

# Annual review of accreditation 2021/22

COSCA (Counselling & Psychotherapy in Scotland)

June 2021

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## About COSCA

COSCA (Counselling & Psychotherapy in Scotland) registers:

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

Its work includes:

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

As of March 2021, there were 686 registrants on COSCA's register. COSCA was first accredited on 19 June 2014. This is its seventh annual review and this report covers 19 June 2020 to 19 June 2021.

## 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 [Standards for Accredited Registers](#) (the Standards). Accreditation is reviewed every 12 months.

Accreditation can be renewed by a Moderator in cases where all Standards are evidenced to be met. A Moderator can also issue Recommendations.

Where concerns do exist, or information is not clear, a targeted review will be initiated 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

## Outcome

Accreditation for COSCA was renewed for the period of 19 June 2021 to 19 June 2022.

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

The following Recommendation was issued to be implemented by the submission of annual renewal documentation:

1. COSCA should look at the design of its website to see whether it can be clear to the complainant immediately on visiting the site, that it is possible to complain. (See Paragraphs 11.1 to 11.6)

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 were no significant changes reported or noted in the past year. 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 were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

## **Standard 3: risk management**

- 3.1 There were no significant changes reported or noted in the past year. COSCA provided its updated risk matrix. COSCA has added two new risks to its register, associated with the Covid-19 pandemic. No other changes were made to the risks identified or the risk scores.
- 3.2 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 were no significant changes reported or noted in the past year. As part of its due diligence, the Authority reviewed records from Companies House and the Officer of the Scottish Charity Regulator and 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 There were no significant changes reported or noted in the past year. 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 were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

## **Standard 7: governance**

- 7.1 COSCA reported that it has recruited a new Chair to replace the retiring Chair who had served six years in post.
- 7.2 The Authority found that this Standard continues to be met.

## **Standard 8: setting standards for registrants**

- 8.1 COSCA reported that it has revised and issued guidance to the COSCA Corporate Affairs Group on Spent and Unspent Convictions. It has informed its members in an e-bulletin in February 2021 ‘about the Disclosure Scotland Act 2020, its implementation in late 2021, and its new requirements for counsellors to be a member of the Protecting Vulnerable Groups Scheme’ and ‘about the new Management of Offenders Act 2019 and its implications for COSCA membership and recruitment of counsellors.’
- 8.2 COSCA has developed and published guidance for its registrants about practising during the Covid-19 pandemic.
- 8.3 The Authority found that this Standard continues to be met.

## **Standard 9: education and training**

- 9.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

## **Standard 10: management of the register**

- 10.1 There were no significant changes reported or noted in the past year. The Authority found that this Standard continues to be met.

## **Standard 11: complaints and concerns handling**

- 11.1 At last year’s annual review, the Authority noted that COSCA had not received any complaints in the previous year and so carried out a targeted review to explore the actions COSCA takes to assure itself that it is receiving complaints where appropriate and the organisations that handle complaints on COSCA’s behalf are handling them appropriately. The Panel noted the significant amount of information available on COSCA’s website about complaints. The Panel considered the service user journey required to access the information and noted that although there was a lot of information it was not easy to find. For example, it was not easy to find the complaint form or know where to send complaints. The Panel reviewed the complaint form and noted that it was quite detailed. The Panel noted that COSCA would provide support to complainants but that this was also not immediately apparent. The Panel felt that these could potentially be barriers to complainants raising complaints with COSCA. The Panel decided to issue a Recommendation that COSCA should consider:
  - a) how it can make its complaints processes more accessible to the public, such as by placing a link on its homepage.
  - b) how it can further support members of the public who wish to make a complaint, for example by signposting to its guidance or providing clear contact details.
- 11.2 When reviewing the information about how COSCA handles complaints, the Panel considered COSCA’s processes for handling career breaks and declarations of poor health. The Panel noted that registrants may decide to take a career break due to poor health and that registrants may be fit to return to practise if the poor health is then managed. The Panel considered the two

processes and noted that it was not clear how they link. The Panel decided to issue a Recommendation that COSCA should consider adding details about how it will consider the impact of continuing health conditions on fitness to practice for those who have taken a career break for health reasons.

- 11.3 At this year's annual review, COCSA provided a summary of the actions taken in response to the Recommendations. COSCA added an icon with a link to its complaints section to the carousel under the 'our services section' on its homepage. Clicking on the icon takes the user to the complaints section which is subdivided into a further four areas: General Information; Making a Complaint; Members Complained Against; and Member Information. These contain all the relevant documents and guidance for making a complaint. COSCA developed a new document [How to Submit a Complaint Against Members of COSCA](#), accessible through the making a complaint area. This provides an overview of the different complaint routes and highlighted resources on the website. Section 4 of the document states that 'Before submitting your complaint directly to COSCA or to a member organisation or individual member who has their own complaints procedure, you can contact COSCA's Chief Executive for further advice, information and support' and provides the contact details. Section 8 of the form provides further sources of support stating 'If you need support or help with submitting this application, you may wish to contact the Citizens Advice Bureau, Community Care Legal and Advice centres, your Trade Union, etc.' before providing details of where the complaint needs to go.
- 11.4 COSCA updated its [Application to Return to Practice After a Career Break Form](#), adding the requirement for applicants to declare a medical condition that could impact on their practice in the long term, and, if so, to provide further specified evidence. COSCA noted that 'those applying to return to practice after a career break, are required to:
- declare a medical condition that could impact on their ability to practise effectively in the long term
  - describe the declared medical condition
  - state whether it is managed, and, if so, how
  - evidence how its management enables them to practise effectively and ethically as an individual member of COSCA.
- 11.5 Those declaring a medical condition are required to complete the *Ability to Practise Notification Form* and submit it along with the application. Applicants are also advised to see [COSCA's Policy on the Declaration of Medical Conditions by Applicants](#).
- 11.6 The Authority reviewed the information provided and found that the Recommendations had been considered. However, concerns remain that it is difficult for complainants to establish easily whether COSCA deals with complaints, particularly since the section comes at the end of the carousel. The Authority therefore decided to issue a Recommendation: COSCA should look at the design of its website to see whether it can be clear to the complainant immediately on visiting the site, that it is possible to complain. (Recommendation 1)

11.7 COSCA advised that it has produced guidance on the holding of complaints panels during COVID-19 restrictions.

11.8 The Authority found that this Standard continues to be met.

### **Share your experience**

12.1 The Authority 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 were no significant changes reported or noted in the past year. The Authority took account of the impact of its decision to reaccredit COSCA.

### **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.