There is a lack of clarity regarding staff with other professional registrations whose scope of practice is encompassed under the current description of functions and activities. The response to FAQ 8 on the SWRB website (as of 28/08/24) is unclear and potentially inconsistent with the specification that the functions and activities identified are to be *only* performed by social workers.
3. Embolden holds significant concerns about the potential adverse impacts on the DFSV sector, including immediate impacts on service delivery, additional barriers to recruitment and cost implications for individuals and organisations.
4. Consultation of the DFSV services sector in the development of the experience-based pathway, including Aboriginal Community Controlled Organisations and organisations delivering regional and remote DFSV services, is vital in ensuring continuity and sustainability of service delivery.

## **About Embolden SA Inc.**

Embolden is the statewide peak body for organisations working to respond to and eliminate domestic, family and sexual violence in South Australia. Our members provide services that promote the safety and wellbeing of women and their children, and work to prevent and respond to violence against women. We lobby and advocate for women's right to respect, safety and self-determination, and represent providers of specialist services in the domestic, family and sexual violence (DFSV) sector, including services that work with men who use violence against women and Aboriginal specialist services.

## **The importance of professionalisation of the DFSV workforce**

Embolden values the contribution that the Scheme will make to the professionalisation of social workers within the DFSV workforce in enhancing professional standards and strengthening community trust in the profession. As people accessing services in the DFSV sector are disproportionately affected by the impacts of poverty, inequality, violence, discrimination and ongoing system failure, Embolden applauds the emphasis on social workers' responsibility to address these issues.

## **The social work qualification and the DFSV workforce in South Australia**

Embolden understands that the SWRB intends to endorse the list of accredited programs from the Australian Association of Social Workers, defined as an accredited Bachelor of Social Work or Master of Social Work (qualifying). While qualified social workers make up a significant proportion of the DFSV workforce, it is important to recognise that social work is one qualification among many that support service provision in the DFSV sector. This interprofessional and multi-disciplinary mix strengthens the sector through the utilisation of diverse skillsets in a collaborative environment.

Embolden's recent survey of its member organisations highlighted the diversity of the DFSV workforce in South Australia. The survey captured information for 279 FTE across 14 DFSV services. Recruiting suitably qualified and experienced staff is a significant challenge across the sector. As a result, many roles do not have essential minimum qualifications, including half of the client facing FTE of the surveyed DFSV organisations.

For roles that have set minimum qualifications, there is considerable diversity with social work being one qualification among many valued by the sector. Others include bachelor or equivalent

tertiary level qualifications in human services, community development, community services, counselling, psychology and social sciences.

Across the sector more broadly, staff bring a diverse range of qualifications from certificate through to PhD level in:

- Aboriginal and Torres Strait Islander Primary Health Care
- Arts (Women's Studies)
- Behavioural Science
- Child & Adolescent Welfare
- Client Assessment & Case Management
- Community Services
- Counselling
- Criminology
- Government Investigations
- Law
- Mental Health
- Midwifery
- Nursing
- Psychology
- Psychotherapy
- Risk Assessment & Safety Management
- Social Work
- Training & Assessment
- Youth Work & Family Intervention

Recruitment of qualified and experienced staff is a significant challenge across the DFSV sector. While it can take up to three months to fill vacancies in metropolitan services, this is doubled for organisations delivering regional, remote and very remote services often requiring multiple rounds of recruitment to fill a single position. Given this context, it is important to avoid creating any additional barriers to recruitment.

In privileging formal social work qualifications, Embolden also suggests that the SWRB should also consider the readiness of social work graduates to deliver services in a complex context such as DFSV. Embolden's member organisations note that they play a significant role in upskilling social work graduates as there is an insufficient focus on responding to DFSV within tertiary courses. This is supported by a recent study, which found gaps in Australian social work graduates' understanding of DFSV and emphasised the importance of personal and professional practice experiences in enhancing graduate readiness.<sup>1</sup>

### **Proposed Scope of Practice for Social Work**

Embolden supports the proposed scope of practice, outlined on page 9 of the Companion Document and particularly the emphasis on empowerment, social justice, human rights and respect for diversities. However, Embolden recommends the addition of the responsibility of social workers to adopt culturally-informed approaches and to support the cultural determinants of health. In this context, Embolden notes that under the description of "Australian Social Work" on page 6, Aboriginal and Torres Strait Islander peoples are only

positioned as clients, rather than as clients and social workers. Embolden also suggests that the addition of self-determination in the discussion of rights (page 7) would be of value.

In the description of how social workers practice, Embolden commends the emphasis on critical thinking, critical reflection and self-awareness and supports the statement on Indigenous knowledges. However, this section would also benefit from acknowledging that all social workers bring their own diverse cultural knowledge to their practice, and that “non-Indigenous social workers” (page 13) are not an homogenous category.

### **Proposed Social Work Functions & Activities in the Context of the DFSV Sector**

Embolden acknowledges that the various functions and activities summarised on page 10 of the Companion Document are undertaken by social work roles in the DFSV sector. To this list, Embolden would suggest the addition of advocacy and a focus on systemic change, in line with AASW Practice Standard 3: “Social workers advocate for policy initiatives and approaches to practice aimed at achieving fair and equitable access for people to social, health, economic, environmental and political resources.” Embolden would also suggest that the list of functions and activities might benefit from being revised to use person-centred language.

These additions and changes aside, Embolden has significant concerns with the proposal that the described functions and activities “can **only** be performed and managed by a registered social worker” (page 10). Embolden notes that FAQ 8 on the SWRB website suggests that staff who perform these functions but who are registered by another professional body within their scope of practice is considered by the SWRB to be good practice, although this is not mentioned in the proposed scope of practice documents. If the intent of the function and activities section is to protect the role of social work, Embolden suggests that the SWRB needs to provide more clarity around what functions and activities are specifically considered the preserve of social work and what may be undertaken by other professions.

In the immediate to medium term, Embolden contends that the proposed restriction of the functions and activities to registered social workers poses a significant risk to the DFSV sector’s continued capacity to deliver services. Current workforce shortages have created competition within the sector and across sectors for suitable staff, with an inequitable playing field. Better pay and conditions in other sectors, and higher costs and barriers to work in rural, regional and remote locations are impacting the ability of the DFSV sector to attract and retain workers. Current reforms in the child protection and early childhood sectors are likely to intensify the competition for suitably qualified and experienced staff in South Australia.

Concerns about the potential negative impacts of the proposed restrictions outlined in the Companion Document are supported by the example of the Victorian experience of introducing mandatory minimum qualifications (MMQ) in the DFV sector. Like the Social Worker Registration Scheme, the intention was to build consistency, capability and accountability across the sector to provide high quality and culturally appropriate supports and services to people experiencing DFV. However, ongoing workforce shortages created additional pressures across the sector and there were challenges in implementing the policy as intended. Unintended negative consequences included roles remaining unfilled due to organisations only employing those with tertiary degrees in Social Work (because of the burden on organisations to assess ‘equivalency’) and alternative pathways not being utilised. With qualified social workers in demand from other sectors, and some offering higher remuneration and lower barriers to entry, the specialist family violence sector was less attractive.

## **The Experience Pathway and the DFSV Workforce**

Embolden understands that the SWRB has noted that there will be an experience pathway to support the registration of staff with high level skills, knowledge and cultural authority, with further details to be released in late 2024. Embolden and its member organisations look forward to being consulted about the experience pathway’s development, given the current lack of clarity and the significant proportion of the DFSV workforce who may need to take advantage of this pathway.

If, like the Victorian experience pathway, this will still require staff with significant professional experience to work towards a formal social work qualification, Embolden is concerned that this will also impose barriers to systemically excluded and marginalised groups gaining employment in the DFSV sector. There are existing issues of accessibility to formal social work qualifications for people with caring responsibilities and people from regional, rural, remote and very remote communities.

There are also concerns around cultural safety in current degree programs, which may prove a barrier for Aboriginal people to enrol in or complete a program of study.<sup>ii</sup> As Embolden’s member organisations have identified the importance of increasing recruitment of Aboriginal staff, there are concerns over the introduction of any further potential barriers to their recruitment. Potential barriers for people with lived experience of DFSV also need to be carefully considered in the experience pathway, especially as the DFSV services sector is embarking on work to elevate the role of lived expertise.

Restricting registration to those with social work qualifications has the added disadvantage of potentially “imposing undue costs on persons seeking to be registered” in contravention of

Section 21(2) of the *Social Workers Registration Act 2021*. Embolden recommends that the SWRB clarifies who is expected to bear the cost of registration. It should also be noted that solely focusing on the cost of registration does not account for the significant and often prohibitive burdens that qualifying for a degree places on people, particularly as the pursuit of a Bachelor-level social work qualification is likely to take much longer than four years for those who cannot afford to study full-time. This includes restricting the amount of paid work a person can undertake while completing a degree, particularly during placement periods, and the debt that students take on. People experiencing poverty or already relying on Commonwealth assistance for daily living may be prevented from engaging with the formal and unpaid study options required.

In addition to ensuring equitable access to registration, Embolden considers the experience pathway of vital importance in guarding against the loss of the significant professional experience and cultural expertise that already exists in the sector, in the absence of any formal social work qualifications. If this loss occurs as an unintended consequence of mandating registration across a range of roles in the DFSV sector, this is likely to significantly compromise South Australia's ability to effectively and appropriately respond to DFSV.

## **Supporting the DFSV Sector to Implement the Social Work Registration Scheme**

Embolden supports the registration of staff who currently have social work qualifications and work in the DFSV sector. However, Embolden asks that consideration be given to support DFSV organisations to implement new requirements, with an understanding of the implications on capacity and funding. Impacts which may adversely affect the DFSV sector include increasing pressures on already unsustainable caseloads to support staff to undertake formal study, and requirements for formal learning plans. The current lack of clarity around costs also makes it difficult to predict or prepare for the impact of the Scheme on the DFSV sector. Given these issues, it would be important to consider sector readiness in the context of transition times for both standard registration and the experience pathway.

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<sup>i</sup> Unveiling Graduate Readiness to Respond to Domestic and Family Violence in Australian Social Work Programmes, KS Schaffer, NI Martin, JE Lawrence and IR Bryce, *The British Journal of Social Work*, Volume 54, Issue 5, July 2024, Pages 2087-2106).

<sup>ii</sup> Walter, M., & Baltra-Ulloa, A. J. (2019). Australian social work is white. *Our voices: Aboriginal social work*, 65-85.