

ADCS response to the consultation on the national assessment and accreditation system

10 March 2017

1. The Association of Directors of Children's Services Ltd (ADCS) welcomes the opportunity to respond to the consultation on the proposed national assessment and accreditation system (NAAS). ADCS is the professional association for directors of children's services (DCS) and their senior management teams. Under the provisions of the Children Act 2004, the DCS is the chief officer responsible for the discharge of local authority functions with regard to education and children's social care and champion for children across wider children's services.
2. ADCS members welcome the government's commitments as set out in *Putting Children First* (2016) to raising the quality and confidence of the children and family social work workforce. This work is complex and challenging. The profession needs highly skilled practitioners who are able to make difficult decisions in order to safeguard and improve outcomes for vulnerable children and families.
3. The ADCS Workforce Development Policy Committee has engaged extensively with Department for Education (DfE) officials on the social work reform agenda since the announcement of knowledge and skills statements in 2014. Our members have been clear about their views on assessment and accreditation which are outlined again below for the purposes of this consultation.
4. The programme of social work reform which the DfE have embarked on is complex in nature and has a number of strands, some of which will have more obvious benefit than others: knowledge and skills statements for the three statuses; an additional knowledge and skills statement for achieving permanence; employer endorsement; assessment and accreditation for child and family practitioner and practice supervisor; assessment and accreditation for practice leader; practice supervisor development programme; practice leader development programme; teaching partnerships; extended routes of entry into the profession; and, the new regulatory body for social work. ADCS members remain concerned that there is a lack of coherent oversight of the entire reform programme, the development of these different, yet inter-related, strands of work continue to be progressed in a fragmented way. This is particularly evident in the sequencing of the strands of work, it is unclear why the NAAS is being progressed ahead of the establishment of the social work regulator, Social Work England.

Approved child and family practitioner and practice supervisor

5. ADCS members are clear, if the government is committed to implementing assessment and accreditation for approved child and family practitioner and practice supervisor statuses, this must be mandatory, rolled out at pace and fully funded as a new burden.
6. *Putting Children First* (2016) describes assessment and accreditation as a "nationally consistent mechanism to demonstrate whether individual social workers are able to meet these standards [as set out in knowledge and skills statements]...assessment and accreditation will provide that mechanism, so that employers and the public can therefore be assured that social workers meet these expectations". A voluntary system is unlikely to achieve the objective of creating consistency across the country.
7. ADCS members believe that voluntary implementation of the NAAS poses a number of risks which will further destabilise an already fragile workforce. The introduction of the three statuses for

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statutory child and family social work effectively forces specialisation from the point of qualification in a social worker's career. This will remove some of the flexibility in the workforce which many local authorities benefit from, particularly in relation to all age multi-disciplinary teams. It also creates barriers in terms of retention and continued professional development (CPD) for those staff who wish to gain a breadth of experience and knowledge across the spectrum of social work practice.

8. There is a danger that in introducing voluntary assessment and accreditation, a tiered social work profession will be created – those who are accredited and those who are not. The consultation proposes timescales by which social workers progressing through the statuses and those entering the profession from other service areas and jurisdictions should be endorsed for assessment. There are no timescales proposed for endorsement for those social workers who are staying in practice and not progressing through the statuses. This is an inequity within the NAAS and may result in some social workers being a priority for endorsement as LAs work to the proposed timescales.
9. Further, ADCS members are concerned that in a tiered profession, a social worker's professional judgement could be questioned on the basis that they are unaccredited even though there is no statutory requirement for this, e.g. during court proceedings. This may result in an increased number of court appointed independent social workers undertaking assessments. This will result in potential further delays in court proceedings for children, young people and families and increased costs to LAs, yet there are no proposals as to how independent social workers carrying out such functions will become endorsed for accreditation.
10. The relationship between the new universal inspection framework for children's social care and the NAAS must be clarified. It would be inappropriate for the inspection system to be used as a means to drive up voluntary adoption of the NAAS by including a judgement based on the proportion of assessed and accredited social workers in an LA or indeed the number of social workers who fail to become accredited.
11. The consultation document does not refer to DfE expectations in relation to the accreditation of the inspectorate workforce. ADCS members feel it would be unreasonable to allow the inspection of statutory functions to be carried out by inspectors who are not themselves accredited. Further details on this would be welcomed, including whether inspectors will be required to register with Social Work England.
12. ADCS members are clear that, if the NAAS is not mandatory and fully funded by central government, DfE expectations of an assessed and accredited workforce will be considered alongside other local priorities in the context of austerity and the needs of vulnerable children, young people and families. Considering the recent research by Bywater et al (2017) it is clear that those LAs who may benefit most from the NAAS, i.e.. those who are judged as not yet good and generally have high levels of deprivation, are unlikely to have the resources or capacity to participate in a voluntary system.
13. In the context of continued austerity and increasing demand for services, ADCS members would argue that at a cost of £23m to the public purse, this initiative does not provide good value for money and funding would be better spent on supporting front line and early help services. ADCS members would welcome further discussions about this.

Practice leaders

14. ADCS members are clear that the assessment and accreditation of practice leaders should not be mandatory. Within children's social care, the responsibility for practice does not sit solely with one individual, there are numerous complex contextual factors which impact on leadership in this area and these cannot be reflected in the assessment of one person. The practice leader status does not equate to assistant director in all local authorities. Where this is an assistant director, this level of officer appointment is generally an elected member appointment, there may be tensions between employment decisions made by democratically elected representatives in the locality and the expectations of DfE.
15. Within the consultation there is no consideration of the impact on a LA if their designated practice leader does not achieve the expected accreditation; the pool of able candidates for these roles is not large. Nor has the DfE considered the small number of incumbents currently without a social work background and who would be excluded from their roles by this requirement.
16. The consultation document suggests all practice leaders will be accredited during phase one. The development of assessment and accreditation of practice leaders has, to date, progressed at a slower rate than other aspects of the reform programme. As yet, there are no detailed proposals as to what assessment for this cohort will look like therefore implementation during phase one would seem premature. The proof of concept phase highlighted a number of important equality and diversity issues in relation to the age and ethnicity of those being assessed. An assessment process for practice leaders must go through a similar testing phase to ensure any impact in relation to equality and diversity issues can be identified and mitigated against.

Consultation questions

Does this approach balance effectively the clear expectation that social workers carrying out statutory functions will be accredited, with sufficient scope for employers to manage the results for their workforce appropriately?

17. DfE expectations are clearly set out however ADCS members do not feel the proposals strike the right balance when considering the potential risks to the workforce. The question suggests that DfE has identified a potential problem of workforce turbulence as a result of the NAAS yet offers no solutions as to how to manage this. LAs across England are working hard to increase the stability and quality of the social work workforce and would not welcome anything that negatively impacts on this.
18. ADCS members believe that if assessment and accreditation for children and family practitioners and practice supervisors is to be implemented, this must be mandatory, fully funded and rolled out at pace. If the NAAS remains a voluntary scheme, DfE must be open and transparent about the consequences for LAs who do not meet their stated expectations.

Do you agree that the above lists provide a good basis of the statutory child and family social work functions for which social workers should be accredited?

19. The lists detailed in the consultation document generally outline a sensible basis on which child and family practitioners and practice supervisors working in statutory child and family social work can be identified. There are two exceptions to this: the child and family practitioner list does not mention those who are responsible for approving prospective adopters; and the practice supervisor list includes local authority designated officers (LADO). Although all new appointments to the LADO role must now be qualified social workers, there is no requirement for current or former LADOs moving between local authorities to be social workers. ADCS members are concerned that accreditation of those LADOs with social work qualifications may well undermine good-performing incumbents who do not hold such a qualification.

20. DfE expectations of an accredited practice leader in every LA seem to mandate this role without being explicit. In a service where there are multiple social workers and a smaller number of practice supervisors, if an accredited person leaves, the service can still function as it is not reliant on one accredited person. However, with only one practice leader envisaged per local authority, how will a local authority meet this expectation if a practice leader leaves and an accredited replacement cannot be recruited in a timely manner?

Do you agree that a social worker undertaking the ASYE or similar programme, carrying out statutory functions, should not be assessed until after 12 months minimum full time continuous employment with the same employer (including time for completion of ASYE)?

21. Newly qualified social workers (NQSW) will experience an increased level of autonomy and a broader caseload on successful completion of their ASYE. This enhanced remit will help to develop their knowledge and skills as outlined in the knowledge and skills statement and it is right that they should have a minimum of 12 months continuous employment with the same employer in order to demonstrate this.
22. There are a growing number of routes into social work and the 12 month minimum continuous employment may not suit all models. Although 12 months feels right for the majority of NQSWs, those entering the profession via fast track routes, such as Frontline and Step Up, may seek to become accredited at an earlier stage.
23. Further clarity is needed as to how roles can be occupied on an unaccredited basis. Questions four and five focus on the maximum time new practice supervisors and leaders, along with those moving into statutory children and family social work from another service or territory should be able to practice without accreditation. It is not clear from the proposals how long NQSWs and social workers not progressing through the statuses will have to become accredited.

Do you agree that new practice supervisors, supervising the carrying out of statutory functions, and new practice leaders, should be assessed after 12 months minimum full time continuous employment with the same employer?

24. The details relating to the practice supervisor development programme remain unclear, is this focused at aspiring practice supervisors or newly promoted? Will it be accessible to all or only fund a fixed number of places per year? If all newly appointed practice supervisors are to be supported via this programme, the time it takes to complete it, along with a period of consolidated practice should be an indication of the timescales needed prior to assessment. Without any details of the practice development programme, a minimum of six months of employment with the same organisation would seem appropriate.
25. The requirement of a minimum six month period of continuous employment prior to assessment may also help to create some additional stability at this critical level of management.
26. As there are no detailed proposals regarding the assessment and accreditation of the practice leader status, it is difficult to provide a full and considered answer to this question in relation to practice leaders.

How long after starting work in a child and family social work role, carrying out statutory functions, should practitioners, practice supervisors and practice leaders moving into such roles be put forward for assessment as a maximum?

27. Social workers transferring into child and family social work must be given the opportunity to develop the required knowledge and skills. It would be appropriate to expect a social worker in this situation to have successfully achieved endorsement within 12 months.

28. DfE may believe that the NAAS will not prevent social workers from other domains of practice entering statutory child and family social work however ADCS members would disagree. There is concern that, given adult social work will not have an assessment and accreditation system, this service comes to be perceived as the Cinderella service for those who fail to become accredited. This is not only a concern about how the social work profession as a whole is perceived, but also that the link between adult and children's social work will be broken. ADCS members firmly believe that in order to address the needs of vulnerable children and young people in a holistic and sustainable way, a systemic approach is needed to break the cycle of adult disadvantage, much of which is driven by the impact of substance misuse or mental ill-health on adults' ability to parent their children.

How long after starting child and family social work where the social worker is carrying out statutory functions, should practitioners moving from other jurisdictions be expected to be put forward for assessment as a maximum?

29. There must be equity within any NAAS therefore social workers transferring to English statutory child and family social work practice from another jurisdiction should be allowed a maximum of 12 months to demonstrate they meet the required knowledge and skills and achieve employer endorsement.

Do you agree that agency and self-employed social workers, carrying out statutory functions on behalf of others, should be endorsed for assessment by the organisation which has direct experience of their practice? We would expect this to be the local authority, trust or employer that has the statutory functions.

30. The organisation providing endorsement for agency and self-employed social workers must have direct experience of their practice. Such endorsement should only be given to an agency/ self-employed social worker following a significant period of employment with a LA, allowing for an informed judgement to be made regarding practice and therefore whether to support endorsement or not.

31. Further thought must be given to the way in which independent social workers can be endorsed as no clear proposal has been made in relation to these roles. Many will not work for an organisation that has a statutory child and family social work function however they may be appointed by a court to undertake independent assessments in court proceedings. Recent serious case reviews have focused in on this area of practice.

Do you agree that it should be left to employer discretion to decide when a social worker is endorsed for reassessment?

32. Endorsement for reassessment must be at the discretion of the employer which has the direct experience of an individual's practice. This, however, must be linked to DfE expectations regarding the length of time someone can be in a statutory child and family social work role without accreditation.

33. The proposed NAAS does not deal with the tricky issue of repeated failure. This may be rare in practice, but it clearly needs to be planned for. This may be particularly relevant where an employer is happy with an employee's performance yet they repeatedly fail to become accredited. What does this mean for the employer and employee? How does this relate to an employee's employment rights?

Should re-accreditation be expected, periodically, once a social worker has gained accreditation, to ensure that their knowledge and skill level is maintained?

34. Rather than creating a system of re-accreditation, ADCS members would be interested in developing strong links with already established local appraisal mechanisms or indeed linking re-accreditation with the role of the new social work regulator, Social Work England, via expectations around CPD linked to maintaining registration. It is a source of concern as to why the NAAS is progressing ahead of the establishment of the new regulatory body.

Do you have any further comments?

35. The proof of concept phase raised a number of important equality and diversity issues in relation to the age and ethnicity of those being assessed. There were also further unexplained discrepancies in success rates in relation to the geographic location of the employer and those in specialist roles tended to score lower on the general and applied knowledge. ADCS members would expect these issues, particularly those in relation to equality and diversity, to be fully understood and addressed prior to the implementation of phase one.
36. The infrastructure required to support the NAAS must be carefully thought through. Delivery of assessments must be scaled up quickly to develop sufficient capacity if DfE is to meet the expectation that all child and family social workers will have had the opportunity to be accredited by 2020. Planning delivery for a voluntary system will be much more complex as participant numbers remain unclear.
37. There is an obvious gap within the NAAS framework relating to support prior to assessment and accreditation for those child and family practitioners, practice supervisors and practice leaders who are already in post. Many may not feel they need this, but in the context of the proposed development programmes, it would seem appropriate that this cohort is also able to access targeted support and development opportunities funded via central government.
38. There must be absolute clarity on the interface between the new regulatory body, the knowledge and skills statements and the NAAS. It is not clear why the NAAS is being progressed ahead of the creation of Social Work England if the organisation's objectives are to promote and maintain: public confidence in social workers in England; and, proper professional standards and conduct for social workers in England. Further, the new regulator will cover social workers in both children and adult services yet the knowledge and skills statements and NAAS are only applicable to those working in statutory children and family services.
39. ADCS would welcome the opportunity to remain in dialogue with the DfE as the NAAS and broader social work reform agenda continue to develop. Please contact Esther Kavanagh Dixon, ADCS Policy Officer, esther@adcs.org.uk.