

## Response to Welsh Government draft school and community-based counselling operating toolkit

December 2019

### 1. Introduction

- 1.1 The Professional Standards Authority for Health and Social Care promotes the health, safety and wellbeing of patients, service users and the public by raising standards of regulation and registration of people working in health and care. We are an independent body, accountable to the UK Parliament. More information about our work and the approach we take is available at [www.professionalstandards.org.uk](http://www.professionalstandards.org.uk)
- 1.2 As part of our work we:
- Oversee the nine health and care professional regulators and report annually to Parliament on their performance
  - Accredit registers of healthcare practitioners working in occupations not regulated by law through the Accredited Registers programme
  - Conduct research and advise the four UK governments on improvements in regulation
  - Promote right-touch regulation and publish papers on regulatory policy and practice.

### 2. General comments

- 2.1 We welcome the opportunity to respond to the Welsh Government consultation on the draft school and community-based counselling operating toolkit. It is positive that the Welsh Government is seeking to provide this revised guidance to those providing counselling services in schools to ensure that the service provided is high-quality and delivers improved outcomes for children in a safe environment.
- 2.2 We would however suggest that the guidance may wish to refer more clearly to the importance of making sure that counsellors are on an Accredited Register as well as working within an ethical framework and with relevant experience and demonstrable competence in working with children and young people.
- 2.3 The Accredited Registers programme is the Government backed accreditation scheme for registers of health and care practitioners who are not regulated by law. It provides a clear and independent method for employers, commissioners and members of the public to ensure that health practitioners are on a register that meets relevant standards of competence and conduct.
- 2.4 It is positive that the Welsh Government are recognising the potential contribution of practitioners on counselling registers. There are over 50,000

counsellors and psychotherapists on the 11 counselling registers accredited by the Authority. This includes two play therapy registers<sup>1</sup> as well as one psychotherapy register whose practitioners work specifically with children.<sup>2</sup> Other registers have specialist registers for practitioners working with children. We have consistently highlighted that this is an underutilised workforce.

- 2.5 We recognise that the Welsh Government have worked closely with the British Association of Counselling and Psychotherapy (BACP) in the revision of this guidance. However, in order to give the most accurate and helpful information we would suggest referencing membership of the Accredited Registers programme as a means of assurance in its own right. It would be helpful for the Welsh Government to signpost to our 'check a practitioner' tool on our website which provides schools and the public with an easy way to check registers - <https://www.professionalstandards.org.uk/check-practitioners>

### 3. Detailed comments

#### Accredited registers programme

- 3.1 The Professional Standards Authority is responsible for the operation of the Accredited Registers programme which accredits voluntary registers of practitioners who are not regulated by law. The programme currently covers 25 registers and 88,000 practitioners including counsellors and psychotherapists, play therapists, sports therapists and complementary therapists amongst others.
- 3.2 The purpose of the programme is to enable patients, employers and commissioners to choose practitioners from a register that has been accredited knowing that it must meet our standards. The standards cover protecting the public, risk management, complaints handling, governance, setting standards for registrants, education and training, and managing the register.

#### Assurance for counsellors

- 3.3 We are supportive of the Welsh Government seeking to advise schools to select counsellors on the basis of appropriate qualifications and experience and to ensure that individuals are operating within a relevant ethical framework. This is particularly important in a school setting where counsellors will by default be working with vulnerable children.
- 3.4 The BACP are accredited under the Accredited Registers programme however, there are a number of other counselling registers who also have specific Children and Young Person (CYP) frameworks which are also accredited by the Authority. A full list is available on our website.<sup>3</sup>
- 3.5 We welcome the reference to Professional Standards Authority accreditation; however, we suggest that it would be much clearer for the guidance to

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<sup>1</sup> The British Association of Play Therapists and Play Therapy UK.

<sup>2</sup> The Association of Child Psychotherapists.

<sup>3</sup> <https://www.professionalstandards.org.uk/what-we-do/accredited-registers/find-a-register/-in-category/categories/professions/counselling>

signpost to the Accredited Registers programme itself as a clear Government backed method of finding a practitioner on a register which meets appropriate standards. Schools would then have the flexibility to find a practitioner from any of the relevant registers.

- 3.6 It is worth noting that similar guidance produced by the Department for Education states: 'If employing counsellors directly it is strongly advised that schools employ staff with a minimum of a diploma in counselling (typically two years part time study), on an Accredited Voluntary Register, ideally holding accreditation with a professional body, and ideally with relevant experience and demonstrable competence in working with children and young people'.<sup>4</sup>

### References in the guidance

- 3.7 We have highlighted a couple of specific places in the guidance that our comments are directly relevant to, however there may be others.
- 3.8 As currently drafted the last paragraph of page 29 could be interpreted as saying that BACP holds the only national accredited register for all practitioners meeting CYP standards which is incorrect.
- 3.9 On page 16 the guidance states: 'It is expected that all counsellors and supervisors will be members of a professional body related to counselling or psychotherapy and adhere to an ethical framework or code.' Based on our previous comments we suggest that this should also refer to a practitioner being a member of an Accredited Register as this is an independent method of ensuring that an individual meets the relevant standards regardless of which professional body they are a member of.

## 4. Further information

- 4.1 Please get in touch if you would like to discuss any aspect of this response in further detail. You can contact us at:

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