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Welsh Government
Consultation - Summary of responses

Consultation on draft school and community-based counselling operating toolkit

March 2020

Mae'r ddogfen yma hefyd ar gael yn Gymraeg.
This document is also available in Welsh.

School and community-based counselling operating toolkit (revised 2020)

- Audience** Counselling providers and managers of counselling services; other professionals including teachers, emergency services, social workers, third sector workers and people working in youth
- Overview** This consultation sought the views on a revised draft of the counselling toolkit which was first published in 2011.
- Action required** No action - for information only.
- Further information** Enquiries about this document should be directed to:
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Support for Learners Division
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-  @WG_Education
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- Additional copies** This document can be accessed from the Welsh Government's website at www.gov.wales/education-skills
- Related documents** Welsh Government consultation document - School and community-based counselling operating toolkit (2019)

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Introduction

The [School-based Counselling Operating Toolkit](#) was first published in 2011. At the time, the toolkit built on the [National Strategy for School-based Counselling Services](#) which was published by Welsh Government in 2008. Together, the National Strategy and the Toolkit paved the way for new legislation (under the School Standards and Organisation [Wales] Act 2013), requiring local authorities to make reasonable provision of independent counselling services for children and young people aged between 11 and 18 and pupils in Year 6 of primary school.

The 2011 Toolkit was very much a joint collaboration between the Welsh Government and the British Association of Counselling and Psychotherapy (BACP) and in recent years it had become clear that a revised document was long overdue. Revision of the toolkit was further hastened by the Children, Young People and Education Committee's *Mind Over Matter* Report (April 2018) which, amongst other things, recommended that Welsh Government should assess the quality of the counselling available, not least how the service copes with increasing demand, tackles stigma and meets the needs of children and young people. This included updating and revising the 2011 counselling toolkit.

The revised [Draft School and Community Based Counselling Operating Toolkit](#) has been developed in close collaboration with a working group comprising counselling leads and providers from local authorities across Wales. Its production has also included a good deal of input from BACP colleagues.

The aim of the revised toolkit is to support schools and colleges to better understand their legal responsibilities and to clarify what effective counselling practice should look like. Some of the changes are factual in nature, reflecting recent updates in Welsh legislation, but most reflect best practice. It will provide a valuable resource for counselling providers and managers of counselling services on the best practice for delivering the service in both a school and community setting. More importantly, it will promote consistency of provision and equity of access to those young people who need the service.

A consultation was launched on 23 October 2019 and closed on 18 December 2019. Its purpose was to seek views on the clarity and usefulness of the changes we have made to the revised toolkit.

The consultation consisted of four specific questions concerning the draft guidance:

- Please explain how you believe the revised counselling toolkit could be changed so as to have a positive effect on promoting consistency of provision of the counselling service across all Wales and equity of access for young people.
- Do you agree that the content of the revised counselling toolkit is appropriate and effective? If not, what further amendments do you think are necessary?
- Do you think that the revised counselling toolkit provides the right level of support for counselling providers and managers of counselling services on the best practice for delivering the service in both a school and community setting?
- Following publication of the revised counselling toolkit, what (if any) implementation activity (training and/or awareness-raising for specific audiences, for example) do you consider will be necessary?

Further questions invited respondents to say whether they felt that the revised toolkit could have any positive or negative impact on the Welsh language. Respondents were also invited to offer any additional comments that weren't covered by the other specific questions.

Summary of consultation responses

The consultation received **20** responses - 6 via the Welsh Government's online consultation system and 14 by email. 2 responses were submitted in Welsh. The majority were from local authority counselling services and providers (including the BACP). Other respondents included Estyn, the Office of the Children's Commissioner for Wales, the Professional Standards Agency, teaching unions, the third sector and 2 private individuals.

Most of the responses welcomed the revised toolkit. Not all respondents commented on every question and some chose not to respond to the questions at all – choosing instead to provide thoughts, comments and tracked changes to the text. A summary of the responses and a selection of comments, grouped by themes is provided below:

Question 1 - Please explain how you believe the revised counselling toolkit could be changed so as to have a positive effect on promoting consistency of provision of the counselling service across all Wales and equity of access for young people.

(a) General

The majority of responses were very positive about the content of the revised guidance. The following typify responses to this question:

“Given the diversity of populations, systems, structures and resources across the 22 authorities in Wales, it is difficult to see how the revised counselling toolkit could reasonably be further improved to achieve this objective”.

“The document is very inclusive, so we don't see a need for this to be changed. The change we would envisage would be to ensure that the service delivered by local authorities is equitable.”

“We welcome this revised version of the operating toolkit for school and community based counselling. The change of title to incorporate work taking place in the community, and online, is a measure of the change in scope of counselling for children and young people that has taken place since 2011. As an organisation that delivers counselling to children and young people in settings including both schools and the community through education and family support routes we appreciate the need to expand the reach of appropriate, high quality counselling services within a professional operating framework.”

(b) Relationships with children and UNCRC requirements

Two respondents felt that the toolkit should contain more information on how to involve children and young people in developing counselling services. One also focussed on how taking a children's rights approach to the provision of counselling could enhance the draft toolkit:

“This toolkit could be enhanced by emphasising the importance of relationships with children and young people from the very beginning of the document – working with them both as individual service users and as groups who have experience and can help to improve service delivery through sharing these experiences.”

“Children’s human rights under the UNCRC could underpin this toolkit, and encourage local authorities to consider how the services they are offering support and promote these rights, and I hope that the Welsh Government can work to better embed these principles in this document.”

We have included more advice on how this can be done in the final version of the toolkit.

(c) Evaluation

Three respondents commented specifically on the need for the toolkit to include more guidance on service evaluation:

“The section headed ‘Outcome monitoring/service evaluation’ is focused on monitoring outcomes and provides no guidance on service evaluation. Service evaluation needs to improve. For example, there are considerable differences across Wales in the proportion of pupils using the service, the average number of counselling sessions, the average number of missed sessions and the average change in scores pre- and post-counselling. Service use by specific groups, including vulnerable groups, needs to be evaluated, particularly where there are statutory duties relating to certain groups (e.g. Welsh language, protected characteristics)”.

“The revised counselling toolkit does not make reference to a process of ongoing review and/or evaluation of counselling service provision both within schools and in community settings. A formal monitoring process should be suggested to determine that counselling service providers are working in line with the toolkit’s guidance on best practice?”

“Service evaluation should reflect on Welsh provision, and consider whether such a service differs from the English service in terms of aspects such as availability, waiting times and outcomes.”

The final toolkit will stress the importance of appropriate evaluation in the development of effective counselling support services.

(d) Access

Two respondents commented on the need for the toolkit to include more about the importance of ensuring equity of access to counselling services as follows:

“The section headed ‘Other groups of children and young people with specific needs’ could be further enhanced with specific advice and guidance in relation to promoting and providing counselling to vulnerable groups that are not currently covered in this

section - for example, children who are home-educated and pupils with English as an Additional Language.”

“Data from the Welsh counsellors’ survey suggests that school-based counsellors in the UK are predominantly female (85%), white (90%). This may be a factor that will need addressing if increasing equitable access for boys and BAME children and young people are to be facilitated.”

“Our experience, shared with other providers, is that access, equity and quality can be undermined by underfunding of services in an environment where the number of children and young people affected by mental health issues and problems is constantly on the rise”.

The final toolkit will be augmented to contain additional information on ensuring access to counselling provision for other vulnerable groups of children and young people.

(e) Waiting lists

A further two respondents felt the revised toolkit should include more guidance on managing waiting lists. They also commented on the effects of lengthy waiting lists for counselling on young people, citing a lack of investment generally:

“There is no real guidance set out in the Toolkit as to what is ‘a reasonable’ amount of time for a young person to be on a waiting list for counselling. What should Schools be doing when counselling waiting lists are high?”

“This waiting period can often lead to a detrimental impact on a young person’s health and wellbeing, and on their ability to engage in, and learn from, education, alongside their peers. Investment in mental health services is well-documented and much needed, and schools cannot compensate for the lack of provision.”

We are in the process of considering the need for a more formal evaluation of counselling provision, to include an assessment of the efficacy of the existing service. Obviously the issue of waiting lists will form part of this review.

(f) Differences in counselling primary and secondary pupils

Two respondents felt it important that the toolkit should emphasise the different skills required when counselling primary age pupils as opposed to those in secondary settings.

“A further recommendation is that the supervisor of a counsellor in a secondary school has experience of working in a secondary school her/himself and so is familiar with this system as well as this client age group. Where possible, supervisors should not be accepted if they have only worked in primary schools or with primary school clients. These two age groups are very different and require different skill sets.”

“The toolkit is clear that services should be universally available to Year 6 pupils. However, the toolkit does not provide specific guidance on providing services in primary schools. Our report ‘Healthy and happy’ (an Estyn thematic report) found that primary school access to counselling service varies across Wales. It may be useful to strengthen the toolkit to ensure equity across Wales for Year 6 pupils.”

Question 2 - Do you agree that the content of the revised counselling toolkit is appropriate and effective? If not, what further amendments do you think are necessary?

(a) General

Again, most respondents agreed that the content of the revised toolkit is appropriate and effective.

“The Counselling Framework complements the new guidance on responding to issues of self-harm and thoughts of suicide in young people. The background information ensures that professionals are able to make the links between different National Strategies and agendas: WAG Mental Health Strategy, Rights of the Child and other legislative documentation such as the All Wales Mental Health Measure, ALN Bill, Safeguarding Procedures. Good reference is made to issues surrounding ACES and their impact on mental health.”

“The case studies are useful and highlight the positive effects of counselling on young people.”

“The other sections are clearly written and provide practical guidance on essential matters such as the role of the counsellor; the importance of working within an ethical framework for counsellors; dealing with complaints; safeguarding and confidentiality; supervision and line management.”

“There is also clear guidance on supporting trainee counsellors, ensuring continuous CPD and Child Protection.”

However, one respondent felt the document to be inappropriately split into two parts, focussing firstly on the referral of children and young people to counselling services, and then on the management and requirements of the counsellor - believing this to be an uncomfortable mix. They felt:

“It should be considered whether a more school-friendly document would be of greater use, with the counselling industry requirements in a separate document, or appendix.”

There were a number of further suggestions about how the document could be further refined and improved which are set out in the following

sections in respondents' own words.

(b) Consistency of language

One respondent had concerns relating to the inconsistency of language used in the toolkit.

"The language used to describe children and young people's difficulties is inconsistent, shifting from emotional health and wellbeing difficulties to mental health. Whilst appreciating the need to recognise and support those with emerging and identified mental health difficulties, this needs to be in the context of the wider population accessing school and community based counselling. The terminology 'emotional wellbeing' is more appropriate in this context."

This has been addressed in the final version of the toolkit.

(c) Whole school approach

Two respondents commented specifically on the importance of counselling services being part of a whole school approach to supporting mental health services.

"It should be strongly emphasised that, however they are delivered, school based counselling services should be fully integrated into the continuum of support available for children and young people within the context of a whole school approach to emotional wellbeing."

"It is good that the toolkit ensures that counselling is seen as part of a whole school approach to promote mental health and wellbeing."

(d) Counsellor accreditation

A single respondent had the following comment to make in relation to counsellor accreditation:

"We would 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."

(e) Counsellor protection

One respondent also felt the toolkit could be strengthened to highlight the responsibility of the school for the safety of the counsellor:

"An agreement that the school is also accountable to the counsellor in meeting their obligations in terms of her/his safety in the school. The counsellor should also have the right to feedback on her/his sense of progress and this should include their sense of safety in the school. Every counsellor should have the right to withdraw from a school if they do not feel safe there."

"In the initial contract, certain other rights for the counsellor should be included. Unlike any other school staff member, she or he has no union membership."

(f) Direct referrals to CAMHS

Two people were concerned about the referral process to CAMHS, which are inconsistent across authorities in Wales:

“The interface with specialist CAMHS could be developed, emphasising the stepping up and stepping down of support for children and young people with changing needs.”

“I believe if as counsellors we were able to make direct referrals to CAMHS, the referrals would be first hand, thorough and accurate and with YP consent be able to share additional information.”

(g) Gender identity

One respondent expressed the following regarding gender identity:

“The guidance should reflect the complex interrelationship of children and young people’s gender identity and expression and wherever possible avoid the use of binary descriptors.”

Additional information on this issue will appear in the final version of the toolkit.

(h) On-line counselling

A single respondent had the following to say about on-line counselling:

“Further guidance on the use of on-line counselling and some best practice examples would be a good addition.”

The Welsh Government, is in the process of considering the need for a more formal evaluation of counselling provision. This will include on-line counselling provision.

Question 3 - Do you think that the revised counselling toolkit provides the right level of support for counselling providers and managers of counselling services on the best practice for delivering the service in both a school and community setting?

(a) General

The vast majority of respondents commented favourably in terms of this question. A selection of their responses follows:

“It gives comprehensive guidance, for example on the use of community venues, lone working and accessing counselling via IT.”

“The document reflects the progress made provides an appropriate level of guidance and support. It is particularly helpful to those who are new to the overall management or direct provision of school and community counselling services.”

“The guidance on counsellors taking care of their own wellbeing is a welcome addition to the toolkit.”

“The Guidance clearly sets out practical advice and recommendations on the role of the Counsellor, LA and School as well as other partners in relation to relationship building, confidentiality and sharing information (GDPR), use of an allocated room, assessment and evaluation and monitoring.”

“The revised toolkit provides a good level of support around best practice in both school and community settings.”

There were a couple of other suggested changes/inclusions as follows:

(a) Counsellor qualifications and experience

“Whilst the toolkit content is appropriate and effective in dealing with support for student, trainee and experienced counsellors, more needs to be done to ensure that all counsellors have access to a supervisor with extensive counselling experience, knowledge and understanding of counselling children and young people, and of a school setting, for support.”

“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.”

“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>.”

In the final published guidance these issues will be emphasised.

(b) Supervision of counsellors

“We feel that the toolkit must emphasise that counsellors must undertake clinical supervision with a supervisor with extensive counselling experience, knowledge and understanding of counselling children and young people, and of a school setting, and that this should not just be best practice but should be standard practice. It is also important that counsellors have access to supervisors in their preferred language.”

This will also be addressed in the final published guidance.

Question 4 - Following publication of the revised counselling toolkit, what (if any) implementation activity (training and/or awareness-raising for specific audiences, for example) do you consider will be necessary?

Responses in this category are grouped under 4 main themes as follows:

(a) Raising awareness/promotion

“Raising awareness will be necessary for audiences like GPs, assembly members (quite often they don't know the difference between individual counselling and a CBT light group intervention with facilitators), youth offending teams, carers projects. There needs to be hours free so staff can do things like training though.”

“Promotion will be required with Headteachers, ALNCos, Heads of Year, Well-being/Pastoral Support leads in schools.”

“There will need to be Regional Awareness Raising within the consortia for all school leads, educational psychologists, school nurses, CAMHS professionals, counselling managers, ALN Leads, PRU Managers.”

“Further work is needed to promote services to vulnerable groups and to Year 6 pupils, working with relevant partners to achieve this.”

“Awareness raising through the press, social media, youth organizations, schools. Leaflets, posters.”

(b) Training

“Training needs to be undertaken to enable teachers, youth workers and others who work supportively with young people to have effective conversations with young people before counselling becomes necessary.”

“The education workforce within schools will certainly need to receive training to ensure that there is an understanding of the nature of the service, how and when to refer (including systems and responsibilities within the school), and the relevant provisions regarding confidentiality etc. This type of training will apply to teachers and classroom assistants, at secondary level, and Key Stage 2 / Year 6 in primary schools.”

“Training on the contents of the toolkit for qualifying and newly qualified teachers and other school staff is clearly important. New staff going into schools at a point when supporting wellbeing and mental health in schools is such a priority alongside a new curriculum will need to be clear on the purpose of schools counselling, how it works and the ethical standards associated with the service.”

“Cluster level sessions could be implemented to create forums for discussion for Head Teachers / members of SLT with counselling provision as an area of

responsibility. Areas of focus should be: reviewing existing arrangements schools have in place, what works well, what needs to change, how this can be done. This would allow schools to benefit from shared and creative thinking as well as supporting monitoring of service delivery to ensure it is in line with best practice guidance.”

“We believe it is essential that schools and education professionals have access to high-quality training, especially in relation to the Health and Well Being Area of Learning and Experience in the new curriculum, where supporting the emotional health and well-being of all their learners is essential.”

(c) Information

“The school management and in particular the 'link person' must be given much greater information about counselling and what it does and does not offer. In particular, their training should cover counsellor confidentiality, client consent, therapeutic aims and complex realistic outcomes (which have not been exaggerated by counselling services seeking school funding). The realistic outcomes should cover clients who have not improved according to any traditional counselling measurement but who report satisfaction with the service.”

(d) School Governor buy-in

“It might be beneficial for there to be a requirement within the document for governors within the school to sign the document, as a commitment that they have read and understood the toolkit and will support the provision within their schools.”

Q5 - Effects that the draft school and community-based counselling operating toolkit would have on the Welsh language

Q6 - How could the proposed toolkit be changed to have positive effects/no adverse/no less favourable effects on the Welsh language

Most respondents comments focussed on two main issues - ensuring counselling through the medium of Welsh is available to all those pupils requiring it; and difficulties in recruiting Welsh speaking counsellors.

(a) Recruitment of Welsh speaking counsellors

“The document is available in Welsh. Online counselling resources and service need to be available in in Welsh. It may prove difficult to recruit Welsh speaking counsellors with the right skills set.”

“Support staff to improve their Welsh language skills.”

“We are aware that it is difficult to recruit Welsh speaking counsellors in many areas. There should be learning opportunities for existing counselling staff to learn Welsh,

as well as for Welsh speakers to be able to use their language in gaining counselling qualifications, in order for the active offer to be realised.”

(b) Counselling provision through the medium of Welsh

“There will be a detrimental effect if counselling services are not able to offer a service through the medium of Welsh.”

“Welsh Government and local authorities should ensure that young people with a preference for counselling in Welsh are equally able to receive a service as those with a preference for counselling English.”

“Service evaluation should reflect on Welsh provision, and consider whether such a service differs from the English service in terms of aspects such as availability, waiting times and outcomes.”

“We are concerned about the access that a Welsh medium or bilingual school would have to a counsellor who can work through the medium of Welsh. It is also important that counsellors have access to supervisors in their preferred language.”

“There is no specific guidance around ensuring counselling can be provided in Welsh language, which would necessitate the availability of Welsh speaking counselling professionals.”

“It is important to ensure that counselling is available to children and young people in the language that is most natural to them, so that they can feel as comfortable as possible discussing issues that are intense, complex and painful. Obviously, the offer should be proactive, and the child or young person should not have to specifically ask for it.”

(c) Changing the toolkit to ensure positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

“The document appropriately makes reference to the Welsh Language Act, but does not develop guidance beyond raising awareness.”

The document should promote the availability of counselling through the medium of Welsh, and ensure service providers give consideration to other community languages.”

“Include a comment on the importance of having a bilingual service available for all those who require this and how LA’s should strive to appoint bilingual counsellors where possible.”

“Need to ensure that counselling service is available through the medium of Welsh for any young person requiring it. Bilingual counsellors need to be available in every area.”

“There is a wider issue than the toolkit’s guidance. To ensure the Welsh language is treated no less favourably than the English language requires provision of

counselling courses in both Welsh and English - it is not clear how many Welsh medium counselling courses exist.”

Additional comments

Comments included:

(a) Best practice examples

“Best practice is seen in the case studies in relation to the positive effect of counselling on young people. However more examples of best practice from LA’s in relation to counselling service structure and provision would be useful for managers.”

“Some examples of best practice from Local Authorities in relation to provision/structure would enhance the Guidance e.g. Use of group counselling, targeted counselling provision for specific issues e.g. transgender”

“Early intervention is paramount when dealing effectively with pupils experiencing emotional health difficulties. We believe similar guidance on best practice in this area would be of value to primary schools and we would be happy to contribute to its development.”

(b) Funding issues

Significant underfunding of the counselling service generally was seen as one of the biggest hurdles. Comment’s included the following:

“Our experience, shared with other providers, is that access, equity and quality can be undermined by underfunding of services in an environment where the number of children and young people affected by mental health issues and problems is constantly on the rise.”

“The day to day reality of the underfunding of such services means that many young people will not be able to access them at all, or only after an often-substantial period of waiting. Our members tell us that some large secondary schools (1000+ pupils) in Wales have access to a counsellor for only one or maybe two days per week. This suggests that the service is stretched to breaking point and needs to be addressed.”

(b) Promotion of positive mental health

“The toolkit states that headteachers and governing bodies have day-to-day responsibility for mental health issues in schools. This is wholly inappropriate. Legal requirements arising from the School Teachers’ Pay and Conditions Document place responsibilities to promote the safety and the emotional health and wellbeing of pupils on headteachers and governors. This is also stated in the Welsh Government guidance “Thinking positively - Emotional health and well-being in schools and Early Years settings”, therefore this statement needs to be amended to reflect this.”

(c) Comments from a group of year 6 pupils

This is a selection of comments taken from a group of Y6 pupils who responded to the consultation:

“The toolkit should reflect:

- *the preference (of this group) for counselling to take place at school;*
- *for online counselling to be something offered alongside, rather than instead of, face-to-face work, and usually through on-screen rather than through audio, text or email communication, or through an online forum;*
- *the children’s preference for the counsellor to help the child work out their own ways of coping with problems, and discuss with the child, taking their wishes fully into account.*

The following rules for online counselling should also go into the toolkit:

- *Never ask for a child’s home address – or their postcode, home town or city;*
- *Never ask a child who is only being counselled online to meet with you in real life;*
- *Don’t ask a child any inappropriate questions online.”*

(e) The effects of building constraints on counselling

“Not all schools were built to accommodate external support services, such as school-based counselling services, school nursing services and other therapeutic services. Although schools all make use of such external services, the accessibility and confidentiality of services are compromised in some schools due to the constraints of the building. Where schools give these services a high priority, they adapt spaces successfully to provide suitable privacy in a relaxed and attractive environment.”

Next steps

The Welsh Government welcomes the responses to the consultation.

Consulting on the revised toolkit has provided an insight on the issues of concern. It has also helped identify shortcomings in the content of the toolkit and given us an opportunity to consider them in advance of its publication. All comments received will be carefully considered when finalising the guidance.

The Welsh Government believes that the new toolkit will help enable counselling providers in schools and, increasingly in the wider community, to deliver services that are of high quality, safe, easily accessible and available at the point of need.