

Annual review of accreditation 2018/19

COSCA (Counselling & Psychotherapy in Scotland)

May 2018

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About COSCA (Counselling & Psychotherapy in Scotland)

COSCA registers:

- COSCA Accredited Members
- UK Body Accredited Members
- Practitioner Members
- Counsellor Members
- Counsellor Members (Organisations)

Its work includes:

- Setting and maintaining standards of practise and conduct
- Maintaining a register of qualified professionals
- Assuring the quality of education and training
- Requiring registrants to keep up their skills up to date through continuing professional development
- Handling complaints and concerns raised against registrants and issuing sanctions where appropriate.

As of March 2018, there were 477 registrants on COSCA's register.

COSCA was first accredited on 19 June 2014. This is its fourth annual review and this report covers 19 June 2017 to 19 June 2018.

Background

The Professional Standards Authority accredits registers of people working in a variety of health and social care occupations not regulated by law. To be accredited, organisations holding such registers must prove that they meet our demanding [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every twelve months.

Accreditation can be renewed by a Moderator in cases where there are no concerns that a register is not meeting the Standards. A Moderator can issue Recommendations and note Achievements.

Where concerns do exist, or information is not clear, a targeted review will be recommended by a Moderator. The outcome of this review is assessed by an Accreditation Panel, who can decide to renew accreditation, renew accreditation with conditions, suspend accreditation or remove accreditation. Panels may also issue Recommendations and note Achievements.

- **Condition** – Changes that must be made within a specified timeframe to maintain accreditation
- **Recommendation** – Actions that would improve practice and benefit the operation of the register, but do not need to be completed for compliance with the Standards to be maintained. Implementation of recommendations will be reviewed at annual renewal
- **Achievement** – Areas where a register has demonstrated a positive impact on one of the four pillars of the programme; protection, choice, confidence and quality.

Outcome

Accreditation for COSCA was renewed for the period of 19 June 2018 to 19 June 2019 .

Accreditation was renewed by a Moderator following a review of evidence gathered by the Accreditation team and supplied by COSCA.

No Recommendations or Conditions were issued.

The following Achievement was noted:

1. COSCA's work to ensure registrants' online presence complies with its standards and helps service users make informed decisions. (See paragraphs 7.1-7.5)

The following report provides detail supporting the outcome.

Assessment against the Standards for Accredited Registers

Standard 1: the organisation holds a voluntary register of people in health and/or social care occupations

- 1.1 There have been no significant changes reported or noted in the past year.
- 1.2 COSCA has seen an increase in the number of registrants on its register in the past year, from 464 to 477.
- 1.3 The Authority found that this Standard continues to be met.

Standard 2: the organisation demonstrates that it is committed to protecting the public and promoting public confidence in the occupation it registers

- 2.1 There have been no significant changes reported or noted in the past year.
- 2.2 COSCA has signed the Scotland Declaration on Human Rights, which is run by the Scottish Council for Voluntary Organisations. The declaration intends to send out 'a clear message to policy makers across the UK and beyond, that organisations in Scotland view equality and human rights as vital to our society'.
- 2.3 COSCA has reviewed its safeguarding and notification measures in accordance with the Office of the Scottish Charity Regulator's (OSCR's) advice to charities and their trustees to 'act with due care and diligence'. The OSCR had reminded its charities that 'trustees should make sure that they create a safe environment for staff, beneficiaries and volunteers.'
- 2.4 COSCA noted a challenge in finding counselling services for members of the public who are unable to pay. COSCA noted increasing demand for children and adult services, where 'no additional funding (was) being made available by the Scottish Government for the training of new counsellors'. COSCA highlights on its website that students may apply for Individual Training Accounts (ITAs) of up to £200 each year towards course costs. COSCA also highlights other potential sources of funding such as grants from trusts, career development loans, and sponsorships.
- 2.5 COSCA surveyed its membership to 'map the European 'footprint' of COSCA and its members and get a better idea of the range of issues /agendas people are collaborating on with European partners' and 'to gather a range of useful examples to inform our European and international work'. COSCA received a low response to the survey and considers that its registrants may be missing out on opportunities to work with and learn from European counterparts.
- 2.6 COSCA surveys its organisational members, which range from small, often multidisciplinary teams to large specialist counselling organisations, to 'identify and raise awareness of good quality service provision'. COSCA identified common challenges such as funding, but noted that in spite of increasing demand, for example, organisations were able to keep waiting times down with careful management and referral to other services. COSCA noted increased development of young people's services and identified a need to

check if services were missing transgender clients in the way statistics are recorded, or in the availability of services.

- 2.7 The Moderator noted COSCA's work to review its safeguarding measures. The Authority found that this Standard continues to be met.

Standard 3: risk management

- 3.1 There have been no significant changes reported or noted in the past year.
- 3.2 COSCA has updated its organisational risk register to account for risks of additional cuts in funding for services in the addiction field and for changes in Europe associated with Brexit.
- 3.3 The Authority found that this Standard continues to be met.

Standard 4: the organisation demonstrates that it has sufficient finance to enable it to fulfil its voluntary register functions effectively including setting standards, education, registration, complaints and removal from the register

- 4.1 There have been no significant changes reported or noted in the past year. As part of its due diligence, the Accreditation team reviewed records from Companies House and the OSCR and noted that COSCA appears to be financially sustainable.
- 4.2 COSCA receives funding from the Scottish Government; its current grant covers the 2016-2019 period.
- 4.3 The Authority found that this Standard continues to be met.

Standard 5: the organisation demonstrates that it has the capacity to inspire confidence in its ability to manage the register effectively

- 5.1 COSCA highlighted the challenge of becoming General Data Protection Regulation (GDPR) compliant, and implementing new data security standards across the collection, storage and destruction of personal data.
- 5.2 As part of this, COSCA has trained its staff in data security standards for handling information about individuals.
- 5.3 The Moderator noted COSCA's work to ensure it is GDPR compliant. The Authority found that this Standard continues to be met.

Standard 6: the organisation demonstrates that there is a defined knowledge base underpinning the health and social care occupations covered by its register or, alternatively, how it is actively developing one. The organisation makes the defined knowledge base or its development explicit to the public

- 6.1 There have been no significant changes reported or noted in the past year.
- 6.2 The Authority found that this Standard continues to be met.

Standard 7: governance

- 7.1 COSCA had previously issued guidance to registrants about providing counselling through electronic communications such as video calling, instant messaging, texting, phone and email. That guidance noted the different

dynamic between practitioner and client in such settings, the need to take international legislation into account, and requirements to meet the ethical and legal standards and requirements of the use of technologies. COSCA had noted related risks and mitigating actions in its risk matrix.

- 7.2 COSCA recently produced its 'Guideline on Online Networking, Email and Social Media' which highlights different technical, ethical and legal issues and challenges when online. The guidelines cover points including data protection and GDPR awareness, client confidentiality, separation of private and professional life, consent and the need to respond to negative feedback or comments with only positive actions.
- 7.3 COSCA's 2017 Annual Ethical Seminar advised registrants how their online presence can be 'congruent, honest, and meet the ethical standards expected of them by COSCA and other stakeholders' and to 'use social media for counselling as part of having an online presence'.
- 7.4 COSCA provided evidence of its Review of Registrants' Online Presence, checking that websites are compliant with its standards.
- 7.5 The Moderator noted COSCA's work to ensure registrants' online presence complies with its standards, and helps service users make informed decisions as an Achievement
- 7.6 The Authority found that this Standard continues to be met.

Standard 8: setting standards for registrants

- 8.1 There have been no significant changes reported or noted in the past year.
- 8.2 COSCA recently published Guidance on Clinical/Professional Wills to assist registrants when therapy ends due to unplanned events such as 'accident, protracted illness, death or other professional interruption'. COSCA requires registrants to nominate executors to inform and support clients, and supervisees, if the registrant is suddenly unable to work with them, as well as managing related financial and administrative issues.
- 8.3 COSCA's published Terms and Conditions (1 April 2017) require registrants to 'abide by COSCA's Constitution and Statement of Ethics and Code of Practice'. Following a query from the team, COSCA clarified that its 'Constitution' referred to its Memorandum of Association, Articles of Association and Standing Orders which are provided at time of registration and available on request.
- 8.4 The Authority found that this Standard continues to be met.

Standard 9: education and training

- 9.1 There have been no significant changes reported or noted in the past year.
- 9.2 COSCA stated it had 'contributed to the development of training of counsellors to work with children and young people by awarding COSCA conditional validation to 2 new courses'.
- 9.3 The Authority found that this Standard continues to be met.

Standard 10: management of the register

- 10.1 At last year's annual review, the team checked a sample of COSCA registrants that could be verified against other sources (other registration, business websites and practice addresses). As a relatively high percentage of registrant profiles resulted in queries from the team, COSCA immediately carried out a full review of its register for those registrants who are members of other Accredited Registers, statutory regulators and professional bodies, and identified those where further action was required. The Panel noted COSCA's immediate response to the queries raised and actions taken, however instructed COSCA to review its quality assurance mechanisms to ensure the accuracy of its register, in particular for registrants who also hold registration with another Accredited Register or a statutory regulator.
- 10.2 COSCA has introduced a more proactive model for checking for inaccuracies on registrants' profiles, where previously it had relied on registrants to inform it of changes. COSCA carries out ongoing reviews of registrants' membership with other statutory and voluntary organisations and has carried out three full reviews of its register since the last annual review. COSCA maintains a spreadsheet of registrants' other memberships and contacts organisations to verify memberships where these are not printed online.
- 10.3 COSCA has checked that registrants' personal websites are active and compliant with COSCA's standards, and maintains a spreadsheet of registrants' websites.
- 10.4 COSCA issued a registration compliance notification letter in August 2017, reminding registrants of their responsibility to immediately notify COSCA of any change of circumstance and not only at annual renewal of registration.
- 10.5 COSCA reviews its full register every three to four months. The register is also updated on receipt of information from registrants and from its Corporate Affairs Group.
- 10.6 As part of the annual review process the team checked a sample of register entries and did not have concerns about the accuracy of COSCA's public register.
- 10.7 COSCA has revised its procedures to reduce delays in notifying applicants to the register about the decisions of its accreditation and validation panels.
- 10.8 COSCA has changed sections displayed on its register as 'Specialist Areas' to 'Areas of Interest'. This ensures that information displayed on registrants' profiles reflects an accurate account of their training/experience and provides clarity for those using the register. COSCA has also added an explanation of Areas of Interest on the 'About the Register & Registrants' section of the register website. Specialist training is not assessed by COSCA, however COSCA's *Statement of Ethics and Code of Practice* requires its registrants to only work within the limits of their competence.
- 10.9 The Moderator noted changes made to how COSCA checks and reviews its register. The Authority found that the Instruction was fulfilled and that this Standard continues to be met.

Standard 11: complaints and concerns handling

- 11.1 There have been no significant changes reported or noted in the past year.
- 11.2 COSCA member organisations include national and local specialist and generic organisations in the voluntary sector, but also in the statutory and private sectors across Scotland. They may offer counselling, training, standards setting or accreditation of other bodies. Member organisations may operate their own complaints procedures, in line with COSCA's Standards for Complaints Procedures, which must be accessible online via their website. Outcomes of complaints must be reported to COSCA and will be published on COSCA's register along with sanctions issued.
- 11.3 At the last annual review, the team checked a sample of 10 COSCA Member Organisations to check if they provided clear information about handling complaints, in line with COSCA standards. A minority of these did not appear to describe their relationship with COSCA as part of complaints handling processes. COSCA contacted these organisations to correct or improve information provided. The Panel noted COSCA's actions, however instructed COSCA to include further checks of member organisations' complaints handling procedures within its audits, to ensure these organisations provide accurate information about COSCA's role in complaints handling.
- 11.4 COSCA described audits undertaken of member organisations that included checks that they 'pass information about COSCA's Complaints Procedure onto all their clients and/or those to whom they provide counselling related services including training and supervision'. COSCA also advised its compliance review of member organisations' websites includes checking complaints procedures.' COSCA provided a spreadsheet of its compliance work and advised it has developed a spreadsheet tool for its compliance reviews of all member organisations. COSCA noted a risk that organisations may be small and volunteer-operated and it can take time for these to make updates to websites where required.
- 11.5 Last year the team identified one organisation that did not reference COSCA's complaints procedures. COSCA highlighted that it has since worked with the organisation in a complete review of its complaints procedure. The team noted that complaints information, including information about COSCA's complaints processes, is now available from the footer of the organisation's website.
- 11.6 A suggestion from the team that another member organisation could highlight that COSCA could offer assistance to those unable to make complaints in writing, was now stated on that organisation's website.
- 11.7 COSCA is in ongoing communication with member organisations identified as requiring work to meet COSCA's standards. COSCA offers assistance and advice where appropriate to assist member organisations to move towards full compliance.
- 11.8 COSCA has not received any concerns in the past year. COSCA reviewed one complaint handled by a member organisation and determined no further action was necessary.

- 11.9 COSCA confirmed that it had reviewed the organisation's complaints procedure, which clearly provides sufficient information to escalate to COSCA if the complainant is dissatisfied.
- 11.10 The Authority found that the Instruction was fulfilled and that this Standard continues to be met.

Share your experience

- 12.1 The Accreditation team did not receive any responses to the invitation to share experience and did not receive any concerns about COSCA during the accreditation year.

Impact assessment

- 13.1 There have been no significant changes reported or noted in the past year.
- 13.2 COSCA continues to note the potential future impact of Brexit and a second Scottish independence referendum.

Equality duty under the Equality Act 2010

- 14.1 The Authority had regard to its duty under the Equality Act 2010 when considering the application for renewal of accreditation.