

Social Work Oversight Engagement in British Columbia



Engagement Report

**Ministry of Children and
Family Development**

June 2024

SOCIAL WORK OVERSIGHT IN BRITISH COLUMBIA: ENGAGEMENT REPORT

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ACKNOWLEDGEMENTS

The ministry acknowledges the diverse territories of First Nations across British Columbia. We are grateful to carry out our work on these lands. We acknowledge the rights, interests, priorities, and concerns of all Indigenous Peoples (First Nations, Métis, and Inuit), respecting and acknowledging their distinct cultures, histories, and rights.

We gratefully thank each person and partner organization who participated in our engagement; the perspectives shared were essential to help us understand the diverse range of thoughts and opinions on social work oversight in B.C. We acknowledge the energy and time that it takes to share your ideas and perspectives with the ministry and are grateful for your contributions.

Thank you!

INTRODUCTION

The Ministry of Children and Family Development (the ministry) holds responsibility for legislation that informs the structure of B.C.'s current state of social work. The ministry led a public engagement process on the topic of social work¹ oversight² in B.C., with the goal of developing an understanding of the diverse range of perspectives and priorities on this topic. The scope of discussions covered oversight relating to all social work occupations across B.C., including the ministry, community care facilities, mental health organizations, hospitals, self-employed/private practice, community development, Indigenous Child and Family Services agencies, and First Nations and other levels of government (e.g., federal, municipal). As the engagement process was led by the ministry, engagement discussion and survey feedback often focused more narrowly on the work of the ministry and the child welfare system.

The ministry set out to learn from the social work community, Indigenous partners, sector partners, and the public about the strengths, challenges, and opportunities of the current social work oversight model in B.C. An analysis of the feedback received was conducted and validation sessions were held through fall 2023. This report identifies and reflects on the key themes and messages raised by participants through the engagement process. As a result of what we heard and learned, the ministry identified early actions and next steps. Our next steps will focus on exploring the impacts and effects of potential approaches to improve the current state of social work oversight in B.C.

¹ In the [Social Workers Act](#), social work is defined as “the assessment, diagnosis, treatment and evaluation of individual, interpersonal and societal issues through the use of social work knowledge, skills, interventions and strategies, to assist individuals, couples, families, groups, organizations and communities to achieve optimum psychological and social functioning.”

² Oversight is the system of standards and requirements under which social workers practice. Oversight impacts social workers, social worker employers, and people who access social work services.

EXECUTIVE SUMMARY

Social work is a multi-faceted profession, involving direct and indirect services to individuals, families, and communities. Social workers play a vital role in helping individuals build on their strengths, overcome challenges, and achieve their goals and aspirations³.

As the ministry responsible for legislation that informs the structure of B.C.'s current state of social work, the ministry set out to hear from the many diverse individuals, groups and communities involved in social work services about what is working well in the current state of social work oversight in B.C., and opportunities for improvement.

The information shared in this report provides an overview of the current state of social work oversight in B.C.; the engagement process; the views and ideas that emerged from discussions through engagement sessions, written submissions, and surveys that took place throughout 2022 and into 2023; what we learned; early actions the ministry has taken; and next steps.

The engagement process included:

- Thirty-two engagement sessions held with 76 partners and over 200 participants;
- Two web-based surveys, one for social workers and one for the public; and
- An invitation for written submissions.

Engagement discussions centered around five themes informed by initial research and analysis of social work oversight. These themes were developed through consideration of past reports related to social work oversight⁴, research into professional regulation, and jurisdictional scans of existing practices for social work oversight.

1. Oversight and Governance
2. Equity, Inclusion, Anti-Racism and Truth and Reconciliation
3. Practice Requirements, Standards and Ethics (including complaints and discipline processes)
4. Recruitment, Retention and Service Delivery
5. Legal and Administrative Considerations

³ This description was adapted from [B.C.'s 2023 Social Work Week Proclamation](#).

⁴For example: [Indigenous Resilience, Connectedness and Reunification – From Root Causes to Root Solutions](#); Ministry of Health [Recommendations to Modernize the Provincial Health Profession Regulatory Framework](#); and [Addressing Racism: An independent investigation into Indigenous-specific discrimination in B.C. health care](#).

The input gathered through engagement clearly showed the high degree of knowledge, experience, and passion that participants have on the topic of social work oversight. The engagement also demonstrated the complexity of oversight.

Complex issues, and a broad range of concerns and experiences were brought forward by participants. In some instances, the issues raised conflicted, showing the layers of complexity in relation to the current state of social work oversight in B.C. Some individuals called for an increase in regulation of social workers, while others raised issues and concerns with the current state of social work oversight being colonial and inflexible.

While there were a wide variety of ideas and interests, there was a clear and shared interest from all parties to make improvements in three key areas: accountability, access, and quality. A summary of views and concerns as they relate to social work oversight are presented under these themes:

- **Accountability:** ensuring accountability of social workers serving individuals, families, and communities to protect public interest and safety.
- **Access:** improving access to registration, addressing systemic barriers that come with regulated oversight, supporting diversity, equity, inclusion, anti-racism and Truth and Reconciliation, and improving the registration process in general.
- **Quality:** supporting the delivery of high-quality social work services while enhancing the well-being of individuals, families, and communities.

By listening to those who participated in the engagement, the ministry learned about how different individuals, groups, and communities experience complex and competing issues when working within the current state of social work oversight. While there are some immediate actions that can be taken, the ministry learned that social work oversight in B.C. operates in a multilayered and interdependent environment where actions in one area create impacts and consequences in other parts of the system.

A thorough analysis of the implications and effectiveness of different approaches to addressing the concerns raised, coupled with continued engagement with partners and the community, is required to understand impacts and implications of various approaches to improved accountability, access, and quality in the social work profession. This work will inform options for the development of medium- and long-term actions.

CURRENT STATE OF SOCIAL WORK OVERSIGHT IN B.C.

Social workers enhance the well-being of individuals, families, and communities, while promoting social fairness and addressing inequalities within the social service system. They work in a variety of settings (e.g., hospitals, private practice, public sector, and non-profit organizations) and serve a broad range of children, youth, young adults, and adults across B.C. The purpose of regulating professionals such as social workers, doctors, engineers, teachers, architects, chiropractors, etc., is to ensure that professionals operating under the title of the profession are providing expert services safely and in a manner that benefits the public. The social work profession is regulated in all Canadian provinces and the Northwest Territories.

In B.C., the social work profession is regulated under the [Social Workers Act](#) (SWA) and the [Social Workers Regulation](#) (SWR). The SWA defines the work and role of the professional as follows:

- **“social work”** means the assessment, diagnosis, treatment and evaluation of individual, interpersonal and societal issues through the use of social work knowledge, skills, interventions and strategies, to assist individuals, couples, families, groups, organizations, and communities to achieve optimum psychological and social functioning; and
- **“social worker”** means a person who practises social work.

The SWA provides legislative authority to create the B.C. College of Social Workers (BCCSW) as B.C.’s regulatory body for social work. The SWA sets out the BCCSW’s role and responsibilities and empowers the BCCSW to create bylaws to govern the social work profession. Certain bylaws require approval by the Minister of Children and Family Development (the Minister) (e.g., [registration specific bylaws](#)).

B.C. uses a title protection model to regulate social workers. Under a title protection system, those who meet certain criteria and register with the regulatory body can use the protected title (e.g., “social worker”). The SWA protects title only, it does not restrict social work practice. Under section 18 of the SWA, title protection applies to the title of “social worker,” “registered social worker,” and “registered clinical social worker” and can only be used by those who are either (1) registered with the BCCSW, or (2) are employed by an exempt employer listed under [section 4 \(2\)](#) of the SWR. Social workers employed by exempt employers may use the title of social worker without registering with the BCCSW and are held to the rules, standards, and policies of their employer.

Oversight Models

Oversight can be achieved in numerous ways using a variety of levers and tools. Mechanisms and tools used by the ministry and the BCCSW provide examples of two ways

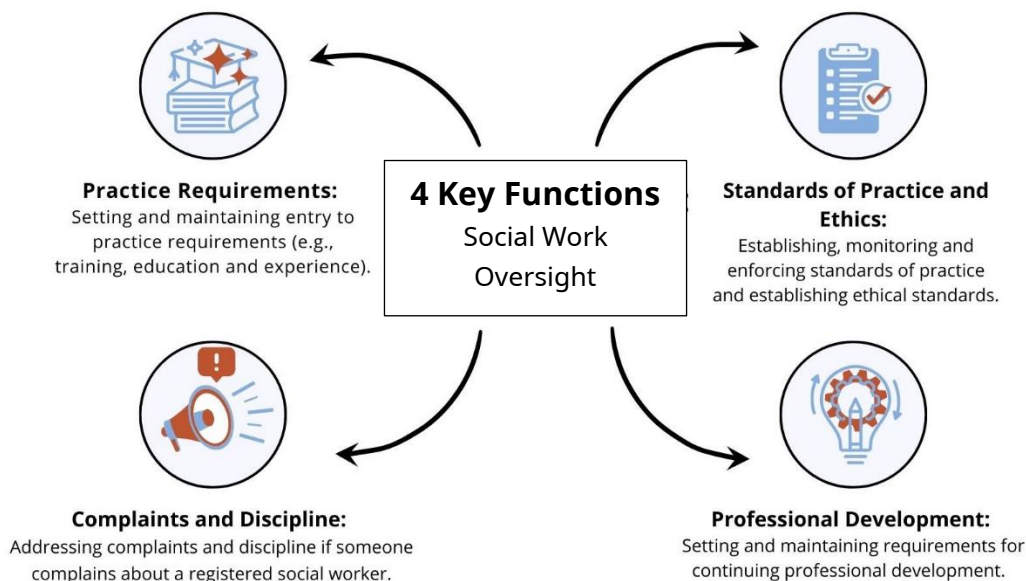
for providing oversight. Several occupations in B.C. are regulated to protect health, safety, and confidence in quality services. There are different approaches taken to achieve this oversight including self-regulation/regulatory college (e.g., health professions), government regulation (e.g., Teacher Regulation Branch, Early Childhood Educators, private training institutions), or various oversight agencies for police officers such as the Office of the Police Complaint Commissioner and the Independent Investigations Office.

Social workers in B.C. who operate a private practice or work for an employer who is not exempted under the SWR are overseen by the BCCSW. Exemptions exist for large, publicly accountable employers who have oversight structures in place. Social workers in B.C. are also subject to established complaints and discipline processes either through the regulatory college or through their employer.

In general, people who want to work in the capacity of a Social Worker, must:

- Have recognized and verified education;
- Undertake required and relevant on-going professional development;
- Follow a code of ethics and standards of practice;
- Meet other standards set out by the regulatory organization or employer, as applicable; and
- Have a criminal record check completed.

Other Canadian jurisdictions use similar approaches to social work oversight, with registration and employment requirements for child welfare and/or government staff varying across jurisdictions. Across Canada jurisdictions may require government staff to register with a regulatory body, have partial requirements (e.g., staff with a social work degree must register) or have no requirements for staff to register with a regulatory body.



Ministry of Children and Family Development

The ministry serves as one example of “an exempt employer under the SWR”, as a large, publicly accountable employer with oversight mechanisms in place. The regulatory exemption ensures that individuals are not subject to duplicative regulation. Examples of other exempt employers include Indigenous Authorities and municipalities.

The ministry is committed to ensuring ethical, professional, and competent practice of all professionals serving vulnerable children and families throughout B.C. through a multi-pronged oversight approach. In all staff oversight, the ministry works to ensure high-quality practice and strong oversight measures for all staff who interact with children, youth, and families. The ministry employs a wide variety of social program staff who provide different services to support children and families. Examples include child protection workers, resource workers, family service workers, child and youth with support needs workers, Roots practitioners, youth justice workers, child and youth mental health clinicians, youth transition (SAJE) navigators, practice analysts and consultants, team leaders, and others.

The ministry has employed those with Social Work, Child and Youth Care and similar degrees for many years. In 2019, the ministry broadened educational requirements for some positions, such as child protection workers:

- **Preferred credentials** are bachelor’s degree or higher in Social Work or Child and Youth Care or Master of Education in Counselling Psychology/Master of Arts in Counselling Psychology with completion of a practicum in family and child welfare.
- **Expanded credentials** are bachelor’s degree in a Human Services field or bachelor’s degree with a Major/Honors in a Human Services field or master’s level graduate Certificate/Diploma in a Human Services field after the completion of an unrelated bachelor’s degree, plus, a minimum of one year of related or job-specific work experience.
 - Human Services fields include: Psychology, Sociology, Criminology, Anthropology, Early Childhood Education, Indigenous Studies, Education, or Nursing.

Oversight through Designation and Delegation Model

The CFCSA provides for two processes of conferring legal authority: Designation and Delegation. A Designated Director is an individual with statutory responsibility for carrying out powers, duties and functions authorized by the CFCSA. The Minister designates Directors via Section 91, 91.1 and 91.2 of the CFCSA. Designation is done in writing via a letter signed by the Minister. The Minister relies on the Provincial Director of Child Welfare to recommend individuals for designation.

One aspect of the legal authority of a Designated Director is the ability to delegate some of their authority to others via Section 92 of the CFCSA. Delegation results in a shared authority between the Designated Director and the person(s) they have delegated. The ministry has two primary means of delegation – individual and class delegation.

- **Individual Delegation:** The Designated Director is responsible for ensuring the delegate has the required education and experience as well as assessing the delegate to be qualified and competent, to carry out specific powers, duties, and functions under the CFCSA. An individual should only be delegated to the level required for them to perform their job. There are seven types of delegation, with six levels of delegation via the C-Series that are tied to the ministry's preferred and expanded credentials and a category for Social Program Officer Assistants.
- **Class Delegation:** Designated Directors are also able to delegate authority to a class of persons. Each class of persons is unique and identified by the job role. This means that all individuals in the role identified as part of the class have the legal authority outlined in the class delegation. The delegated authority must be exercised within the parameters of the class members job description.

Section 77 of the Adoption Act provides for similar designation and delegation authorities whereby a director may delegate any of the director's powers, duties, or functions under the Adoption Act.

As part of this delegation/designation model, ministry social workers are held accountable under law. They must exercise their powers and duties in the best interests of vulnerable children and families and adhere to policy as prescribed by the Ministry. The consequence of failing to uphold these legal obligations would result in a formal review that could lead to disciplinary action, providing oversight comparable to the effects of registering with a regulatory oversight body.

Delegated workers in the ministry abide by [Standards of Conduct for BC Public Service employees](#) and are required to take an [Oath of Employment](#). Employees complete a six-month probation period and rigorous on the job delegation training under the direction of a supervisor to pass all requirements delegated under the [Child, Family and Community Service Act](#) (CFCSA) and/or the [Adoption Act](#). The ministry's accountability practices include supervision, discipline, and labour relations processes that can cover a broad range from additional training to dismissal, depending on the circumstances.

Complaints and Discipline

A delegated worker's practice can be formally reviewed through sections 93.1 and 93.2 of the CFCSA, which provides the ministry with the authority to conduct reviews for the purpose of organizational learning and to ensure fairness is achieved by professionals providing services to families interacting with the ministry.

The ministry has additional oversight in place through legislation that provides powers to specific bodies, including the [Representative for Children and Youth Act](#), [Public Interest Disclosure Act](#), and [Ombudsperson Act](#). B.C. is one of the only jurisdictions in Canada with an Office of the Representative for Children and Youth (RCY), a legislated oversight body with a [mandate](#) to review, investigate and publicly report on ministry conduct and the provincial child welfare system. The RCY advocates on behalf of children, youth and young adults; monitors, reviews, audits, and publicly reports on the ministry's designated services; and conducts independent reviews and investigations into the critical injuries or deaths of children receiving reviewable services.

British Columbia College of Social Workers

As mentioned above, the BCCSW is responsible for regulating the social work profession in B.C. The SWA sets out the BCCSW's mandate, structure, jurisdiction, and powers. The SWA provides the BCCSW with the legislative authority to: (1) serve and protect the public; and (2) work in the public interest. As of February 29, 2024, there were 6,121 social workers registered with the BCCSW.⁵

The BCCSW is governed by a board of directors composed of four publicly appointed members and eight elected registrant members from diverse professional and cultural backgrounds who are nominated for election or appointment to the Board based on identified and published competencies needed to execute the mandate of the College and functioning of the Board. In B.C., the Minister appoints public members and the profession elects professional social worker members.

The BCCSW's role can be broken down into four key functions as outlined in the graphic below:

The BCCSW is a not-for-profit organization and funds its operation through the collection of application and registration fees. Effective December 1, 2023, annual registration fees with the BCCSW were \$309.10. These fees are comparable to and generally lower than fees charged by social work colleges in other provinces.⁶

Registration Requirements

Typically, for applicants from within Canada, the requirements for applying for registration with the BCCSW are a degree in social work from an institution accredited by the Canadian Association of Social Work Education (CASWE) and 700 hours of social work experience from practicums or other social work-related positions. Applicants must submit a transcript from their degree program as well as undergo a criminal record check, provide

⁵ Number provided by the BC College of Social Workers on March 1, 2024.

⁶ Sample comparison of annual renewal fees for full registration class with social worker colleges across Canada: Ontario (\$400), Alberta (\$400), Manitoba (\$360), Prince Edward Island (\$245)

two pieces of identification, a current resume, and references. Applicants with social work education from outside Canada follow a similar application process with the applicant needing to demonstrate their education obtained outside of Canada meets similar social work degree requirements as the applicants need to demonstrate their knowledge, skills and abilities are “[substantially equivalent](#)” to a social work education in Canada.

Those without a social work degree can apply to register with the BCCSW, if they can demonstrate they have a bachelor’s degree in a related field that meets the BCCSW’s “[substantially equivalent](#)” requirement and have a minimum of 700 hours of social work experience. These applications are considered on a case-by-case basis. In these cases, as with internationally educated applicants, the applicant’s university education must be substantially equivalent to a social work degree from an academic program approved by the BCCSW, including substantive upper-level university education in social welfare and policy; social work ethics, practice and theory; human behaviour and development; as well as research methods.

Once preliminary documentation has been received, the BCCSW reviews the application to determine if the applicant meets registration requirements. If the applicant meets the preliminary requirements of registration, the applicant must write a licensure exam developed by the [Association of Social Work Boards](#) (ASWB) at the Bachelor level, Master level, or clinical licensure exam. ASWB offers nonstandard testing arrangements to accommodate different learning styles or abilities. Successful completion of the exam is a requirement for registration with the BCCSW for those who are not currently registered within B.C., or another Canadian province. When approved for registration, the applicant must pay an annual registration renewal fee and complete 40 hours of continuing professional development each year, including three hours of ethics training, to keep their membership in good standing.

[Complaints and Discipline](#)

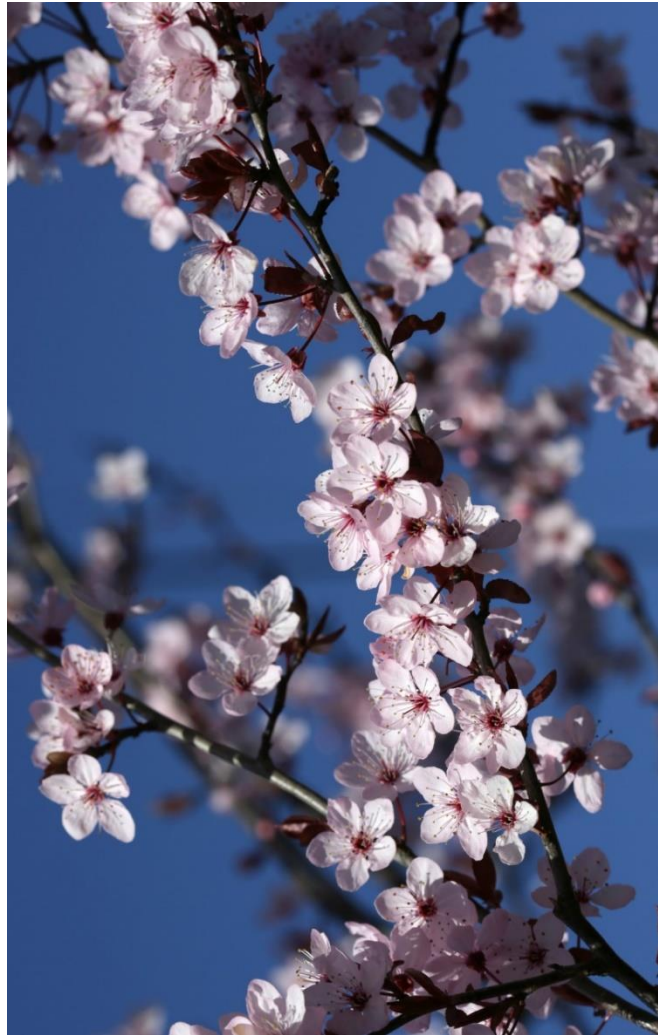
The BCCSW investigates and adjudicates complaints through the Inquiry Committee of the BCCSW, which assesses conduct and competency against standards of practice and ethical standards set by the BCCSW to ensure consistent, fair, and unbiased evaluation of complaints. If a remedial or discipline action is directed by the Inquiry Committee and/or Board against the registrant, the BCCSW publishes a summary of the action taken on its website and the online registry within the framework of the SWA, and may include any hearing decisions, Interim Orders, Consent Orders, and Consent Agreements.

ENGAGEMENT OVERVIEW AND PROCESS

The ministry engaged on social work oversight in B.C. from the spring of 2022 until early 2023. The engagement was followed by analysis of the feedback received to identify themes and collate what we heard, and validation sessions held through summer and fall 2023.

Purpose of the Engagement

Purpose of the engagement was to explore the current state of social work oversight, including what is working well and opportunities for improvement. The engagement process to gather input from partners and the public will allow the ministry to develop a better understanding of the diverse range of needs, perspectives, and opinions surrounding social work oversight.



Engagement Discussion Themes

Discussions centered around five themes informed by initial research and analysis of social work oversight. These themes were developed through consideration of past reports related to social work oversight⁷, research into professional regulation, and jurisdictional scans of existing practices for social work oversight.

1. **Oversight and Governance:** Discussions explored the strengths and challenges of regulated oversight.
2. **Equity, Inclusion, Anti-Racism, and Truth and Reconciliation:** Discussions focused on how social work oversight intersects with equity, inclusion, anti-racism, and truth and reconciliation. Participants also discussed how the current state of

⁷For example: [Indigenous Resilience, Connectedness and Reunification – From Root Causes to Root Solutions](#); Ministry of Health [Recommendations to Modernize the Provincial Health Profession Regulatory Framework](#); and [Addressing Racism: An independent investigation into Indigenous-specific discrimination in B.C. health care](#).

oversight impacts the many diverse individuals, groups and communities who work in or access social worker services throughout B.C.

3. **Practice Requirements, Standards and Ethics (including complaints and discipline processes):** Discussions explored how regulation can work to help ensure practitioners maintain consistent practice and ethical standards, who sets those standards, and how they are maintained.
4. **Recruitment, Retention, and Service Delivery:** Discussions explored the strengths and challenges of recruitment and retention of social workers within the current state of social work oversight in B.C.
5. **Legal and Administrative Considerations:** This theme explored potential legal, legislative, and administrative implications associated with the current state of social work oversight in B.C.

Summary of Engagement Participation

Engagement Sessions

In spring 2022, the ministry launched the Social Work Oversight Engagement website and, throughout the rest of 2022 and into early 2023, hosted 32 virtual and in person engagement sessions with over 200 participants and 76 partners.

Partners who participated in the engagement sessions included⁸.

Health Sector: all health authorities in B.C. were represented.

Indigenous Partners: Rights and Title Holders; Modern Treaty Nations; Metis Nation BC (MNBC); Inuit Tapiriit Kanatami (ITK); and Aboriginal Friendship Centres.

- MNBC and the ministry co-facilitated two advisory circles on social work oversight, including one in-person session hosted by MNBC.

Internal Government Partners: cross-government partners (e.g., Ministry of Health) and Ministry of Children and Family Development leadership from both policy and service delivery divisions.

Social Sector: B.C. Representative for Children and Youth (RCY); BC Foster Parents Association; Inclusion BC; and members of the Provincial Association of Residential and Community Agencies.

Social Work Educators: Douglas College; Thompson Rivers University; University of British Columbia; University of Victoria; and Vancouver Island University.

⁸ This is not an exhaustive list.

Social Work Representatives: BC College of Social Workers and BC Association of Social Workers.

Youth: Provincial Director of Child Welfare Youth Advisory Council and BC Youth in Care Networks.

Surveys

The social worker survey included 1142 respondents while 534 respondents completed the public survey. Close to 9000 comments were received in response to the open-ended questions included in both surveys.

The surveys used a combination of closed and open-ended questions to determine what respondents think about the strengths, challenges, and opportunities for change within B.C.'s current state of social work oversight.

The social worker survey asked general questions about the current state of social work oversight in B.C., as well as focused questions on the following topics:

- Oversight and Governance
- Equity, Inclusion, Anti-racism, and Truth and Reconciliation
- Practice Requirements, Standards and Ethics
- Complaints and Discipline

The public survey also asked general questions about the current state of social work oversight in B.C., as well as focused questions on the following topics:

- Equity, Inclusion, Anti-Racism, and Truth and Reconciliation
- Complaints and Discipline

Using a qualitative data analysis tool, a thematic analysis approach was used to review the qualitative data collected in each survey.

Written Submissions

Fourteen formal submissions were received during the public engagement portion of the Social Work Oversight Engagement. Of the submissions received, seven were from private individuals and seven were from partner organizations. Between December 2022 and January 2023, the ministry also received 380 emails from a public letter writing campaign concerning social work oversight in B.C.

Validation Sessions

The ministry hosted a series of validation sessions through summer and fall 2023. Validation sessions included participants from engagement sessions and social workers who completed the social worker survey and indicated they would like to participate in further engagement opportunities related to social work oversight.

Four sessions were held for government partners, Indigenous partners and sector partners and were aimed at validating the analysis of the feedback received during the engagement sessions. Two validation sessions were also held for social workers who completed the social work survey to validate the results of that survey.



WHAT WE HEARD

During the engagement process many different issues were raised, challenges expressed, and ideas for solutions were offered. The ministry-led engagement process resulted in much of the discussion and input being focused on issues relating to the ministry's role as responsible for social work legislation and for governing B.C.'s child welfare system. **While there were many different views expressed, the overall learning from what we heard was that there is a shared interest in improving accountability, access, and quality.**

These key themes can be summarized as follows:

- **Accountability:** ensuring accountability of social workers serving individuals, families, and communities to protect public interest and safety.
- **Access:** improving access to registration; addressing systemic barriers that come with regulated oversight; supporting diversity, equity, inclusion, anti-racism, and Truth and Reconciliation; and improving the registration process in general.
- **Quality:** supporting the delivery of high-quality social work services while enhancing the well-being of individuals, families, and communities.

This section of the report summarizes what we heard and begins to consider the complex factors that relate to the challenges and solutions put forward during the engagement process. These ideas for potential solutions mark the beginning thinking on approaches

that can be considered. The potential impact and effectiveness of solutions were not considered during the engagement and will be an important part of our work going forward: to understand the root problems associated with concerns raised regarding accountability; to identify the full range of potential options to address challenges; and, to determine the effectiveness of these options. Any approach to strengthen accountability and oversight comes with unintended impacts and may introduce barriers to factors relating to practice or the sector such as recruitment of diverse workforce. Before implementing broad policy shifts, this interplay of factors needs to be fully analyzed and considered.

In this section of the report, those who participated in the engagement, whether through surveys, written submissions or engagement sessions, will be described generally as “participants”.

Accountability

Participants discussed concerns and challenges with accountability mechanisms that exist in the current state of social work oversight in B.C. As such, engagement discussions focused mainly on two accountability mechanisms: the ministry’s internal oversight and the BCCSW as a regulated third-party oversight body. A key takeaway from participants engaged in this project was an overarching desire to ensure accountability of individuals serving vulnerable children and families.

The discussion on accountability and ideas for consideration centred on the existing structure under the BCCSW and provided an important starting point for further analysis. Next steps will need to include building on participants’ ideas while considering how other professions approach accountability in different ways. For example, some:

1. Require registration with an oversight body (health professions, architects, lawyers),
2. Provide oversight through employer accountability structures (e.g., CFCSA section 93.1 and 93.2 provides the ministry with the authority to conduct reviews for the purpose of organizational learning and to ensure fairness is achieved by professionals providing services to families interacting with the ministry),
3. Rely on Oversight Body (e.g., Office of the Police Complaint Commissioner, B.C. Representative for Children and Youth),
4. Have oversight structured into Ministry operations (B.C. Teacher Regulation Branch, Early Childhood Educator Registry), or
5. Combination of the above.

Comparative analysis of these approaches is required to assess the effectiveness of each for improving oversight and accountability of professionals. A combination of researching

a variety of oversight approaches while further exploring what we heard about accountability will inform the ministry's next steps and further work that needs to be done.

Accountability – Challenges, Ideas, and Considerations

The effects of the current state of oversight allowing for registered and unregistered social workers in the province was at the centre of the discussion on accountability. The SWR allows people who work for certain organizations to call themselves social workers, without needing to obtain formal social work credentials (See the Current State of Social Work Oversight in B.C. section above for further details). Concerns were raised that registered and unregistered social workers may create inconsistencies in the profession and in practice and cause confusion for the public. In this realm, the concept of true title protection was raised in relation to mandatory registration and who should be able to call themselves a social worker (i.e., only those who hold a social work degree). Participants outlined challenges associated with the exemptions currently in place under the SWR and provided their perspective on the removal of exemptions from the regulation⁹ as being important for improving social work oversight in the following ways:

- Public protection and consistency in oversight,
- Standards of practice and quality of care,
- Protection of the social work title, and
- Credibility and legitimacy of the profession.

As a solution, many participants deemed that registration with the BCCSW was an important tool to ensure oversight and safety. Participants stated mandatory registration¹⁰ could work to ensure:

- All social workers in B.C. are held to the same standards, given the requirement to follow consistent standards of practice and ethics.
- Greater accountability and independent oversight, including a formalized third-party complaints process.
- Standardized training and education for social workers.
- Title protection and public protection.
- Improved credibility and strengthened professional identity for social workers.

The potential negative impacts of mandatory registration were also discussed. Participants recognized mandating registration would limit the number of individuals eligible to work

⁹. If exemptions were removed those who work in a social work-titled position or call themselves a social worker would be required to register with the BCCSW.

¹⁰ Mandatory registration appeared to be understood differently by participants. Most people calling for mandatory registration would like to see a registration requirement applied to anyone who holds a social work degree and works in the social service field.

and impact recruitment and retention efforts. As an example, if applied to the ministry, mandatory registration would threaten workforce stability. The ministry intentionally recruits a broad range of skills and experience to support the many different types of work done by the ministry. Recruiting for a broad range of skills and experience supports operating with a more diverse work force and allows for the recognition of lived and cultural experience when hiring. A broadscale requirement would result in lost expertise of ministry employees in the areas of child and youth care, youth substance use, Indigenous mediation, educational psychology, and other highly valued areas of education and knowledge.

Survey participants discussed their understanding of the definition of social work throughout their responses. Many expressed concern that the current state of social work oversight in B.C. allows people without social work degrees to call themselves social workers. Comments related to the definition of social work mainly supported the belief that a social worker is someone who holds a social work degree. There were some participants who stated their belief that individuals with lived experience bring value and should be able to work as a social worker, and others who believed someone with a related degree plus work experience could work as a social worker. The ministry's broadened educational requirements align with these comments and support diversity in hiring for certain positions such as child protection workers.

The challenges of staffing shortages across the province also came up in discussions as another consideration related to accountability. Participants spoke to the issue of high burnout and workload concerns in the profession. Some participants worried that increased regulation and registration may add to recruitment and retention challenges in a tight labour market, especially in rural and remote communities, and the resulting impacts to the levels and quality of service that could be provided.

Some participants expressed that without mandatory registration, there is no way to protect the public from unregistered social workers who may have been disciplined or dismissed by their employer from seeking employment elsewhere. There was a general sense that registration ensures this type of accountability, and some form of independent third-party regulation should be required for social workers and other professionals working in a helping profession. The ministry will need to explore the range of opportunities to address this concern – for example, publication of internal investigations.

Participants also raised that staff working for exempt employers would be subject to multiple (and sometimes duplicative) requirements from multiple oversight bodies. They believed the oversight mechanisms provided by the large, publicly accountable employers that are included in exemptions are sufficient to keep their staff accountable, negating the need for independent oversight for these staff. (See The Current State of Social Work in

B.C. section above for more information on rules, standards, and regulations held by exempt employers, using the ministry as an example).

Access

Participants raised concerns about the lack of equity, inclusion, anti-racism, and Truth and Reconciliation in relation to regulated oversight and the barriers that may prevent people from registering as a social worker. With respect to the current state of social work oversight in B.C., registration with the BCCSW enables access to practice for those who hold in jobs or roles that use the title “social worker” and when they wish to call themselves a “social worker” in practice. Participants shared different perspectives and a variety of views on access, the most common challenges and concerns raised were that regulated oversight:

- Creates systemic barriers and is viewed as inherently exclusionary, colonial, and patriarchal.
- Does not support diversity, provide cultural safety or anti-racism training, and does not support the needs of the various groups who access social work services.
- Imposes limits and barriers on the registration process and requirements.

Access – Challenges, Ideas, and Considerations

Some participants expressed concern about the registration process being a barrier for those who do not have a social work degree. These participants spoke to the value of relevant lived experience and prior learning. Participants shared there should be more avenues for entry to practice rather than focusing on an exam and degree. Suggestions were made for how to offset costs associated with entry to practice that can be a barrier for many (i.e., application fees, cost of writing the licensure exam and subsequent annual fees); either by support of the employer or general supports could be made available to assist individuals with covering the cost of fees.

The licensure exam was a common discussion topic among participants who expressed concerns about access to registration, including concerns with the exam only being offered in a few metropolitan locations across B.C. The exam was seen as a barrier both geographically and financially (for transportation and sometimes accommodation costs) for applicants. Some noted the barrier to access the exam geographically negatively impact recruitment and retention efforts. Others expressed opposition to the exam originating from the ASWB, an American based organization, and questioned the relevance of the exam for those practicing in B.C. There was also concern expressed about lack of accommodation made for those with unique learning styles who may have difficulties completing a licensure exam. Some participants called for the removal of the exam.

Through the BCCSW, the ministry is aware that effective January 2024, the Association of Social Work Boards (ASWB) has partnered with a new testing provider, PSI, to administer its social work licensing examination. As part of this partnership, ASWB and PSI are actively working towards implementing remote testing capabilities, which are expected to be made available mid-2024. This initiative aims to address many of the issues related to geographical and financial inaccessibility by providing applicants with the flexibility to take the exam remotely. BCCSW believes that this remote testing arrangement will significantly improve accessibility and alleviate the burden of travel and associated costs for applicants across B.C.

Some participants stated that ideally entry to practice would move away from a colonial model of using academic degrees and licensure exams to assess knowledge and skills. While some called for flexibility in accepted credentials and the recognition of lived and cultural experience, other participants expressed concern about approaches to workforce hiring such as allowing frontline workers to have credentials from a variety of human service degrees outside of social work. These participants worry the other human service degree credentials do not qualify a person to work with vulnerable populations.

There were also ideas raised for more inclusion in social work oversight. The most common suggestions for making improvements were to incorporate the topic of equity, inclusion, anti-racism, and Truth and Reconciliation into training (e.g., continuing professional development), and post-secondary education. Others suggested that trauma-informed care and gender diversity training also become mandatory requirements for continuing professional development. In addition, participants advocated for increased accessibility to post-secondary education programs to encourage underrepresented populations to enter the field of social work.

Indigenous Specific Challenges, Ideas and Considerations

The current state of social work oversight was viewed by many participants as being exclusionary and colonial, with discussion focusing on barriers to Indigenous representation in the current state and the impacts on Indigenous Peoples.

Some suggestions focused specifically on improving the current state of social work oversight for Indigenous Peoples including:

- Collaborate with Indigenous Peoples, including providing opportunities for more Indigenous representation in leadership roles.
- Ensure social workers understand the community of the people they serve.
- Develop Indigenous practice standards; incorporate Indigenous teachings into practice.
- Formalize Indigenous representation on the BCCSW Board, in addition to the Indigenous council already in place.

- Incorporate training on colonialism and reconciliation, including within post-secondary education and continuing professional development requirements.
- Integrate diverse approaches to social work education, e.g., mandatory field placements with Indigenous communities and/or organizations, curriculum developed by Indigenous Peoples.
- Make social work education more accessible to Indigenous students, including opening more seats and programs, particularly in rural and remote areas.
- Create an Indigenous specific registration process.

Other suggestions included the need to work in partnership with Indigenous Peoples to transform the overall system with many suggesting a new system that would see oversight and practice based in Indigenous communities and traditions. Furthermore, views were also expressed that some Indigenous Peoples and governments do not want external oversight and instead should develop their own oversight processes.

The ministry is committed to meaningful reconciliation with Indigenous Peoples and communities by recognizing the United Nations [Declaration on the Rights of Indigenous Peoples](#) (the Declaration) and applying B.C. legislation respecting the [human rights of Indigenous Peoples](#). Guided by the Declaration and legislation, the ministry is working to ensure the well-being of Indigenous children, youth and families and collaborating with communities through making amendments to the CFCSA and by integrating the federal [An Act respecting First Nations, Inuit and Metis children, youth and families](#) national principles and standards.

In November 2022, B.C. introduced legislation to [uphold Indigenous jurisdiction over child and family services](#). The legislative amendments removed barriers for Indigenous governing bodies to exercise their inherent jurisdiction over child and family services and provide pathways for Indigenous peoples not exercising their own laws, to collaborate with the ministry through shared and consent-based decision making agreements. Each agreement will be unique and co-created with the Indigenous community. Work relating to jurisdiction recognizes the inherent right of self-government over child and family services in provincial legislation and part of the landscape of self-government would include oversight within the frameworks created when communities reclaim jurisdiction.

Quality

Challenges raised under the topic of quality interact with those discussed under accountability and access. For example, public protection and public accountability with respect to different standards of practice and lacking consistency in oversight have links to quality. Participants also spoke about improving quality and the role of recruitment that ties to discussions on accountability.

Quality – Challenges, Ideas, and Considerations

Participants offered suggestions for making changes to social work oversight to improve quality, including speaking about the need to invest in social work education and to provide increases in pay, resources, and support to encourage recruitment and retention efforts. The following ideas were offered on ways resources and funding could be increased to support recruitment and retention efforts:

- More resources for rural and remote communities, in particular Indigenous communities.
- Increase opportunities for “hands-on” learning, including options for paid practicums.
- Reduce caseloads to decrease staff burnout and increase support to service recipients.
- Increase pay and advancement opportunities in the field.
- Provide practice support and skill development for both social workers and their supervisors.

Some participants also spoke of the need to address systemic issues inherent in social services to better support professionals working in the field, as well as those in receipt of the services. In this regard, some provided their view that expanding requirements to recruit more individuals with lived experience and/or diverse credentials could address labour shortages. These perspectives align with the direction the ministry has taken to broaden educational requirements for some positions by accepting preferred and expanded credentials. The recognition of expanded credentials by a regulatory oversight body could be an area for future consideration as well.

With regard to questions about regulation of practitioners with credentials and experience other than a social work degree, participants suggest that some form of independent third-party regulation would be beneficial for these professionals to protect the public and ensure accountability. However, there was no consensus as to where responsibility for regulating those without social work degrees should fall. The following suggestions were made regarding regulating practitioners without social work credentials:

- Regulate under an oversight body separate from BCCSW, with many suggesting the regulatory body should be based on an individual’s education.
- Regulate under the BCCSW and grant registration status based on equivalent skills and work history.
- Create a separate regulatory oversight body for social service workers to register under.
- Expand BCCSW to include social service workers, creating separate categories of registrants for those who do not hold a social work degree.

The conflicting views on regulating those without social work degrees ties back to the topics of accountability and access, where participants expressed differing opinions regarding who should be able to work as a social worker based on their level of education, cultural, and lived experience. In terms of improving quality, conversations weighed the merits of lived experience, or a related degree plus work experience, against the value of holding a social work degree to be considered qualified to be a social worker.

As with all ideas put forward by individuals during the engagement process, further consideration needs to go into exploring the ideas put forward for improving quality and the associated implications of making changes.

WHAT WE LEARNED AND EARLY ACTIONS

The input gathered through this engagement clearly indicated the high degree of knowledge, experience, and passion that participants have on social work oversight. Participants brought forward complex issues, a broad range of concerns and experiences. As noted in the “What We Heard” section, views sometimes conflicted with each other during discussions showing the layers of complexity in effective, responsive, quality, accessible, and accountable oversight. Some individuals called for an increase in regulation of social workers, while others raised issues and concerns with the current state of social work oversight as being colonial and inflexible.

The opposing views brought forward by participants not only highlight the tension that exists between perspectives and concerns expressed, but also shows that further work needs to be done to explore potential approaches for making improvements, and fully understand the impacts of different approaches on the many diverse communities accessing social work services in B.C.

While the discussions highlighted the complexity of the social work oversight landscape, overall, the ministry clearly heard a shared interest in improving accountability, access, and quality. There were also calls to advance work on anti-racism, continued reconciliation, and culturally appropriate services to children and families in B.C.

In addition to the efforts of the ASWB to expand access for registration to the BCCSW through implementation of remote testing capabilities for social work licensing examination (expected mid-2024), and ongoing work to be responsive and address continuous improvement at the BCCSW, the ministry is also implementing early actions to improve social work oversight in the areas of accountability, access, and quality.

Accountability:

Strengthening Degree verification: The ministry has degree verification and validation processes in place to authenticate degrees obtained in Canada and internationally. Recently, the credential verification process underwent improvements where new hires and pre-existing ministry employees undergo credential verification wherever the position requires a bachelor’s degree or higher and a criminal record check or enhanced security clearance. A criminal record check is also a requirement for all ministry staff.

Strengthening Oversight: The ministry is also taking more actions to improve accountability of ministry social workers. Budget 2024 includes a budget increase of \$129.5 million for child safety, family supports, and children in care services. This funding includes investments to support increased oversight of the child protection system and the staff administering child protection services and focuses on:

- Improving how child protection work is delivered through process and practice improvements and more front-line and oversight staffing levels.
- Continuing the creation and implementation of an Associate Provincial Director of Child Welfare to provide systemic practice oversight and guidance to Designated Directors (statutory decision makers) in the service delivery areas on child safety matters.
- Creating a new Child Safety Oversight and Practice Development team to support the work of the Associate Provincial Director of Child Welfare and provide increased practice support and systemic oversight of services focusing on child safety and wellbeing for children, youth, and families in B.C.

Access:

Indigenous Child Welfare Director: March 2024, the Ministry introduced through regulation, the role of the Indigenous Child Welfare Director (ICWD). This position will be designated under the CFCSA and have a distinct accountability to provide practice oversight for services delivered to Indigenous children and youth involved with the ministry. The introduction of the ICWD also contributes to the ministry’s early actions on accountability as an additional layer of oversight for ministry workers.

The ministry intends that the learnings gathered through this engagement around equity and inclusion, are contemplated by the new division for the ICWD, ensuring the ministry’s workforce upholds a standard of anti-racism, cultural competency, cultural humility, and cultural safety.

Quality:

Wage Stability: As part of Budget 2024, the ministry committed to improving workforce stability through government’s rollout of the Shared Recovery Mandate, which offers over 17 percent wage lifts over three years.

These wages enable government to attract and retain the needed resources which are vital to ensure supports and safety needed for children, youth, and families.

In addition, the ministry’s standards for conduct across its workforce include:

- Use of Structured Decision Making (SDM) tools – a system of risk assessments, guidelines, prompts, and checklists that help guide worker decision making to ensure consistent and quality practice. Most child welfare authorities in Canada use the SDM model.
- Practice guidelines that instruct workers on how to use the tools, in combination with their own clinical judgement and consultation with supervisors, to determine risk to children and respond appropriately.

- Implementation of the Aboriginal Policy and Practice Framework into ministry training as well as embedding the *Declaration on the Rights of Indigenous Peoples Act* into ministry Child Welfare training.
- Requiring staff to participate in mandatory courses, including training on An Act respecting First Nations, Inuit and Métis children, youth, and families, reconciliation, cultural safety and agility, and how to shift practice to align with this legislation.

These early actions – including improving degree verification, training supports, and enhancing accountability mechanisms – demonstrate immediate steps the ministry has taken in response to issues raised during the engagement that were specific to oversight of ministry staff. With respect to medium- or long-term actions in this multilayered and interdependent system, the ministry needs to conduct more thorough analysis and continue to work together with Indigenous partners and communities to understand impacts and implications. As work progresses, the ministry will continue to work directly with Indigenous Peoples, to understand how priorities such as Indigenous jurisdiction over child and family services and the delivery of services pursuant to Indigenous laws are impacted by social work oversight decisions.

NEXT STEPS

By listening to those who participated in the engagement, the ministry learned about how people experience complex and competing issues when working within the current state of social work oversight. We heard the difficulties people have experienced and recognize the importance of giving this work the time and attention the issues demand and deserve.

The next steps in this work will focus on conducting research and analysis to better understand what we do, and do not know, about the challenges and ideas put forward. For example, the ministry will seek to understand challenges around recruitment and retention, including use of post-secondary social work programs. The ministry will conduct a more fulsome analysis to understand the issues brought forward and explore the impacts and effects of potential approaches. The way forward will need to be informed by working with Indigenous People to make improvements and engaging with partners to fully understand the implications and effectiveness of different approaches for making improvements to the current state of social work oversight in B.C.