
Ymateb i Ymgynghoriad / Consultation Response

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Pwnc / Subject:	Draft school and community-based counselling operating toolkit

Background information about Estyn

Estyn is the Office of Her Majesty's Inspectorate for Education and Training in Wales. As a Crown body, Estyn is independent of the Welsh Government.

Estyn's principal aim is to raise the standards and quality education and training in Wales. This is primarily set out in the Learning and Skills Act 2000 and the Education Act 2005. In exercising its functions, Estyn must give regard to the:

- Quality of education and training in Wales;
- Extent to which education and training meets the needs of learners;
- Educational standards achieved by education and training providers in Wales;
- Quality of leadership and management of those education and training providers;
- Spiritual, moral, social and cultural development of learners; and,
- Contribution made to the well-being of learners.

Estyn's remit includes (but is not exclusive to) nurseries and non-maintained settings, primary schools, secondary schools, independent schools, pupil referrals units, further education, adult community learning, local government education services, work-based learning, and teacher education and training.

Estyn may give advice to the Assembly on any matter connected to education and training in Wales. To achieve excellence for learners, Estyn has set three strategic objectives:

- Provide accountability to service users on the quality and standards of education and training in Wales;
- Inform the development of national policy by the Welsh Government;
- Build capacity for improvement of the education and training system in Wales.

This response is not confidential.

Introduction

We welcome the new toolkit, which provides helpful, updated guidance for all partners involved in counselling services. We have identified three areas where the toolkit could be further improved:

- While the toolkit provides helpful guidance on working with some vulnerable groups, this section could be extended to cover all vulnerable groups.
- The toolkit is clear that counselling services should be universally available to Year 6 pupils, but does not offer specific guidance on providing services in primary schools.
- The toolkit would benefit from guidance on service evaluation, as local authorities and their services (whether provided directly or commissioned) need to improve the quality of their service evaluation.

Consultation Questions

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.

Supporting comments

There are three areas where the toolkit could be improved.

To promote consistency of provision

1. The section headed 'Outcome monitoring/service evaluation' (pages p70-71) is focused on monitoring outcomes and provides no guidance on service evaluation. Service evaluation needs to improve. In discussions with local authorities, we often find that they do not evaluate their service well enough. They do not ask questions about the data available. 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). Services should consider differences in service use and impact by individual school in order to identify potential issues. We rarely find local authorities using such information to challenge the quality and impact of the service being provided or to inform future service planning or commissioning.

To promote equity of access

2. The section headed 'Other groups of children and young people with specific needs' (pages 20-22) 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.
3. 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' 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?

Agree	<input checked="" type="checkbox"/>	Disagree	<input type="checkbox"/>	Neither agree nor disagree	<input type="checkbox"/>
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Supporting comments

Agree, but we would recommend adding to the toolkit as detailed in our response to question 1.

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?

Supporting comments

Agree, but we would recommend adding to the toolkit as detailed in our response to question 1.

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?

Supporting comments

It may be useful to provide support on service evaluation for providers and commissioners, and encourage sharing of current practice in this respect.

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

Question 5 – We would like to know your views on the effects that the *Draft school and community-based counselling operating toolkit* has on the Welsh language, specifically on:

- i) opportunities for people to use Welsh
- ii) treating the Welsh language no less favourably than the English language.

What effects do you think there would be? How could the positive effects be increased, or negative effects be mitigated?

Supporting comments

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.

Question 6 – Please also explain how you believe the proposed toolkit could be formulated or changed so as to have:

- i) positive effects or increased positive effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language
- ii) no adverse effects on opportunities for people to use the Welsh language and on treating the Welsh language no less favourably than the English language.

Supporting comments

The toolkit is very clear about expectations in relation to Welsh language requirements.

The section on service evaluation could recommend that service providers and commissioners monitor and evaluate services against these requirements.

Question 7 – We have asked a number of specific questions. If you have any related issues which we have not specifically addressed, please use this space to report them.

In our report '[Healthy and happy](#)' (June 2019) we included references to counselling services. We quote these below and offer comments with respect to how well these are addressed in the revised toolkit.

“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.” (paragraph 69)

We note that the revised toolkit includes clear guidance to promote a suitable environment for counselling services provided in schools.

“All secondary schools host an independent counselling service provided, or commissioned, by their local authority. In a few cases, school staff control who accesses the service, despite access to the service being an equitable entitlement for all pupils in Wales.” (paragraph 86)

We note that the revised toolkit is clear that the member of staff who has the responsibility for making contact with the counselling service “does not take a gatekeeper role for referrals as this is the sole responsibility of the service.”

“Depending on the local authority, primary schools sometimes have access to counselling services for Year 6 pupils and occasionally for younger pupils. Primary schools also sometimes have access to other therapeutic services, again depending on what is available locally. However, primary schools generally struggle to access counselling or other therapeutic services at the time of need for pupils following a bereavement or other traumatic circumstance.” (paragraph 86)

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. Given the current situation, it may be useful to strengthen the toolkit to ensure equity across Wales for Year 6 pupils.

Responses to consultations are likely to be made public, on the internet or in a report. If you would prefer your response to remain anonymous, please tick here: