

## IRISH ASSOCIATION OF SOCIAL WORKERS

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### SUBMISSION TO CORU CONSULTATION ON CONTINUING PROFESSIONAL DEVELOPMENT: STANDARDS AND REQUIREMENTS FRAMEWORK DOCUMENT

23<sup>rd</sup> April 2013

#### Introduction

The Irish Association of Social Workers (IASW), founded in 1971, is the national organisation of professional social workers in the Republic of Ireland. This submission has been informed by the views of the Board of the Association and members

The IASW welcomes the CPD Framework and the statement that “CPD is an important component in the continued provision of safe and effective services for the benefit of service users”. It is essential to keep the Framework document broad and flexible as it needs to inform individual CPD Frameworks for each of the twelve health professionals. However, a number of core principles which underpin CPD for social workers need be included in the Framework Document so as to ensure that they can be drawn on in the formulation of the CPD Framework specific to the social work profession.

This submission is structured using the questions outlined by CORU in their online feedback form.

**5. The following definition of CPD is proposed in the framework document: “Continuing professional development is the means by which health and social care professionals maintain and improve their knowledge, skills and competence and develop the professional qualities required throughout their professional life. CPD is an important component in the continued provision of safe and effective services for the benefit of service users.” Do you think this definition provides a clear statement of the purpose and desired outcomes of continuing professional development?**

YES

The IASW considers a CPD activity to be more than an hour of learning which is the unit of measurement outlined in the draft document. One CPD credit is defined as an hour of learning in the glossary of terms in the document. This definition needs to be broadened encompass CPD activities rather than solely learning activities, with one hour of CPD activity equating to one CPD credit as a rough guide rather than a prescriptive one. Some CPD activities may not be clearly defined as learning and may not lend themselves to being measured in hours. For example, the CPD activity *social work tutor to social work students (college)* is awarded 5 points per student in the IASW CPD policy. This represents a specific block of CPD activity rather than an hourly measure.

The IASW believes that each profession's Registration Board needs to decide the minimum credits for each CPD cycle, and whether registrants need accrue minimum points in particular areas of CPD activity. For example, social workers would need a minimum of CPD activity in the area of supervision while this would not necessarily be a requirement for other professions. We would ask that the Framework be broad enough to facilitate each profession's Registration Board to capture the CPD requirements to maintain the standards, ethics and performance of that profession.

While recognising that registration is an individual responsibility, some responsibility in relation to supporting registrants to meet the requirements of CPD should be with social work employers and this principle needs to be reflected in the Framework document. Most social workers work in state agencies and many social work duties involve carrying out the statutory functions of those agencies as delegated by the employer. Social work employers need clarity about the need for them to provide support to social work registrants they employ.

**6. All registrants are required to undertake CPD as a condition of their registration. The standard for CPD is set out in the framework for the Code of Professional Conduct and Ethics, in the section Standards of Performance. "The registrant must make sure that his/her knowledge, skills and performance are of a high quality, up to date and relevant to their practice. Registrants are required to maintain and develop professional competence by participation in continuing professional development". The CPD requirements (page 12 of framework document) set out what the registrant has to do to demonstrate how s/he meets the standard for CPD. Do you think that the requirements are clear? NO**

The IASW are of the view that the requirements for CPD in this section need additional clarification and specification.

2.6.1 The first CPD requirement in section 2.6 states that "a registrant must engage in a range of CPD activities on an ongoing basis". While in agreement that it is essential that a range of CPD activities are covered and CPD is balanced, the IASW believes that it is also essential that this range is comprehensive. We suggest that this can be achieved by categorising CPD activities into a number of areas, registrants required to acquire a minimum number of CPD points in each area. For example, the categories of CPD activities recognised by the IASW CPD policy are:

1. Supervision
2. Skill development and gaining new knowledge and information
3. Contributing to the development of professional social work knowledge and practice

The requirement could be redrafted to read: A registrant must engage in a range of CPD activities across a number of broad categories on an ongoing basis. The registrant needs to acquire a minimum number of CPD points in each category in line with their Registration Board's requirements.

2.6.2 The IASW requests that the minimum number of CPD credits required for each 24-month cycle is not specified in the Framework document, that this task falls to the Registration Board for each profession.

2.6.3 The IASW asks that references to organisational context and service users to be included in this requirement. While self-directed review is important, equally important for the social work profession is review of professional development needs in relation to service user needs and in response to the needs of the organisational context in which the social worker operates. The plan needs to be formulated in conjunction with professional line management and signed off by same (where this structure exists).

2.6.4 It is perhaps more accurate to refer to a professional development plan rather than a personal learning plan. Please refer to points made under 7 below.

2.6.5 The requirement to make an annual declaration of compliance is confusing in the context of a 24 month cycle. Some learning modules do not lend themselves to fit into a 12 or 24 month period, e.g., PhD, external study options.

## **7. What are your views on the proposed requirements for CPD? Please answer in the space provided.**

In addition to the points made above, the IASW ask that a number of key principles are included in the Framework Document. These are:

- CPD is not an individual process – it takes place in the context of service user needs and workplace requirements. Social workers do not work in isolation;
- Increased emphasis on the work context as an explicit consideration in the formulation of the CPD professional development plan – how is the plan relevant to the role of the professional specific to the organisation in which they work (where relevant);
- Involvement of line management (where relevant) in the formulation and review of the CPD professional development plan;
- Line managers involved in consultation in relation to CPD need to be of the same profession. Where this is not possible, registrants need to negotiate with management to ensure that they have access to consultation and/or supervision with line management from the same profession.

## **8. Is the explanation of the stages of the CPD process clear and easy to understand (pages 14 to 17 of document)?**

The stages of the CPD Process are clear and easy to understand although there is room for increasing clarity in relation to a number of points.

The level of guidance on the percentage of points that should be allocated to the various development approaches was viewed as unsatisfactory. In relation to the requirement that registrants 'must engage in a range of CPD activities' (last paragraph, p.15) we would like to reiterate our previous point re section 2.6.1. We suggest that this can be achieved by categorising CPD activities into a number of areas, registrants required to acquire a minimum number of CPD points in each area. Such an amendment could help structure the registrants professional development plan so as to encompass CPD across a number of categories and therefore, across a range of CPD activities. For example, the categories of CPD activities recognised by the IASW CPD policy are:

1. Supervision
2. Skill development and gaining new knowledge and information
3. Contributing to the development of professional social work knowledge and practice

**9. The proposed process for registrants when undertaking their CPD is set out in the five stages:**

- 1. Review**
- 2. Plan**
- 3. Implement**
- 4. Reflect**
- 5. Demonstrate**

**Please provide any comments or observations on the 5 stage CPD process, in the space below.**

The IASW welcomes the reference in the reviewing and planning stages on organisational context and the focus on consulting with an employer, manager, supervisor or colleagues. However, an increased emphasis on the role of managers/supervisors is essential for the social work profession. The substitution of 'professional development activities' in place of 'learning activities' in this section is crucial with regard to keeping the range of activities broad, beyond what could be constructed as learning activities.

In stage 3, we recommend that the general rule of 1 hour of CPD activity = CPD credit be amended. See our feedback in this regard under question 5.

Stage 4 details the reflection stage in the learning cycle and from the perspective of the IASW, has one major omission, which is professional supervision from a person of the same profession. The IASW consider it essential that professional supervision is included in this section.

In the IASW CPD policy, professional supervision refers to the arrangement for the review of work and the development of knowledge and skills which meet professional development needs and accountability requirements. The IASW position is that professional supervision is distinguished from "consultation" in that supervision is a line management responsibility; other supervision functions

undertaken by non-line managers constitute consultation. The current IASW CPD policy accepts the following forms of supervision as long as the supervisor is a professionally qualified social worker:

- Individual supervision within the organisation
- Individual consultation provided outside the workplace
- Peer consultation between managers/principal social workers

While we understand that many of the health and social care professionals, who will register with CORU do not have professional supervision an essential component of CPD, it is an essential component for the social work profession. As such, we ask that reference be made to professional supervision in this section so that it can be referred to in the future.

In addition, there are concerns that naming reflection at a stage in this process does not recognise the reflective practice that social workers engage in on an ongoing basis. Reflection is a core element of the social work role and profession. The social work profession takes the view that a supervisory relationship supports and strengthens reflective practice and is a core element of professional development.

### **Section 3.3 How much CPD is required?**

As stated earlier in this submission, the IASW recommends that the number of CPD credits required for each cycle is specified by each profession's Registration Board.

Although quite clear, this section does not provide detail in relation to the CPD points required when a registrant works part-time or when a registrant takes extended periods of leave (maternity, sick, absence, etc.). It was viewed that all the points below potentially impact more significantly on women, given maternity and the higher instances of women taking career breaks to facilitate childcare in the early years.

A number of queries in this regard were received from our members:

- In relation to the number of CPD points required over a 24 month period, this appears to be the requirement regardless of work hours, full-time, part-time, job-share. The requirement should be lower for those working less hours thus reflecting a fairer system.
- Similarly for those who may be out of work for over the 24 month period, for example maternity leave, career break or long term sick leave, the requirements should be less for these situations.
- The stipulation that no extra points can be carried over from one 24 month period to another was viewed as problematic for number of reasons;
  1. It doesn't allow for significant recognition of the long term impact on practice should someone take on significant training for example Masters or PhD course;
  2. It doesn't allow any flexibility for someone planning on taking time off work for example, maternity leave or career break, to 'build up' points in the previous 24 month period.

It is essential that a named service or organisation was available to accredit post-qualification training. This could be a function for professional bodies, as is the case in the nursing and medical professions, for example.

All of the above stages would be more effectively done in the context of a supervisory relationship. Reflective practice in particular is something that needs to be done in collaboration with a supervisor. A personal learning plan drawn up between a supervisor and worker will lead to an appropriate list of CPD activities being sought and implemented. Social Workers are very familiar with the Kolb's Cycle of Experiential Learning, it being part of the Tony Morrison model of supervision which many social workers have received training in and base supervision policies on. In addition, the supervisor verifying the CPD activity is one aspect of the Irish Association of Social Workers CPD policy and CPD log which many Social Work Departments in many different settings have adopted nationwide.

**10. The CPD portfolio is the means by which the registrant maintains a record of their CPD throughout each 24 month cycle. The portfolio has five elements:**

- 1. Professional Practice and Practice Setting**
- 2. Personal Learning Plan**
- 3. Record of CPD Activities**
- 4. Reflections on CPD Activities**
- 5. Evidence of CPD Activities.**

**Is the explanation of the elements of the portfolio, provided in the framework document, clear and easy to understand?**

**11. Do you think the CPD portfolio, as proposed, is an appropriate way for registrants to maintain their CPD records on an ongoing basis and document their compliance with the CPD requirements?**

- 1. Professional Practice and Practice Setting*

The stated purpose of this section is to enable CPD assessors appreciate the professional setting and role of the registrant so as to enable them assess how the CPD activities selected and undertaken are linked to the registrant's professional role and work. The IASW is of the view that increasing the role of the line manager (where in place) will decrease the need for practice setting details and make it easier for CPD assessors to establish the relevance of CPD activities undertaken. This would be applicable in social work but would have differing levels of relevance to the other professions.

For example, line managers could be requested to sign off on each CPD activity to verify that the activity is appropriate to the individual registrant's role, learning needs, service user needs and work context. It is current IASW CPD policy that CPD points can be awarded for attending (IASW approved) conferences, information sessions and CPD events if verified by line manager or supervisor as relevant to the individual's role as a social worker. Such involvement by line managers

would also increase awareness among line managers of the need to support employees who are registered professionals to engage in relevant CPD activities in terms of supervision, time off, funding and expenses.

## 2. *Personal Learning Plan*

It may be more accurate to rename Professional Development Plan.

## 4. *Reflections on CPD Activities*

Concern that reflection may be constructed as an event rather than as an ongoing practice engaged in by professionals as described in the glossary of terms in the Framework Document. Could this section be retitled *Evaluation of CPD Activities*?

## 5 *Evidence of CPD Activities*

The IASW CPD folder is provided to members when they join the Association. In addition to our CPD policy, it provides clear structures and guidance for recording (hard copy and electronic formats) and evidencing CPD activities. Members of the Association have suggested that the IASW CPD folder continue to be used by the social work profession. In a survey of members conducted in 2012, over three-quarters of those who answered the question 'Is the CPD log easy to follow and use?' said yes.

**12. To monitor compliance with the scheme a random selection of registrants from each profession will be required to submit their portfolio for audit at the end of each 24-month cycle. Are the stages of the proposed audit process clearly presented and easily understood (pages 21-24) YES**

**13. The criteria that will be used by the assessors when they are assessing CPD portfolios are set out on pages 25 & 26 of the framework document. Do you think the assessment criteria will act as a useful prompt for registrants on how to ensure their CPD portfolio meets the CPD requirements? YES**

While there is a need for clearer guidance on appropriate allocation of CPD credits to activities, this guidance is probably best given by each individual Registration Board. Again, we ask that CPD requirements specify that a minimum number of CPD credits be required in each of a number of categories of activities so as to ensure a shared understanding of what constitutes a range of activities.

Member submissions raised a number of questions in relation to the assessor role in the audit process

- Would assessors be sufficiently familiar with the workers setting to properly assess the appropriateness of the CPD activity?
- What would the training/qualifications of assessors be?
- What happens if a social worker, who has worked without censure, is assessed as non-compliant?

- Does a finding of non-compliant imply that the social workers is unfit to practice? Does this finding have implications for their line-manager and their competence to manage a social work service?

**14. Appendix 1 (pages 28-30) presents a list of CPD activities and gives examples of appropriate supporting documentation for each activity. This list, whilst not exhaustive, is intended to guide and assist registrants when planning and undertaking CPD. Are there other learning activities that should be added to the list? YES**

This appendix could be renamed *Examples of CPD activities and supporting documentation* in order to broaden the focus from learning to a wider range of CPD activities.

It would be useful to increase examples of CPD activities which involve supervision, both in terms of providing and receiving professional supervision and consultation as well as peer consultation between managers/principal social workers.

It would also be useful to include training delivered by the registrant in examples of CPD activities.

The Framework document needs also provide clarity as to whether agency-specific mandatory training receive credits, i.e., training not necessarily relevant to the professional practice but important for working in that particular agency-e.g hand hygiene, fire training, manual handling. The IASW recommends that this is the case.

Suggested additions to learning activities include: activity related to implementing new legislation or guidance, activities where worker is promoting social work within multi-disciplinary environment-through groups or improvements, for managers-activity related to disciplinary matters as this will often involve maintaining professional standards. Also, the category of contributing to development of professional practice needs to be added.

There are a number of issues re confidentiality relating to evidencing work done and submitting portfolio for audit e.g. including an agency policy in portfolio or placement materials, or info re critical cases or details of supervision. If this work were verified by supervisor the need for extensive evidence of a sensitive nature going externally would be minimised.

**16. Appendix 2 (pages 31-37) presents templates for each of the five elements of the CPD portfolio. These templates are designed to aid and guide the registrant in the process of building and maintaining their CPD portfolio. A registrant can choose to use these templates or if there is an alternative template available from their professional body, employer or other representative body this may also suffice. Templates are provided for:**

1. Professional Practice and Practice Setting
2. Personal Learning Plan
3. Record of CPD Activities

#### **4. Reflections on CPD Activities**

#### **5. Evidence of CPD Activities.**

#### **Do you think the templates provide a useful resource for registrants undertaking CPD? YES**

We welcome the templates as non-prescriptive – they are useful as guides. As the Framework allows registrants to use other templates that are already in existence, such as those developed by their professional bodies, this allows the Framework to be flexible enough to respond to registrants needs.

#### ***Conclusions***

The IASW recommends that the CPD Framework is broad and flexible enough to incorporate the professional development needs of all 12 professions and takes account of the settings in which each profession works to ensure competent professionals who can provide safe and effective services to the public. The key points from our submission are as follows:

- Framework needs be flexible enough to facilitate the inclusion of professional specific needs, i.e., supervision for social workers, involvement of line managers
- Professional development plans to replace personal learning plans
- Broaden the definition of CPD activities and of CPD credits across a range of activities
- A registrant must engage in a range of CPD activities across a number of broad categories on an on-going basis. The registrant needs to acquire a minimum number of CPD points in each category in line with their Registration Board's requirements
- Each profession's Registration Board decide minimum credits for each CPD cycle
- Framework needs take account of part-time registrants and registrants who take leave – the requirement to have the same CPD points as other registrants impacts unequally on women and those who take leave to care for children
- CPD is not an individual process – it takes place in context of service user needs and in context of organisational environment
- It is essential that a named service or organisation was available to accredit post-qualification training. This could be a function for professional bodies, as is the case in the nursing and medical professions, for example
- Concerns listed regarding the audit process need to be addressed

Thank-you for the opportunity to comment and provide feedback on the Framework Document.

Kind regards

Ineke Durville (Chairperson IASW)

Frank Browne (Board member, IASW)

Clíona Murphy (CPD Officer)