THE BRITISH CODE AND THE ITALIAN CODE OF ETHICS FOR SOCIAL WORK: A LINGUA-CULTURAL COMPARATIVE ANALYSIS

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Abstract

Globalization, socio-political transformations and migration flows are creating social tensions worldwide and are modifying the ethnic and socio-linguistic profile of countries. In this fast-evolving scenario, social workers make a significant contribution by coping with the challenges which arise, particularly during periods of change. Accordingly, the contribution of social workers is increasingly required in many different areas of society and, in line with Recommendation Rec (2001)1 of the Committee of Ministers to member states on social workers (17 January 2001), they have been provided with legal frameworks within which they can practise. Given this new professional perspective, the Code of Ethics for Social workers has become a relevant and binding document. Indeed, in this document, the Committee clearly stated the expected goal(s) of the social worker's activities and outlined the best practices for the management of a correct and effective practitioner-patient relationship. Social workers' commitment to act ethically is an essential aspect of the quality of the service offered to patients/customers, since offering support to vulnerable people/communities is a fundamental part of their professional practice. Nonetheless, while some universal principles based on respect for the dignity of all people are common to all countries, some ethical challenges facing social workers are specific to particular socio-cultural contexts. From this standpoint, this paper will compare both the British and the Italian 'Code of Ethics for Social Work' in a lingua-cultural perspective. In particular, by drawing on the Appraisal Framework (Martin and White 2005), selected examples from the two codes will be analysed in order to highlight to what extent the use of different lexico-grammatical choices and rhetorical strategies convey different underlying values and beliefs. Our investigation will aim at providing a possible explanation for such differences, which in turn echo and reflect differences in socio-cultural backgrounds of the countries whose codes are investigated.

1. The need for a Code of Ethics

All professions should have a code of ethics, thanks to which it is possible not only to enhance the professional status of a given type of employment and define professional identity, but also provide a guide for the suitable actions of the operators in order to protect consumers from abuse and bad practices. However, as Millerson (1964: 9) observes, "[s]ome occupations require greater control than others, due to the nature of the work involved. Some need a rigid and comprehensive code while others do not. Need for a code depends upon the professional situation". In fact, some professions need to be

ruled by rigid and far-reaching codes precisely because of the kind of work involved, and "[c]odes of ethics and conduct for social workers and agencies *are essential* [my italics] to support effective social work practice and ensure respect for human life" (Appendix to Recommendation Rec (2001)1 of the Committee of Ministers to member states on social workers no. 6).

A social worker's workload includes many different duties, ranging from care-giving all the way up to prevention, rehabilitation of deviant behaviour and social reintegration and the redistribution of resources. According to the Council of Europe Committee of Ministers Recommendation Rec (2001)1 of the Committee of Ministers to member states on social workers, a social worker

> promotes the social welfare of individuals, groups and communities, facilitates social cohesion in periods of change and supports and protects vulnerable members of the community, working in partnership with service users, communities and other professions. For some people, personal misfortune or change will affect their ability to act for themselves. Some need help and guidance. Some need care, support and protection. Social workers respond to those needs.

The Code of Ethics therefore stands out also as an element of unification within all different aspects of a profession in accordance with the law and the ever-changing and multifaceted socio-cultural and often multiethnic scenario in which social workers operate.

2. Comparing the BASW Code of Ethics and the *Codice Deontologico dell'Assistente Sociale*

The longstanding and profound bond that links the Italian social worker to the British model of the welfare system can be easily found by tracing back the birth of the professional social worker (Girotti 2005), even though such a historical analysis would lead us beyond the scope of our investigation.

As is well known, Britain was among the first European countries to engage in systematic state intervention in the welfare field. Ever since 1601, with the enactment of the 'Old Poor Law' (Cannon 2004) [1], Britain has been the homeland of charity

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[1] The Act for the Relief of the Poor, popularly known as the 'Elizabethan Poor Law', or the 'Old Poor Law' was an Act of the Parliament of England passed in 1601. Society in Elizabethan England was changing and the number of poor people living in abject poverty was increasing. A series of laws had already been introduced by the English Parliament in 1563, 1572, 1576, 1597, culminating in the 1601 Poor Law Act which formalized earlier practices by making provision for a *national* system to be paid for by levying property taxes. Under the 1601 Act, each parish was obliged to relieve the aged and the helpless, to bring up unprotected children to be industrious, and to provide work for those capable of it but who were lacking their usual trade. The main objectives of the 1601 Act were: to levy a compulsory poor rate on every parish; to provide working materials; to offer relief to the 'deserving' poor or of the 'impotent' poor – the old, the blind, the lame, and so on. This could include the provision of 'houses of dwelling'; to collect a poor relief rate from property owners; the setting to work and apprenticeship of children who were orphaned or whose parents were unable to support them. The 1601 Elizabethan Poor Law continued with further adaptations – for example the 1662 Settlement Act, Gilbert's Act (1782) and the Speenhamland system of 1795 – until the passing of the 1834 Poor Law Amendment Act, and formed the basis of poor relief throughout the country for over two centuries (Harris 2004; Morgan 2009).

organizations and, subsequently, of 'Scientific Philanthropy'. The aim of this paper is to analyse similarities and differences between the *Code of Ethics of the British Association of Social Workers* (henceforth BASW CoE) [2] and the Italian code, namely the *Codice Deontologico dell'Assistente Sociale* (henceforth CDAS) [3], in a lingua-cultural perspective.

2.1. *Analysis of layout and contents*

From a first analysis of their internal layout the two codes appear quite different. In fact, while the English code consists of three sections which are then further articulated [4], the Italian one is composed of seven Articles (*Titolo*), which are then broken down into several different Items (*Capo*) plus three additional sections.

In CDAS, *Title* I is about the definition of the profession and disciplinary powers, *Title* II is about its principles, while *Titles* III, IV,V, VI and VII are devoted to different kinds of social workers' responsibilities. In particular, *Title* III deals with the responsibility of a social worker with regard to clients; *Title* IV lists social workers' responsibilities to society, *Title* V clarifies social workers' responsibilities towards colleagues and other professionals, *Title* VI outlines social workers' responsibilities with regard to their employers and *Title* VII is about the responsibilities of social workers towards their profession.

The structures of both codes show substantial differences: the Italian code is longer, with a greater subdivision into articles and (sub)items, and with a final part devoted to disciplinary proceedings [5] which, as we will see, is missing in the British one.

The BASW CoE is organized into three sections plus the Introduction, where scope and objectives are clarified. Sections 1 and 2 draw on the background, definition and statement of ethical principles of the British code, while Section 3 comprises principles which specify how the general ethical principles outlined in Section 2 should be put into practice in the context of the UK.

2.2. *Major similarities*

In both codes it is clearly stated that social workers must respect not only basic human rights, but also the beliefs, values, needs and preferences of the users and, in their professional practice, every possible form of prejudice must be banned (Table 1).

Another fundamental principle which is to be found in both codes is the principle of

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[2] The BASW's *Code of Ethics* dates back to 1975, and has been revised and updated on several occasions. (Hatton 2008). The edition referred to here is the latest version agreed in 2010, which substitutes the 2002 version, integrating the internationally agreed *Definition of Social Work* (International Federation of Social Workers (IFSW), principles of the International Association of Schools of Social Work (IASSW) (2000) and the international statement '*Ethics in Social Work – Statement of Principles'* (IFSW and IASSW, 2004 cdn.basw.co.uk/upload/basw_112315-7.pdf; Girotti 2005).

[3] The version analysed here is the latest one, the text approved by the National Council on 17 July 2009.

[4] Section 1 – 'Background' – is subdivided into 1.1 'Ethics in social work' and 1.2 'The international definition of social work'; Section 2 – Values and ethical principles – is sub-grouped into 2.1 'Human rights', 2.2 'Social justice', and 2.3 'Professional integrity'.

[5] In its final part the CDAS presents three additional sections: the first is entitled '*Disposizioni Finali'* while the other two, '*Sanzioni Disciplinari*' and '*Procedimenti Disciplinari'*, regulate disciplinary proceedings.

BASW CoE	Italian CADS
Social workers […] should respect people's beliefs, values, culture, goals, needs, preferences, relationships and affiliations. Social workers should recognise their own prejudices to ensure they do not discriminate against any person or group. They should ensure that services are offered and delivered in a culturally appropriate manner. They should challenge and seek to address any actions of colleagues who demonstrate negative discrimination or prejudice (Section 3.7).	*L'assistente sociale svolge la propria azione professionale senza discriminazione di età, di sesso, di stato civile, di etnia, di nazionalità, di religione, di condizione sociale, di ideologia politica, di minorazione psichica o fisica, o di qualsiasi altra differenza che caratterizzi le persone* (Titolo 2.8)*.

* Henceforth the English translation of Italian CADS will be given as footnotes in square brackets. Translations are intentionally as literal as possible in order to fully highlight differences between the two codes. [The social worker performs his/her professional action without any discriminations based on age, gender or sex, marital status, race, nationality, religion, social status, political opinions, mental or physical disabilities, or any other difference which might distinguish people (Titolo 2.8)].

Table 1. The fundamental principle underlying the two codes

social justice which, to use Translation Studies terminology, is 'explicitated' [6] in Italian in '*principi di giustizia ed equità sociali*'. The concept of social justice is, however, much more frequently evoked in the British code than in the Italian one (Table 2).

BASW CoE	Italian CADS
Respect for human rights and a commitment to promoting **social justice** are at the core of social work practice throughout the world (Section 1.1). Human rights and **social justice** serve as the motivation and justification for social work action (Background). Principles of **human rights and social justice** are fundamental to social work (Section 1.2). Social workers have a responsibility to promote **social justice** (Section 2.2).	*La professione si fonda […] sulla affermazione dei* **principi di giustizia ed equità sociali** (Titolo 2.5)*.

* [The profession is based on […] the assertion of principles of justice and social fairness (Titolo 2.5)].

Table 2. Explicitating social justice

Both codes also clearly define the relevance of "[a]cting with the informed consent of service users, unless required by law to protect that person or another from risk of serious harm" (Section 3.1.3) / *Nella relazione di aiuto l'assistente sociale deve ricevere esplicito consenso, salvo disposizioni legislative e amministrative* (Titolo III, capo I. 12).

Other key terms to be found in British and Italian codes are 'privacy', 'reliability' and 'confidentiality'. Privacy and professional secrecy represent the user's primary rights and this trusting relationship compels social workers to consider all information and data gathered by reason of their profession as strictly confidential.

In Table 3 some significant examples are shown.

Particularly interesting is the principle of responsibility [7]. In both codes great emphasis

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[6] In Klaudy and Károly's terms (2005: 16): "Explicitation takes place, for example, when a SL […] unit of a more general meaning is replaced by a TL […] unit of a more special meaning; the complex meaning of an SL word is distributed over several words in the TL; new meaningful elements appear in the TL text; one sentence in the SL is divided into two or several sentences in the TL; or, when SL phrases are extended or 'elevated' into clauses in the TL".

[7] See respectively in The Code of Ethics for Social Worker, Introduction, Section 2.2; Section 2.3;

BASW CoE	Italian CADS
Social work relationships should be based on people's rights to respect, privacy, reliability and confidentiality (Section 3.1).	*La riservatezza ed il segreto professionale costituiscono diritto primario dell'utente* (Titolo III, Capo III, 23)*.
Social workers should ensure the sharing of information is subject to ethical requirements in respect of privacy and confidentiality (Section 3.5).	*La natura fiduciaria della relazione con utenti o clienti obbliga l'assistente sociale a trattare con riservatezza le informazioni e i dati riguardanti gli stessi* (Titolo III, Capo III, 24)**.
Social workers should respect the principles of confidentiality that apply to their relationships and ensure that confidential information is only divulged with the consent of the person using social work services (Section 3.10).	*L'assistente sociale deve adoperarsi perché sia curata la riservatezza della documentazione relativa agli utenti ed ai clienti* (Titolo III, Capo III, 25)***.
	L'assistente sociale è tenuto a segnalare l'obbligo della riservatezza e del segreto d'ufficio a coloro con i quali collabora, con cui instaura rapporti di supervisione didattica o che possono avere accesso alle informazioni o documentazioni riservate (Titolo III, Capo III, 26)****.

* (Confidentiality and professional secrecy are the user's primary right [Titolo III, Capo III, 23]).
** (The trust-based relationship with his/her users or clients obliges the social worker to deal with their information and data in the strictest confidence [Titolo III, Capo III, 24]).
***(The social worker must endeavour to ensure the confidentiality of his/her users' or clients' documents and information [Titolo III, Capo III, 25]).
**** (The social worker must inform co-workers, people (s)he cooperates with, people (s)he collaborates with for educational supervision purposes, people who can in some ways have access to confidential material or information, that they are all obliged to confidentiality and professional secrecy [Titolo III, Capo III, 26]).

Table 3. Privacy and professional secrecy as the user's main right

is given not only to social workers' responsibilities towards service users, but also towards other professional practitioners. Social workers not only "have a responsibility to promote social justice, in relation to society generally, and in relation to the people with whom they work" (Section 2.2), but they also "have a responsibility to challenge discrimination on the basis of characteristics such as ability, age, culture, gender or sex, marital status, socio-economic status, political opinions, skin colour, racial or other physical characteristics, sexual orientation or spiritual beliefs" (Section 2.2). In Section 3 of the BASW CoE, dedicated to ethical practice, great emphasis is also given to social workers' 'responsibilities in the work place' (Section 3.13 'Using professional supervision and peer support to reflect on and improve practice'), 'responsibilities to the profession' (Section 3.14 'Taking responsibility for their own practice and continuing professional development' and Section 3.15 'Contributing to the continuous improvement of professional practice').

Similarly, Titles III, IV, V, VI and VII of the Italian CADS are entirely devoted to the responsibilities that guide the operational practice of social workers in different operational sectors.

2.3. *Some major differences*

The British and the Italian codes for Social Workers, as we have seen, rely on a similar set of values. There are differences, however. A significant difference between

Section 3; Section 3.13; Section 3.14; Section 3.15; Section 3.16 and Titles III, IV, V, VI and VII of the Italian CADS.

the two codes concerns the importance given to research in the context of social services – an aspect which is cited less frequently in the Italian text compared with the British one. "*L'assistente sociale è tenuto alla propria formazione continua al fine di garantire prestazioni qualificate, adeguate al progresso scientifico e culturale, metodologico e tecnologico, tenendo conto delle indicazioni dell'Ordine professionale*"[8] (Titolo VII, Capo I, 54). The emphasis given to research in the BASW code is rather different: "Social work bases its methodology on a systematic body of evidence informed knowledge derived from research and practice evaluation, including local and indigenous knowledge specific to its context" (Section 1.2); moreover, "[s]ocial workers need to keep up to date with relevant research, learning from other professionals and service users" (Section 3.14); "Social workers should use professional knowledge and experience to engage in research and to contribute to the development of ethically based policy and programmes" (Section 3.17).

The importance the BASW CoE devotes to studies and research derives from the already mentioned centuries-old tradition that England can boast in the social sector. This puts British social workers as forerunners of their profession capable of adapting to the evolving needs of society. As is clearly stated in the British code, "It is understood that social work in the 21st century is dynamic and evolving, and therefore no definition should be regarded as exhaustive" (Section 1.2).

The second major difference pertains to the two large final sections which the Italian CADS reserves for disciplinary sanctions and procedures. In its final part the Italian CADS contains a section regarding the disciplinary sanctions that may be imposed on social workers, and a second section concerning the disciplinary proceedings that may be incurred. Such aspects are not taken into account in the British text.

3. A linguistic analysis

The comparison between structural and content issues carried out so far has highlighted that the two codes under scrutiny are both informative texts and official legal documents which provide readers with an impersonal representation of facts. The main communicative functions of both codes appear to be the same: regulating the rights and duties of those involved in social work, providing information on compliance with laws and directives, and drawing the attention of the reader – both assistant and service user – to the politics of conduct as laid down by law.

Let us now come to a more specific analysis of lexico-grammatical choices and modes of textuality of the two codes. In particular, by applying the analytical tools of Appraisal Framework (AF), it is possible to explore the ways in which Italian and English are used to express or evaluate situations, how attitudes and emotive factors appear in the two texts, and how rhetorical strategies are used to convey (c)overt stances. From this linguistic comparison major differences in terms of historical and cultural connotations start to emerge.

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[8] [The social worker is required to constantly update his/her own professional training in order to ensure not only qualified services, but also, by taking into account the professional association's statements, services which are adapted to scientific, cultural, methodological and technological progress (Titolo VII, Capo I, 54).]

3.1. *Appraisal Framework: some introductory remarks*

Before beginning a comparative investigation of certain qualitative aspects relating to the two codes, it might be useful to briefly look at the main analytical tools of Appraisal Framework.

Appraisal Framework (AF) is an umbrella term covering all evaluative uses of language [9]: its two core concerns are: how speakers/writers adopt and indicate positive or negative attitudes and how they negotiate these attitudinal and other types of positionings with actual or potential dialogic partners. The AF system thus explores the way language is used to evaluate and/or to adopt stances, to construe textual personas, and how affective involvement can be conveyed through a set of indicators including exclamation, repetition, intensification and attitudinal lexis. The system of Appraisal comprises three major interactive subsystems: Attitude, Gradation, and Engagement. Engagement posits that all utterances are ultimately dialogistic: speakers/writers engage in a 'dialogue' to the extent that they respond to other speakers/writers or anticipate possible responses. Such dialogistic effects play a significant role in text construal and the meaning-making processes by which speakers/writers share value positions, attitudes and beliefs and negotiate relationships and express their commitment by either 'endorsed' or 'disendorsed' utterances.

Attitude concerns the speaker's positive/negative assessment of people, places, things, state of affairs and their associated emotional/affectual responses. Attitudinal Positioning may concern positive and negative evaluations involving:

> affect
> judgement
> appreciation [10].

Affect is thus concerned with emotional reactions and disposition [11]; judgement refers to meanings which serve to evaluate human behaviour positively and negatively by reference to a set of institutionalized norms. Judgement in turn can be either inscribed (or explicit) or implicit, and is subdivided into two wider categories, namely 'social esteem' and 'social sanction' [12]. Appreciation relates to positive and negative assessments of material objects (artefacts, works of art, texts, processes, and so on). Attitudinal position is often evoked not by single words (though individual words can be attitudinal) but by phrases or complete stretches of language and, above all, by the interaction of diverse elements of the statements which transmits the writers' propositions and points of view and, therefore, must be analysed as a whole.

Evaluative language can be thus expressed by means of two primary modes: dialo-

[9] The Appraisal Framework was initially developed in the early 1990s by Professor Jim Martin and his research team based at the University of Sydney. It emerged as an extension of Halliday's Systemic Functional Linguistics within a wider literacy project which aimed at defining more precisely the attitudinal values by which texts apply social norms to evaluate human behaviour (Martin 2000; Martin and White 2005).

[10] White P.R.R. 2012b.

[11] Bednarek's works (2008, 2009) have added new interesting insights into the category of Affect by widening the explicit focus of analysis on the type of attitudinal target or attitudinal assessment considered.

[12] White P.R.R. 2012c.

gistic and attitudinal, which are the ones prominently used in analysing the documents investigated here. Considering the ethical implications of the documents analysed, affect and judgement will be the categories which appear most relevant to our textual analysis, with particular reference to affective evaluation, which is the category that allows us to trace the difference in commitment that can be discerned between the two codes [13].

Affectual positionings in the BASW CoE are mainly conveyed through:

– verbs of emotion indicating mental or physical processes, or verbs which metaphorically convey either sympathetic or active commitment such as *embrace*; *take action; engage; alleviate; build; sustain*;
– adverbs which specify circumstances of manner, such as *effectively*; *ethically; professionally; legally;*
– adjectives of emotion: *vulnerable*; *oppressed; disadvantaged*;
– recurrent nominalization of terms such as *commitment*; *change; empowerment.*

In the Italian CADS, in most cases such verbs as *embrace*; *take action; engage; alleviate; build; sustain* are generally rendered with the more neutral verb *contribuire* [contribute] which does not convey the pragmatic force of the corresponding verbs in the English code. In the same vein, more frequently recurring adjectives, nominalizations and phrases (for example *persona*; *utente*; *interessato*; *procedure dell'organizzazione di lavoro*; *iniziative di partecipazione*), mainly belong to the bureaucratic/legal lexical area, whereas those more frequently present in the BASW CoE (e.g. *vulnerable*; *oppressed*, *disadvantaged commitment*; *change*) strictly refer to welfare and social issues. Investigation will now focus on selected examples.

4. Commenting on findings

4.1. *Affective level and informative level*

The first finding to emerge from the linguistic analysis of the professional ethical code of the BASW and the Italian CADS is the presence of two different levels of discourse, an 'interactive' level and an 'autonomous' level (Hunston and Thompson 2000). In terms of the 'autonomous' level, it is more common to find informative terminology and neutral attitudes, while the 'interactive' level reveals more subjective comments from the author and an evaluative attitude towards the topic in question (Abbamonte and Cavaliere 2006). In the BASW CoE the authorial presence is more evident and the writer's comment and evaluative attitude to the subject matter is more explicit and apparent: an 'interactive plane' is at work. In the Italian CADS, where informational terms and a more neutral attitude prevail, the 'autonomous plane' is foremost. Generally, the British code uses a more emphatic and intentional language, whilst the Italian code adopts a more informative and prescriptive, coercive tone also conveyed by the recurrent deontic modal *dovere* (see Table 4: *deve*, *devono*, *dovere*) [14]. Herein lies the difference between the 'affective' plane, which is more pragmatic and where we can

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[13] White P.R.R. 2012a.

[14] For an in-depth analysis of the Italian modal system see, among others, Conte 1995 and Pietrandrea 2005.

BASW CoE affective plane	Italian CADS informative plane
The Code comprises statements of **values** and **ethical principles** relating to **human rights**, **social justice** and **professional integrity**, followed by practice principles that indicate how the ethical principles should be applied in practice (Background - Section 1.1).	*Il presente Codice è costituito dai **principi** e dalle **regole** che gli assistenti sociali **devono** osservare* (Titolo I.1)*.
Social work values are **embodied** in the profession's national and international codes of ethics (Background - Section 1.1).	*La professione si fonda sul valore, sulla dignità e sulla unicità di tutte le persone, sul rispetto dei loro diritti universalmente riconosciuti e delle loro qualità originarie, quali libertà, uguaglianza, socialità, solidarietà, partecipazione, nonché sulla affermazione dei **principi** di giustizia ed equità sociali* (Titolo II.5)**.
In solidarity with those who are disadvantaged, the profession **strives** to alleviate poverty and to work with **vulnerable** and **oppressed people** in order to promote social inclusion (Background - Section 1.1).	*L'assistente sociale **deve** contribuire a promuovere una cultura della solidarietà e della sussidiarietà, favorendo o promuovendo **iniziative di partecipazione** volte a costruire un tessuto sociale accogliente e rispettoso dei diritti di tutti* (Titolo IV, Capo I.33)***.
Social workers should act with **integrity** and treat people with **compassion**, **empathy** and **care** (Section 3).	*Nella relazione di aiuto l'assistente sociale ha il **dovere di** dare, tenendo conto delle **caratteristiche culturali** e delle **capacità di discernimento** degli interessati, la più ampia informazione sui loro diritti, sui vantaggi, svantaggi, impegni, risorse, programmi e strumenti dell'intervento professionale, per il quale deve ricevere esplicito consenso, salvo disposizioni legislative e amministrative* (Titolo III, Capo I.12)****.

* (This Code consists in the **principles** and **rules** which social workers **must** comply with [Titolo I.1]).

** (The profession is based on people's value, dignity and uniqueness, on the respect for their rights which are universally recognized and for their original qualities, such as freedom, equality, sociality, solidarity, participation, as well as on the assertion of **the principles** of social justice and equity [Titolo II.5]).

*** (The social worker **must** contribute to promote a culture of solidarity and subsidiarity, by favouring or promoting participation in initiatives aiming at creating a welcoming social fabric where everyone's rights are respected [Titolo IV, Capo I.33]).

**** (In his/her helping relationship the social worker, by giving due consideration to the **cultural characteristics and capacity of judgement** of the people concerned, **has the duty** to provide as much information as possible about their rights, benefits, handicaps, commitments, resources, programmes, tools for professional intervention, for which (s)he must receive explicit consent, unless otherwise provided, under laws, regulations and administrative provisions [Titolo III, Capo I.12]).

Table 4. BASW CoE affective plane vs. Italian CADS informative plane

find a wealth of terminology relating to the emotive and socio-cultural involvement of the author (values, ethical principles, human rights, social justice, professional integrity, embodied, strives, work with vulnerable and oppressed people, compassion, empathy, care), and the informative, bureaucratic plane (*principi, regole, iniziative di partecipazione, caratteristiche culturali, capacità di discernimento*). By comparing examples from the BASW CoE and the corresponding concepts in the Italian CADS the differences in the intensity of the affective positioning are evident, as Table 4 above highlights.

It appears that in the Italian text the authorial attitudinal positioning does not fully convey the social workers' vocational emotional/emphatic commitment towards service users' needs, and sometimes the expected abilities/desire of the social workers themselves to overcome service users' problems seem ultimately to be questioned. On the contrary, in the BASW CoE terms like *solidarity, disadvantage, strive, alleviate, work with, vulnerable and oppressed, commitment* all contribute in communicating affect.

The intense commitment of the British social worker is conveyed in some of the opening phrases of the code: "Social work values are embodied in the profession's national and international codes of ethics", "Social workers should act with integrity and treat people with compassion, empathy and care"; in the Italian code, instead, we find a bare, detached definition of the code and an introduction to rules to be complied with (see Table 4 above). As we can note from the excerpts in Table 4, the British code relies on terms which come within the 'affective' sphere, as in the first example where 'vulnerable and oppressed people' are mentioned. The Italian approach, on the contrary, appears to be much less 'affective' and much more matter-of-fact.

In both countries the codes are binding: "The Code is binding on all social workers who are BASW members in all roles" (BASW CoE Introduction) – "*Il rispetto del Codice è vincolante per l'esercizio della professione per obbligo deontologico*" (Italian CADS Titolo I.3); however, the Italian CADS guidelines outline bureaucratic and formal standards of practice, whereas the British code contains recommendations. The two texts differ in their use of modal verbs: the BASW CoE chooses throughout the text the hedging option *should*, while the Italian code is regulatory in its prescriptive modal *deve* (must). This results in a difference in authorial engagement, where the main assumption of the BASW CoE is that it upholds the Association's main objective of expressing the fundamental values and principles of social work whilst acting as a guide, whereas the Italian code clearly posits itself as a regulatory document outlining the obligations of a social worker, once again through the prevailing use of the deontic modal *dovere* (Table 5).

BASW CoE	**Italian CADS**
The Code comprises statements of values and ethical principles relating to human rights, social justice and professional integrity, followed by practice principles that indicate how the ethical principles **should** be applied in practice (Section 2.3).	*L'assistente sociale, nel rispetto della normativa vigente e nell'ambito della propria attività professionale, **deve** agevolare gli utenti ed i clienti (Titolo III, Capo I.13)*.*
Social workers **should** promote the full involvement and participation of people using their services in ways that enable them to be empowered in all aspects of decisions and actions affecting their lives (Section 2.1.3).	*L'assistente sociale investito di funzioni peritali **deve** esercitarle con imparzialità ed indipendenza di giudizio (Titolo III, Capo II.21)**.*
Social workers **should** ensure that resources at their disposal are distributed fairly, according to need (Section 2.2.3).	*Nel rapporto professionale l'assistente sociale **non deve** utilizzare la relazione con utenti e clienti per interessi o vantaggi personali (Titolo III, Capo II.22)***.*

* [The social worker, in compliance with the regulations and within his/her professional activity **must** help his/her own users and clients (Titolo III, Capo I.13)].
** [The social worker, when carrying out his/her tasks as an expert, **must** be impartial and independent in making his/her decisions (Titolo III, Capo II.21)].
*** [In his/her professional relationship the social worker **must not** use his/her relationship with users and clients for personal interests or advantages (Titolo III, Capo II.22)].

Table 5. Differences in authorial Engagement

Nonetheless, a seemingly divergent feature emerging from the comparison of the two codes is a shift in perspective in the choice between concrete and abstract terms.

4.2. *Concrete and abstract language*

Consider the examples reported in Table 6.

BASW CoE concrete language	Italian CADS abstract language
Social work interventions range from primarily person-focused psychosocial processes to involvement in social policy, planning and development. These include counselling, clinical social work, group work, social pedagogical work, and family treatment and therapy as well as efforts to help people obtain services and resources in the community. Interventions also include agency administration, community organization and engaging in social and political action to impact social policy and economic development (Section 1.2).	*La professione è al servizio delle persone, delle famiglie, dei gruppi, delle comunità e delle diverse aggregazioni sociali per contribuire al loro sviluppo; ne valorizza l'autonomia, la soggettività, la capacità di assunzione di responsabilità; li sostiene nell'uso delle risorse proprie e della società nel prevenire ed affrontare situazioni di bisogno o di disagio e nel promuovere ogni iniziativa atta a ridurre i rischi di emarginazione (Titolo II.6)**.
Social workers […] respect […] each person's spiritual integrity and well-being (Section 2.1). **Social workers** […] respect […] people's dignity (Section 2.2). **Social workers** […] promote the full involvement and participation (2.3).	*La professione si fonda sul valore […] di tutte le persone (Titolo II.5).* *La professione è al servizio delle persone (Titolo II.6).* *L'esercizio della professione si basa su fondamenti etici (Titolo II.2)***.
respect for **human** rights (Section 1.1).	*rispetto dei **diritti universalmente riconosciuti** (Titolo 2.5)****.

* [**The profession** is at the service of people, families, groups, communities, different social groupings to contribute to their development; it enhances their self-reliance, their subjectivity, their ability to take responsibility; it supports them when using both public or their own resources to prevent or cope with difficult situations, and in promoting every intervention aiming at reducing risks of marginalization and social exclusion (Titolo II.6)].
** [**The profession** is based on the value of all persons (Titolo II.5); **The profession** is at the people's service (Titolo II.2); **The practice of the profession** is based on ethical foundations (Titolo II.2)].
*** [respect for **universally recognized rights** (Titolo 2.5].

Table 6. BASW CoE concrete language vs. Italian CADS abstract language

The BASW CoE makes use of more 'concrete' terms and lists the various areas in which social workers are meant to intervene, involving the readers in a more direct and explicit manner, allowing them to share in the concepts that are discussed. The British code, following its empirical tradition, explicitly refers, for example, to *agency administration, community organisation* and engagement in *social and political action* designed to impact *social policy and economic development*. The Italian CADS, instead, simply states that the profession exists to serve individuals, encourage their autonomy, their capacity to assume responsibility and so on, but no advice is given as to how these aims are to be achieved.

Moreover, in the Italian CADS, emphasis is frequently put on service users' self-determination: "*L'assistente sociale deve impegnare la propria competenza professionale per promuovere la autodeterminazione degli utenti e dei clienti, la loro potenzialità ed autonomia, in quanto soggetti attivi del progetto di aiuto*" (Titolo III, Capo I.11) which

evokes an implicit distance between social services and the people who benefit from them, thus creating a detached client-provider relationship.

In line with this perspective, the term 'social workers' is used in the BASW CoE to indicate people who are actively employed in the field of social work, while the Italian code uses more frequently the much more general definition *professione* which refers to the role of the professional in a much wider sense, and makes it a more abstract term.

Accordingly, all the duties of social workers are described in Italian by using a rather more austere and detached language such as *le attività della professione*, *la professione*, *l'esercizio della professione* as opposed to 'social worker(s)' in the BASW CoE. One of the possible (psycho)socio-cultural reasons for repeatedly using terms evoking professionalism/expertise in the Italian code could be the necessity or desire, on the part of Italian social workers, to emphasize their only recently acquired professional status and authority in the eyes of both service users and also other doctors and psychologists working in the same field [15]. Britain's social welfare, on the contrary, can boast a very long standing tradition (Harris 2004). "Anglo-Saxon cultural tradition [is] a tradition which places special emphasis on the rights and the autonomy of every individual" which conditions every individual to be constantly aware of other people (Wierzbicka 2003: 30).

The British code thus frequently refers to 'human rights', while the Italian code mentions *diritti universalmente riconosciuti* which could refer to a much wider unspecified spectrum of rights.

The social worker is also urged to be proactive and dynamic in his/her actions and decision-making processes through the recurrent use of verbs such as *promote, take actions, focus, work, act, endeavour*, and nominalizations including *involvement* and *participation.*

The recurrent prefix *inter-* [16] used in compounding terms such as ***inte****rvene,* ***int****eract/* ***inter****actions*, ***inter****ventions*, ***inter****related*, implies continuous (inter)relationships and exchange between social workers and users themselves.

Another aspect which is continuously stressed in the British code is that "[s]ocial workers are change agents in society" (Section 1.2). This concept is lexically conveyed by

> formulaic patterns [which] acquire discursive relevance in terms of their ability to homogenize discourse which, in turn, provide stylistic cohesion. More importantly, […] formulaic patterns are generative of a discourse. The ideological significance of such lexicalization comes to the fore when we realize to what extent these patterns of repetition concur to build up a defined context (Cavaliere 2012: 97).

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[15] In Italy the first official legal acknowledgement given to social workers dates back to 1987 when a presidential decree (D.P.R. no. 14 of 15 January 1987) allowed them to exercise their profession if they possessed a diploma for social workers. Then rules meant as a guide for social workers in the exercise of their profession were progressively implemented. In March 1993 (law no. 84) this led to the institution of a professional register for social workers. In 1999, by governmental decree (D.M. no. 509 of 3 November 1999) compulsory university training for social workers was introduced and the first *Codice Deontologico degli Assistenti Sociali* (code of ethics) was adopted (Bortoli 1997; Dente and Spisni 2010: 186; Cava 2006: 25-26).

[16] This derivational affix appears in numerous English loanwords probably from Vulgar Latin *inter-rāre*, derivative of *terra* (earth). As is known, the prefix *inter-* basically indicates some kind of a connection between things, usually meaning 'between', 'among', 'mutually', 'reciprocally', 'together'.

The core conceptual context – the social worker's fundamental role in "meeting human needs and developing human potential" (Section 1.1), and promoting or enhancing positive changes – is built up through recurrent lexical items such as *change, problem solving, empowerment, liberation*. Within a FrameNet [17] approach – where it is claimed that every word brings with it a set of associated concepts that might be related to a 'script' – these words allocate to the 'perception' of a frame, in our case relating to 'change'; in frame semantics the view is taken that word meanings are best understood in reference to the conceptual structures which support and motivate them. Lowe (1997: 2-3) spells out the fundamental principles of FrameNet in the following passage:

> We believe, therefore, that any description of word meanings must begin by identifying such underlying conceptual structures. Frames have many properties of stereotyped scenarios – situations in which speakers expect certain events to occur and states to obtain. In general, frames encode a certain amount of 'real-world knowledge' in schematised form.

In the BASW CoE the repetition of certain concrete lexical items (*social work interventions, human rights, social justice, full involvement and participation*) communicates the idea of (required and/or achieved) efficiency in terms of the social worker's initiatives and work; this, in turn, should stimulate a chain-reaction-like response in the reader (generally the social worker himself/herself) who is urged to be proactive and effective in offering a helping hand. In the Italian CADS, on the contrary, the discernible trend towards adopting bureaucratic and vague terms (e.g. *esercizio della professione*, *capacità di assunzione di responsabilità, rispetto della normativa vigente*) create a kind of emotional gap between the text and the recipient who is not so physically and empathically involved as when reading the British code.

5. Final remarks

Even though the British text clearly stands out as the ethical and theoretical source for the Italian code, socio-cultural differences between the two countries emerge in the lexical and textual choices. By comparing detailed examples, our investigation aimed to highlight how different pragmatic uses of lexico-grammatical choices and modes of textuality convey differences in authorial stance towards the topic – commitment and distancing being the main categories for the British code and Italian code respectively. In particular, the BASW CoE, as can be seen in the qualitative examples reported in

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[17] The FrameNet (FN) research project is based on Fillmore's theory of frame semantics, which he developed in the 1970s. The FrameNet Project, housed at the International Computer Science Institute in Berkeley, California, is a project in corpus-based computational lexicography that aims to provide for a significant portion of the vocabulary of contemporary English a body of semantically and syntactically annotated sentences from which reliable information can be reported on the valences or combinatorial possibilities of each item targeted for analysis. Key aspects of the project are a commitment to a descriptive framework based on semantic frames containing frame elements (semantic roles) and a commitment to documenting its observations on the basis of carefully annotated attestations taken from large electronic corpora. In particular, in 2001 Fillmore and Baker finalised the FrameNet method which identifies the following sets: a set of words with a semantic congruence; a set of patterned co-texts identified from a corpus; semantic roles appropriate to the set; a mapping of the roles onto the patterns. The semantic domains to be covered are: Health, Care, Chance, Perception, Communication, Transaction, Time, Space, Body, Motion, Life stages, Social context, Emotion and Cognition (Fillmore and Baker 2001).

the Tables above, uses more affective, concrete and emphatic terms, thereby suggesting 'physical' commitment, as is conveyed by lexical choices such as 'strive' and 'embrace', rather than detached 'legalistic' regulations as shown in the Italian code. The Italian CADS, on the other hand, heavily relies on bureaucratic and legal terms, so that a certain degree of distancing can be felt thus diluting the social meaning and ideological implications that can be found in the English version. The British code's teleological implicatures ultimately stress the ethical and solidarity values pertaining to the social workers' profession, whereas this element is largely absent in the Italian CADS. As far as the Italian code is concerned, this distancing policy can be possibly traced back to the civil law tradition which, in turn, derives from the strong legacy of Roman Law, and the language used in the Roman Forum [18]:

> Since the days of the Law of the Twelve Tables, developed during the early republic, the Roman legal system was characterized by a formalism that lasted for more than 1,000 years […]. The basis for Roman law was the idea that the exact form, not the intention, of words or of actions produced legal consequences (Johnston 1999: 4).

This formalism in language is conducive to the assumption of an authorial attitude which, in the Italian code, is perceived as detached, impersonal, and highly formal [19]. In this perspective, the Italian CADS language appears to be mainly referential, and the

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[18] European identity itself is said to have been built on three pillars: Christianity, Aristotelian philosophy and Roman law. The Roman Empire has left countless marks on the Western world, but its greatest contribution is arguably its legal legacy. Roman law has had an enormous, direct and ongoing influence on the development of law in the West. The Romans were the first to develop a real science of law, the rules of Roman Law were placed in a statutory framework which provided a modern, systematic order. When the empire fell, remnants of Roman law survived, coexisting with the legal system of the Germanic invaders. But Roman law continued to thrive in the eastern Roman Empire. In the first half of the 6th century, Justinian gathered and compiled every legal judgment from the previous centuries. The compilation carried out by Justinian (in Latin, *Codex Justinianus*) first published in 529 and in a revised edition in 534, included both legal advice and decisions issued by Justinian's predecessors and by himself, was thus an aggregation of already existing laws, and an outline of law in general which became highly influential throughout most of the Middle Ages Europe and whose texts were given force of law in Italy, supposedly at the request of Pope Vigilius, in 554. Little is known about the exact fate of the Code of Justinian during the next five centuries, since it was largely dismissed after the fall of the Western Empire (Cortese 1995); however, by the eleventh century, as civilization recovered, and law courts were coming back into usage, the study of law became important and profitable. The precise nature of how it was rediscovered is unknown but Justinian's *Corpus Iuris Civilis* ('body of civil law') began to be studied by several early legal masters, thus forming the basic text for legal education in civil law and leading to the creation of Europe's first university and first law faculty in Bologna (Rashdall 2010: 254). From there Roman law spread throughout Europe, Bologna being the intellectual template for all of Europe. All later western systems of law borrowed heavily from Justinian's *Corpus Iuris Civilis*, including the civil law systems of Western continental Europe, Latin America, and parts of Africa and, to a lesser but still notable extent, the English common law system, from which American law is principally derived as well. Only Britain, having evolved differently as a result of its "splendid isolation", did not take part in the wholesale reception of Roman law in Europe (Charmley 2005: 134). One reason for this is that the English legal system was more developed than its continental counterparts by the time Roman law was rediscovered. Therefore, the practical advantages of Roman law were less obvious to English practitioners than to continental lawyers. However, even though the law continued to evolve over the centuries and, of course, today Roman Law has been replaced by modern codes, Roman law has remained the main source of inspiration in continental Europe (Wieacker 1981; Zimmermann 2001).

[19] As schematized by Katan (2006: 60), while English is generally considered a Lower Context Communication (LCC) language/culture, Italian is in fact normally regarded as a Higher Context Communication (HCC) language/culture, where formality and indirectness are commonly found in transactional communication.

emotional aspect of the topics at issue is backgrounded as a result of the interdiscursive system of bureaucratic language. From a text discourse analysis perspective, in BASW CoE values appear more oriented towards actively mediating/acting between the real needs of service users.

Diversities in perspective are thus undeniable, conditioned as they are not so much by different linguistic systems, but rather by different "cultural grammars" (Wierzbicka 1996: 527), i.e. the existence of underlying subconscious rules shaping people's way of thinking, feeling, speaking, interacting, between the countries. Ultimately, different cultures find their own expression in different "ethnographies of speaking" (Hymes 1962; Bauman and Sherzer 1975) [20].

In our case, discrepancies emerging between the two codes cannot be explained only by referring to differences between linguistic codes, but rather in terms of diverse historical and cultural (re)actions to social issues and partly discrepant socio-cultural attitudes towards motivational and emotional aspects between the two countries. "It is necessary to also link linguistic diversity with external differences to historical, social and cultural background rather than one-sidedly insisting on […] a link between linguistic differences. Languages are […] structured in different ways because they embody different conventions, values, experiences, [so that] the importance of what may be called linguistic-cultural relativity emerges" (House 2009: 11).

Nevertheless, the discernible difference between the British and the Italian social workers' codes of ethics, of course, does not alter their fundamental purpose, i.e. to act as a guide in undertaking the complex job of being a social worker. However, in both countries, as Banks (2006: 98) argues, it is possible that:

> to be successful in their aims of guiding practitioners even in a general way, the codes probably need to be related more clearly to practice than many in fact are. One way of doing this is to ensure that the general value statements are discussed and analyzed during the course of social work education and training and related to the daily practice of social work.

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[20] "Speaking, like other systems of cultural behaviour – kinship, politics, economics, religion, or any other is patterned within each society in culture-specific, cross-culturally variable ways […] which organize the use of language in the conduct of social life" (Bauman and Sherzer 1975: 95).

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