

# Registration and Advice Service update

Agenda Item 10 Paper Ref 08

# Paper for the

Social Work England Board

## **Sponsor**

Colum Conway, Chief Executive

#### Author

Philip Hallam - Executive Director Registration, Quality Assurance, and Legal

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## Reviewed by

Colum Conway, Chief Executive

# This paper is for

Discussion and Advising

# **Associated Strategic Objective**

SO1: We will continue to develop and refine our registration systems and processes.

Impact: Risk Type and Appetite

Regulatory functions - Cautious

## 1. Summary

This paper sets out how the registration and advice service has operated to date, explores the various aspects of the work of the service, and considers performance in 2020/21 and into this financial year. It also sets out how considerations relating to how performance continue to be managed across the course of the year, within the resources available.

#### 2. Structure and functions of the service

# **2.1 Initial assumptions (2018-2019)**

The development of the Registration and Advice service was based on the following:

- A limited understanding of the performance of the Health and Care Professions Council's (HCPC) registration function, taking into account the different nature and model of the operation of that function.
- A decision that Social Work England operate a 'digital by design' and 'self-service' approach to its registration activity, with processes and requirements for applicants and registrants offered through electronic means.
- A decision that the Registration function would also act as the enquiries service for the whole organisation, and that phone calls and emails, including initial enquiries relating to fitness to practise, were managed by the Registration team.
- That the team would be resourced in the following way: 13 x FTE Registration and Advice Officers, 2 x FTE front-line managers, and 1 x FTE Head of Registration. This resource was to provide both the enquiries service, and the delivery of all registration processes. It was forecast that 400 applications could be progressed per month with this resource, and 144 calls and 15 emails per day.
- That email communications with registrants would primarily be through an 'online account', with emails from other groups being managed through a single enquiries' inbox.
- That there would be a peak of registration activity from July-December each year, as graduates joined the register, and the annual renewal process took place.

# 3. Activities undertaken by the registration function

The registration functions of the team are varied, and primarily set out in the legislative framework. Broadly, these activities can be described as follows:

 Application management: the team are responsible for the processing of applications for registration. The majority of these applications are received from applicants who have qualified in England (or the other devolved administrations), and each application is reviewed to ensure that our requirements for registration

- are met. Additionally, there is a steady flow of applications from individuals who have qualified across the world. Depending on the place and type of qualification, these applications are more resource intensive.
- Restoration to the register: Individuals previously registered with Social Work England or the HCPC can apply to re-join the register, and their applications are assessed to ensure that they meet our requirements in relation to safe and effective practice.
- Registration appeals: The team, working with colleagues in our adjudication function, and external solicitors, manage the process for appeals against registration decisions.
- Misuse of title: investigations are undertaken where information is supplied that suggests that a non-registered individual may be using the protected title 'social worker', or where a registrant may have continued to practise during a period of non-registration.
- Annual renewal of registration: between September and November each year, all registrants are required to complete an application for renewal. The registration team manages this process, investigating and assessing applications for renewal where necessary, and administering payment processes.
- Other activities: alongside those set out above, the team are also responsible for; managing requests for voluntary removal from the register; the processing of requesting for register annotations for approved mental health professionals and best interest assessors; processing changes of details for registrants where evidence needs to be provided (such as changes of name); the investigation of possible fraudulent entries on the register; the production of registration certificates; provision of registration information to other bodies; verification of some older social work qualifications, and Direct Debit management for approximately 68,000 registrants.

#### 4. Activities undertaken by the advice and enquiries function

The enquiries service operated by the Registration team was developed to answer enquiries across the whole organisation. In practical terms this has meant that whilst the majority of calls and emails received into the team relate to registration matters, a significant proportion also relate to FTP complaints, or queries about continuing professional development. All emails are triaged and acknowledged by the Registration team on a daily basis, and emails that relate to the registration process are responded to by the Registration team as quickly as possible, depending on the nature of the response required. Where emails are for other parts of the organisation, these are sent to the relevant team, and the response date is calculated upon the date we received the email.

## 5. Performance 2020/21

Performance in the first 15 months of operation was affected by the following factors:

- A greater volume of open applications received from the HCPC than initially anticipated, and more intervention required to process these applications. This created higher workload during the first three months of operation.
- The changes brought about by our response to the coronavirus pandemic from March 2020, which included moving the registration and advice service to remote working. This added a layer of complexity to supporting and developing the team through their first year of operational work inside the organisation. Also, telephone calls received are not able to be transferred as easily to other teams when working remotely, and this therefore meant that extra support to callers (for example in fitness to practise matters) had to be provided by the advice service.
- There was also additional activity generated due to the creation of the emergency register, both in terms of managing enquiries, and administering the emergency register.
- The impact of the pandemic was also felt in the processing of international applicants. Due to local restrictions across the world, overseas regulators, education providers, and government agencies were not able to provide applicants as efficiently with the information they required in order to progress their applications, and this in turn affected our ability to add individuals to the Register in a timely manner. Alongside this, International English Language Testing System (IELTS) reduced their examination service, and this also meant that some internal applicants were not able to demonstrate their English language competence.
- Higher turnover within the registration and advice team than anticipated, caused by long term absences and secondment and fixed term positions being made available within the fitness to practise directorate.
- Continuing development of the Forge system, which meant that reporting of registration timeliness did not (at least initially) accurately reflect how applications were being progressed.
- Our first annual renewal of registration which concluded in December 2020
  marked what would have been the end of the two-year renewal cycle of the
  HCPC, and this meant that in many cases, the data we held for many registrants
  (such as contact information) had not been updated since December 2018. This
  affected our ability to communicate with registrants during the year.

Additionally, as the new regulator for social workers in England, each of our activities were being undertaken with applicants and registrants for the first time. A large part of our advice and enquiries activity between December 2019 and December 2020 was assisting applicants and registrants to understand our requirements and processes, such as the creation of online accounts, how to declare fitness to practise issues, and new CPD and renewal requirements. Each time we engaged with the register on a process for the first time (for example the taking of a Direct Debit payment), there was an upswell of enquiries to both our telephone and email services.

More applicants in the UK than anticipated were unable to use the GOV.UK/verify online identity checking service, and therefore had to provide to us identity evidence. We estimate this to have been in the region of 33-40% of applications. This slowed down the application process for many applicants, as we needed to manually verify identity upon receipt of copies of the relevant documents.

Also, the speed of provision of pass lists by education providers for graduates from approved courses in England was variable in the first year of operation (in part due to issues relating to how providers managed their work during the Covid-19 pandemic), and this led to delays in the processing of applications at various points, with a resultant increase in contact from applicants via telephone and email.

We received a higher-than-expected number of registration appeals during our first year of operation, with 16 appeals received against the 5 we had anticipated. Nine of these appeals related to our English language requirements, and most of the appeals about our decision in this regard related to applicants who were expecting our requirements to match those of the HCPC. The other appeals related to either a decision relating to the applicant's international qualification, or where the applicant had made a safe and effective practise declaration that had led to the application being refused.

We set key performance indicators (KPIs) for the registration and advice service at the start of the 2020/21 financial year, before the impact of all the factors above could be identified. These KPIs were designed to be aspirational, but in hindsight we did not have the data available to provide a reasonable baseline upon which to draw upon. Consequently, we were unable to achieve these KPIs in this first, uniquely challenging, year.

We recognised quickly at the start of 2020 that staffing assumptions made prior to operation would not be able to support the volume of work. Consequently, we increased the Officer establishment from 13 FTE to 19 FTE (which included 3 FTE on a temporary basis from August-January) and put in post a Senior Registration and Advice Officer to assist with managing the email and telephone enquiries operation.

We changed the way we calculated application processing times from September 2020, to provide a more accurate picture of the time taken by registration team members to advance applications and excluding the time when we were waiting for an applicant to provide further information. This revised method of calculation also allows to ensure that applications are managed more effectively, as it is clearer which applications have been 'on hold' awaiting information, so that appropriate action can be taken.

We moved the process of restoration online in November 2020, and this assisted with the speed of processing these applications. This was one of a number of changes we made throughout the year to systems and processes to help improve efficiency and effectiveness. We also made a number of incremental changes to our online guidance for applicants and registrants, based on feedback and the nature of enquiries.

As mentioned above, a significant number of the calls and emails we received over the course of the first year related to registrants interacting with our processes for the first time. We received a large number of requests for information held on the register to be changed, and whilst most of these changes can be completed by the individual registrant through their online account (and guidance was available on how to do so), most registrants contacted us requiring assurance on how to create the account, and then on how to make their changes. The volume of calls and emails of this nature were throughout the year, particularly at times where we were asking registrants to undertake specific activities (for example make a Direct Debit payment, complete CPD, or undertake the renewal of registration). The volume of such calls and emails about registration requirements was greater than we had anticipated, as we had maintained the same registration cycle as the HCPC, and throughout the year had provided clear messages to the register relating to what was required.

Having completed our first year of operation, we used the data to support our assumptions regarding the profile of the registration cycle, and how this affects the advice service. This data has been useful as we have progressed through our second full year of operation.

## 6. Performance 2021/22 to date

We are now 6 months into our second year of operation, and have used the learning from our first year of operation in the following ways:

- We have increased the permanent FTE in the team from 13 FTE to 14 FTE and added in a second Senior Officer to support the team's work. We have also increased the establishment by a further 3 Officers in August -January each year, to assist with the peaks caused by UK qualified applications in the summer, and the September-November renewal period. For this year, we have also employed 2 further Officers to help support the work. We maintain a flexible approach to how the team is deployed on a daily basis, to ensure that staff are used where the need is greatest, whilst ensuring the efficient processing of applications take priority.
- We have made a number of changes to systems, processes, and guidance to ensure that applicants and registrants have the tools they need to 'self-serve' the majority of registration processes. We have also identified amendments to the legislative framework that will improve processes, and these are being taken forward. We have also a years' worth of learning from our interactions with registrants, applicants, and others, which we have used to improve and expand our standard responses and guidance. We have strengthened our engagement with course providers, and this has also assisted with how new applications are processed.

It is clear that performance in the first six months of 2021/22 is significantly improved than at the same time last year. This is in part due to the continuing refinements to processes we have made, and the increasing confidence of the organisation in managing the requirements and expectations of applicants and registrants. This improvement in performance is also due to the lower volume of calls and emails compared to the same point last year, which we believe is due to the reduced need for registrants to provide us with updated information, or raise queries about their online account, now that all registrants have created their online accounts during the renewal period. We will keep this under close scrutiny as we now enter the busiest part of the registration year.

Balancing all of the various aspects of the service will continue to be a challenge within the resources available; at the busiest points of the year, we will aim to ensure the application processing continues to be the priority. This in turn helps keeps calls and emails lower, as applicants do not need to contact us to request updates on the progress of their application. During the renewal period, we expect call and email response times to lengthen, as the team balances these responses against their other work. However, based on the significant improvement to timeliness already apparent this year, we anticipate that processing times for applications should be within the KPI at all times, and we will endeavour to maintain performance against the advice service KPIs. This second year of data will allow to properly build a more accurate prediction of performance into future years.

Annex one sets out a comparison of performance between 2020/21 and this year to date, with a prediction of performance for the remainder of this financial year.

# 7. Conclusions and/or Recommendations

Over the course of the first six months of our second full year of operation, it is clear that some of the challenges that were acute in our first year have receded, and performance in both the registration and advice services has stabilised or improved. However, due to the cyclical nature of the registration year, we anticipate that there will continue to be greater call on the service between July-December each year, and this will affect the time taken to process applications and respond to emails and phone calls. We have this year resourced the team to manage this increased activity (and increase of 3 FTE) and will do so in future years. Further development and improvement to online systems will also assist with increasing efficiency in application management.

Within the resources available it will not be possible to maintain a consistent level of performance throughout the year, taking into account peaks of activity; to do so would require an additional 10 FTE between July and December to manage additional telephone and email enquiries. This would increase registration payroll costs by approximately £185,000 per year and would also require increased infrastructure to manage this additional resource. Therefore, we continue to improve our 'digital by design' offering and ensure that the work of the team is balanced appropriately throughout the year to ensure maximum

efficiency in application processing. We will also continue the engagement activity with all stakeholders, to continue to ensure that applicants, registrants, and their employers are aware of the requirements and timescales relating to registration.

## 8. Annex

See Annex 08a: comparison table of performance: 2020/21 (full year) v 2021/22 (April-August) and predicted profile for future years.