



Submission on the Inquiry into the Operation of the Social Workers Registration Act 2003 to the Social Services Select Committee

EXECUTIVE SUMMARY

Aotearoa New Zealand Association of Social Workers (ANZASW) actively supports the mandatory registration of social workers. The Association's view is that holding a recognised social work qualification must be the trigger for social work registration. Restricting registration to roles entitled 'social worker' or to certain types of social work practice would mean that a significant number of practicing social workers would not be required to register. This would limit the ability of the Social Workers Registration Board (SWRB) to "protect the safety of members of the public by prescribing or providing mechanisms to ensure social workers are competent to practice"¹.

ANZASW's preferred option for achieving the changes required for mandatory registration of social workers would be the repeal of the existing Act and replacement with new legislation regulating social workers.

The International Federation of Social Workers (IFSW) definition of social work is central to any definition of social work in Aotearoa New Zealand. This definition could be incorporated in legislation as has been done in some countries or be used by SWRB to define social work.

In relation to competency ANZASW supports the move to social workers being deemed competent through completion of a New Zealand qualification or registration by an overseas authority. There must however be a robust mechanism for assessing competence to work with Māori and people from different ethnic and cultural groups in Aotearoa New Zealand for social workers who have not completed a New Zealand qualification.

The development of a fitness to practice social work framework is appropriate and establishes a transparent process for determining fitness to practice that is easily understood by all stakeholders.

The changes proposed for the Complaints Assessment Committee and the Social Workers Complaints and Disciplinary Tribunal and processes are necessary to ensure that there is a rigorous regulatory process and to protect the public from poor social work practice.

¹ Social Workers Registration Act 2003 Section 3(a)

Introduction

Aotearoa New Zealand Association of Social Workers, or ANZASW, is the professional body for social workers in New Zealand. It is a high priority that we make this submission on behalf of our members to the Inquiry into the Operation of the Social Workers Registration Act 2003.

In order to be in a position to write this submission on behalf of our membership ANZASW conducted a survey. The questions in the survey were related to Social Service Select Committee Terms of Reference for this inquiry.

Social work practice is about providing assistance, understanding and encouragement to sensitive, stressed and vulnerable clients taking into account the wider social factors affecting their lives. Social workers are focused on improving client's wellbeing whilst affecting long term change in both personal and social situations.

Aotearoa New Zealand Association of Social Workers

Aotearoa New Zealand Association of Social Workers (ANZASW) is the professional body for a national collective of more than 3,400 social workers, who have day-to-day involvement with the most vulnerable people in our society. Our work is guided by a Code of Ethics that is aligned with the International Federation of Social Workers (IFSW) Statement of Ethical Principles.

The international definition of social work is:

“Social work is a practice-based profession and an academic discipline that promotes social change and development, social cohesion, and the empowerment and liberation of people. Principles of social justice, human rights, collective responsibility and respect for diversities are central to social work. Underpinned by theories of social work, social sciences, humanities and indigenous knowledge, social work engages people and structures to address life challenges and enhance wellbeing.”²

Social work is founded on principles of human rights and social justice and in Aotearoa New Zealand, is guided by the Treaty of Waitangi and respects the equality, worth and dignity of all people. In accordance with the March 2012 IFSW Global Agenda³ “we commit ourselves to supporting influencing and enabling structures and systems that positively address the root causes of oppression and inequality. We commit ourselves wholeheartedly and urgently to work together with people who use services and with others who share our objectives and aspirations, to create a more socially-just and fair world”. We believe the overarching principles of social work are

² Agree by the International Federation of Social Workers; International Association of Schools of Social Work and International Council on Social Welfare in 2014

³ International Federation of Social Workers, International Association of Schools of Social Work and International Council on Social Welfare (2012). ‘The Global Agenda for Social Work and Social Development Commitment to Action’. Available at isw.sagepub.com (accessed 13 June 2012)

respect for the inherent worth and dignity of human beings, doing no harm, respect for diversity and upholding human rights and social justice.

Our mission is to enable people to develop their full potential; our skill-set is problem solving and facilitation of positive change in individuals, organisations, whānau and communities. We recognise the environment contains opportunities for people to be both agents of change and victims of factors beyond their control. As a profession, we strive to alleviate poverty, foster social inclusion and liberate those who are vulnerable or oppressed. Our interventions involve problem solving, development of coping strategies, one-on-one counselling and therapy, family and group work, agency administration, community organisation, social action and social change and helping people to access services, resources and support systems within their community.

Social workers respond to crises and emergencies along with the personal or social problems that arise from experience of barriers, inequities and injustices within our society. We work across government and non-government settings including community organisations, iwi agencies, youth justice, child protection, mental health, addictions, disability and private practice. We are involved in research, training, education, professional development, competency assessment, data gathering, risk assessment, structural analysis, interagency protocols and the improvement of social policy.

The Social Service Select Committee Terms of Reference

As part of a wider review of the current operation of the Social Workers Registration Act 2003 the Minister for Social Development has presented an issues paper to us. This paper identifies and discusses key issues with the current operation of the Act, including its relationship with other legislation such as the Vulnerable Children Act 2014. The Minister has asked us to consider these issues and the options to address them, with a view to making recommendations to Government for legislative reform. In this context, the terms of reference for our inquiry are to consider:

OUR MEMBERS ARE SAYING

If we have registration for real estate agents and financial advisors, we should have it for social workers, and their clients can be very vulnerable.

I believe registration should be mandatory. I liken it to any other profession, and I am sure one would not be happy to be cared for by any other health professional who is not registered with their regulatory body.

- whether registration of social workers should be mandatory
- the potential challenges to registration at present
- the adequacy of current competence assessments and other pre-requisites for registration
- how fitness to practise social work is assessed by the Board
- the level of oversight of social workers by the Social Workers Registration Board
- the process and powers of the Complaints Assessment Committee
- the adequacy of grounds of discipline and sanctions available to the Social Workers Complaints and Disciplinary Tribunal
- the appropriateness of suspension and cancellation of registration and practising certificates as sanctions for non-compliance.

Should registration of social workers be mandatory?

Aotearoa New Zealand Association of Social Workers supports mandatory registration of social workers and legislative ‘protection of the title’ social worker.

The only way to ensure that the social work profession as a whole is regulated is to require holders of a social work qualification who are delivering social work services in the broadest sense to be registered.

Without mandatory registration and protection of title people without a social work qualification and little or no professional accountability can identify themselves as a social worker and offer social work services.

This is well illustrated in the 2013 census which indicated that over 18,000 people identified their occupation as social worker.

OUR MEMBERS ARE SAYING

Mandatory registration is long overdue. It is a necessity to ensure that only properly trained, educated and skilled practitioners are employed in the functions that social workers fill with often vulnerable people. Requiring registration will increase the professionalism of work being done in society to empower people and increase social justice on behalf of individuals.

“Social work is a highly skilled professional function with often extremely vulnerable populations. Voluntary registration does not provide adequate assurances that individuals practicing social work are practicing at a minimum acceptable level of skill that is helpful and does not adversely impact on clients”.

An in-depth analysis by the Social Workers Registration Board (SWRB) identified that only 6,132 of these people would have met the minimum educational criteria for social work registration under the provisions of the Social Workers Registration Act 2003 (SWRA). This indicates that approximately 12,000 people claimed to be providing social work services to Aotearoa New Zealanders, at a time of vulnerability or crisis, who did not hold a recognised social work qualification. Nor was there any guarantee that they met other registration criteria such as:

- Being required to receive professional supervision
- Being required to undertake continuing professional development
- Demonstrating competence to practice social work
- Demonstrating fitness to practice social work.

It is recognised that social workers work with vulnerable people and with people, communities or systems in crisis. For this reason, it is believed to be important that social workers providing services are qualified, fit to practice, competent and accountable. Mandatory registration is regarded as the appropriate mechanism to achieve consistent standards of practice across all fields of practice.

Registration provides assurance to service users that social work practitioners have a recognised social work qualification and are fit to practice, are competent to practice, are receiving supervision and are undertaking continuing professional development. Overarching this is the professionalism that comes with working to the SWRB Code of Conduct and the ANZASW Code of Ethics.

Social work is a profession that intervenes in the lives of people through professional services such as but not limited to:

- a holistic or clinical assessment of a client based on the social worker's knowledge and skills;
- identifying and analysing the issues that emanate from that assessment;
- formulating a plan in response to the issues presented, including setting mutually agreed goals, time frames and review dates; and
- exiting support when it is deemed safe and appropriate to do so⁴.

⁴ Social Workers Registration Board_20151008_082345_07823_1860.docx CW_DocID: 556193 P21

OUR MEMBERS ARE SAYING

"I believe anyone calling themselves a social worker should be registered. Social Worker is a very misused title".

At present many employers, and the general population, seem to believe that anyone can do social work and 'tack on' social work to other jobs e.g. nursing.

The provision of these services impacts on the life and wellbeing of people using the service therefore ANZASW is of the opinion that mandatory registration is necessary to protect the public from unsafe or inadequate practice. This puts the profession of social work alongside other regulated professions that have the capacity to impact on the well-being and safety of the service users.

Which Social Workers Should Be Required to Register?

The Issues Paper: Proposed legislative reform of the Social Workers Registration Act 2003⁵ raises two issues:

- For whom or what kind of work should registration be required;
- What would be the best way to define the class(es) of persons for which registration is required?

ANZASW takes the position that registration must be required for all forms of social work. In taking this position ANZASW would expect the provider of social work services to hold a recognised social work qualification.

Restricting registration to roles entitled 'social worker' or to certain types of social work practice would mean that a significant number of practicing social workers would not be required to register. This would limit the ability of the Social Workers Registration Board (SWRB) to "protect the safety of members of the public by prescribing or providing mechanisms to ensure social workers are competent to practice"⁶.

For the purposes of describing what practicing social work involves ANZASW uses the following description:

Practicing social work involves:

- *Direct interaction with people using the service in the context of a 'front line' role;*
- *Managing, supervising or mentoring other social workers;*
- *Teaching social work practice or theory;*
- *Other roles that utilise an individual's social work knowledge, skills, values and ethics, where the individual has some level of influence on or engagement in decisions about people using the service.*

People using the service includes, but is not limited to, individuals, families, whanau, hapu, iwi, groups, organisations, communities, staff, supervisees, students.

Following the example of other regulated human services holding a specified qualification is a requisite for registration. ANZASW therefore argues that a recognised social work qualification must be the pre-requisite for social work registration.

⁵ Social Workers Registration Board_20151008_082345_07823_1860.docx CW_DocID: 556193

⁶ Social Workers Registration Act 2003 Section 3(a)

INTERNATIONAL DEFINITION OF SOCIAL WORK

The scope of social work practice is very broad which makes defining kinds of social work or tasks requiring registration difficult. This approach risks leaving off key tasks or social work fields of practice and may not easily and quickly capture emerging fields of practice.

Limiting social work registration to positions holding the title “social worker” would exclude a wide range of social work positions with titles that do not contain the words social worker yet require a social work qualification or include a social work qualification as one of the ‘desired’ qualifications. Types of roles excluded with this approach include for example Drug and Alcohol Workers, Youth Workers, Probation Officers, Outreach Workers, Facilitators, Community Advocates, Whanau Ora Workers and Community Workers. Position titles for social work roles is limited only by imagination.

Protection of Title

While recognising that social workers are employed under a wide range of role titles ANZASW is of the opinion that the title Social Worker must be protected.

This would prevent people without social work qualifications and accountabilities claiming to be social workers and claiming to be delivering social work services.

Determination of Qualifications and Defining Social Work

The Social Workers Registration Act 2003 currently requires the Registration Board to “recognise New Zealand Qualifications for the purposes of this Act”. ANZASW supports the continuation of this legislated requirement.

The definition of social work could be legislatively defined in a manner similar to the Lawyers and Conveyancers Act 2006 or Education Act 1989 or be defined by the regulatory authority as in the Health Practitioners Competence Assurance Act 2003. If a definition of social work was to be included in legislation ANZASW would advocate for the inclusion of the International definition. This has been enshrined in legislation in a number of countries whose social work professional associations are members of IFSW.

If the definition of social work is to be a SWRB responsibility ANZASW would continue to advocate for the use of the IFSW definition of social work.

“Social work is a practice-based profession and an academic discipline that promotes social change and development, social cohesion, and the empowerment and liberation of people. Principles of social justice, human rights, collective responsibility and respect for diversities are central to social work. Underpinned by theories of social work, social sciences, humanities and indigenous knowledge, social work engages people and structures to address life challenges and enhance wellbeing.”

In a rapidly changing world ANZASW would have a preference for defining social work in the context of registration to be determined by the Regulatory Authority. This allows definitions to be more easily maintained and adapted as social work requirements and fields of practice emerge.

The potential challenges to registration

The most common challenge identified by members was cost related. A number of points where cost became an issue were identified including but not limited to:

- The cost of completing a qualification
- Initial registration costs
- The Annual Practicing Certificate (APC) cost
- Cost of maintaining registration requirements, specifically supervision and continuing professional development fees.
- The length of time to become registered.

Currently it can take several weeks for an employee to achieve registration resulting in significant delays re employment. In a new environment of mandatory registration, it is essential that processes are developed to enable temporary registration to be accomplished in a timely way. Enabling the streamlining / speeding up of the process of full registration, whilst not compromising outcomes that provide assurance of public safety, is also necessary. Whilst there is a process for new graduates, in particular it is processes for unregistered social workers and / or overseas trained / new immigrant social workers requires attention.

Where the employer meets registration and APC fees it was felt that mandatory registration could present issues due to increased financial pressures experienced by employers across Government and particularly the NGO Sectors.

Where social workers are required to meet all costs associated with registration it was identified that the burden could be such that practitioners left the workforce.

A risk identified by members is the risk of 'de-skilling' the workforce. The parallels discussed included the Registered Nurse / Enrolled Nurse and the Early Childhood Educator / Teaching Assistant models.

There is concern that employers will consider employing support workers with lower level qualification to cover some of the tasks and functions currently undertaken by social workers. This was perceived as a mechanism to a) reduce costs with lower salary rates and b) avoid the costs associated with registered social workers. ANZASW does not support this approach. It is however recognised that in a mandatory registration environment it would be easier to limit the possibility of this de-professionalisation from occurring.

This issue is closely related to the discussion above with respect to the definition of social work. For the protection of the public it is essential that all roles 'practicing social work' are included

within this legislation and not just those called 'social worker'. This would go some way towards mitigating the risk of employers using other titles to describe social work practice.

Competence assessments and other pre-requisites for registration

Competence to Practice Social Work

The ANZASW competency assessment process was established in 1989 as a mechanism for 'self-regulation' of the social work profession. The competency assessment process established an external moderation of social work practice that was valued by both practitioners and employers.

Under the provisions of the SWRB Programme Recognition requirements social work students in their final practicum placement are required to be assessed against the SWRB's ten core competencies⁷. This beginner practitioner competency is valid for two years. In the current environment the graduate must complete a full competency assessment within the two-year period.

Registered social workers and members of ANZASW must recertify their competence to practice social work every five years.

ANZASW supports the options proposed by the SWRB in the Issues Paper:

The Board could be required to assess and only recognise New Zealand or overseas qualifications where a graduate of that qualification will have the professional competence required to practice social work.

If so, where an applicant for registration has a recognised New Zealand or overseas qualification, a competence assessment may be unnecessary and professional competence could be presumed.

In addition to overseas qualifications, the Board could recognise overseas registration as a social worker as giving rise to a presumption of professional competence.⁸

⁷ SWRB Placement Within a Recognised Social Work Qualification May 2015

⁸ Social Workers Registration Board_20151008_082345_07823_1860.docx CW_DocID: 556193 Page 32

OUR MEMBERS ARE SAYING

I favour a regime that presumes competence until proven otherwise. The best way to do this is to examine competence in the context of sustained complaints against social workers.

Cultural Competence and Communication Skills

Competence to work with Māori has to be a central competence for social work practice in Aotearoa New Zealand due to the over-representation of Māori in many of the adverse social indicators.

As Aotearoa New Zealand becomes increasingly multi-cultural it is also essential that social workers are able to work with a wide range of different ethnicities and cultures.

The ability to communicate clearly both orally and in writing are essential skills for social work practice in Aotearoa New Zealand.

Social workers seeking registration without a New Zealand qualification (SWRA Section 7) are required to demonstrate their ability to “*speak and write English reasonably effectively and understand spoken and written English reasonably well*”. There are a number of Aotearoa New Zealand graduates, both citizens and migrants, who struggle to demonstrate the ability to communicate effectively, particularly in writing.

ANZASW in general supports the SWRB options for assessment of cultural competence and communication skills.

The Board could be required to assess and only recognise New Zealand qualifications where a graduate of that qualification will have the cultural competence and communication skills required to practice social work.

If so, where an applicant for registration has a recognised New Zealand qualification, a further assessment of cultural competence and communication skills may be unnecessary.

ANZASW would want reassurance that graduates genuinely understand and can practice cultural competence, with particular reference to competence to work with Māori and the place of Te Tiriti of Waitangi in Aotearoa New Zealand.

Graduates must be able to demonstrate a level of written communication skill that enables them to produce comprehensive and understandable written case notes and reports. Programme Recognition Standards would need to ensure that in the absence of an independent assessment that standards for cultural competence and communication are of a sufficient level to ensure practitioners are highly competent in these skill areas.

OUR MEMBERS ARE SAYING

It doesn't take a rocket scientist to figure out that if our most vulnerable/marginalised in society are overrepresented by Maori one has to at least have an ability and aptitude to work effectively with Maori. Thus social workers need to demonstrate their cultural competency skills continuously and that it's not just a tick box exercise to fulfil the needs of one's social work registration. These cultural competence skills should also be easily transferable and evidenced when working with different ethnic and cultural groups to ensure safe, effective social work practice.

I have seen standards drop especially in terms of literacy and ability to articulate in writing some of the expectations around process and lack of comprehension around what is expected.

ANZASW would support the requirement for social workers applying for registration without a New Zealand qualification to demonstrate competence work with Māori and with different ethnic and cultural groups in Aotearoa New Zealand and therefore supports the statement:

“It would still be necessary for those applying for registration without a New Zealand qualification to demonstrate cultural competence and communication skills”.

Registration on the Basis of Practical Experience

The ability to register on the basis of having enough practical experience to compensate for the lack of a recognised qualification has provided an appropriate pathway to registration for social workers who entered the profession prior to social work qualifications being readily available and prior to the enactment of the Social Workers Registration Act 2003.

Social Workers entering the profession after 2003 did so knowing that the requirement for registration was holding a recognised qualification.

ANZASW supports the proposal to maintain registration on the basis of enough practical experience prior to 2003 for a transitional period of twelve months following Royal Assent of an Amendment or new Act.

Fitness to practise social work

Social Workers often work with very vulnerable people. For this reason, assessing fitness to practice is essential for social workers, both at the time of entry into the profession as a student and at regular intervals throughout their professional life is essential for the protection of service users.

Social Workers work across a wide range of fields of practice. Some will be in roles that fall within the Vulnerable Childrens Act definition of core workers. It could be argued that the requirements of the Vulnerable Childrens Act should apply to anyone working with vulnerable people. A robust fitness to practice assessment would however more than adequately address safety issues.

ANZASW would support the SWRB prescribing the criteria for determining fitness to practice social work and developing a

OUR MEMBERS ARE SAYING

For those whose qualifications are from elsewhere, there should be an additional requirement to achieve competency to work with Maori via an assessment related course that includes Te Reo and Tikanga.

framework for assessing fitness to practice. Care must be taken to ensure that the criteria and / or framework do not unwittingly introduce an element of cultural bias.

Oversight of social workers by the Social Workers Registration Board

Overall ANZASW members recognise that independent oversight of social workers is necessary, and essential in a mandatory registration environment.

A number of members noted that employing agencies also need to be held to account in situations where the systems and processes put in place actively create barriers to the delivery of safe, competent practice. Any oversight process needs to be able to identify both the role of the social worker and that of those in management roles when assessing culpability for the matter being complained about.

ANZASW would support:

- *Both competence to practice and fitness to practice being pre-requisites for the issue of practicing certificate.*
- *If the social worker is no longer fit to practice or competent to practice:*
 - *impose conditions on a social worker's registration or practising certificate;*
 - *make a complaint in a broader range of circumstances; or*
 - *refer the matter back to a Complaints Assessment Committee (CAC) for further reconsideration of the best further action to be taken.*

ANZASW would recommend an additional option here, 'to require the social worker to undergo a competency assessment'. This could relate to all ten ANZASW Practice Standards or the SWRB Core Competencies or relate to specific practice standards / core competencies where issues have been identified.

- *Cancellation only being open to the Tribunal to do so, after the CAC and tribunal process has been followed with the Board being empowered to refer its concerns about a social worker's competence or fitness to practice social work to a CAC to enable this process to be undertaken.*
- *Where the Board receives notification of concerns about a social workers' ability to adequately practice social work the Board [actions could include]:*
 - *powers to suspend for a longer period of time on an interim basis;*
 - *expanding the power of suspension and/or allowing the imposition of conditions where the Board is satisfied that the social worker is unable to perform adequately the function required to practice social work satisfactorily;*
 - *power to review fitness to practice;*
 - *power to refer the matter to a CAC.*

Process and Powers of the Complaints Assessment Committee

ANZASW would support the development of a framework for screening complaints and convictions to include considering whether:

- *the complaint is trivial, frivolous, vexatious or in bad faith;*
- *the passage of time means it would be impracticable to investigate the complaint;*
- *there are reasonable grounds to suspect or believe that a person is no longer fit or competent to practice social work;*
- *there are reasonable grounds to suspect or believe that grounds for discipline by the Tribunal exist.*

With this framework in place ANZASW would support the Board taking over some or all of the Tribunal Chairperson's role in receiving and screening both complaints and convictions, with some administrative tasking being able to be delegated to the Registrar or employees of the Board.

With appropriate safeguards in place to ensure the scope of the powers to screen reflect the preliminary nature of the screening assessment, ANZASW could support screening that included the option of "*contacting the complainant, the person who is the subject of the complaint, and his or her employer*". It will be important however to ensure that there is clear demarcation between the registry function and the disciplinary functions of SWRB in order to maintain credibility within the sector.

It is regarded as appropriate for the CAC to be able to consider "other conduct or matters" that become evident during the course of an investigation. This would enable the CAC to consider all issues rather than potentially have to commence a separate investigation into new matters.

The concept of CAC being able to respond to low level misconduct is appropriate. ANZASW therefore supports the additional options for disposing of a complain which include:

- *directing an apology from the social worker to the complainant;*
- *directing mediation of the complaint, including to the Employment Relations Authority mediation process;*
- *referring the subject matter of the complaint to the police;*
- *censuring the social worker; and/or*
- *directing that the social worker undergo training, counselling or mentoring.*

Discipline and Sanctions Available to the Social Workers Complaints and Disciplinary Tribunal

ANZASW would support changes to the membership of the Complaint and Disciplinary Tribunal including:

- *the Chairperson and Deputy Chairperson are both lawyers*
- *three registered social workers*
- *one lay person*

Suspension and cancellation of registration and practising certificates as sanctions for non-compliance.

The current SWR Act requires that registration can only be cancelled if the social worker is found guilty of "gross or severe" professional misconduct.

The options proposed by the Issues Paper⁹ appear to allow the Board to determine the severity of the misconduct and impose lesser sanctions for professional misconduct at the lower end of the scale and cancellation for that which is at the higher end of the scale. This has the potential to remove the need to define “gross or severe”. This approach would allow the impact of the misconduct on the service user/s to be the defining point about the degree of grossness or severity.

ANZASW therefore supports the options:

- *The imposition of conditions could be available in conjunction with suspension, rather than only as alternatives.*
- *The Social Workers Registration Act 2003 (SWRA) be reviewed so that in each situation where cancellation of registration is an option, the lesser responses of suspension and/or imposition of conditions are also available.*
- *References in the SWRA to cancellation or suspension of a practising certificate be removed so that it is only registration that is cancelled or suspended (with a consequent automatic effect on a practising certificate).*

The current ANZASW complaints and disciplinary process for members who are not registered social workers allows for immediate suspension of membership in circumstances where protection of the public is deemed necessary.

ANZASW would therefore support the ability of the Board to be able to suspend registration or a practicing certificate on the basis that:

- *the social worker is not competent or fit to practice social work or, because of a mental or physical condition, unable to perform adequately the functions required to practice social work satisfactorily; and*
- *the suspension or conditions are reasonably necessary for the protection of the public.*

The Best Means for Achieving Reforms

It is recognised that social work activity falls within the parameters of the World Health Organisation (WHO) definition of health and is consistent with the WHO identified determinants of health.

The Health Practitioners Competence Assurance Act 2003 (HPCAA) takes a somewhat more medicalised approach to regulation. A third of the ANZASW members are working in health settings thus fall under the “Allied Health Professionals’ group of practitioners. The remaining two thirds of our membership work in a wide range of individual family whanau group and community settings working to enhance the wellbeing of those they work with.

Social Workers have been well served by regulation under an Act dedicated to the profession of social work and social work practice. This approach has supported the far reaching scope of social work practice.

⁹ Social Workers Registration Board_20151008_082345_07823_1860.docx CW_DocID: 556193 Page 76

ANZASW therefore would support the maintenance of an Act dedicated to the regulation of social workers. The preferred option is the repeal of the SWRA and replacement with new legislation regulating social workers.

A second option would be a hybrid approach with a primary Act regulating social workers the SWRA adopting some of the services established under HPCAA) such as the Complaints and Disciplinary Tribunal.