

Education and Training Committee – 19 November 2015

Review of social work education, and its engagement with the HCPC approval process from 2012 to 2015

Executive summary and recommendations

Introduction

This report reviews the HCPC's work in the area of qualifying social work education, following the completion of approval assessments of programmes transferred from the GSCC. This report reviews the three years of approval visits to social work programmes, reflects on the outcomes of the process, and provides comments on the HCPC's experiences in social work education.

Following Committee's input, the report will go through the HCPC's publication process, where it will be reviewed to consider presentation of message, compliance with house style, and will be subject to legal scrutiny. It is anticipated that this review will be completed and the report formally published in January 2016.

Following its publication, we will publicise the report via several channels, including our blog, on social media, and in the Education Department's regular stakeholder newsletter, Education Update. The executive will also take forward the particular learning points identified into other areas of work, and bring these learning points back to the Committee where they are relevant.

Decision

The Committee is asked to discuss the report, and provide feedback on the draft content. It is also asked to comment upon the report's general structure and themes.

Background information

- Education and Training Committee paper, 14 November 2013 – [Review of the Health and Care Profession Council's approval visits to social work pre-registration education and training programmes in the 2012–13 academic year](#)
- Education and Training Committee paper, 5 March 2015 – [Review of the Health and Care Professions Council \(HCPC\) approval visits to social work pre-registration education and training programmes in the 2013–14 academic year](#)

Resource implications

Resource implications for the Education and Communications Departments have been accounted for in departmental work plans.

Financial implications

Costs associated for publication and distribution have been accounted for in the Education Department budget 2015–16.

Date of paper
11 November 2015

Review of social work education in England, and its engagement with the HCPC approval process from 2012 to 2015

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Executive summary

Welcome to the report on Health and Care Profession's Council's work in qualifying social work education in England, in the period 1 August 2012 to 31 August 2015. This report focuses on one specific aspect of our work as the statutory regulator for social workers in England and our experiences from the previous three years.

In 2012, we inherited over 280 pre-registration programmes from the General Social Care Council and embarked upon a significant piece of work to approve all of these programmes against our existing education standards and newly approved professional standards for social workers.

Over the last three years, we have visited over 80 education providers and approximately 250 social work programmes. We have witnessed education providers closing a substantial number of programmes and replacing with new provision, often at postgraduate level. Our approval process has required the majority of education providers to revisit and change their programmes before we have granted open ended approval. In some cases, this involved tweaking elements of the programme; for others the required change was more far reaching.

In 2012, we took the decision that social work students should no longer be registered in England. It was decided that the most effective means of assuring the fitness to practise of social work students in England was through our education standards and approval process. An interim 'Suitability Scheme' was put in place to assist education providers and social work stakeholders through the transition. There was very little use or reliance on the Scheme over the three year period and it officially closed in August 2015.

Social workers are the largest profession on our Register, and the only profession which we regulate in England only, rather than UK wide. The number of registered social workers has increased from 83,000 in 2012 to 92,000 in 2015. Approximately 15,000 UK trained social workers have joined the Register over the last three years. We currently approve just under a thousand programmes across the 16 professions that we regulate. Social worker programmes account for just over a fifth of the total.

Social work education in England has changed significantly over the last three years, adapting to our new regulatory model alongside developments from the Social Work Reform Board, changes to all aspects of funding and a plethora of external reviews. The wider context in which social work education in England operates remains in flux. We are confident that education providers' experiences of the last three years and our on-going approval and monitoring processes will facilitate further changes, where necessary, whilst ensuring a rigorous and robust focus on the safe and effective practice of all future social workers in England.

We always reflect on our experiences of bringing new professions onto our model of regulation and continue to look at ways to improve and develop our standards and processes. Our involvement with social work education over the last three years will help shape our current reviews of our standards of proficiency for social workers and our standards of education and training and its guidance. The influence of social work education can already been seen on our wider developments with service users and carers in education.

We hope you find this report of interest. If you have any feedback or comments, please email me at education@hcpc-uk.org

DRAFT - for consideration by ETC -
19 November 2015

Introduction

About us

We are the Health and Care Professions Council. We are a regulator and were set up to protect the public. We currently regulate the following 16 professions.

- Arts therapists
- Biomedical scientists
- Chiropodists / podiatrists
- Clinical scientists
- Dietitians
- Hearing aid dispensers
- Occupational therapists
- Operating department practitioners
- Orthoptists
- Paramedics
- Physiotherapists
- Practitioner psychologists
- Prosthetists / orthotists
- Radiographers
- Social workers in England
- Speech and language therapists

In order to protect the public, we:

- set standards for the education and training, professional skills, conduct, performance, ethics and health of registrants;
- keep a register of professionals who meet those standards;
- approve programmes which professionals must complete so they can register with us; and
- take action when professionals on the Register do not meet our standards.

As of November 2015, there are almost 340,000 professionals on our Register, across the 16 professions that we regulate. Just over a quarter of these professionals (around 92,000) are social workers in England. As of 1 September 2015, we approve 987 programmes in total, including 221 social work programmes, which is just over a fifth of the total.

The history of social work regulation, and the four county picture

Social workers in England were first brought into statutory professional regulation in 2001, when the General Social Care Council (GSCC) was established. The Social Care Register was opened in 2003, meaning that only those on the GSCC register could use the title of 'social worker' in England.

As part of its review of arm's length bodies in 2010, the government abolished the GSCC and transferred most of its regulatory functions to the HCPC on 1 August 2012. From this date, we became the statutory regulator for social workers in England, and therefore became responsible for

- setting standards for the professional skills of social workers in England
- keeping a register of professionals who meet those standards
- approving and monitoring qualifying social work programmes in England; and
- taking action when social workers in England do not meet our standards, including ongoing fitness to practise concerns from the GSCC.

We did not assume responsibility for the post-qualifying training framework that was maintained by the GSCC.

Social work is a devolved matter in the UK. The GSCC was only responsible for social work regulation in England, and this is also our area of responsibility. Therefore, we can only comment on social work regulation in England. There are three other social work regulators located in Northern Ireland, Scotland and Wales. These regulators are:

- the Northern Ireland Social Care Council;
- the Care Council for Wales; and
- the Scottish Social Services Council.

The purpose of this report

This report reviews the first three years of the new regulators' work in the area of qualifying social work education. In 2012, we inherited over 280 programmes that were approved by the GSCC to educate social workers for practice. This report reflects on the processes, outcomes and challenges that the regulator has experienced between 2012 and 2015.

We acknowledge that there have been two government commissioned reports on social work education while we have been the regulator for social workers in England, and that there are continuing changes and challenges in the sector, including the rise and fall of a professional body, and the creation of two chief social worker roles. This report is not intended as a response to, or comment on these reports, or on any other initiative, but is intended to present what we have found while assessing social work education.

This report draws on:

- the conditions and recommendations set on the programmes that have engaged with our approval process¹;
- data transferred from the previous regulator, the General Social Care Council (GSCC);
- our programme records, and documentation submitted by education providers as part of our process; and
- a survey formed of structured and unstructured elements, of both professional leads at education providers, and of our visitor experts.

¹ All approval visitors' reports are published on our website at www.hcpc-uk.org/education/programmes/approvalreports/

Our regulatory approach

Assessment against our standards

We approve programmes to our standards of education and training (SETs), which (in the context of social work education) ensure students that complete the programme meet the standards of proficiency (SOPs) for social workers in England. The SOPs set out what a social worker should know, understand and be able to do when they complete their education and training so that they can register with us.

Our approval and monitoring processes ensure that programmes and education providers meet the standards of education and training. The approval process involves an approval visit and an initial decision as to whether a programme meets the standards of education and training. A programme is normally approved on an open-ended basis, subject to satisfactory monitoring. All of our processes ensure our regulation is robust, rigorous and effective, without being overly burdensome for education providers².

The SETs are flexible and primarily outcome focused, enabling education providers to deliver social work programmes in a non-prescriptive way, as long as students who complete the programme meet the SOPs for social work. For this reason, we use words like 'appropriate', 'effective' and 'relevant' throughout the standards. We make decisions about what constitutes as 'appropriate', 'effective' and 'relevant' on a case-by-case basis, with input from social work experts and lay people (who we call 'visitors'), considering the context of the programme and the social work profession.

We undertake a detailed assessment of programmes against our standards, considering a wide range of documentation, and question various stakeholders at an intensive two day approval visit. In order for us to approve programmes, we require education providers to make changes if they do not meet our standards. We call these requirements 'conditions', which we set on almost all of the programmes that we assess.

We make independent decisions about whether our standards are met, without influence from government, professional bodies, employers or other interest groups. Our visitors recommend whether a programme should be approved to our Education and Training Committee, with the Committee making the final decision in the public domain. In this way we ensure decisions on programme approval are made independently and transparently³. 93 per cent of professional leads at education providers that responded to our survey agreed that we make transparent decisions about approving programmes.

There are several of the standards that link to guidance, standards and policies set by other bodies or organisations⁴, and to other standards and guidance produced by the HCPC. There are two points to note about these links.

² The Professional Standards Authority, which oversees all health and care regulators in the UK, promotes a 'right touch regulatory model'. Our annual performance reviews demonstrate that they are satisfied that our regulatory model is risk based, proportionate and targeted.

³ Minutes of Committee's decisions are available at www.hcpc-uk.org/aboutus/committees/educationandtrainingpanel/

⁴ We regularly update the list of guidance that supports the SETs guidance, which can be found at www.hcpc-uk.org/Assets/documents/10004CADFurtherinformation-standardsforpreandpostregistrationprogrammes.pdf

Firstly, we recognise that the SETs do not function in isolation, and that there are many players in social work education. We link to other standards and guidance to ensure that education providers recognise the importance of the whole picture of professional education and the wider social work sector. As examples, the SETs and associated guidance:

- refer to professional body advice (SETs 3.7, 3.14, 5.6, 5.8 and 6.1);
- reference equality and diversity law (SET 2.4);
- link to funding bodies (SET 3.1);
- link to Quality Assurance Agency (QAA) subject benchmarks (SET 4.2);
- reference “registration with other regulators or organisations” with regards to staff at practice placements (SET 5.6); and
- ensure “compliance with external-reference frameworks” in assessment (SET 6.2).

Secondly, in order to ensure HCPC approved programmes develop social workers who are set up as a professional for life, the SETs link to the other HCPC standards that we expect registrants to adhere to (namely the standards of conduct, performance and ethics, and the standards for continuing professional development). In the SETs and its guidance, there are also frequent references to both the SOPs broadly as a set of standards, and to specific SOPs. We also produce guidance on conduct and ethics for students, and a document called Health, disability and becoming a health and care professional⁵, which are intended to support students during their studies.

How we ensure our standards are fit for purpose

In 2012, we set up a working group to help us prepare the SOPs for social workers in England. This group brought together a number of key stakeholders from the social work field, including employers, educators and organisations representing the profession. We also discussed the standards with a group of service users and carers, and held a public consultation on the proposed SOPs.

Our legislation requires us to set the SOPs at the level required for safe and effective practice to ensure public protection. This has been viewed by some social work stakeholders as setting the bar ‘too low’ for the aspirations of the profession. However, our role as a regulator is to maintain the threshold level for the professions we regulate, not to require best practice in the standards we set or drive forward the profession. To do so would see us acting unlawfully in setting standards higher than those required for public protection.

Following the completion of our review of social work programmes, we have started work to review the social work SOPs⁶. This review is to ensure that the standards:

- remain fit for purpose;
- are well understood by our stakeholders including registrants, service users and carers, education providers and the public; and

⁵ This guidance has recently been updated, and is referenced in the SETs as “A disabled person’s guide to becoming a health professional”.

⁶ The approach to reviewing the SOPs for social workers in England was discussed and agreed by the Education and Training Committee on 4 June 2015. The Committee paper, which includes an indicative timetable for completing the review, can be found at www.hcpc-uk.org/assets/documents/10004BCBEnc03-ReviewofstandardsofproficiencyforSocialWorkersinEngland.pdf

- take account of change, including changes in practice, legislation, technology, guidelines and wider society.

We are also currently undertaking a periodic review of the SETs⁷, which came into effect in their current form in 2009. There are specific areas that will be considered by this review, but our initial assessment is that the existing standards generally work well across all of the professions that we regulate, and therefore the review will focus on strengthening rather than radically changing the standards. We have noted learning points for the SETs review while reviewing social worker programmes, which are stated through this report.

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⁷ The approach to reviewing the SETs was discussed and agreed by the Education and Training Committee on 11 September 2014. The Committee paper, which includes an indicative timetable for completing the review, can be found at www.hpc-uk.org/assets/documents/10004814Enc02-Reviewofthestandardsofeducationandtraining.pdf

How we have worked with professional bodies

Professional bodies have an important role in promoting and representing their profession. Different professional bodies perform different functions, but most shape their profession's knowledge and skills. Professional bodies may develop learning and curriculum frameworks, and some assess qualifying education and training. We work with professional bodies across most of the professions we regulate, and consider how changes led by professional bodies may impact on programmes meeting our standards.

Social work professional bodies

We have worked with different social work professional bodies at different times over the last three years. We primarily worked with the (now defunct) College of Social Work (TCSW) as they developed and implemented the professions' new career development framework and integrated this into a new process for assessing qualifying social work education. The British Association of Social Workers (BASW) were not involved in assessing qualifying social work education between 2012 and 2015, and therefore our interactions with them from an educational perspective has been limited. We anticipate this may change in the future.

TCSW, formed out of the recommendations of the Social Work Task force (SWTF), was established in 2012 and was charged with taking forward many of the SWTF recommendations. A key area of its work that impacted on programmes meeting our standards was the development and introduction of the Professional Capabilities Framework (PCF) for social workers in England. The PCF set out what TCSW expected social workers to learn, both as part of their initial education and training, and when developing in employment. TCSW also undertook an 'endorsement' process of qualifying social work programmes, which ran alongside our approval process, to 'endorsement criteria' set up by TCSW. The endorsement criteria set out how TCSW expected qualifying programmes to be set up and run.

Our requirements vs College requirements

In 2012, the social work profession found itself with a new regulatory model and a new professional body for the first time. We attempted to differentiate between our role as the regulator, and that of TCSW as the professional body in our early communications with the sector. However, education providers still often misunderstood the complimentary but different roles played by the two organisations, or where the responsibilities of one organisation ended and the others' began. Problems also stemmed from the similarities between the PCF and our SOPs, and that TCSW based their endorsement model on our approval model, especially in terms of documentary requirements and deadlines.

Although TCSW was often happy for us to lead questioning at approval visits, there were occasions when they focused on particular issues which were very specific to the often prescriptive endorsement criteria being met. These discussions, although useful to TCSW, were not always useful to us in considering how our standards were met. There were also examples of TCSW reviewers having particular 'pet issues', and focusing on these issues above all others, which distracted from education providers addressing our (or indeed TCSW's) more fundamental concerns.

Having said that, it was useful for education providers seeking HCPC approval and TCSW endorsement to work to one set of documentary requirements (albeit with two mapping exercises) and to the joint HCPC / TCSW agenda when planning approval

visits. In our survey, education providers commented that the structure provided by us in the approval process was useful for them in engaging with the approval process. Visitors also positively commented on the structure and focus of our regulatory approach.

Fundamentally, the intended outcome of the endorsement criteria and the SETs was the same (to ensure programmes produced good social workers), but education providers faced challenges in meeting two sets of requirements, that were at times, very different. The endorsement criteria functioned differently from the standards, and were also written differently. For example, they regularly referenced other TCSW guidance documents, but did not specify what was required by the guidance documents in the criteria itself. For example, criteria 1.b) stated that “Admission and selection procedures are carried out in accordance with the Guidance on calibre of entrants (selection, admissions and suitability) held by The College of Social Work...” but does not particularly note TCSW requirements for each area of admissions. Although the SETs refer to other HCPC standards, along with guidance produced by other organisations, they can be read and understood as a standalone set of standards.

The endorsement criteria had particular prescriptive requirements, for example criteria 4.d) stated that “The programme provides 200 days of practice learning which will include: 30 days for development of practice skills, 70 days first placement, 100 days last placement.” We do not set prescriptive requirements such as these, but instead require education providers to demonstrate how elements of their programmes are appropriate to the programme as a whole, and that the programme delivers students who meet the SOPs.

Individual criteria also spanned several different areas, which could obscure the focus of the criteria. For example, criteria 3.b) stated that “The programme engages in scholarship and research working with employers and people who use services and carers, wherever possible, to enhance the quality of the student experience and the development of the profession.” This criteria focuses on the very different areas of:

- partnership working with employers;
- service user and carer involvement;
- student experience;
- curriculum development; and
- development of the wider profession.

We have particular standards to address all of these areas, which are more granular to enable us to focus on relevant areas of the programme, ensuring we give each area sufficient attention.

There were many instances of TCSW requirements working alongside ours. A particular example is in the area of training for placement staff. TCSW had prescriptive requirements for placement educators to be trained to a particular standard (discussed later in the report). We have requirements that practice placement educators are appropriately trained. Although in this case, the requirements of HCPC and TCSW come from different perspectives (appropriate training for undertaking the role, and prescriptive training requirements, respectively), both organisations ensure the quality of the training for practice placement educators.

We have discussed above where the endorsement criteria were particularly prescriptive, but there were also criteria that were flexible, like our standards. For

example, criteria 2.c) stated that “Systems and quality assurance processes ensure that contributors to the course are **suitably** prepared, and remain up to date with current and **relevant** knowledge, values, policy, research and practice” (bolding added for emphasis). This criteria had a very different focus to the majority of the criteria, which were more prescriptive. This criteria was more similar in function to our SETs, as it required a judgement based on how stakeholders contributed to the programme, and how the programme functioned.

TCSW’s processes usually allowed for education providers to submit a response to issues raised, but did not allow for particular ‘conditions’ to be set on endorsement. If TCSW considered that there were fundamental issues with the programme that the education provider could not address in the 2-3 months following the visit, they would not endorse the programme. In these instances, as TCSW did not give the education provider the opportunity to respond, it could be said that they pre-determined the outcome of their process. We have analysed conditions set for programmes that sought endorsement from TCSW, but were not endorsed⁸, to consider whether we also saw more issues with these programmes. We also picked up more issues with these programmes, setting an average of 1.4 more conditions per programme. On these occasions, we gave the education provider the opportunity to make changes to address the issues, and after changes were made, were able to approve them through our regulatory process.

Collaborative working

One of our organisational values is collaboration. We considered this when working with TCSW, and supported its development as a new professional body wherever it was appropriate for us to do so. Considering our independent role, we undertook collaborative scrutiny of programmes with TCSW at approval visits, sat on their Learning and Development Reference Group, and co-produced supporting documentation for education providers, such as a joint standard agenda for approval visits, and mapping of the PCF to the SOPs.

Our intention was always to be collaborative with social work stakeholders, and to undertake our right touch regulatory processes when considering social work education. When we questioned visitors in September 2015, they considered that education providers had a good understanding of the differences between the HCPC and TCSW, and that we worked collaboratively with other organisations when asked to do so. The visitors made this judgement based on considering the documentation provided, and on discussions at approval visits. If we were not satisfied with how a programme was running in relation to our standards (which included issues around understanding the roles of the HCPC and TCSW, or that the roles were misrepresented), then we set conditions to address issues.

What the closure of the College means for social work education

Initially, there was a lack of understanding by education providers of the value of having the endorsement scheme running alongside the approval process. This could have stemmed from the previous regulator straddling both roles usually performed separately by a professional body and a regulator. Fairly quickly, however, there was buy in from

⁸ TCSW did not publish a list of programmes that they did not endorse, but we were able to cross reference their endorsed programmes list (www.tcsw.org.uk/QualityProgrammeEndorsement/EndorsedHEIs/ accessed 30 September 2015) against information that we recorded regarding visit attendance.

most education providers to TCSW as an organisation (although this was possibly not reflected in terms of professional membership across social work). 92 per cent of programmes that we assessed also engaged with TCSW's endorsement scheme, and visitors ranked TCSW second in terms of being a "driver for change" in the profession (with central government being first and the HCPC being third).

Even with the support for the endorsement scheme, TCSW closed in September 2015, which represents a challenge for social workers in England. Part of this challenge is to understand that the role of the regulator will not change due to the closure of TCSW. Considering the boundaries of our legislation, it is still not appropriate for us to provide particular guidance or best practice advice. This guidance and best practice advice is for the profession lead on. The HCPC is one organisation in a heavily regulated sector, and our role is to ensure programmes are able to deliver students that meet the SOPs, to ensure public protection. For the reasons noted at the top of this section, a strong professional body is as beneficial to social work as a strong regulator, but one cannot replace the other.

Although the closure of TCSW is unfortunate for the social workers, it does not impact on our ability to run a robust quality assurance process. We have done this so far for social work and will continue to do so following the closure of TCSW, as we do with other professions that we regulate. Most of the functions of TCSW have now been passed to other organisations, including the PCF which has been passed to BASW. A notable exception is the endorsement scheme, which is being temporarily hosted by a group of employers and educators. There are currently no definitive plans for any organisation to formally take the endorsement scheme forward.

Depending on how other organisations take forward initiatives that were run by TCSW, there could be a significant vacuum left around curriculum and / or other guidance. This could lead to education providers expecting us to provide more guidance, or to have more specific requirements (which we are not able to), and therefore may impact on how programmes engage with our approval and monitoring processes. We may also see a wider range of programmes presented to us for approval. We are able to deal with this from a regulatory perspective, as we do not require a professional body view to make decisions about whether programmes meet our standards.

Our approach to ensuring social work programmes were fit for purpose

‘Transitional approval’

All qualifying social work programmes in England which were approved by the GSCC when it closed were approved by us on 1 August 2012. We termed this approval as ‘transitional’, until we assessed each programme against our standards. We undertook a schedule of approval assessments over a three year period from the 2012–13 academic year. When programmes had demonstrated that they met our standards, they became approved, and will remain so as long as they continue to satisfactorily engage with us around changes and monitoring.

We decided that programmes would not be required to inform us of any changes prior to them completing their approval assessment, as long as the changes were in line with the recommendations of the SWTF. We made this decision based on the limited risk of programmes (all given a ‘green’ rating by the GSCC) implementing agreed, sector wide changes to come into effect from September 2013. We also decided that requiring education providers to evidence all changes would create unnecessary administrative burden for both education providers, and for us, for little value in terms of considering whether programmes met our standards (which they would have not yet demonstrated)⁹.

This was a proportionate way of dealing with changes to programmes, and we did not see any particular issues when undertaking approval assessments that suggested we should have required engagement with our monitoring processes throughout the transitional period.

Approval assessment prioritisation

When we took over regulation of practitioner psychologists and hearing aid dispensers, we conducted a paper-based exercise to identify significant changes to programmes, and used this information to prioritise our assessment of programmes. We adopted a different approach for social workers as we did not feel it was appropriate or beneficial for the new regulator to disrupt the on-going work and momentum of the Social Work Reform Board (SWRB) (formed out of the SWTF). As mentioned above, education providers were already preparing to make a number of changes from the 2013–14 academic year onwards and so we created a schedule that built upon this.

We produced a three year schedule of approval assessment to education providers, requested that we looked at their entire social work provision rather than individual programmes and prioritised the schedule by taking the following factors into account:

- GSCC quality assurance evidence, including the existing GSCC re-approval cycle;
- the demand for practice placements within regions;
- the size and frequency of student cohorts; and
- the entire provision within each education provider and region.

We specified in which academic year we would consider each provider, but gave flexibility as to when we visited in that academic year. We also reserved the right to

⁹ Decisions about how to assess transferred programmes are contained in the Council paper The Social worker in England pre-registration programmes – approval and monitoring processes (19 June 2012), available on our website at www.hcpc-uk.org/assets/documents/10003AD9enc03-socialworkerinEnglandpre-registrationprogrammes.pdf

reprioritise an approval assessment if significant changes unrelated to the common developments from the SWRB were proposed or where significant concerns came to light.

Overall there was very little movement in our three year schedule. 92 per cent of programmes were assessed in the intended academic year which suggests that our scheduling process was pitched appropriately. We considered programmes at seven education providers in different years than planned. In these instances, we made risk based decisions to move visit dates, for following reasons:

- education providers wishing to start new programmes (typically new postgraduate provision) at an earlier date than we planned to visit, and us wanting to consider their whole provision together;
- education providers changing their validating arrangements; and
- education providers moving visits by a few months and transcending the academic years as a result.

There were no instances when we reprioritised a visit due to a significant concern. In 2012, we agreed that we would undertake a visit sooner if concerns arose about a transitionally approved programme, including those received from direct complaints or through engagement with the Suitability Scheme. This flexibility was agreed in response to concerns received from the GSCC and through the student fitness to practise consultation. Evidence to support these concerns has not manifested itself over the last three years. There was nothing reported via the Suitability Scheme, nor were there any substantiated complaints, that meant we needed to move a visit forward. We discuss outcomes from the Suitability Scheme, and our approach to student fitness to practise in more detail later in this report.

Change

Data migration

Social workers in England were the sixteenth profession to join the HCPC Register. We drew on past experiences from bringing other professions on board¹⁰, and worked with the GSCC to ensure a detailed and robust exchange of programme data. This included agreeing the information that was to be transferred and set out the processes of liaison, preparation and delivery of data. The GSCC contacted each education provider before its closure with a list of programmes that would be passed over to us.

In total, 282 programme records were transferred from the GSCC. After initial contact with education providers, we amended the records and agreed that 250 programmes, delivered by 82 education providers, remained open and were transitionally approved until we made a decision whether to grant open ended approval. Most of these amendments to programme data were due to:

- education providers considering and rationalising their social work provision in line with requirements we were imposing;
- education providers informing us of inaccuracies in the way their programmes were recorded; and
- differences in the way we recorded programmes compared to the GSCC.

Outcomes of our approval process

Over the three years, we considered 235 social work programmes in total, including 187 of the transitionally approved programmes, packaged together into 93 approval assessments. We approved 184 of the 250 programmes that transferred, requiring changes of 175 of these programmes. We have also considered 43 new programmes, many of which were at existing education providers, but with some entirely new provision. We required changes of all new programmes. We have considered two programmes twice in the three year schedule, due to significant changes being made to these programmes following their initial approval. In total, we required changes of 96 per cent of social work programmes before we approved them.

Six of the programmes visited withdrew after we conducted the visit element of the process and were not approved. The non-approval in these cases was due to significant conditions being placed on approval, and education providers deciding to withdraw from the process rather than attempt to meet the conditions.

As part of our normal procedures, we withdraw approval from programmes with no students on them. We do this to ensure that the list of approved programmes is accurate, and to eliminate the risk of education providers enrolling to dormant programmes, which may not be up to date and well resourced.

Social work education providers have closed 68 programmes in the time that we have been the regulator, including 66 transitionally approved programmes, and two new programmes which we approved for the first time, but which were closed by education providers after one or two cohorts of students. Across the three years, we did not

¹⁰ Review of the process of HCPC approval of practitioner psychologist pre-registration education and training programmes in the academic years 2009–10, 2010–11 and 2011–12 [www.hcpc-uk.org/Assets/documents/10004C89PPAPPprocessreview-threeyear\(final\).pdf](http://www.hcpc-uk.org/Assets/documents/10004C89PPAPPprocessreview-threeyear(final).pdf) and Hearing aid dispenser approval process review 2010–11 www.hcpc-uk.org/assets/documents/1000373320110824dAPVPPRHADApprovalreview.pdf

consider programmes at four education providers as we planned to, as they stopped running their social work provision entirely.

The table and graph below compares the list of transitionally approved programmes and the list of approved programmes on 1 September 2015.

Graph 1 – comparison of transitionally approved programmes, to approved programmes on 1 September 2015, by mode of study

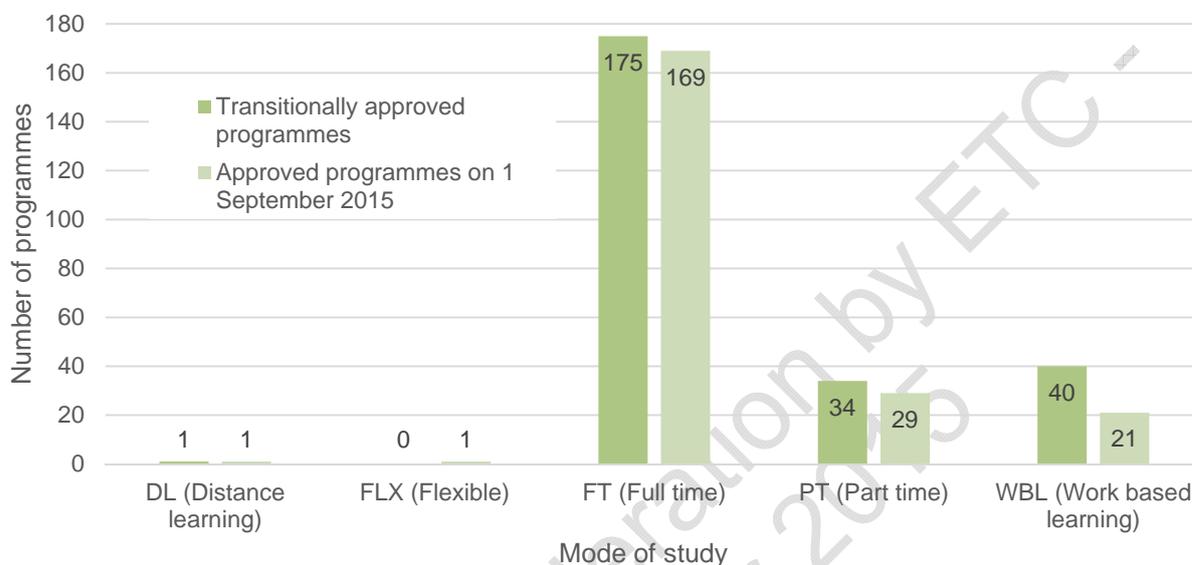


Table 1 – comparison of transitionally approved programmes to approved programmes on 1 September 2015, by mode of study and academic level

Mode of study	Number of transitionally approved programmes			Number of approved programmes on 1 September 2015		
	Under-graduate	Post-graduate	Total	Under-graduate	Post-graduate	Total
Distance learning	1	0	1	1	0	1
Flexible	0	0	0	1	0	1
Full time	89	86	175	71	98	169
Part time	23	11	34	18	11	29
Work based learning	21	19	40	7	14	21
Total	134	116	250	98	123	221

Following the completion of our approval process, there are 221 approved social work programmes at 78 education providers. This is down 11 per cent from the 250 transitionally approved programmes.

In terms of mode of study, we have seen a real terms reduction in the number of work based learning programmes, from 40 (16 per cent of the total number of programmes) to 21 (10 per cent). When we consider the percentage distribution of modes of study, we have seen an increase in full time programmes (70 per cent to 76 per cent), and part time programmes have remained relatively consistent (14 per cent to 13 per cent). In both cases, undergraduate programme numbers have dropped, meaning a slight drop

in numbers for both modes across the board, but postgraduate programme numbers have stayed the same for part time, and have increased for full time. This impacts on the significant shift in the split between undergraduate and postgraduate programmes, from 46 per cent postgraduate programmes in 2012, to 56 per cent postgraduate programmes in September 2015. 63 per cent of education providers delivering social work education deliver both undergraduate and postgraduate programmes, with 24 per cent delivering undergraduate only, and 13 per cent delivering postgraduate only.

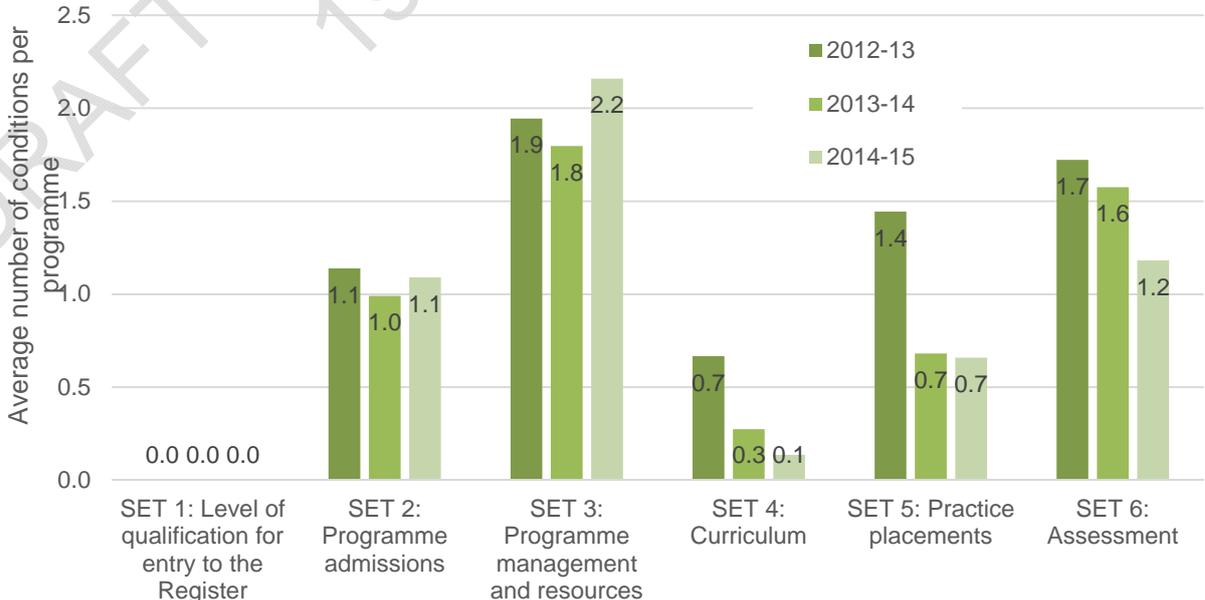
This shift was not anticipated in 2012, was not linked to a SWRB recommendation, and is not due to regulatory or professional body requirements. It is also worth noting that the increase in postgraduate programmes is not just due to government backed ‘fast track’ programmes (discussed later in this report). When these programmes are taken out of the numbers, there is still an upward shift in the number of full time postgraduate programmes. There could be several reasons for this shift, including a reaction by education providers to an increase in the number of career changers who already have an undergraduate degree, changes to bursary arrangements, or due to competition in the job market and the perception that a higher level of qualification would look more attractive to employers. We discuss this area further, including the link to student numbers, later in this report.

Changes required by us at programme level

Conditions drive improvements, and ensure programmes meet our standards before new students are allowed to enrol for the first time. We have considered every social work programme in England over the last three years, and have ensured that any initial shortfalls identified in meeting our standards have been satisfactorily addressed.

Overall, we set 1329 conditions across the three years. This equates to an average of 5.8 conditions per programme (or 14.2 conditions per education provider). Across the three years, we set most conditions on programme management standards, with the least set against our curriculum standards.

Graph 2 – Average number of conditions applied per programme, by SET and academic year

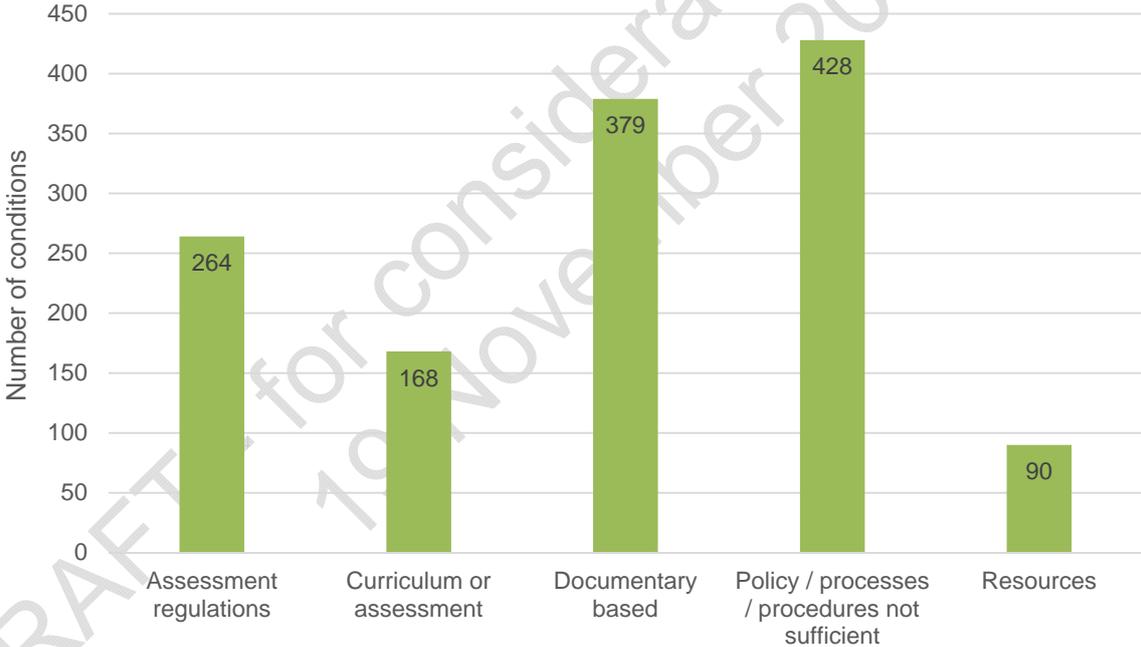


We set fewer conditions as we progressed through the schedule, setting an average of 6.9 conditions per programme in 2012–13, with the figure reducing to 5.3 in 2013–14, and then to 5.2 in 2014–15. This could be read as justification of our schedule, with programmes visited earlier in the schedule being correctly prioritised and risk assessed. Alternatively, it could be that education providers got used to our requirements over time and learnt from each other’s experiences and our feedback on each year’s performance.

A major concern in social work education in 2012 was the availability and quality of practice placements. Therefore, this was a major consideration when we decided the approval assessment schedule. Although we saw issues with practice placements come through in conditions, these issues were not as significant as expected, with 0.9 conditions set per programme for SET 5 (practice placements) on average across the three years. Having said that, there were more conditions set for SET 5 in year 1, with 1.4 per programme on average in 2012–13, compared to 0.7 in both 2013–14 and 2014–15, again, justifying our assessment schedule.

We have analysed all of the conditions set for social work programmes, and have broadly categorised them into five different areas.

Graph 3 – Number of conditions, by broad issue



Almost a third of all conditions required changes to policies, processes or procedures when they did not support the effective delivery of a programme. These conditions could require a substantial rewrite of a policy, or more clarity or detail for an existing policy. There were a broad range of issues here, for example:

- policies were not yet implemented, were not fully developed, or were unfinished, so it was not clear how they would run effectively;
- a policy did not clearly define who was responsible for undertaking it, or elements of it; and
- policies referencing, and / or being based on, out of date requirements. For example, placement audit tools referencing GSCC requirements.

There were some key, and very specific issues captured through conditions in this area. For example, we set one condition because an education provider was not effectively preparing students for placement. This showed that the policies in place to prepare students were not working as they needed to, and that changes were required to ensure students were supported in their learning at placement.

The second most frequent reason for us setting conditions (25 per cent) was due to issues with documentation. We required changes to key programme documentation, to ensure the programme team, placement providers and educators, and students were clear about the expectations of the programme, and their role in participation, delivery and assessment. In this way, we can be satisfied that student learning and achievement is supported, and that service users are protected. Poor documentation also impedes us making a well-informed judgement about whether particular standards are met. When we are unable to reach a decision on whether a programme meets a standard, we apply a condition to ensure that the standard is met. It is not useful for education providers to have excellent policies if they are not well documented, and easily available to stakeholders. Examples of issues picked up in this area include:

- lack of information for applicants (for example, financial costs, bursary changes, the timing of placements and teaching, how the admissions process works);
- communication of information to current students (progression and achievement, attendance requirements, academic and pastoral support, information about placements);
- correct and consistent information for admissions staff, to enable them to make appropriate, fair and consistent admissions decisions;
- correct language around regulation and the wider sector; and
- ensuring all stakeholders in assessment monitoring have the information they need to ensure quality in assessment.

We required over 250 changes to assessment regulations. Assessment regulations are important to ensure education providers ensure and maintain quality in assessment, and to ensure students who complete programmes are fit to practise. There must be appropriate safeguards in place to ensure students achieve the social worker standards of proficiency and those who do not cannot receive the final award. We required many of these changes as social work programmes were proposing to follow the standard regulations of the education provider and there was insufficient evidence that such regulations were robust and effective enough for a professional programme. We required changes to ensure:

- statements around student progression and achievement were clear;
- awards and exit awards were named appropriately;
- the policy for giving aegrotat awards was appropriate;
- there was the right of appeal for students; and
- external examiner arrangements were appropriate.

We required almost 170 changes to the curriculum and assessment to guarantee that students were taught and assessed in all threshold standards for safe and effective practice. These conditions highlighted deficiencies in how the curriculum design and delivery or assessment strategy, supported and ensured students met the SOPs for social work. We required changes when there were gaps in the curriculum or assessment about what a student needs to know, understand and be able to do when they complete the programme, or when there was too much of a focus on a specialist area and the breadth of standards was not achieved. Changes in this area also ensured that:

- the curriculum of programmes was kept up to date;
- students understood the importance of their conduct, performance and ethics;
- teaching and learning was effective; and
- interprofessional learning was well managed to support students in their development as social workers.

Just over 5 per cent of all required changes were linked to resources. Having sufficient and appropriate resources is key to ensuring that students' are supported to meet the SOPs and be fit to practise on completion of the programme. In this context, 'resources' include teaching staff, physical resources such as the library and classroom space, and staff at placements. We set the fewest number of conditions in this area, but us correcting issues with insufficient resources, or clarity of how resources were being used appropriately, was crucial to ensure the effective delivery of programmes.

Changes driven by others, and their impact on our process

The PCF was seen as a positive move by social workers, and was generally well adapted by education providers. We supported its implementation by jointly developing a mapping document to our SOPs with TCSW. However, there were problems caused when education providers relied on using the PCF to demonstrate how our standards were met. Sometimes, there were assumptions made that if the PCF was being used to drive the curriculum, our requirements around curriculum (particularly those linked to professional capability) would be met.

We set 24 conditions that explicitly referenced the PCF in their reasoning. Issues ranged from clarity of ownership of the framework, to assumptions that if the PCF was being addressed through learning outcomes, that the SOPs automatically would be. The latter is a demonstration of the problems that can be caused by considering the HCPC standards as 'good enough' standards, and considering that other sets of standards go beyond what we require, which is not the case. It is crucial for education providers to consider how the social worker SOPs are delivered by the programme, and how students are aware of them in relation to their learning and future practise.

Change in student population

Earlier in this report, we commented on the shift in provision from undergraduate level to postgraduate level. The picture becomes more detailed when we look at student numbers on these programmes. We collect information on student numbers to allow us to make a case by case decision about the appropriateness and effectiveness of the resources available for each programme. We currently record the maximum number of students that a programme is approved to take in each intake.

These numbers are fairly crude and do not account for variations due to non-completion, withdrawal, one-off under or over recruitment or where programmes do not run entirely for a year. The figures below are not intended to provide numbers of students that are currently studying social work programmes, or how many social workers can be expected to enter the workforce at a particular point. However, we can draw some interesting conclusions from the data, as long as the caveats noted are understood.

Table 2 – potential student numbers (taken from maximum cohort size) per year, for approved programmes on 1 September 2015

	Total student numbers across all programmes (%)	Class size		
		Lower bound	Mean average	Upper bound
Undergraduate	4,214 (55)	6	43	260
Postgraduate	3,406 (45)	2	28	112
All	7,620	2	34	260

There are still more students studying at undergraduate level, than postgraduate level, even though there has been an increase in postgraduate provision over the last three years. This is primarily due to postgraduate programmes typically have a smaller number of students studying on them, an average of 28 per cohort compared to 43 on undergraduate programmes. The figures show that the initial qualification for new social workers is almost as likely to be postgraduate as undergraduate. There is a wide range in student numbers, from 2 to 260, and some outliers with the upper and lower parts of the range. Just a few key or large scale changes (programme closures or new developments) could change the overall picture.

The flexibility within our standards allows us to approve a variety of models of education and training at differing academic levels. There is no evidence from our approval assessments to indicate that a particular academic level equates to a more successful outcome (ie less conditions). We make no value judgement of a social worker's competence based on the level at which they have studied.

Expected challenges and what we found

In this section, we consider if and how the expected challenges facing social work education in 2012 manifested themselves in our approval process over the last three years. Several of the recommendations of the Social Work Reform Board related to qualifying social work education and training, and we have referenced these recommendations¹¹ in this section where applicable. We have required education providers to deal with any issues identified below when they impacted on our regulatory requirements, and we are now satisfied that all approved programmes meet our standards with the changes made

Range and availability of practice placements

The scale of social work education in particular regions, and therefore potential strain on the availability of practice placements, was identified as a challenge before we took over regulation. As discussed, placement availability was one of the considerations when we made our risk based decisions about how to schedule approval assessments.

We have a particular standard that directly deals with issues in this area. SET 5.2 requires education providers to ensure “[t]he number, duration and range of practice placements must be appropriate to support the delivery of the programme and the achievement of the learning outcomes.” 86 per cent of programmes met this standard at the first time of asking, which demonstrates that there were a good range of placements in a variety of settings across most of the programmes that we assessed.

We set conditions on SET 5.2 at 12 education providers. The most frequently noted issue was with the range of placements available to students, particularly that:

- placements were too focused on either children and families or adult social work for the required generic nature of the SOPs (8 conditions);
- there were too few opportunities for students to experience statutory placements or interventions (9 conditions); and
- it was unclear as to how the education provider would manage the achievement of the learning outcomes with the range of placements available (4 conditions).

The last part of SET 5.2, about the “achievement of the learning outcomes”, is key in our decision making. We do not have particular requirements about how many placements there must be, how long they must be, or where they must be. We make a judgement that the number, duration and range is appropriate to support students’ achievement of each programme’s learning outcomes, which in turn demonstrate the SOPs have been met.

From the work we have undertaken in the last three years, and considering the conditions set, there does not appear to be any greater strain on placement availability as there is in other professions. That is not to say that there is no strain on the availability of placements in the profession. Students often see their placement as a way into work when they qualify, and therefore some students prefer certain types of placement experience (for example, those in a statutory setting, or those with children and families) depending on their career goals. We set 10 conditions to deal with the

¹¹ Specifically, the reforms laid out in the final paper produced by the Social Work Reform Board – Building a safe and confident future: Maintaining Momentum (June 2012)
www.gov.uk/government/uploads/system/uploads/attachment_data/file/175947/SWRB_progress_report_-_June_2012.pdf

issue of placement availability. These issues occasionally impacted on students starting their placement.

Many education providers initially misunderstood what was expected in terms of the range of placements that should be available to students. The requirements of the regulator and professional body were often confused and differences in terminology overlooked. There is a link between the range of placements (in terms of statutory and non-statutory interventions) required for TCSW endorsement, and our requirements for the range of placements to support the learning outcomes. On occasion, issues we identified were impacted by education providers confusing the requirements of TCSW with ours, and assuming that if they met TCSW requirements, that ours would also be met.

TCSW's requirements were also often misunderstood, compounding this issue for us, with many stakeholders oversimplifying what TCSW required of them. TCSW guidance is clear that "...[t]he last placement (100 days) must prepare students for the statutory aspects of a social worker's role". This was often misread as the last placement needing to be in a statutory setting, when in fact the requirements here were more nuanced as "...[p]reparation for statutory social work should be defined by the tasks undertaken by students on placement, rather than the setting".

Our requirements here are output focused. So rather than requiring students to experience placements in a specific number settings, education providers were able to demonstrate how they met this standard by determining how the range of placements that students would experience were appropriate to support the achievement of the programme (and placement) specific learning outcomes. This gave education providers more flexibility in designing their placement experience.

Through the three years, we did not pick out particular issues with the number or duration of placements. This suggests that the 200 placement days required by the previous regulator, and then adapted by TCSW in its endorsement requirements was usually sufficient for programmes to meet our requirements in this area.

Following the closure of TCSW, it will be interesting to see whether the generally accepted 'best practice' placement structure remains as it is, or whether traditional HEI programmes develop more innovative placement experiences which able to meet our more flexible requirements. We are not prescriptive with the number of placement days required, and would prefer to see a shorter good quality placement than a longer poor quality one.

We have seen an atypical placement model at the Frontline programme, which would not have met TCSW's prescriptive placement requirements. Through the approval process, this programme was able to demonstrate how placements supported the delivery of the programme and the achievement of the learning outcomes, and therefore met SET 5.2.

Placement quality

A recommendation of the SWRB was that placements were "supervised and assessed by practice educators who meet nationally agreed benchmark standards". This recommendation recognises the important and integral part that placement staff play in providing good quality social work education. We ensure quality staff at practice placements by assessing that they:

- are “appropriately qualified and experienced” (SET 5.6);
- have “relevant knowledge, skills and experience” (SET 5.7);
- undertake “appropriate” training (SET 5.8); and
- are “appropriately registered” (SET 5.9).

The wording of these standards allows flexibility for education providers to design their placement experience, including the staff resources required to support them, in an output focused way. We ensure that placement staff are appropriate to the particular placement, considering the intended outcomes of that placement, and recognising that all placement environments are different.

TCSW developed their own Practice Educator Professional Standards (PEPS), which was then linked to endorsement criteria requiring that “[s]tudents on practice placement are supported and assessed by people who meet the practice educator professional standards (PEPS)”. In addition, TCSW required all practice educators to be registered social workers by October 2015.

In the majority of cases, we were satisfied that education providers had sound processes in place to manage placement experience, including the above areas related to staff. The widely used Quality Assurance of Practice Learning (QAPL) scheme has provided a good framework for education providers to effectively manage placement experience. There are several tools provided by QAPL, which when used effectively by education providers supported the delivery of placements, and enabled programmes to meet our standards in this area. For example, there is an HEI audit form, feedback forms for practice educators and students, and a tool to collect data about the quality and availability of placements.

There was more to meeting our standards in this area than just using QAPL though, and we set conditions for the above standards at 13 education providers (15 per cent). Many of the issues in this area were due to a light touch approach by the education provider. There was often an assumption that we would be satisfied that professional requirements were being met if QAPL was in place, and / or that placement educators had gone through PEPS training.

The use of QAPL and / or the reliance on PEPS alone is not sufficient to demonstrate how programmes meet the relevant standards in SET 5. We make decisions about programmes meeting the standards on a case by case basis, which means that what is right for one programme may not work for another. So we would not be satisfied that SET 5.8 (which ensures “appropriate practice placement educator training”) is met simply because all placement staff have met stage 2 of the PEPS. We are interested in how education providers apply tools such as QAPL to support the delivery of their programmes.

Through making judgements at a placement level, beyond the overall requirements of TCSW, we were able to be assured that placements were of a good quality at all social work programmes in England, following changes being made where applicable.

Partnership working

A recommendation of the SWRB was to develop the “role of partnerships in design and delivery, including provision of placements”, to enable “students to graduate with the skills and knowledge to work as effective practitioners.” It was felt that different expectations were held by academics, students and employers about what graduates

should be able to do upon completion of qualifying education and training, and that strong partnerships between HEIs and employers would help reduce these differences. We do not have a particular standalone standard about partnerships, instead our requirements are integrated throughout all of our standards, including:

- SET 3.2, which ensures that programmes (including any partnership agreements) are “effectively managed”;
- SETs 3.8, which ensures the effective use of resources to support student learning “in all settings”;
- SET 4.3, which requires that the “integration of theory and practice” is central to the curriculum;
- SET 5.1, which ensures that placements are “integral to the programme”. The guidance for this standard discusses “ongoing partnership arrangements with... practice placement educators”;
- SET 5.10, which requires “regular and effective collaboration between the education provider and the practice placement provider”; and
- SET 6.3, which ensures that professional aspects of practice are “integral to the assessment procedures in both the education setting and practice placement setting.

We set conditions across these standards to particularly address issues with partnerships as follows:

- We set seven conditions for SET 3.2 which required changes when contractual agreements between the education provider and a partner were not sufficient, and when there were problems with the communication between partners, especially in agreeing formal procedures.
- For SET 5.10, we set conditions on nine programmes, focused on ensuring that collaboration was formal, effective, and that there was regular and effective communication with particular practice placement providers.

We did not set any conditions for SET 5.1 or SET 6.3, and none of the conditions set for SET 3.8 or SET 4.3 related to partnerships. The small number of conditions to address issues with partnerships (on programmes at only 9 per cent of education providers) demonstrates that well managed partnerships were already embedded into the delivery of many programmes in the sector.

Months or years of work are usually required to form an effective partnership, and in the case of social work education, many education providers had been working with local partners for extended period before regulation was transferred to us. Therefore, in many cases, partnership arrangements were in place long before we started to assess programmes. However, there were many challenges that come with long term partnerships which our standards highlighted. We sometimes saw issues with how partnership arrangements were documented, with assumptions made about who was responsible for what, as two parties had been working together for a long time. Issues that arise when partners are involved will often be on practice placement, and will therefore often be to do with a student’s fitness to practise. Therefore, managing any issues is critical for the safety of service users.

There was certainly a ‘pick up the phone’ culture at some education providers, which may work day-to-day for many issues, but is not satisfactory in terms of providing evidence that robust processes are in place to manage any issue that arises, including the more serious issues noted. In these instances, we set conditions to ensure long

established informal policies and procedures were well documented and formalised, so that all parties were clear about who was responsible for particular areas and decisions.

TCSW produced specific guidance about partnership working, and included requirements in their endorsement criteria. Particularly, TCSW required programme admissions to be linked to workforce planning, and for placements to follow the guidance, including agreeing “joint aims and outcomes” and “Memorandum of Co-operation(s)”. It is debatable whether TCSW’s endorsement criteria contributed to the low level of issues in this area, especially considering the when it was implemented (2013) and the length of time usually required to negotiate and implement effective partnership arrangements. However, TCSW’s requirement certainly provided a good framework for education providers to base their partnership arrangements on, and as criteria to develop them to, and helped to ensure consistency in arrangements.

Several education providers are currently making changes to their partnership arrangements with the government led ‘teaching partnership’ pilot. This scheme is specifically intended to address the reform noted at the top of this section. For the pilot, changes were required at education providers in several key areas, which could include ownership of the programme, admissions requirements and practice placements. Although we expect changes of this nature to be reported to us, there has been some reluctance by education providers in demonstrating that our standards continue to be met. This has been for two reasons:

- As changes are being driven by government, some education providers have made assumptions that our requirements will be satisfied. In these cases, there has been a lack of understanding of our independent role in approving programmes against our standards.
- Some education providers considered that they were ‘enhancing’ their existing programme(s) and that therefore they did not need to inform us of changes. However, whether a change is an ‘enhancement’ is subjective, and we still need to consider whether the way the standards are met has changed.

An outcome of the teaching partnerships pilot could be that all government funded programmes would need to demonstrate the teaching partnership criteria in order to continue to receive funding. Therefore, we could see many changes across almost all approved social work programmes.

Following the work that we have undertaken over the last three years to assess social work programmes, it is important to note that we, as the regulator, are assured that current partnership arrangements are able to support the delivery of effective programmes, for all social work programmes in England. Having said that, our understanding of partnership working has developed over the last three years. The idea of partnerships in our standards is implicit, rather than us having explicit requirements around partnerships in particular standards, or for particular areas (for example in delivery and assessment, and supporting students). Following the introduction of social work into our regulatory model, this is an area we will address in the SETs review.

Admissions

A reform of the SWRB was to “[strengthen] the calibre of entrants to social work education and training”. This recommendation was intended to ensure potential applicants to programmes possessed the necessary intellectual and personal qualities needed to be an effective social worker.

We have particular standards to manage admissions to programmes, with several being specific to the qualifications, experience and suitability of applicants, namely:

- SET 2.2: The admissions procedures must apply selection and entry criteria, including evidence of a good command of reading, writing and spoken English.
- SET 2.3: The admissions procedures must apply selection and entry criteria, including criminal convictions checks.
- SET 2.4: The admissions procedures must apply selection and entry criteria, including compliance with any health requirements.
- SET 2.5: The admissions procedures must apply selection and entry criteria, including appropriate academic and / or professional entry standards.

In making decision about admissions requirements, we robustly and holistically consider each programmes' entry standards and admissions process. In order to do this, we consider more than just quantifiable requirements (such as UCAS points or English proficiency qualification), and do not prescribe at which level entry requirements should be set at. In applying our admissions standards, we ensure that a fair and appropriate process is in place, rather than focusing on the level at which quantifiable admissions requirements are set.

In order to make these decisions, our requirements in this area contain a mix of fairly specific requirements, and more flexible standards that are focused on output. SETs 2.2 and 2.3 are specific in terms of what education providers must require of applicants. The guidance for these standards reference the expected equivalency level in relation to International English Language Testing System (IELTS), and specify the usual level of criminal conviction disclosure needed (albeit, under the old CRB system). SETs 2.4 and 2.5 are more flexible, and link more to the particular profession and the programme of study.

Social work programmes which met our standards often had three areas that they considered when applying academic and professional entry standards, which we judge under SET 2.5. Consideration was given to:

- quantifiable competency based elements, such as a minimum UCAS tariff score;
- 'relevant' experience in a related area. This was usually quantifiable in terms of length of experience, but a judgement was also made about the relevance of that experience; and
- whether an applicant was suitable to study a professional social work programme. This was entirely judgement based, and education providers would often involve service users and carers in making these judgements.

All of these elements fed into a decision about whether a candidate was suitable to be admitted to the programme, and that the programme was suitable for the candidate.

We required changes to policies regarding the selection and suitability of students for 15 per cent of the education providers considered by the process. The main issues that we found were that admissions policies were unclear (21 conditions), and that a policy was present, but that we had not been provided with the specific criteria applied by education providers (6 conditions). These issues were usually addressed by education providers by clearly stating policies in their documentation.

There were also more significant issues in this area, to do with consistency of admissions assessments (7 conditions). These issues required bigger rethinks by

education providers, such as ensuring their admissions staff had adequate training to perform the role fairly and effectively, and ensuring that health and character tests were applied consistently.

The SWRB recommended that there should be a minimum UCAS points threshold for entry to social work programmes. This recommendation was taken forward by TCSW, who required, in their endorsement criteria¹², that education providers followed guidance produced by The Higher Education Academy (HEA) in conjunction with TCSW and Joint University Council Social Work Education Committee (JUC-SWEC)¹³.

There may have been an overall increase to the calibre of entrants to social work programmes due to TCSW's requirements in this area, but it is difficult for us to see whether quantifiable admissions requirements have risen since 2012. Although we consider these requirements as part of our process, we do not record them in a structured way, and have no data from the previous regulator to compare to.

In our view, considering whether the average UCAS tariff has risen is a reductive way to ascertain how successful this reform has been. This is particularly the case given that the ratio of undergraduate and postgraduate programmes has changed significantly since 2012 (as discussed earlier in the report). This, coupled with new work based education and training routes, means that the focus on undergraduate entry to social work may not be where these reforms are ultimately delivered.

Importantly, we are not concerned with setting a particular threshold of quantifiable admissions criteria. When considering the admissions requirements for social work programmes, we consider the output focused nature of our standards, and particularly the SETs identified above, to ensure applicants who take up a place on a programme are equipped to study the programme's curriculum, and are suitable in terms of health and character to undertake a professional social work programme.

Following our detailed assessment of the admissions requirements for all social work programmes in England, we are satisfied that all approved programmes are admitting suitable students to ensure public protection.

Student fitness to practise

Following the announcement that we would be taking over social work regulation, there was much debate about whether we should continue to register all social work students, as the previous regulator had done. We took the decision to not continue to register social work students¹⁴, based on outcomes from independent research, which was commissioned to consider the most appropriate mechanism for assuring student fitness to practise (FTP), and on outcomes from a public consultation. When we made this decision, we noted that the following SETs are intended, in part, to ensure education providers are effectively managing student FTP:

¹² From the revised version (June 2014)

¹³ Assessing the suitability of students to enter and remain on qualifying social work programmes: Guidance for universities and their employer partners in England (November 2014) www.heacademy.ac.uk/sites/default/files/resources/assessing_the_suitability_of_students_to_enter_and_remain_on_qualifying_social_work_programmes.pdf

¹⁴ The Student fitness to practise and registration Council paper (10 May 2012) is available on our website at www.hcpc-uk.org/assets/documents/10003A3Cenc04-Studentfitnesstopractise.pdf

- SET 2.3: The admissions procedures must apply selection and entry criteria, including criminal convictions checks;
- SET 2.4: The admissions procedures must apply selection and entry criteria, including compliance with any health requirements;
- SET 3.16: There must be a process in place throughout the programme for dealing with concerns about students' profession-related conduct;
- SET 4.5: The curriculum must make sure that students understand the implications of the HCPC's standards of conduct, performance and ethics;
- SET 5.12: Learning, teaching and supervision must encourage safe and effective practice, independent learning and professional conduct; and
- SET 6.5: The measurement of student performance must be objective and ensure fitness to practise.

We set 66 conditions and thirteen recommendations for these standards. Although eight of these conditions had no link to student FTP, some conditions were explicitly linked to student FTP, and some were partially linked.

One education provider was unable to evidence how issues around professionalism (rather than competence) would be dealt with by the student FTP procedure. There was also an issue with the student FTP referral procedure at this education provider. Clarity around the student FTP referral procedure was also an issue at another four education providers. We set a recommendation for one education provider to review how they prepare students to practise safely on placement. We set recommendations if we are satisfied that a standard is met, but consider that there may be a risk in this area in the future. As recommendations form part of our reports, we are able to refer back to them in our monitoring processes if required.

We set conditions with a partial link to student FTP when:

- health requirements were unclear in the admissions procedures (six education providers);
- there was insufficient information to demonstrate how programmes ensured students understood our standards of conduct performance and ethics (three education providers);
- policies were unclear in the programme documentation (six education providers); and
- the quality assurance of elements of practice placements was not sufficient (three education providers).

In total, we set conditions to manage issues with student FTP at 20 education providers, which is around a quarter of education providers considered through the process. These education providers needed to make changes to their programmes to satisfy us that they had robust procedures in place to deal with student FTP. The majority of education providers already had appropriate processes in place to manage these issues themselves.

Social Work Student (England) Suitability Scheme

We recognised that the social work community, including education providers, employers and placement providers, could face challenges during the transition to our system of quality assurance with regards to student FTP, so we decided to introduce the Social Work Student (England) Suitability Scheme (the Scheme) to deal with

concerns about social work students in England in the transitional period¹⁵. The Scheme enabled us to:

- provide an opinion, in exceptional circumstances, to a social work education provider on whether an applicant was of suitable character to be admitted to a programme;
- investigate where we considered that an education provider had failed to deal with a credible complaint about a student appropriately;
- consider the outcomes of an education provider's fitness to practise procedures to determine whether a student should be prohibited from a programme;
- maintain a record of students who are not permitted to participate in a social work programme in England; and
- manage open cases concerning individuals applying to be on the student register maintained by the GSCC and those individuals who were on the GSCC student register.

When we completed our assessment of a transitionally approved programme, we were satisfied it met the SETs, and it could therefore not access the Scheme. We had made the judgment that the programme had robust systems of its own in place to manage concerns about students. As we have assessed all social worker programmes in England, no education provider can now access the Scheme. Our Fitness to Practise Department has also completed work on all cases referred through the Scheme and therefore, the Scheme is now closed.

Over the course of the three years, we had very little interaction with the Scheme. In total, 49 cases were referred to us, as follows:

- 41 cases from education providers concerning applicants to programmes;
- seven cases referred directly to us rather than to the education provider in the first instance; and
- one case was received from an applicant to an education programme.

When considered as a percentage of the potential student body over the three years, the number of cases referred represents 0.2 per cent of programme student numbers.

Due to the previous regulator's involvement with student FTP and admissions decisions, part of the work we needed to do over the three years was to challenge perceptions of our role in relation to decisions about student FTP. Some education providers were concerned about the removal of a perceived safety net (the registration of students), or were not confident to make admissions decisions alone in borderline cases. When education providers contacted us about these issues, we talked through how our processes worked, and flagged the Scheme should an education provider want to engage with it.

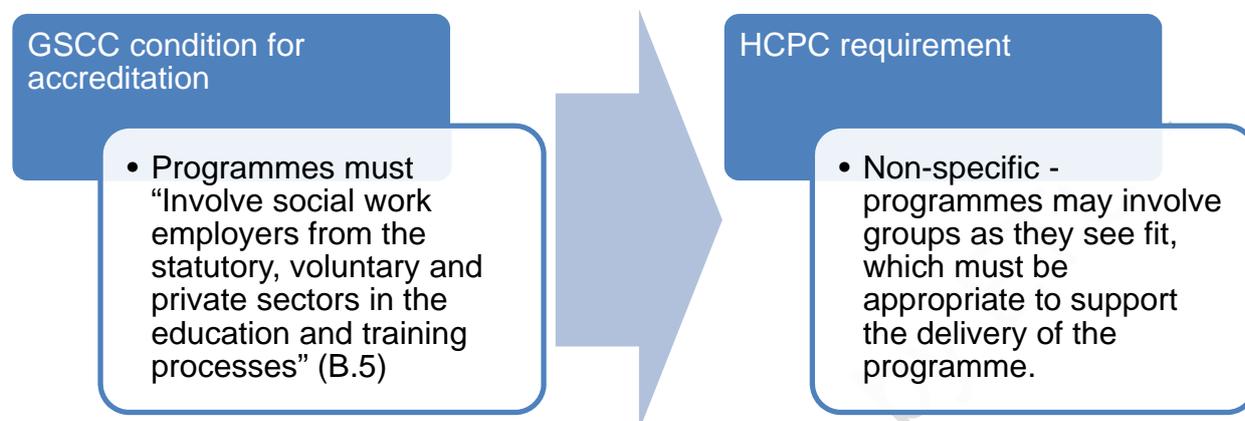
All of the above demonstrates that our decisions about student FTP and student registration were right touch and proportionate. There was very limited interaction with the Scheme, and the conditions that we set dealt with any issues in this area.

¹⁵ The Social Work Student (England) Suitability Scheme Council paper (19 June 2012) is available on our website at www.hcpc-uk.org/assets/documents/10003AD8enc02-Socialworkerstudentsuitabilityscheme.pdf

Challenges identified through the process

How education providers engaged with our standards

From feedback received through process, education providers sometimes struggled to move from the prescriptive requirements of the GSCC to the non-prescriptive nature of our standards.



We anticipated that this could be an issue, and therefore explained how our standards work (in that they are flexible, non-prescriptive and output focused) as part of the communication work that we undertook. We also delivered free seminars aimed at familiarising social work education providers with our standards and processes, and provided supporting documentation geared specifically to social work education providers, which included focused correspondence, and information available publically.

Sometimes, education providers would have preferred our standards to be more prescriptive, and our guidance to be more accessible and inclusive. In particular, there was discomfort about the use of terminology that implied a preference for health over care, and higher education institutions over alternative or private providers. The language currently used in our guidance was last reviewed in 2009 when our Register was dominated by allied health professions. We plan to address these concerns through the SETs review process. We encourage all of our stakeholders to engage with the public consultation part of this process, so we get as broad a range of views as possible on how the SETs should be developed. We will contact key individuals at education providers, and across the wider sector, when the consultation is published.

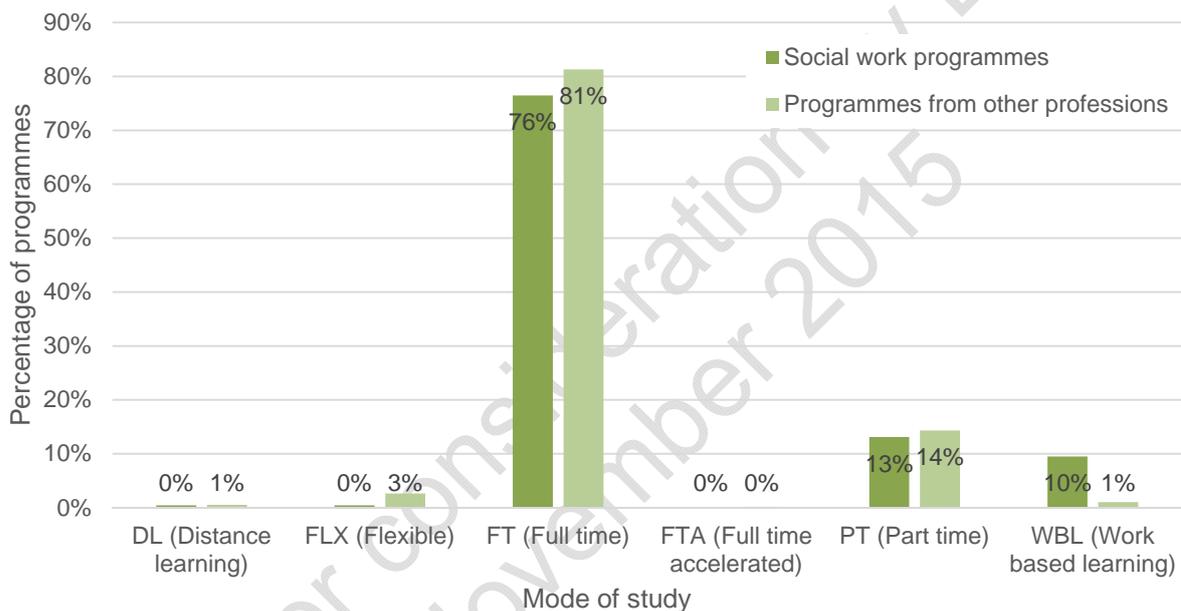
Over time, education providers became more comfortable with how our standards worked, and with how to present evidence to demonstrate that our standards are met. 89 per cent of social work education providers who responded to our survey agreed that our standards are flexible, so they can be applied to all of the professions we regulate, and to different models of education and training.

The wide variety of programmes

In 2012, all programmes in England were either delivered by an HEI (235 programmes) or delivered by an FE college with HEI validation (15 programmes). By September 2015, the number of programmes delivered by HEIs and FE colleges had reduced (in line with the reduction in programme numbers across the board). Two new programmes also started running at non-traditional social work education providers, one at a social enterprise (backed by government), and one led by a local authority (which is validated by an HEI).

Programmes in the rest of the UK (not England) are more uniform at present, with all programmes being delivered either by an HEI, or an FE college validated by an HEI. The Care Council for Wales approves both undergraduate and postgraduate qualifying programmes. Neither the Northern Ireland Social Care Council nor the Scottish Social Services Council approve postgraduate qualifying programmes, with the expected qualifying level instead being the “Social Work Degree”. As previously noted, there has been a shift so postgraduate programmes are more numerous in England. Considering this, along with the (albeit low number of) new programmes in England not delivered by HEIs, we can see that the SETs have enabled innovation in the sector, due to their non-prescriptive nature and outcome focus.

Graph 3 – Social work programmes compared to programmes from other professions, by mode of study



As the graph above shows, 76 per cent of social work programmes¹⁶ are delivered as full time, compared with 81 per cent of qualifying programmes for the other professions we regulate. The most notable difference in distribution for mode of study is that 10 per cent of social work programmes are work based learning, compared to 1 per cent for other programmes.

Ownership of programmes

We set slightly more conditions for work based learning programmes when compared to other modes of study, 6.1 on average per programme compared to 5.7 for all other modes of study. When we considered these programmes, there were some questions about the ownership of programmes, and who we should consider as the ‘education provider’ for the programme.

We expect the education provider to maintain overall responsibility for the delivery of programmes, including responsibility for, and control over, admission procedures, management of programme resources, all aspects of the curriculum, practice placements, and assessment. Many work based learning programmes listed an HEI as the education provider, but were in fact led by a collaborative relationship between an

¹⁶ As of 1 September 2015

HEI and an employer. Sometimes, there was an assumption when programmes were presented to us that the HEI should be regarded as the education provider, when in fact the HEI may have only be partially responsible for the programme. This presented some challenges for these programmes in meeting our standards.

We set a wide range of numbers of conditions on the 22 work based learning programmes considered, from 1 condition to 26 conditions. Those at the top of the scale often struggled with issues around programme ownership, particularly, who (the HEI or the employer) was responsible for specific areas of the programme.

Management of, and engagement with, these education and training routes can be challenging for HEIs, employers, and students alike. If an employee is studying to 'upskill' from their current role, and they are placed with their employer to undertake practice placements, there can be confusion around what is required of the various parties involved in the student's learning. For example, education providers have faced challenges in ensuring that students are not expected to learn on their own at placement, or through their existing role. We expect education providers to demonstrate that placement is a true learning experience for work based learning students, as we would expect for all other modes of study.

Students can also face challenges if something goes wrong on their placement. It was not always clear whose processes would apply to a work based learning student (for example if there is an issue with student attendance on placement). Sometimes, there was a tendency to default to the employer's policy, where it may have been more appropriate for the HEI's policy to apply. These were problems that directly linked to the HEI being considered as the education provider, as we would expect the education provider to manage student attendance.

There can also be pressure from employers to pass students, and potential conflicts of interest for placement staff in assessing the performance of students, considering employers' investment in students (or as they often see them, employees). Understandably, employers do not want students to fail, but it is the education provider's responsibility to ensure it owns the processes around assessment, and it must be able to fail a student if it needs to. We have raised these issues with programmes where we have seen them, and have set conditions to deal with these issues.

There were some HEI led programmes with significant elements of learning delivered by Further Education (FE) Colleges. The GSCC recorded these programmes as being "college based" and particularly approved FE Colleges to deliver elements of the programme. These programmes usually functioned as an FE College delivering level 4 and 5 of a BSc (Hons) programme, with students joining the HEI for level 6. This was a well understood education and training model in social work, and the HEI could be confident of taking a more hands off approach because the GSCC's quality assurance process had been applied to the FE College.

Our requirements are different here, as we expect the education provider to manage all elements of programme delivery, and to therefore oversee the learning that occurs through another organisation. When required, we required education providers to make changes to ensure they were able to ensure the quality of the whole provision.

Whilst issues around programme ownership are not exclusive to social work education, the higher proportion of work based learning and collaboratively delivered programmes when compared to qualifying programmes for the other professions, means it is a more prevalent issue for social work.

‘Practice ready’ social workers, and the question of specialism

Readiness for practice as a social worker is a highly debated topic within the profession, with many differing opinions about the actual issue itself, even before considering opinions on how best to address any perceived shortcomings of newly qualified graduates. The debate often centres on to what extent a newly qualified social worker should ‘hit the ground’ running when first entering employment.

Employers often cite the lack of relevant experience (particularly in statutory settings) as a reason for why more focus should be given to certain types of social work through specialisation in the curriculum of approved programmes. Furthermore, the perceived gap between the employer and the educator is also seen as contributing to a lack of employable social workers completing approved programmes. There are a range of initiatives in social work intended (at least in part) to deal with perceived shortcomings, for example:

- an intention of the government led teaching partnerships scheme is to “bridge the transition from education into practice, work and employment itself”¹⁷;
- the Assessed and Supported Year in Employment (ASYE) is intended to “develop key knowledge and skills at the end of the first year in practice”;
- there are specific ‘Knowledge and Skills Statements’ for children and families, and adult social workers, which is specialism taken post qualification;
- the Approved Child and Family Practitioner (ACFP) status (currently being piloted), which, like the ASYE, is intended to certify post qualification experience; and
- the PCF, which is intended to “set out the key capabilities for social workers at all levels of their career”.

All of these initiatives compliment the role of the SOPs and recognise that the transition from initial education and training into employment requires support and supervision. We recognise this transition, and that social workers are lifelong learners, through our requirement that all social workers must complete continuing professional development (CPD), and demonstrate how they have met our standards for CPD upon request.

There are still questions around both the longevity and impact of many of these initiatives. The involvement and role of the regulator could alter if there are clear risks to service users, or legislative change that requires us to annotate our Register or approve specific post registration specialisms.

When considering how these perceived issues can be effectively addressed within the sector, and whether we as the regulator should be involved in addressing any issues, it is important to remember how our standards are designed to function. Within the context of education and training, the SOPs are the statutory requirements of what a student must know, understand and be able to do by the time they have completed their

¹⁷ Taking Forward Professor Croisdale-Appleby’s Review of Social Work Education, Re-visioning Social Work Education: A Department of Health Update (December 2014)
www.gov.uk/government/uploads/system/uploads/attachment_data/file/383048/review_of_social_work_education_update.pdf

education and training. Completing an approved programme is the beginning of a social worker's life as a professional. There is a difference between fitness to practise and fitness for employment, which may require further development and learning specific to a particular setting or role. We recognise that a registrant's scope of practise will change over time and that the practise of experienced registrants often becomes more focused and specialised than that of newly registered colleagues.

Social work as currently regulated by us is 'generic', in that an individual qualifies as a social worker first, with specialisation in particular areas chiefly taking place post-qualification. The SOPs are therefore designed to set out the knowledge and skills of a 'generic' social worker who is equipped with the knowledge, understand and skills to work across the breadth of social work practise. Once registered, newly qualified social workers typically choose to specialise in work with adults, with children and families, in mental health or in other areas.

Qualifying programmes with focus on a specialist area

The government backed schemes of Step Up to Social Work, Frontline and Think Ahead have a more explicit focus on social work with specific client groups, namely social work with children and families and with people with mental health problems. There has been some concern in the profession about these schemes, but the Step Up and Frontline programmes have been able to successfully complete our approval process¹⁸ and in doing so satisfy our generic social work regulatory standards. When considering Step Up and Frontline programmes, we set two conditions to deal with the issue in the curriculum of overspecialisation to children and families knowledge. In both cases, the education provider made fundamental changes to their curriculum to effectively address these issues through the approval process.

More broadly, these programmes needed to make a greater number of changes with an average of 10.5 conditions applied per programme, compared to 5.5 for all other social work programmes. Issues at these programmes often stemmed from the preparedness of education providers, questions around ownership of policies and procedures, and some assumptions that because the scheme was government backed, that we would understand how it worked and be satisfied with certain areas of the delivery of the programme.

Preparedness was a significant issue for two reasons. Firstly, for Step Up Cohort 2, the timeframes given by the Department for Education (DfE) in the tendering process did not give education providers sufficient time to develop what was (for some, at least) a new model of education and training, and to have it approved through our process. Secondly, because education providers were often underprepared when they submitted documentation for scrutiny (which takes place eight weeks before we perform our (usually) two day visit), we found that the post-visit process to meet conditions was more arduous due to the number of documentary updates required, and at times took longer. This is demonstrated by the higher number of conditions that we set (and therefore changes we required) for programmes. On occasion, this impacted on the start date of programmes, to which students had been recruited.

¹⁸ Think Ahead is currently going through the process

Although these programmes are backed by government, with a significant spend attached due to students being salaried or having student fees paid, they currently only account for around 5 per cent of student numbers for social work programmes.

There are also several programmes intended to train students that are able to register as social workers and nurses¹⁹. These programmes take students down a particular career path to particular roles usually in the field of learning disabilities or mental health. These programmes are funded by local authorities who have identified a work force need for employees with this particular mix of skills, knowledge and experience. In 2012, there were 10 of these programmes in total at 7 education providers. This dual provision has reduced significantly, and as of September 2015 there are only two education providers running such programmes. The closures of these programmes were initiated by education providers. Through the approval process, education providers who delivered these programmes were able to satisfy us that the programmes met the standards (after meeting conditions, in all cases) and we considered that they were secure enough to continue to run with the information provided.

The SETs have allowed for non-traditional 'fast track' programmes to be approved, with the output focus of the standards. Having said that, there is push and pull between the requirements of government departments (in these cases, where the funding currently comes from) and of the regulator. Since 2012, we have seen increasing preference by the DfE (and the DH to a lesser extent) to fund programmes which produce specialist social workers at the point of qualification. We work within legislation which only allows us to register 'generic' social workers. From our perspective, we will continue to regulate social work in this way until such time as there is a change in our legislation.

¹⁹ We do not regulate nurses. The Nursing and Midwifery Council (NMC) is responsible for approving qualifying nursing programmes.

Future challenges

Uncertainty in social work education, and the importance of patience

The social work profession has developed in many ways over the three years that we have been the regulator and continues to change. Many of the prevalent issues in social work education today are very different to those of three years ago. Many innovations and changes are driven by external influences to the HCPC, but are allowed for by our right touch model of regulation, and our flexible and non-prescriptive standards. Our visitors considered the top driver for change in the sector as being central government, followed by TCSW. This is as it should be, as our role is to protect the public by ensuring that social workers are well trained, rather than to develop, fund or commission innovate education and training models. Having said that, when programmes have fallen short of meeting our standards, we have driven changes to ensure that they do.

Compared to other professions that we regulate, social work appears to generate more interest and involvement from stakeholders outside of the profession. Social work and its qualifying pre-registration education is under frequent review and in flux. There is currently uncertainty around programme and placement funding, student bursaries and the genericism / specialism question.

There are also challenges with the closure of TCSW, and with the transfer of most of its functions to other organisations. For example, it is unclear if and how BASW will take forward the recommendations of TCSW's review of the PCF²⁰. One of the recommendations of this review is to "explain priorities and relationships" between the PCF and the two chief social worker Knowledge and Skills Statements. This recommendation links to the question of post qualifying specialism discussed earlier in this report.

Any changes that we have made to social work education are only just beginning to be felt in the sector. There is a time lag of three to four years between programmes being approved, recruiting students for the first time and those students graduating and entering the workforce as newly qualified social workers. The earliest that any programme was approved to meet our standards was from September 2013. The first group of students that completed an HCPC approved programme begun entering the Register in the summer of 2015. However, these would only have been students that completed programmes of less than two years in duration (usually postgraduate programmes) that were approved in the first year of the schedule. In September 2015, for the first time, all new social work students enrolled on a programme approved against our standards.

Considering the above, recent reforms in social work education, including those driven by SWRB, have yet to significantly impact the workforce. The profession should be patient before it attempts to draw conclusions about the long term impact of recent innovations on the sector.

²⁰ TCSW Review of the Professional Capabilities Framework (PCF) (August 2015)
http://cdn.basw.co.uk/upload/basw_122248-9.pdf

Ongoing monitoring

Ongoing programme approval is subject to satisfactory engagement with our monitoring processes. This means that education providers need to flag significant changes that impact our standards before they take place, and that we consider the education provider's internal monitoring documentation against our standards on a regular basis. At the time of writing, 40 social work programmes have been considered through our 'annual monitoring audit' process, with a further 62 programmes to be audited this academic year.

Programmes must consider our requirements when implementing changes to their programmes, including those prescribed by professional organisations, central government, and local authorities.

DRAFT - for consideration by ETC -
19 November 2015

Conclusion

We have required changes of 96 per cent of programmes to ensure they comply with our standards. There were a wide range of issues that social work programmes faced in meeting our standards, ranging from fundamental issues with programme design and delivery, to issues with how policies and procedures were used and documented. Our approval process has effectively captured these issues, with only a small number of programmes not being able to (or being unwilling to) make the changes we required to become approved.

Our flexible standards, with their outcome focus which ensure qualifying programmes produce safe and effective social workers, have supported and facilitated wider changes in the sector. These changes have included the reforms of the SWRB, government initiatives, and the shift to postgraduate education. Some programmes have faced bigger challenges than others in meeting our standards, but this was not due to any specific model of education and training being incompatible with our regulatory model.

Social work is a profession that is in constant flux, and education providers appear resilient, and accustomed to change. Social work programmes were able to adapt to our regulatory model well, and were keen to learn about our requirements. As the bulk of social work programmes enter our ongoing monitoring cycle, education providers will need to carefully consider how changes impact the way their programmes meet our standards and engage appropriately. As we are an independent regulator we reach our own decisions about whether programmes continue to meet standards irrespective of the drivers for change and breadth of support from other stakeholders.

The evidence gathered through our Social Work Student (England) Suitability Scheme shows that our right touch approach to student registration and student fitness to practise was the proportionate and appropriate. The evidence also shows that concerns noted by many in 2012, about the challenges that would be caused by the closure of the student register, and changes to the way that student fitness to practise is managed, were unfounded.

The sector will need to be patient when considering the success of its reforms. Almost all approved programmes are at least two years in length (with more than half being three years or longer). Many social work students do not complete their studies, and many graduate do not go on to work as a social worker. Therefore, the impact of changes made as a result of our requirements, or due to the work of the wider sector (including the SWRB), are still unknown in the workforce. It will take time for recent changes to be felt, especially considering the large number (over 90,000) of existing social work registrants.

The quality of social work education is continually improving and the work we have undertaken over the last three years has helped contribute to this improvement. We are confident that there is a robust quality assurance process in place to ensure HCPC approved social work programmes are producing good quality social workers who are fit to practice. Our quality assurance process is right touch and evidence based, is well tested across all of the 16 professions that we regulate (including social work), and allows us to force programmes to change when we need them to. Following our detailed assessment of every social work programme in England, we can confidently state that social work education in England ensures public protection.