



Work in Progress: Social Work, the State and Europe

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Abstract

Social work has had varying relationships with the nation state both over time and between different countries. From its early stages the occupation had both state sanctioned and voluntary streams. Its international dimension has been enhanced in the European context through policy and funding measures over the past few decades.

During this period we have also seen the rise of globalising trends leading to questions about the ongoing powers of nation states. This paper examines some aspects of the relationship between social work and the state, taking into account the emergence of European and also international policies and frameworks.

The paper focuses initially on migration as an example of a common trend; an area of policy with both national and European dimensions; and a field in which social professionals are engaged to varying degrees. Secondly, it considers the progress of the 'professional project' in Europe, using developments in five countries to illustrate some of the issues associated with 'professionalization'. European and international frameworks may lead to some convergence in national understandings of the key roles of social workers and an enhanced sense of professional identity across nation states, despite very different starting points and current forms of organisation.

Introduction

Social work has had varying relationships with the nation state both over time and between different countries. From its early stages the occupation had both state sanctioned and voluntary streams. It also had an international dimension (Lyons 1999; Healy 2001) and the international, or perhaps more appropriately the regional, dimension of social work development has been stimulated over the last two decades or so, notably by the policies of the European Union. This has been specifically through its ERASMUS/ SOCRATES schemes, and more generally through wider policies aimed at social integration and harmonisation of national welfare policies (broadly defined) (Cannan et al 1992; Lorenz 2006). During this period we have also seen the rise of globalising trends giving rise to questions about the ongoing powers of nation states (Held et al 1999). This paper examines some aspects of the relationship between social work and the state, taking into account the emergence of European and also international policies and frameworks.

Initially, it might be useful to consider some of the common trends in Europe, focusing particularly on the issue of migration. Population movement is intrinsically linked to ideas about citizenship, personal and national culture and identity, and the resources available for the development of national economies (Lorenz 2006). However, the regulation of immigration has been a closely guarded competence of nation states and, although international human rights conventions 'allow' people to leave countries, the right of entry -

and the status to be accorded to such immigrants - remains primarily the concern of the state. The European Union has begun to exert some influence in this field since the mid nineties (Ginsburg and Lawrence 2006) and patterns of migration within the European region (which I here limit to the 27 countries in membership of the EU in 2007) have also changed. Migration invariably leads to the more or less permanent establishment of minority populations illustrating varying degrees of 'integration' with host populations: the process of migration itself, in its various forms, can be stressful. Both long established and recently arrived groups might therefore be subject to intervention by social professionals, either at the behest of the state or through voluntary channels.

Secondly, I will examine some of the ways in which policies and processes at national levels have tended to encourage or limit the roles of social workers, including through the establishment of regulatory codes. Drawing on accounts of social work in selected European countries, I indicate how national frameworks are shaping the social work profession and speculate on the extent to which European policies and principles articulated at international level might be leading to some convergence. However, there is also evidence of very different starting points and contexts in which the occupation has developed in individual nation states and that these continue to affect current patterns of social services provision, social work roles and education.

The idea of a 'social work project' – an intention to develop an occupational field that is publicly recognised as a profession (Macdonald 1995) - is over a hundred years old with roots in various countries on both sides of the Atlantic. It tends to have been seen as a national project, but some exponents would want to see this project strengthened at the level of continental regions and globally and there is some evidence that this is happening. I would state here that the goal of such a project should not be one of professional aggrandisement but rather be aimed at strengthening the ability of social work to identify (from its interventions in the lives of individuals and communities) and then to articulate and critique, the adverse effects of social policies and regional and global processes on people who are routinely excluded or marginalised in terms of economic and political power. In this sense social work has a dual mandate – both to respond to the 'private ills' of individuals and communities and also to make or enable representations in public forums to redress them. This can be a difficult and uncomfortable role for individual workers and agencies, and indeed for the occupation as a whole, and perhaps goes some way to explaining why the designation of 'profession' is resisted by some (both within and outside the occupation) and not widely accepted in wider professional and public circles.

The European context with particular reference to migration

Within the wider trends towards globalisation of economies, political ambitions and cultures – which themselves frame national welfare efforts and thus the roles of social workers (Lorenz 2006; Lyons et al 2006) - we can identify a number of social trends across the range of European states which provide the context for the work of social professionals. These include, fundamentally, the deepening of the divide between the haves and have-nots and the inter-related problems of social dislocation reflected in individual and family breakdown, substance abuse and crime. Such social problems are interwoven with demographic trends related to the increasing age profile of countries across Europe, compounded, in some states, by the decline in the birth rate. The picture is further complicated by the impact of migration. Whereas mobility of labour has generally been promoted within the European Union, the wish to exclude those who are not members of this 'club' has intensified as social divisions and demands on welfare systems and concerns about 'national identity' have increased.

While the origins of the EU were rooted in economic and political concerns about stability at regional level, policy development in its later stages has included the recognition that stability also requires social measures and development of cultural symbols and identities which support the idea of a European region in additions to national loyalties. Since the early 1990s the development of social policy has included measures to address social exclusion (Steinert and Pilgram 2003). This has been accompanied by the recognition that minority groups (identified by different nationality, race, ethnicity, language and/or culture) are among those people who are likely to be marginalised. However, relatively limited efforts at European level (and rather variable attempts nationally) to combat racism and xenophobia have been paralleled by tighter immigration and border controls at both European and national levels (Mitchell and Russell 1998; Mynott 2002).

Trends in migration and current patterns of settlement are complex and reflect different characteristics related to the histories of different countries (particularly in terms of colonial relationships) as well as more recent geo-political and economic pressures (Castles 2000; Lyons et al 2006). Thus we can observe the presence of settled (and long established) minority ethnic groups related to the colonial histories of countries (such as France and UK) and also their post war labour and immigration policies (as in Germany and UK); the concentration and settlement of formerly migrant groups (such as ‘the travellers’ in Ireland and the Roma population in the Czech Republic or Hungary); and the changing position of countries as to whether they are ‘sending’ or ‘receiving’ countries (Greece and Ireland). In the case of Greece, its proximity to the Balkan region has resulted in immigration of people fleeing conflict and economic destruction putting additional pressures on a weak welfare system. In contrast, Ireland shows more direct benefits of European Social Fund measures (aimed at addressing poverty) which, combined with a motivated and well educated population, has enabled the country to develop a modern buoyant economy, retaining its own workforce and attracting others.

Thus, some of the more recent examples of immigration have been a direct result of the ‘pull’ of expanding or stable economies (such as migrants from Poland and the Baltic States to Ireland the UK) and have come within the aims of ‘free movement’ advocated by the European Union. However, even this policy has suffered a reverse at national levels, with many of the fifteen member states which made up the European Union until 2004 placing limits on the number or timing of entry of people from the accession states (predominantly those in Central and Eastern Europe), a policy recently intensified with the addition of Bulgaria and Romania (from 1/1/07). Reasons for such moves tend to be expressed as concerns about the ‘flooding’ of national economies with ‘cheap labour’. However, we can also identify a wish by sending countries to build up their own economies (which can be held back by the migration of often young and better educated/more skilled members of the workforce) and to avoid the social problems associated with families being divided when a breadwinner seeks work abroad – both being unintended consequences of migration from countries such as Poland and Lithuania in the post 2004 era (personal communications).

But there are other reasons also for the nervousness with which national politicians – and populations – have viewed accession of Bulgaria and Romania, in particular, and these are almost certainly related to cultural characteristics and actual or stereotypical concerns about governance and criminality. Corruption at government levels is hardly confined to the Balkan states (and other countries regarded as ‘less developed’) but clearly there have been issues in this area which required attention prior to admission. There are also differentials in the extent to which civil society has developed and the capacity of individuals and communities to take

an active role in monitoring new institutions and/or establishing new agencies, including those which might provide social services to supplement those of the overstretched local and central state (Hermoso and Luca 2006).

Additionally, these countries form part of a 'corridor' through which there has been an increase in people smuggling and trafficking. While there are global (inter-continental) aspects to this 'trade', it also has a strong intra-European dimension as young women and under-age youth have been transported from East European countries (including Russia and Ukraine) into the EU (Lyons et al 2006). Criminal gangs based in these countries are also implicated in the trafficking of drugs which find ready markets in the wealthy countries of Western Europe. It can be argued that, in the face of such concerns, it is better to have bordering countries 'on side' and subject to the same controls and forms of monitoring as other states within the European Union. This is an area in which national policies are largely ineffective unless combined with regional agreement about policies and participation in European wide or international bodies aimed at addressing the problem.

It can be suggested that concerns about the 'governability' of particular populations is important in the establishment and current roles of the social professions, from its origins roughly a hundred years ago in many countries across Europe and anew in the post 1989 period in Central and East European countries. The populations now labelled as 'vulnerable' – or, more harshly, as presenting risks to the stability of society - were initially identified on a class basis related to socio-economic position and to some extent this is still the case. But increasingly, as indicated, identification is related to culture in the sense of ethnicity, when outward signs of difference give rise to discrimination, compounding other factors leading to the limited employment opportunities which are often the corollary of immigrant status.

Thus, despite the often altruistic intentions of social professionals, individually and collectively, they have found themselves being increasingly drawn into forms of social work which emphasise their control role (Cohen et al 2002) – in a diverse profession which is itself increasingly controlled in some countries. We shall return to some consideration of control of the profession in the next section but meanwhile, what have been the recent responses of social work to the needs or challenges posed by minority ethnic groups? The development of services which are either specifically targeted at minority groups, or which recognise difference in the context of services aimed at whole populations, are generally related to varied national attitudes to immigrants and the extent to which efforts have been made (in policy and legislative terms) to recognise rights and responsibilities of minority populations, such as through policies aimed at promoting multi-culturalism and equality.

Accordingly, we can identify the development of culturally appropriate services for established adult populations (for example, in relation to elders or people with mental health problems) in countries such as the Netherlands and UK; work with youth from minority communities; efforts to challenge public attitudes and facilitate integration of Roma people in the Czech Republic and Hungary; and the development of services for new minority user groups, including asylum seekers (e.g. in Sweden, the Netherlands; Germany, Greece and the UK) (Lyons et al 2006).

Recently, migration has also opened up the possibilities of an increase in cross-national social work, for example in arranging substitute care for children through fostering and adoption (Selman 1998; Garrett and Sinkkinen 2003). As extended families have been split up, sometimes across national borders, so efforts to foster children with other family members

require locating relatives in other countries and assessing the possibility for resettling children with relations who are distant in geographic if not kinship terms (Lyons 2006). Similarly, in the field of adoption, an earlier pre-occupation (in the UK) with 'same race placement' has led into consideration of a similar principle being one of the factors in the adoption of babies and young children so that, for instance, a childless Polish couple living in the UK is likely to be considered for adoption of a baby from Poland rather than a British child (personal communication).

This current preoccupation (by some) with 'matching' children to the racial, ethnic or national background of parents can also to be viewed against the growing numbers of children born into 'mixed marriages' who, in addition to the possibility of holding dual nationality, are seen as having a dual heritage and needing to create their own version of cultural identity. Whereas children of dual heritage are less likely to become the subjects of social work intervention (or may only become so as the result of marital breakdown and/or conflicts over parenting rights), in the case of substitute care, efforts are needed to ensure adherence to international and European conventions about the rights of the child together with increased comparative knowledge about childcare policies and practices and acquisition of possibly new skills, such as working through an interpreter (Kornbeck 2003)

However, developments in relation to trans-national work and service developments aimed at newer immigrant communities in particular are increasingly being established or maintained within the context of the tightening of legislative controls. In some countries, such as the UK, these are posing problems not just for the immigrants themselves (who may be identified by the media and public as (bogus) 'asylum seekers' or illegal immigrants) but also for social workers, who are increasingly expected to police eligibility for services (Cohen et al, 2002). Efforts to influence policy by social professionals themselves have been muted (Briskman and Cemlyn 2005) and a number of possible reasons can be suggested. It may be that there is a degree of personal and professional ambivalence about (national) immigration policies; many social workers do not see this area of work as a particular responsibility; or social workers may lack power or skills in relation to voicing concerns publicly about the situation of particular individuals and minority groups or developing critiques of national and international immigration policies.

It is possible that in some countries this reticence reflects expectations by policy makers and public alike of social professionals that do not include critical reflection or social action (notwithstanding strands in the profession's origins related to social reform) and this may be reflected in the type of education provided. But it may also be the case that increasing measures introduced over the last decade to bureaucratise and ensure accountability in social work have undermined professional confidence and have stifled individual or, perhaps more importantly, collective reactions and initiatives. It is also the case that there has been a relative increase in the numbers of social workers seeking work in other countries and, although labour mobility in this field is small relative to some occupations, this raises questions about the education and regulation of social professionals, given the particular roles which they are expected to fulfil in specific countries. The next section therefore focuses on issues of public expectations, education, and regulation of the profession in selected European countries.

Educating and regulating the Profession

As signalled earlier, one aim of this paper is to consider issues in relation to social work's periodic attempts to achieve professional status and to view such developments against the backdrop of the relationship with the state and the growth of social concerns evident across

Europe. Weiss and Welbourne (2007) recently used a framework which combined trait and power theories (prevalent in the literature about professions, see Macdonald 1995) to compare the position of social work in ten countries across the world. Five of these are in the European Union and it is possible to illustrate various aspects of 'professionalisation' with examples from Germany, Hungary, Spain, Sweden and UK. These countries in turn are illustrative of very different histories, traditions, and more recent political and economic circumstances and the examples described by national authors illustrate the complexities of professional development even within one region. While the framework utilised by Weiss and Welbourne elaborated eight factors, I propose to discuss these in terms of three major themes:

- public recognition, state sanction and relation to other professions;
- education, including control of entry to the profession and creation of distinct knowledge;
- professional organisation, including ethical standards and regulation.

Public recognition, state sanction and relation to other professions

It is commonly agreed that social work is an organised response to the ills of society although the extent to which its development in various forms has been initiated or sustained by the state varies. Commonly, state led services were established in fields where social control was the primary goal while services which were more concerned with care and rehabilitation tended to derive from volunteer efforts. These patterns still prevail in many parts of Europe, although the organisational boundaries of such services may have shifted over time and variations between countries reflect the particular political and economic ideologies which have shaped broader national welfare systems (Littlechild et al 2005; Lorenz 2006). Specific examples of the variations in public recognition and state sanction are evident in Weiss and Welbourne (2007).

In Sweden 90% of its estimated 30,000 social workers (3 per 100,000 of the population) are employed in state organisations, namely social service centres, which aim to offer a generic range of services (including basic financial support) on a relatively universal basis. These are for the most part quite well regarded by the public at large and recognised as offering a distinctive service. However, for all this integration into state apparatus, the profession is not yet formally regulated (licensed) by the state (despite representations by the profession). While there is healthy recruitment to social work education and employment prospects are relatively secure, salaries tend to be lower than others working in related fields (or even the same settings), such as psychologists and nurses (Hessle 2007).

The UK (where there was similarly strong support for the welfare state until relatively recently) also has a high a proportion of workers employed in public authorities (about 43,000 social workers) and previous studies suggested that about 80% of new entrants went into the statutory services (Lyons and Manion 2004). However, there has been a recent 'splitting up' of previously distinct social service departments into services for children and families (under the auspices of education departments) and those for adults (under the broad remit of health care). This follows a period of concern (over approximately two decades) about the quality of services, particularly in relation to child protection work, and a strong association in the public mind of social work with this area of practice relative to other roles and fields of social work. Other areas of 'social work' utilising more preventive or proactive strategies have

already been 'hived off' to programmes not necessarily staffed by social workers (such as 'Sure Start' concerned with support for pre-school children and their families) so that the extent of any previously assumed monopoly on skills or services has been undermined. The most recent developments also raise questions about the extent to which the contribution of social workers in wider departments or multi-disciplinary teams will be visible or seen as distinctive, although it seems as if responsibility for child protection work will continue to be a core and distinct activity (Payne 2007).

Spain, in contrast, has had a very different history to both the foregoing countries: civil war in 1936-9 led to the dominance of fascism in the post second world war period until 1978 limiting the role of the state in development of welfare. However, since that time, social work has become a well established profession, with up to 80% of personnel employed in municipal services. In 2004 one professional organisation suggested that there are around 42,000 social workers (about 4.4 per 100,000) and relatively large numbers are also employed in third sector organisations, although use of volunteers and no national restriction on use of the term 'social worker' complicates the picture and may obscure public understanding of the social work role. Some social workers may work in interdisciplinary teams and salary levels are comparable with those of teachers and nurses (Charfolet 2007).

The high levels of employment in state run services in Sweden, the UK and Spain can be contrasted with the situations in Germany and Hungary. Germany constitutes an important example of a corporate state which adheres strongly to the principle of 'subsidiarity' (Cannan et al 1992; Lorenz 2006). Thus the majority of its 300,000 personnel qualified as social workers or social pedagogues are employed in one of the 'Big Six' welfare organisations (although a minority are also employed direct by the 'lander' or by smaller independent organisations). While the large and long established voluntary organisations receive significant funding from the state and some functions of social workers are prescribed by legislation and directives, they have a relatively high degree of independence but the roles of social professionals may achieve limited public recognition, due to the fragmentation of their employment bases and lack of central regulation. Despite an expansion in jobs and education since 2000, the status of social workers remains uncertain and a fairly high degree of unemployment among social professionals has kept salary levels relatively low (Staub-Bernasconi 2007).

As one of the countries redeveloping the social services sector since 1989, Hungary presents a different picture again. Apart from the growth of social work education, there was significant legislation in the 1990s relevant to the role of social workers. However, the actual development of municipal social services has been patchy and the period has seen the re-emergence of a number of agencies in the voluntary sector. But, apart from the problems of funding which beset both sectors, problems persist in relation to the qualifications and identity of personnel. For instance, of 2,756 'social workers' employed in Family Support Centres in 2003 about half were not qualified as social workers (though some may hold other professional qualifications). In 2000 the state introduced legislation requiring all managers and professionals working in social services to undertake a short training and pass a Basic Exam relevant to social professions, but there is as yet no formal restriction on use of the term, 'social worker', and there is relatively limited public understanding of their role. This has contributed to limited prestige and remuneration, including when compared with professionals in related fields (Darvas and Kozma 2007).

Education, entry to the profession and creation of distinct knowledge

Given the above and other factors, it is hardly surprising that there are also differences in the histories, patterns and pre-occupations of social work education, although it would be fair to say, that, with the current exception of Hungary, a qualification from an approved social work education course is likely to be an important, if not essential, factor in gaining employment in a social work post in these countries. It can therefore be suggested that steady progress has been made towards the position of social work having control over entry to the profession through the educational process, although this control may not be exclusive. So, for instance in the case of the UK, the Care Standards Act in 2000 led to the establishment of four country specific and government sponsored Social Care Councils and since 1/4/05 the General Social Care Council in England has required registration by all qualified social workers who wish to gain employment in a social work post (Payne 2007).

There is relatively limited agreement about the creation of knowledge. Debates about whether there is a distinct body of knowledge, what this might be and how it might be taught and assessed are current in most European countries (Lyons and Lawrence 2006). In relation to the five country case studies, Staub-Bernasconi (2007) has suggested that there is a strong concern with 'know how' in Germany and this preoccupation (including an emphasis on competencies) would certainly be recognised in the UK, and also apparently in Spain (Charfolet 2007). However, Staub-Bernasconi also refers to the influence of philosophy on much social work education and a concern with theory in some German courses – aspects which would be less apparent in the UK or, in the case of theory and methodology are apparently 'under development' in Hungary and Spain.

Hessle suggests that Swedish social work education is well rooted in a social sciences framework and that similar curricula in the country's 16 schools of social work would draw on teaching from established social science disciplines as well as having a distinct and recognisable core. He describes this as concerned with social investigations and psychosocial work in relation to vulnerable populations, a view likely to be shared by commentators in other countries. Despite this situation in Sweden, the government has resisted calls for registration of social workers, partly on the grounds that social work in different sectors lacks a shared theoretical base (Hessle 2007).

Darvas and Kozma (2007) indicate that a common curriculum has been established in Hungary but that courses can develop their own specialisations: this is partly related to the status attributed to universities as regional resource centres, undertaking research into local issues which are then reflected in the higher education on offer. The UK took a different approach to the identification of a core curriculum, choosing instead (between 1989 and 2003) to specify the outcomes (competences) which should be achieved. However, this did have the effect of producing a high degree of similarity between curricula, although the introduction of new degree programmes (since 2003, under a different regulatory framework) allows for the possibility of slightly more variation. Germany in contrast, due to devolution of the higher education function to the Bundesland, shows considerable variations in curricula between regions (Staub-Bernasconi 2007). However, all five countries share the characteristics of social work education being undertaken predominantly at undergraduate level (mainly by female students) and aiming to produce social workers equipped for generic practice.

Just as there are some variations between countries in the emphases and curricula of qualifying education, there are perhaps greater disparities in the opportunities for research and

post-qualifying qualifications. It could be argued that Sweden currently has the best developed opportunities for learning about and pursuing social work research (including at the doctoral level) while the doctoral route, for instance, is not yet open to social workers in Spain (other than through other disciplines) and only in the early stages of development in Hungary. In the UK, while the opportunity to undertake such research has existed for some time, there is a sense that a PhD is not a valued qualification in the profession as a whole (Lyons 2002) and, in contrast, more effort has been put into developing a post-qualifying framework which addresses the need for continuous professional development of social workers.

PhD opportunities have had implications for the staffing of social work education and two patterns can be observed. In the UK (and perhaps to a some extent Sweden), there was an initial emphasis on recruiting educators with a social work background, even if they lacked the higher academic qualifications usual in academic appointments – a situation which is now changing in both countries. However, in countries where there have been discontinuities in social work education due to conflict and/or political ideology (Germany, Spain and Hungary) it was common for social work initially to be offered on courses taught by people from related professions and disciplines with opportunities to recruit from the profession itself only arising as the profession re-establishes itself. However, in a separate study, Kornbeck (2007) has suggested that social work academics in Germany are more likely to hold a PhD than in Denmark or England. This may be related to quite a long established tradition of training social pedagogues in the University sector and there may also be a gender factor, suggesting an area for further exploration.

Professional organisations, ethical standards and regulation

It can be argued that one indicator of the strength and /or ambitions of an occupational group is the formation of professional associations and the range of functions which such associations might undertake, including the establishment of ethical guidelines. Again, we can see both similarities and variations in the progress made in this area by the five countries studied. All the professional associations now in evidence originated in the second half of the 20th century, with the Swedish Association of Graduates in Social Science, Personnel and Public Administrators, Economics and Social Work (SSR) having been established in 1958. The British Association of Social Workers (BASW) was established in 1970, although it represented the coming together of about half a dozen pre-existing organisations, dating from the first half of the 20th century (Payne 2002). In contrast, area based professional associations in Spain have only had legal status since 1988; the German association was established in 1993 (but based on previous associations); and the Alliance of Social Professionals (representing three different professional associations) (3Sz) was established in Hungary in 1995 (receiving status as a public interest organisation in 2001).

But the establishment of professional associations primarily constitute voluntary efforts: not all social workers choose to join and there may be other associations relevant to particular constituencies. (For instance, this is generally the case in relation to social work educators). Nor is the date of the establishment of a particular association necessarily indicative of its numerical strength or its relationship with the state or influence in other respects. So, for instance, the SSR in Sweden is unusual in having about 80% representation of social workers (Hessle 2007), but this high number may be partly explained by the fact that, in common with some other Nordic countries, this association also has the functions of a Trade Union (and unions have generally been recognised as having a part to play in the development of the economy and the maintenance of the social contract). In contrast it seems likely that only

about 20% of social workers in the UK choose to join BASW (Payne 2007). In the past it was suggested that this low number was related to the fact that the majority of social workers worked for local authorities and chose to join the relevant trade union instead. More recently the requirement to pay a registration fee to the General Social Care Council now suggests a competing claim for social workers' financial resources.

In Germany it is estimated that only about 6% of the professional workforce join the national professional organisation, DBSH (Deutscher Berufsverband für Sozialarbeit, Sozialpädagogik und Heilpädagogik) (Staub-Bernasconi 2007) although there is no indication as to why this figure might be so low. No estimates are given for membership of the Hungarian and Spanish associations, although in Spain social workers are represented through 36 territorial professional associations each with their own statutes (approved by a regional General Assembly and then by the National Council and published in government records) (Charfolet 2007). This suggests a locally based form of organisation which, together with the relatively high number of social workers employed in the public sector, might be successful in recruiting a higher proportion of social workers.

There is also variation in the extent to which professional associations make any efforts to regulate the profession. In Sweden, the SSR established self regulated authorisation in 1998: applicants must have a relevant degree, three years documented experience (including supervision) plus the written endorsement of senior advisors affirming competence to practice. By 2005, 3000 people had been authorised by a commission elected by the board of SSR, which can also consider cases of exclusion or denial (Hessle 2007). This can be contrasted with the situation in the UK where the main role of BASW was to combine with other bodies arguing for a state approved licensing system, established early this century, as mentioned above.

Whatever the level of representation and influence, all the associations identified in this study have been instrumental in drawing up ethical guidelines for the profession although, again, the status of these is highly variable. The British Association's Code of Ethics was initially produced in 1975 (although it was substantially revised in 2002) but, although this is likely to be referred to on many social work courses, it has been difficult in practice to ensure adherence to this code, particularly beyond the limited membership of the association. In addition, registered social workers are now bound by a Code of Practice introduced by the GSCC in 2002 and this body has clear responsibilities for disciplinary action in the case of non-compliance (Payne 2007). This can be contrasted with the position in Germany where Staub-Bernasconi (2007) noted that, despite the establishment of ethical principals in the early 1990s, it seems likely that many social workers would not be aware of them.

In the other three countries, ethical guidelines were also established in the 1990s and some of the authors make direct reference to the existence of the Guidelines issued by the International Federation of Social Workers in 1994 (revised 2004). In Hungary, in 1995 the founders of the Alliance of Social Professionals produced an Ethical Code of Social Work (current version approved 2004): new graduates are required to swear allegiance and new employees must sign a declaration of adherence. There is also an Ethical College which can hold inquiries to consider violations (Darvas and Kosma 2007). In Spain the 1999 Code of Ethics was used to outline the functions of social workers: the association subsequently accepted the international code agreed in 2004.

Although there are no formal sanctions against non-observance, the area based professional associations can operate sanctions and can authorise expulsion or deprive members of their status for up to two years (Charfolet 2007).

Concluding comments

When viewed from a comparative perspective, the picture of social work in Europe still presents many variations, not least in its relationship with the nation state in terms of its mandate, organisation, and regulation. These formal aspects interact with public and professional expectations of the roles that social workers might perform and the education needed for such roles. Notwithstanding increased European and international frameworks; welfare policies influenced by neo-liberal economic thinking; some recognition of social problems which are common or trans-national and even indications of mobility of social workers themselves (Lyons and Littlechild 2006), it seems as if nation states - and the particular histories and cultures associated with them - still have a significant bearing on the distribution of social services between public and independent sectors and the roles expected of social workers.

With regard to roles, there are differences in the extent to which social workers are mainly engaged in face to face work with clients or more involved in care management and their part in the wider planning and policy making process. There are differences in the approaches taken to developing services for activities which might be regarded as core, such as child protection work, relative to activities in more marginal areas, such as with immigrants and asylum seekers. While there seems to be a shared acknowledgement within the profession about the role of social workers in promoting equality and human rights – based on adherence to the ethical principles articulated by IFSW – how these goals are pursued in practice is contingent on national circumstances and policies, as well as public attitudes.

One of the major differences seems to be in the strength and confidence of the profession itself in different countries. Thus, while there seems to be a common attempt at ‘professionalisation’ - and each of the countries discussed has a professional association with ethical guidelines - the extent to which the state supports, directs or regulates social work activities is quite variable and common themes of fragmentation and deprofessionalisation occur in discourses relating to social work in countries such as Germany and the UK, which on some indicators show many differences (Staub-Bernasconi 2007; Payne 2007).

In relation to education, there is some speculation that implementation of new national frameworks to accord with the Bologna declaration (aiming to establish a common European University Area by 2010) will impact on education for social workers (Lyons and Lawrence 2006). Similarly, the establishment of an international definition of the occupation, together with a document describing global standards for education many also lead to increased similarity between courses and qualifications. The issue of comparability of qualifications has certainly been a factor in the profession’s efforts internationally and in the European region to regulate itself in the face of extant or likely mobility of labour within the European Union. However, there are already indications that a previously noted trend in the UK of an increase in recruitment of social workers from abroad might have been reversed by the introduction of state regulation of the profession in the form of requiring a licence to practice. This does not exclude the possibility of qualified staff from other EU countries (and elsewhere) working in the UK, but it can be a disincentive by increasing the cost and time needed to secure employment (personal communication).

In conclusion, the evidence for decline of the nation state in relation to welfare services and social work can be questioned – and an argument that there are indications of convergence in social work in Europe is debateable. In a period when issues of personal identity and national culture are part of professional and public discourses, the development of the social work project and the establishment of a European professional identity still require further work.

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