



# National Strategy for a School-Based Counselling Service in Wales

Response to the Consultation



## Information

Information document No: 057/2008

Date of issue: February 2008

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<b>Audience</b>	Governing bodies and head teachers of maintained and independent schools and pupil referral units in Wales. Local authorities; local health boards; those involved in providing and commissioning health services, particularly CAMHS; teaching and other unions; church diocesan authorities; national and local bodies in Wales with an interest in promoting and supporting children and young people's emotional/mental health.
<b>Overview</b>	This document outlines the response to a consultation on a National Strategy for a School-Based Counselling Service in Wales.
<b>Action required</b>	No further action required.
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<b>Related documents</b>	School-based Counselling Services in Wales - a Draft National Strategy. Circular 47/2006: Inclusion and Pupil Support. National Service Framework for Children, Young People and Maternity Services in Wales. See also the list of documents in the References section of the draft strategy.

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**Response to the Consultation**

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**Action Required:** No further action required

**Further Information:**

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**Related Documents:**

School-based Counselling Services in Wales - a Draft National Strategy

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National Service Framework for Children, Young People and Maternity Services in Wales

See also the list of documents in the References section of the draft strategy.

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## **1. BACKGROUND TO THE CONSULTATION EXERCISE**

Developing a universal school-based counselling service for all children and young people in Wales was a recommendation of the Children's Commissioner for Wales' Clywch Inquiry Report which was accepted by the Assembly Government. It is also one of the key actions (2.35) set out in the National Service Framework for Children, Young People and Maternity Services in Wales.

The Welsh Assembly Government's goal is to have counselling provision available to all school pupils giving them confidence that their needs will be heard and addressed.

In February 2007, the Welsh Assembly Government sent out a consultation draft of its strategy for school-based counselling services in order to gain views from a wide range of stakeholders on how counselling services for young people that are safe, accessible and of a high standard can be developed and delivered.

In developing the strategy the Welsh Assembly Government is keen to emphasise that it relates to formal counselling and that this is only one of a range of services that help to support the health, emotional and social needs of pupils and lead to a healthy school culture. Other elements include emotional literacy programmes, seeking pupils' views through school councils and other means, effective pastoral care, school nurses, education welfare services, advocacy, anti-bullying policies and support for pupils with additional learning needs. It is widely accepted that schools which promote the health and well-being of pupils are also more likely to create an effective learning environment.

The deadline for responses to the consultation was 31<sup>st</sup> May 2007.

The document was distributed to representatives from the following organisations:

- governing bodies and head teachers of maintained and independent schools and pupil referral units in Wales; (the list of schools and PRUs was contained in Annex B of the consultation document);
- local authorities;
- local health boards;
- those involved in providing and commissioning health services, particularly CAMHS;
- teaching and other unions;
- church diocesan authorities; and
- national and local bodies in Wales with an interest in promoting and supporting children and young people's emotional / mental health.

## 2. CONSULTATION QUESTIONS

The consultation document asked the following questions:

Q1. Do you agree that the strategy should focus on services for children and young people of **secondary school age** in the first instance?

Q2. Are these **principles** appropriate ? If not what would you add or change?

Q3. Are these the right **objectives** ? If not what changes would you suggest ?

Q4. Are these the right **outcomes** ? If not what changes would you suggest ?

Q5. Do you consider that this assessment of **costs** is of the right order ? Would costs differ if services were offered **out of school hours** ?

Q6. Do you feel that an expansion in school-based counselling services will lead to a **reduction** in the number of children and young people being **referred to more specialised services** ? On what evidence do you base your response ?

Q7. Do you feel that an expansion in school-based counselling services will lead to an **increase** in the number of children and young people being **referred to more specialised services** ? On what evidence do you base your response ?

Q8. Do you agree that **initial action** should focus on these issues ?

Q9. Do you have comments on any of the **individual actions** proposed or their timings ?

### 3. BREAKDOWN OF RESPONSES

A total of 63 replies were received in response to the consultation document.

A breakdown of the responses is detailed in the table below:

<b>Organisation</b>	<b>Number of Respondents</b>
Local authorities	17*
Communities First (not included above)	2
Health (Trusts, LHBs)	5
Primary schools	7
Secondary schools	5
Special schools	2
Teaching unions	1
Counselling providers	8
Psychology services	2
Voluntary sector	10
Other statutory organisations	4
<b>Total</b>	<b>63</b>

\*representing 12 authorities as 4 authorities provided more than one response from different services. Includes responses from Children and Young People's Partnerships.

A full list of individual respondents is included in the Annex.



#### 4. SUMMARY AND GENERAL POINTS RAISED

Many points raised within the consultation responses were in relation to aspects of detail which will be taken forward in guidance, protocols and ongoing partnership work. The key points raised are summarised below.

The need to expand the level of school-based counselling services was **generally accepted** with only 1 respondent questioning whether money would be better spent on other aspects.

Concerns were expressed that a '**one size fits all**' model would be imposed. This is not the intention of the Welsh Assembly Government (WAG). It does not wish to get rid of any services which are currently working effectively. The aim is to provide a framework of safe and effective practice within which a number of models of practice, adapted to local need can operate.

Several comments were received that it was not necessary for counsellors to be wholly **independent** of schools although it was widely-accepted that they should not perform a teaching role. WAG has amended the strategy to reflect that the key aspect of the independence of a counselling service is not its management structure but that children and young people should be confident of its independence and confidentiality in terms of their problems not being disclosed to school staff.

Differences of opinion were expressed over whether services should allow an element of **self-referral** as this had potential for misuse by children and young people. WAG believes that self-referral is key in terms of providing the widest possible access to children and young people who need counselling and that there is sufficient evidence of effective services involving self-referral to merit this approach.

The importance of ensuring services were **confidential** was emphasised by many respondents as well as the need for specific guidance on this aspect.

It was generally felt that the focus of the Strategy should be on **secondary-aged pupils** as the level of need was greater and they were of the age where formal counselling would be more appropriate. However WAG agrees with the need to cover **children in year 6** to enable them to be supported through the transition to secondary school and will consider how services based in secondary schools can work on a cluster basis with primary schools. Whilst the focus will be primarily on secondary-aged and year 6 pupils WAG also wishes to undertake a small number of **pilots in primary schools**.

Several commentators highlighted the need to ensure that counselling fitted within a **positive school ethos** which promoted good emotional health and that this should be stressed more within the Strategy. This will be strengthened in the final Strategy but the main focus in terms of actions will remain on formal counselling as this is the prime purpose of the Strategy. Aspects of developing emotional literacy / resilience will be taken forward through other WAG initiatives.

The need to ensure that services were available to learners who are **not in mainstream secondary schools** was expressed by many. Whilst the main focus of the Strategy will be children and young people of secondary school age this will not be confined to those in secondary schools. WAG will ask local authorities to consider how they can provide services for those in special schools, PRUs or who are sick or have been excluded from school.

On the question of provision of counselling services **out-of-school hours, including during holidays** many felt that this was required to offer greater flexibility and privacy but that there were also potential problems with non-attendance, particularly in rural areas due to limited public transport. The Assembly Government will ask local authorities to assess how they might approach this aspect of the provision in their local circumstances.

The **principles, objectives and outcomes** were considered to be broadly acceptable with some fine-tuning to reflect some of the issues raised above.

The clear need for funding to implement the strategy was expressed frequently. The Welsh Assembly Government is making available **£1m in 2008-09, £2.5m in 2009-10 and £3m in 2010-11** to take forward the Strategy

The responses suggest, the potential **knock-on effect** of developing school-based counselling services on other services, particularly specialist CAMHS, through an increased level of referrals is difficult to gauge at this stage. For this reason WAG intends to require local authorities to provide information on referrals as part of the monitoring of use of the new funding. This will help to inform consideration of future funding for CAMHS services. Many respondents believe that there may be an initial increase when new services are set-up or current services expanded but over time the effect will be to reduce referrals.

There was general agreement that the **actions** outlined in the Draft Strategy were appropriate subject to further consideration of the timetable for action..

## 5. RESPONSES TO INDIVIDUAL QUESTIONS

As many of the responses to the consultation were extensive it is not possible to cover all comments raised in the following analysis. This highlights the key points raised and describes the Welsh Assembly Government's response to these. Whilst many of the comments received cannot be shown in the limited space available these will be referred to in developing a number of the outputs highlighted in the Strategy, such as guidance on developing services and inter-agency working.

The points reported are mostly paraphrased to cover a number of respondents' comments rather than the exact words used, although this is the case for some. Comments on the same issues appeared against several different questions and where this is the case the points have been addressed within the most relevant question rather than repeating them.

### **Q1. Do you agree that the strategy should focus on services for children and young people of secondary school age in the first instance?**

	<b>No. of responses</b>	<b>%</b>
Yes	39	67
No	9	16
Unsure	10	17
No answer	5	
 Total responses	 58	

#### Key points raised

- As funding is limited it would make sense to concentrate initially on secondary schools.
- Working with young children requires a higher level of training and expertise and as such it may be more pragmatic to strengthen existing services available for secondary schools in the first instance whilst training up staff to work with younger children.
- It is important to also cover primary schools as early intervention will avoid problems in later life.
- There is a need for support for young children and their families.
- If primary school provision is to be developed at a later date there should be a clear timetable as to when this will occur.

- Formal counselling would not be useful for infants as other approaches such as play therapy should be adopted.
- Whilst focus could be on secondary schools there should be some scope for providing counselling for those in year 6 to help them through transition to secondary school.
- The greatest need for counselling is for age group 10-14 – also 13-16 put forward.
- If a cluster approach is taken those counsellors based at secondary schools could provide counselling to a small number of year 6 pupils in greatest need.
- There could be a small number of pilots in primary schools.
- Counselling should sit alongside initiatives to develop children and young people's emotional literacy, which would be particularly key for young children.
- Counselling services should also cover those in special schools and those outside mainstream schools such as those in PRUs / excluded, those who are ill, those in private schools
- Services should also cover those 16-18 year olds in colleges.

#### Assembly Government Response

The responses suggest that the proposed approach of concentrating initially on secondary school age pupils is largely supported. That said WAG recognises that counselling services would also be very helpful for older primary school children and particularly in supporting those in year 6 through the transition to secondary school. In rolling out services WAG will therefore consider whether schools could operate in a cluster where a few children in KS 2 are supported by the secondary school service.. WAG also intends to provide funding to local authorities for a small number of pilots in primary schools.

The counselling strategy is not the only means of developing children and young people's emotional literacy and well-being. WAG is currently looking at the development of teaching materials and other approaches in this area.

WAG also recognises the need to provide counselling to those not in mainstream schools and in rolling out the strategy intends to ask local authorities to assess whether the level of counselling already available to those outside mainstream schools is sufficient and whether there is the opportunity to provide counselling services to those pupils not in mainstream schools as required and in a variety of ways to suit children and young people's needs.

**Q2. Are these principles appropriate ? If not what would you add or change?**

	<b>No. of responses</b>	<b>%</b>
Yes	55	90
No	2	3
Unsure	4	7
No answer	2	
Total responses	61	

The principles were largely felt to be appropriate with only 2 responses saying otherwise. The main objections of those responses was that it may not be realistic for schools to be accountable for the service and that basing a service in a school may not be appropriate for those children who do not feel safe at school.

**Key points raised**

- Counsellors need to be independent
- Service does not necessarily need to be independent of the school but accountable to an independent code of ethics.

**Response** – Diametrically opposed views were received on this subject and questions were raised as to the meaning of independence. Whilst WAG believes that a counselling service which is not directly employed by schools may be the best model in terms of demonstrating independence it also recognises that there are many examples of highly effective services where the counsellor is employed directly by the school. The most important factor seems to be how the counsellor is viewed by children and young people and that they have confidence that their problems will not be shared with others without their knowledge and agreement. In that sense the method of employment is perhaps not the prime consideration as counsellors not employed by schools could still be not seen as independent by children and young people if they have too close a relationship with school staff. WAG does not wish to set boundaries which mean that services which are currently working effectively would need to close down. For that reason the 10<sup>th</sup> principle will be amended to delete reference to management and a new principle will be added to reflect that the key aspect of independence is the view of children and young people and not the nature of employment.

- Self-referral is key – shows difference between school-based and other counselling services.

- Self-referral might be open to misuse e.g. from those wanting to 'mitch' who may inundate the service to the detriment of others.
- Can a self-referral model which is predominantly an adult one be applied to children ?
- There are legal implications to self-referral. It should be a collaboration system instead.
- Self-referral needs clarification at a national level.

Response - Whilst there are potential problems with a service which allows self-referral WAG believes that there is sufficient evidence to suggest that a service which allows an element of self-referral can be highly effective and wishes to adopt this approach as far as possible to enable the greatest possible access for children and young people. This aspect will however need careful ongoing monitoring particularly in setting-up new services.

- There is no mention of the role of the parent.

Response – One of the principles highlights that counsellors will need to work with parents. The strategy also recognises there is a need to provide information to parents and others on the nature and principles of a school counselling service.

- The counselling space should be appropriate.

Response – This is covered in the second of the outcomes for the strategy.

- Assessments should be based on established links in order to prevent duplication of resources.

Response – This is included within a general statement within the 10<sup>th</sup> objective but will be brought out more clearly in the final strategy and in additional guidance.

- Current lack of Welsh speaking counsellors and those speaking ethnic minority languages will make it difficult to fulfil the principle of language of choice.
- Services using sign language will need to be available for those with hearing impairments

Response – 'As far as possible' has been added to the relevant principle to reflect the difficulties in securing a wide enough spread of languages. In developing counselling services WAG will work with local authorities to identify whether a collaborative regional approach can be taken to provide services for those pupils with specific needs.

- How realistic is it to place the onus on the school to be accountable for the service ? Schools will need guidelines on how best to do this.

Response – The principle refers to the service being held accountable by the school or local authority. Guidance will be provided to schools and local authorities. It is envisaged that in most areas local authorities will undertake the role of managing schools' counselling services and monitoring their effectiveness.

- More emphasis needs to be placed on the importance of a positive school ethos which is non-stigmatising as without this the service will fail.

Response – The 2<sup>nd</sup> principle will be amended to reflect this.

- Links to Healthy Schools Schemes need to be made.

Response - The principles are intended to be general to allow for changes over time and to encompass all initiatives. The Healthy Schools Scheme is a key initiative which the counselling strategy will need to work alongside. This is highlighted within the text of the Strategy.

- The 'Western' model of counselling may not be suitable for many ethnic minority children and young people, particularly asylum-seekers. The need to support asylum seeking and refugee children will be particularly marked in some areas.

Response – At present the 'Western model' is the universal method of counselling services in the UK. Over time consideration will be given as to whether this can be adapted for minority ethnic pupils. The specific needs of asylum-seeking and refugee children are recognised but may be better dealt with by community-based counselling services offered in the areas of most need rather than school-based services.

- Counsellors should be subject to statutory regulation.

Response - The Department of Health is considering introducing statutory regulation of counsellors and the Welsh Assembly Government will follow those developments closely. In the meantime schools and local authorities will need to ensure that any counsellors who provide them with services are suitably qualified.

- Need to equip teachers with counselling skills.

Response - This is not the main aim of the strategy as it is focussing on formal counselling provided by qualified counsellors. However it is recognised that

formal counselling should sit within a positive whole-school approach which would include teachers and other school staff having suitable listening skills.

- Counsellors should be required to have a specialism in working with children and young people.

Response – This has been added to the last principle.

- Religion should be included in the 3rd principle

Response – the 3<sup>rd</sup> principle has been amended.



**The revised principles taking account of the consultation responses are as follows:** (additions are underlined and deletions struck through)

## **Principles**

- A service that is child-centred and seeks to respond to the diversity of issues, and challenges faced by young people in society.
- A service that is non-stigmatising and sits within an emotionally supportive school ethos.
- A service that caters for the diversity of individuals' race, gender, disability, culture, religion and belief and sexual orientation.
- A service that as far as possible allows individuals to use the language of their choice, including sign language.
- A service that links with school policies for pupils' well-being and learning outcomes.
- A service that promotes the participation of children and young people in its design and delivery and respects their rights as identified in the United Nations Convention on the Rights of the Child.
- A service which has the welfare and protection of children and young people as its focus and engages counsellors who will work in partnership with schools, parents, families and other agencies to safeguard children and young people.
- A service which enables children and young people to self-refer.
- A service which requires the consent of children and young people.-
- A service that is confidential while working within the boundaries of child protection and independent of the teaching role of the school, though held accountable by the school or local authority for overall delivery of services to pupils.
- A service that gives children and young people confidence that their problems will not be shared without their knowledge and agreement and subject to the boundaries of child protection.
- A service that addresses local needs, uses staff qualified for working with children and adopts a framework of good practice.

- A service that is given appropriate levels of funding over a long term.
- As service that is continually monitored and evaluated.
- **Q3. Are these the right objectives ? If not what changes would you suggest ?**

	<b>No. of responses</b>	<b>%</b>
Yes	54	92
No	1	2
Unsure	4	7
No answer	4	
Total responses	59	

Only one of the respondents felt that the objectives weren't broadly right. This was because they felt that there was a need for more clear-cut responsibilities and actions. Many of the comments offered on the objectives related to more specific questions on the practicalities of implementing the strategy

#### Key points raised

- Terminology should reflect the general nature of children's distress.

Response – Wording of Objective 1 will be amended.

- Counselling services must complement the work already taking place.

Response – Objective 10 aims to capture this. This will be amended slightly.

- No clear line between principles, objectives and outcomes. Objectives are not SMART.

Response – There is often debate on the distinction between principles, objectives, outputs and outcomes. The intention of the Principles is to set-out a framework in which all work on the strategy will fit. The Objectives aim to set out the key areas of development and the Outcomes the result in terms of the experience of and effect on children and young people. The Objectives are felt to be specific, attainable and realistic and many of them measurable. Timetables

are not included as more work needs to be undertaken to assess realistic timescales. However, the actions highlighted within the strategy contain timescales.

- Reference needs to be made to primary schools

Response – An objective has been added to reflect this.

- Add objective about developing emotionally literate schools and a challenging school ethos.

Response – Whilst this is a broad aim which WAG agrees with it is not an objective specifically for the Counselling Strategy. It will be dealt with by other Assembly Government initiatives to which the Strategy will need to link.

- Improve the system of early identification of young people who are experiencing mental health problems.

Response – This is dealt with in the 2<sup>nd</sup> Outcome.

- How will young people be questioned on their opinions ?
- Referral protocols and close-working arrangements necessary.
- Needs to be agreement on funding and responsibilities between agencies.
- Clear guidelines are required on confidentiality.

Response – These are all important aspects which will be dealt with in more detail in guidance which will be developed by WAG.

- The document does not address record-keeping

Response – The last but one objective has been amended to reflect this. This will also be reflected in the final version of the Strategy.

**The revised objectives taking account of the consultation responses are as follows:** (additions are underlined and deletions struck through)

## **Objectives**

- To make it acceptable and easier for young people to ask for help when they are emotionally distressed. ~~worried, confused or afraid~~.
- To develop clear definitions of confidentiality.
- To develop services that are confidential, promoted to young people as independent of formal school structures i.e. teaching staff and school management: and are readily accessible
- To improve access to services for children and young people who are experiencing ~~mental health problems~~ emotional distress.
- To disseminate information on effective models of school-based counselling services for young people ~~and~~ of secondary school age, drawn from within and outside Wales.
- To develop pilot approaches for working in primary schools and explore models of working on a cluster basis between secondary and primary schools, particularly for pupils in year 6.
- To raise awareness and provide information and good practice guidance on delivering counselling services through schools for counsellors, local authorities, Children and Young People's Partnerships, health services, school leaders including governors and leaders of other educational settings.
- To provide information for parents, young people and school staff on the nature and principles of a school counselling service
- To develop partnership and inter agency collaborative working in planning and delivery of counselling services in schools.
- To build safeguarding and child protection into all services that provide counselling in schools to children and young people.
- To be compatible with other ~~policies, plans and initiatives providing~~ services for children and young people and associated plans, policies and initiatives to ensure a holistic approach is taken in meeting their needs.

- To monitor and evaluate the effectiveness ~~development~~ of counselling services that are based in schools and ensure that record-keeping is sufficiently robust.
- To ensure independence and high quality counselling services through appropriate professional counselling supervision.

**Q4. Are these the right outcomes ? If not what changes would you suggest ?**

	<b>No. of responses</b>	<b>%</b>
Yes	53	85
No	4	6
Unsure	5	8
No answer	1	
Total responses	62	

Many of the responses received for this question dealt with general points related to the practical delivery of services rather than being focused specifically on the outcomes. Some of these are reflected below. Other comments not represented below will be used to refine the final strategy and to develop guidance and the process of implementation of the Strategy.

#### Key points raised

- Last outcome should relate to improved quality of life / emotional health rather than just learning outcomes. The service should not be judged merely on an improvement in learning outcomes.

Response – Last outcome amended to reflect these points.

- Concern over the use of 'independence'. Managed within school but with external supervision and a code of ethics and accountability.

Response – The outcome has been amended to remove reference to 'independent'. The reasons for so doing were discussed previously in relation to the principles.

- The availability of specialist support is an issue.

Response - In implementing the Strategy it will be necessary to assess how the lack of specialist support impacts on the effectiveness of a counselling service and where the required specialist support is not available it may be necessary to hold inter-agency discussions to consider how this might be best resolved.

- Should counsellors provide 'therapeutic' interventions or refer on to CAMHS.

Response – It is intended that counsellors will provide therapeutic interventions. The extent to which they are able to do this will be determined by the needs of children and young people and the qualifications and expertise of the counsellor.

- Outcome should be for children to have access to someone they can talk to face-to-face, via e-mail landline or mobile.

Response – This is broadly included in terms of children and young people having 'easy access' to someone they can talk to. Consideration will be given to how counselling services might be delivered in a variety of forms.

- Disagreement with outcome 5 – this means counsellors have an assessment tool and this becomes part of a referral process within education.

Response – This was not the intention of the outcome. The terms assess and referral were not intended to indicate a formal process but to indicate that counsellors would work alongside existing support services such as the educational psychology service.

- One of the outcomes should be a positive perception of the counselling service within a school.

Response – An outcome has been added on this.

- The outcomes should state that services can cater for all pupils needs including e.g. children and young people with special needs, disability, disfigurement or from ethnic minorities including asylum seekers and refugees.
- There also needs to be an emphasis on all children and young people throughout Wales having access to a service.

Response – An outcome has been added on these aspects. The need for services to be able to cater for all children and young people's needs is also set out as a principle

- Further detail is required on how these outcomes will be measured. Need to develop context-based indicators.

Response – This will be set out in guidance issued by WAG.

- Does not fully recognise the contribution made by other services such as educational psychology.

Response - Outcome 5 is intended to highlight the input of educational psychology services amongst other support services. This is explained in more detail in the text of the Strategy.

**The revised outcomes taking account of the consultation responses are as follows:** (additions are underlined and deletions struck through)

## **Outcomes**

- Children and young people have easy and confidential access to someone they can talk to about a range of matters that may affect their emotional health and well-being. ~~who is independent of the school in which any such service is based.~~
- Children and young people have a positive view of counselling services in schools and believe that they are working in their best interests.
- Children and young people who experience emotional problems are able to gain access to assistance and assessment, in the early stages in an environment that is supportive, familiar and comfortable
- Children and young people have access to support at the transition stages, such as, from primary to secondary school or from school to higher/further education or the world of work.
- Children and young people have access to appropriately trained counsellors who are able to provide therapeutic approaches to deal with the emotional / mental health problems that they experience.
- Children and young people have access to appropriately trained counsellors who are able to assess when they should be referred to the education support services for consideration of their need for more specialised services.
- Children and young people can access appropriate guidance to empower them to access practical help e.g. on substance misuse, sexual health, domestic abuse, legal aspects or advocacy and complaints.
- Children and young people experience improved emotional health and well-being to enable them to reduce the effect of emotional and mental health problems as a barrier to learning. ~~learning outcomes.~~
- Children and young people throughout Wales have equal access to a counselling service which is able to respond to their individual needs.



**Q5. Do you consider that this assessment of costs is of the right order ?  
Would costs differ if services were offered out of school hours ?**

	<b>No. of responses</b>	<b>%</b>
Yes	15	31
No	14	29
Unsure	20	41
No answer	14	
Total responses	49	

Less than half of the respondents felt able to offer a view on the likely costs as they did not have sufficient knowledge. Opinion was split almost in half over whether the assessed costs were of the right order. Opinions were also divided as to whether costs would differ if services were offered out of school hours with a higher proportion feeling that costs would be greater.

**Key points raised**

- Costs would be staggered over several years as qualified staff become available
- Need to consider set-up costs as extra in first year.
- Costs must include cost of supervision.
- Costs would be less through buying in services on a session-by-session basis rather than having a counsellor in-house.
- Counsellors need to be available 52 weeks of a year.
- Out of school hours provision is important as it is a way of children and young people being able to attend counselling without their peers knowing. However it would also make it more difficult to keep it a secret from their parents.
- There is a far higher proportion of 'did-not-attends' for out-of-school hours services which would add to the overall cost of the service.
- Out-of-school hours services would be particularly difficult for children in rural areas to attend due to limited public transport and greater travelling distances.
- Costs would be higher if out-of-school hours services were offered. Issues of running sessions in the evening e.g., recruiting counsellors, time constraints, access problems, other commitments, transport, CAHMS not available, therefore should stay in school time.
- There would be cost savings if a more flexible approach was taken with a variety of services e.g. online, telephone and group counselling.

**Assembly Government Response**

It is not possible to draw conclusions from the consultation responses regarding the likely costs of the Strategy. This is an aspect which will need further work as the Strategy is worked out on the basis of funding already approved.

There will be initial set-up costs in the first year of implementing the Strategy due to the need to establish counselling spaces, to develop working relationships, establish procedures and promote the service.

In light of the consultation responses the Assembly Government will ask local authorities to consider their local needs and assess whether they believe it is desirable and effective to provide out-of-school hours services, including during school holidays.

**Q6. Do you feel that an expansion in school-based counselling services will lead to a reduction in the number of children and young people being referred to more specialised services ? On what evidence do you base your response ?**

**Q7. Do you feel that an expansion in school-based counselling services will lead to an increase in the number of children and young people being referred to more specialised services ? On what evidence do you base your response ?**

<b>Q6. Reduction in referral ?</b>			<b>Q7. Increase in referral ?</b>		
	<b>No. of responses</b>	<b>%</b>		<b>No. of responses</b>	<b>%</b>
Yes	25	58	Yes	20	42
No	8	19	No	15	31
Unsure	10	23	Unsure	13	27
No answer	20		No answer	15	
Total responses	43		Total responses	48	

#### Key points raised

- Almost impossible to predict results.
- Intervention at an earlier stage should avoid later referrals.
- There is some evidence from primary care that the number of onward referrals is reduced.
- There will be an increase in referral due to the identification of previously unmet need.
- Initially there will be a 'bow-wave' increase in referral but over time there will be a reduction as earlier intervention avoids later and inappropriate referrals.
- It will lead to more appropriate referrals so a greater number of referrals will be acted upon more quickly and effectively.
- There may be an increase but this may be minimal as very few referrals occur currently.
- Will need more primary mental health workers to triage and offer interventions quickly once need is identified to ensure immediate access to CAMHS as appropriate.
- 'Reverse referrals' also occur in some developed services whereby specialist CAMHS refer children with less complex needs to school counselling services.

### Assembly Government Response

From the responses it is difficult to gauge whether there will be an increase in onward referrals to specialist CAMHS services as a result of expanding school counselling services, as shown by the differing opinions of those currently providing counselling services. This suggests that the number of onward referrals may also be dependent on the way in which the counselling is provided.

For this reason the Assembly Government proposes monitoring the amount of onward referral closely in the first year of new funding before deciding what future approach to funding should be taken. The Assembly will consider with Children and Young People's Partnerships the possibility of moving towards greater pooling of budgets locally, particularly between health services and local authorities to allow greater flexibility of provision and improve joint-working.

The need for sufficient primary mental health workers to support the counselling strategy is recognised and the Assembly Government will consider how this might be addressed.

#### **Q8. Do you agree that initial action should focus on these issues ?**

	<b>No. of responses</b>	<b>%</b>
Yes	44	81
No	0	0
Unsure	10	19
No answer	9	
Total responses	54	

The actions were universally supported by those who offered a view and there were a limited number of comments other than those already reflected previously for other questions.

### Key points raised

- I would be concerned if a 'one size fits all' stance is taken.

Response – The aim is to provide a framework setting out effective and safe practices within which local authorities can develop their own model of delivery based on their local needs.

- Little reference to young people's views being sought.
- Delighted with consultation with children.

Response – The principles include a statement that children and young people should be involved in the design of services. The research project into current provision within Wales involved obtaining children and young people's views.

- There is already some research evaluating different types of counselling so don't reinvent the wheel.
- Begin by establishing what services exist in Wales.

Response – This was the aim behind commissioning the research project undertaken by BACP and published in November 2007.

- A focus needs to be added regarding the ability of schools to set-up such a service in terms of room availability etc.

Response – This is included in the outcomes but will also be included in guidance and in local authorities' proposals for use of new funding.

- Protocols need to address governance and line management.

Response – This will be emphasised in guidance.

- Look at existing needs and collect stats on how many young people are referred into services to show how many counsellors are needed per head of the school population and where.

Response – This information will be collected from local authorities as a condition of the new funding which they will receive to develop services.

- The first phase of implementation must include developing protocols for inter-agency working.

Response – Agreed, this will be added to the list currently shown in paragraph 4.25 of the draft Strategy.

- Concerned about appointing inexperienced counsellors through a staff shortage.

Response – The level of qualification of counsellors will need careful monitoring during the expansion of services.

**Q9. Do you have comments on any of the individual actions proposed or their timings ?**

	<b>No. of responses</b>	<b>%</b>
Yes	43	68
No	20	32
Unsure	0	0
No answer	0	
Total responses	63	

Many responses highlighted that several of the timings of the actions needed amending because they were no longer achievable, most notably the recruitment of the coordinator and the research project.

Key points raised

- What is the timescale for actually putting counsellors in place in schools ?
- Danger of time-lag between launching the initiative and being able to provide the professionals to deliver the service.

Response – The aim is to have counsellors in place as soon as possible but there will be a limit to the extent to which this will be possible due to the insufficient number of trained counsellors currently available. As training new counsellors will take around 4 years the most optimistic view would be that full provision will take 4 years. However it is unlikely that all the new counsellors required will begin training in year one of implementation of the Strategy. At this stage it is difficult to estimate how long it will take to get to the full quota of counsellors required.

- If counsellors are involved in training school staff this will reduce the time they have to spend with individual children and young people. Use training providers instead.

Response – There will be a need for counsellors, as a minimum, to provide training to staff on how they should interact with and refer to the school's counselling service. The extent to which they are involved in wider training of school staff on emotional and mental health but will have to take account of the need to provide a sufficient number of hours of direct services to children and young people as well as the availability of other services which could undertake this work.

- There are insufficient trained counsellors so maybe we should build on existing training and train school nurses.

Response – The final Strategy will take more account of the school nurses' role in emotional health in schools and their interaction with school counsellors. This is particularly relevant in light of the One-Wales commitment for a family nurse per secondary school in Wales.

- Strategy should have been written after the research and evaluation stage.

Response – On balance the Assembly decided to consult on a draft strategy based on an initial scoping report so as not to lose any momentum in implementing the Strategy. The final Strategy will be informed by the research project undertaken by the BACP and published in November 2007.

- It is essential that there is training concerning disfigurement.

Response – This will be added to the list of elements to be covered in training currently highlighted in para 4.12 of the Draft Strategy

- Ensure Estyn has expertise to make assessments.

Response – WAG will work with Estyn to consider how the existence of counselling services should be taken into account in LEA and school inspection and what expertise would be needed to make assessments.

- Need to make an effort to recruit and train counsellors from black and ethnic minority groups.

Response – The need to recruit and train new counsellors will be promoted through a variety of approaches to ensure that all under-represented groups are engaged.

- Authorities who start from a low base should be recognised in financial allocation.

Response – Whilst it will be necessary to ensure as far as possible that all local authorities are brought up to a similar level of provision, consideration will also need to be given to not financially ‘punishing’ local authorities and schools who already have counselling services funded from their current budgets.



## **6. NEXT STAGES**

The Strategy will be revised in light of the consultation responses and taking into account the research into the current provision undertaken on behalf of the Welsh Assembly Government by the BACP (published in November 2007). It is intended that the final version of the Strategy will be published in early summer 2008.

In the meantime discussions will take place between the Welsh Assembly Government, the WLGA, local authorities, health services and other partners about the distribution and use of the funding available to take forward the strategy in 2008-09

A number of the actions identified in the Draft Strategy will also be taken forward, including the employment of a Coordinator to take forward the Strategy.

The Steering Group set-up to advise on the development of the Strategy will have a key role to play both in agreeing the final Strategy and the criteria for use of the funding. It is envisaged that they will remain the key group for advising the Assembly Government on the implementation of the Strategy.

## **ANNEX: LIST OF RESPONDEES**

British Association of Counselling and Psychotherapy (BACP)  
Baden Powell Primary School  
Barry Comprehensive School  
Blaenau Gwent Children and Young People's Framework Partnership  
Bridgend CBC Educational Psychology Service  
Bridgend County Borough Council  
Caerau Children and Young People's Project  
Bro Morgannwg NHS Trust  
British Psychological Society  
Bryn Celynnog Comprehensive School  
C4YP  
Caerphilly CBC, Behaviour Support, Caerphilly Inclusion Services  
Caerphilly CBC, Social Services Department,  
Caerphilly Children and Young People's Framework Partnership  
Cardiff County Council, education department  
Carmarthenshire County Council Youth Service  
Carmarthenshire Youth and Children's Association  
Changing Faces Cymru  
Changing Patterns  
Churches' Child Protection Advisory Service  
City and Council of Swansea  
Contin You Cymru  
Davies, J, Counsellor, Denbighshire  
Denbighshire CBC  
Ebbw Vale Comprehensive School  
Face 2 Face Counselling Project, Monmouthshire Youth Service  
Governors Wales  
Llanrumney High School  
Merthyr Tydfil CBC Local Authority  
National Association of Principal Educational Psychologists in Wales  
NCH Cymru  
Neath Port Talbot Council  
Neath Port Talbot CBC - Communities First  
Neath Port Talbot Parenting Matters  
North Wales Nursing and Midwifery Committee  
NSPCC Cymru  
NUT Cymru  
Pembrokeshire Young People's Partnership  
Pencae Primary School  
Pontyclun Primary School  
Pontypridd and Rhondda NHS Trust  
Powys Children and Young People's Partnership  
Rhondda Cynon Taf Local Authority

Rhondda Cynon Taf and Merthyr Tydfil Educational and Child Psychology Service  
RNID Cymru  
Sandycroft C. P. School  
Save the Children  
St David's College  
Teens in Crisis  
Vale of Glamorgan Council  
Vale of Glamorgan Youth Service  
Welsh Assembly Government Ministerial Advisory Sub-group on Ethnic and Cultural Diversity  
Welsh Assembly Government Ministerial Advisory Sub-group on Children and Young People's Participation  
Welsh Language Board  
WLGA  
Wrexham County Borough Council  
Wrexham Local Health Board  
Young People's Counselling Service  
Ysgol Gymraeg Brynsierfel  
Ysgol Gynradd Llangadog  
Ysgol Y Rhos

Confidential response from a special school.