



## Youth Access' feedback to the HPC consultation on the statutory regulation of psychotherapists and counsellors

### **Back ground information on Youth Access and Young Peoples' Counselling Services in the VCS and the Statutory Youth Sector**

Youth Access is the national membership organisation for Young People's Information, Advice, Counselling and Support services (YIACS).

As the national umbrella body for Young People's Information, Advice, Counselling and Support services (YIACS), Youth Access believes all young people have a right to locally accessible, free, confidential and impartial information, advice, counselling and support. We work in partnership with our members, The National Youth Agency and other organisations to promote the development of high quality, young people-centered services.

Youth Access has over two hundred member agencies (YIACS) working with thousands of young people across the country every day, dealing with over a million enquires a year on issues as diverse as sexual health, emotional and mental health, relationships, homelessness and benefits.

YIACS are the largest provider of youth counselling services across the country. Agencies have between 10 and 60 staff per organisation. Our member agencies provide free, discreet, self-referral counselling services in one stop shop settings as well as wrap around services such as advice, information, sexual health and specialist support.

Youth Access promotes young people's services that:

- respect the dignity and self-worth of each young person
- respect and value individual differences
- recognise and are sensitive to the growing autonomy of each young person
- respect every young person's right to be a voluntary participant in any helping process
- Recognise the potential of each young person.

Youth Access works towards good outcomes for young people by working with and through its members and other organisations to secure provision that:

- Responds to the information, advice, counselling and support needs of young people
- Achieves high standards of ethics and good practice
- Demonstrates a commitment to evidence-based practice
- Advocates for individual and groups of young people
- Involves and encourages the participation of young people

### **The YIACS Offer**

Youth Access membership of Young People's Information, Advice, Counselling and Support Services (YIACS) are an important element in the local delivery of integrated youth support services. They combine both prevention and early intervention services.

Open to all young people, YIACS offer a universal access point to target and specialist services, enabling them to make an important contribution to local offers of Information, Advice and Guidance and Targeted Youth Support.

YIACS have their roots in youth work, yet have evolved a distinctive set of values, principles and standards. By drawing on the different traditions of youth work, advice work and counselling, YIACS have developed an approach, which works successfully with young people. YIACS can offer young people:

- Simple and easy access to information, advice, counselling and support – either through self-referral or with the support of friends, family or another professional.
- A range of free services “under one roof” delivered by professional and trained staff working in multi-disciplinary teams who understand young people and who have good links with other services that young people might also want help to access.
- A young person-friendly environment offering a flexible mix of drop in and appointments, and with help available on a one off, occasional or regular basis, and over the short, medium and long term.
- Impartial help that works alongside young people at their own pace; helping each young person to identify and understand their unique needs and aspirations, supporting them to make their decisions and achieve their goals.
- Respect and recognition of every young person’s right to privacy and confidentiality within a framework that promotes the safety and well-being of all young people.

- Help to negotiate and reduce the gaps and age barriers present in other services by being available to a broad age range of young people, often up to 25 years.
- Accountable services that secure young people's participation and involvement in supporting and evaluating their continued quality and effectiveness and ensuring they deliver the best outcomes for young people.

## **Evidence**

Since 1999, Youth Access have initiated and contributed to a number of emotional and mental health research projects and developed a range of evidence in relation to the provision of youth counselling services. The starting point for much of this work was the longstanding concern that the services in our membership were often poorly understood or recognised in relation to their response to young people's mental health needs. In addition, relationships between YIACS and statutory mental health services were too often characterised as at best indifferent and at worst as hostile. While this situation presented immediate problems for YIACS, it was and to a considerable extent continues to be, young people who lose out.

(See references attached at end)

## **Youth Access' response to the consultation questions**

### **1. Do you agree that the Register should be structured to differentiate between psychotherapists and counsellors? If not, why not?**

Youth Access does not agree with the criteria recommended by the PLG to support this distinction and the likely confusion this would result in, for the public.

The proposed differentiation appears neither to be well founded, or based on any real evidence of difference in the context of how these practitioners work with the emotional and mental health needs of young people seeking help. The distinctions need to relate to public protection and understanding. In the context of youth counselling that is the public protection of young people over any professional protectionism.

The word 'counsellor/ing' is:

- Widely understood by the public, and universally used by commissioners, providers and young people within the Children, Family and Young People's sector.
- Used in the name of current youth counselling services for example, No. 5 Youth Counselling and Information; In Touch Youth Counselling Service (Young Devon); and Contact Youth Counselling Service. Or in on-line and paper based youth counselling service information and discussions with young people about what counsellors can offer them.
- Almost always used by Youth Information, Advice, Counselling and Support Services YIACS (of which there are over 200 across the country) as an overarching word to describe a whole range of different therapeutic approaches and interventions, simply because 'counselling' is better understood by young people, and their families/carers.
- Universally used in children and young people's national policy. For example, the DCSF Targeted Youth Support Guidance to Commissioners (2007) provides a list of the sort of accessible services, of which youth counselling is one, to be commissioned by Children's Trusts as part of integrated services.

The recommended criteria for the distinction are unconvincing because:

- There is a huge range and level of training available. This makes the distinction even less clear, particularly for those working with young people who need a completely different level of knowledge,

skills, aptitude and context understanding for working with young people.

- It is not a reasonable assumption to make that a counsellor in a youth counselling setting, working with a young person is less able to conduct a counselling assessment to assess emotional and mental health, risk and/or any need for statutory mental health referral than a psychotherapist– it really is not that simple.
- The majority of practitioners complete adult counselling, psychotherapy and psychology training programmes. Youth Access plugs this gap by offering specialist CPD training to both counsellors and psychotherapists to ensure they have the right combination of knowledge and skills to equip them to work with the complexity of need presented in youth counselling settings including mental health.
- It is not clear that an evidence base exists to justify the proposed differential criteria. Youth Access has no knowledge of such an evidence base existing in the context of working with young people.

## **2. Do you agree that the Register should not differentiate between different modalities? If not, why not?**

Youth Access does agree because:

- A counsellor will be able to use a preceding adjective such as 'Integrative' counsellor, or 'Psychodynamic/psychotherapeutic' counsellor. Youth Counselling agencies will be able to continue to provide service information in an accessible and understandable way. Any other therapeutic interventions and approaches offered to young people can continue to be described under the broad accessible heading of 'Counselling'.
- In the Young People's Sector counsellors use a range of modalities and often use the term 'Integrative Counsellors'. Research findings (Young Minds, Mental Health Foundation, the former SEU, Youth Access and others) demonstrate that young people benefit from access to flexible and creative interventions rather than a one-size-modality fits all approach. Therefore, this recommendation is in the best interests of young people who will be able to continue to access flexible and multi-skilled practitioners.
- Youth counsellors will continue to practice using a responsive, creative, young person friendly and flexible approach that best meets the client's needs. Otherwise, youth counsellors would have to register under a whole range of different modalities in different parts of the register.

### **3. Do you think that the Register should differentiate between practitioners qualified to work with children and young people and those qualified to work with adults? If yes, why? If not, why not?**

Youth Access does support the register differentiating between counsellors qualified to work with children and young people and those qualified to work with adults.

It is widely accepted in national policy, research (DH, DCSF, Young Minds, Mental Health Foundation, the BMA, the RCP, Youth Access and from young people themselves that there are specific CORE competences, theory, knowledge, and a particular set of skills required to work with young people for example, adolescent development, brain development in young people, mental health problems specific to adolescence, information sharing, confidentiality, child protection as well as specific legislative requirements that the children and young peoples' workforce have to comply with.

Reasons for Youth Access' support include:

- This consultation is about future counselling training and the corresponding entry-level threshold for the children and young people's workforce. We understand that this proposal will not affect access to the register for the existing youth counselling workforce.

Qualification levels and post qualification CPD for the youth counselling workforce in an independent survey for Youth Access in 2008 included:

*"Counselling degree or diploma 73%, counselling certificate 39%, postgraduate counselling diploma 19%, psychology degree 5.50%. 9% had a qualification in an allied subject such as, psychology/psychotherapy." (CwDP independent survey, 2008)*

A snapshot of the YIACS youth counsellors' workforce CPD training showed counsellors undertaking training to work with young people in:

*"Child protection & safeguarding 21%, working with creativity 12%, suicide risk 9%, substance and alcohol misuse 19%, bereavement 11%, art therapy 7%, self harm 19%, eating disorders 11%, play therapy 6%, working with young people 14%, SEN 10%, attachment 5.5%, mental illness general 14%, CBT 10%, psychosis 3%, working with strong emotions and challenging behaviour, 14% abuse 9% domestic violence 3% and bullying 1%."*

- We recommend that the register allow dual registration for practitioners qualified for example, to work with both young people and adults or children and adults.

- As a result of the Green Paper Every Child Matters, the DCSF has set out the required knowledge and skills 'to practice' for everyone working in the Children's and Young People' workforce known as the Common Core. The Common CORE will soon become a NOS Unit (SfJ leading on Unit development).

The essential point here is that in order to work with young people, counsellors need a particular set of skills, theory, knowledge, aptitude and experience, very different to working with adults. For example,

*"Current understanding of the young person's brain points to the existence of a developmental period in which there is both an increased vulnerability to negative environmental experiences and enhanced receptivity to positive, including therapeutic and life experiences – both of which may carry long term consequences for adult life.<sup>1</sup>*

*Research suggests the brain is still developing up to the age of 25 and beyond, with the early adult years critical to the formation of self image, social skills and impulse control. The timing of the 'normal' maturation of brain structures suggest that society's expectations for young people's planning, organisational and self-regulatory capacities can be misplaced.<sup>2</sup>*

*There is accumulating evidence that the neuroplasticity of the developing brain, particularly during adolescence may be experience-dependent. This means the life experiences of each young person has a unique influence on the development of their brain and his/her current and future patterns of thinking, relating and behaving.<sup>3</sup>*

*Increased awareness of the complex changes in the developing brain carries major implications for the types of interventions and policies designed to improve outcomes for young people."*

(Commissioning Young People's Counselling Services, 2007)

In addition, again different to those working with non-vulnerable adults, the children and youth workforce have to meet the requirements of specific legislation. For example, The Safeguarding and Vulnerable Groups Act (2006), which has laid down the foundation of the new Vetting and Barring Scheme which aims to stop unsuitable people from working with children, young people and or vulnerable adults. This will result in a register for everyone paid or unpaid who is allowed to or barred from working with children, young people or vulnerable adults.

We recommend that the Vetting and Barring Scheme register should cross-cut with the HPC register to avoid young people and concerned

<sup>1</sup> Young Minds, (2006). A work in Progress: the adolescent and young adult brain. A briefing paper. London: Young Minds. ([http://www.youngminds.org.uk/sos\\_YM\\_AdolescentBrain.pdf](http://www.youngminds.org.uk/sos_YM_AdolescentBrain.pdf))

<sup>2</sup> Young Minds, (2006). Stressed out and Struggerling. Emerging Practice: Examples of mental health Services for 16-25 year-olds. Young Minds.

<sup>3</sup> Schore, A.N. (2001). The effects of early relational trauma on the right brain development, affect regulation and infant mental health. Infant Mental Health Journal 22 (1-2), pp. 201-269.

families having to locate a different register to decide whether the counsellor is safe (particularly when practitioners set themselves up in lone private practices where no additional employer safeguards can be exercised).

- The Children and Young People's workforce, particularly in the Voluntary and Community Sector (VCS) is under the spotlight with regard to current workforce skills, competencies and new vetting and safeguarding procedures.

Views held by some of the professional membership organisations for example:

*'that there are currently many professional development routes for people to specialise in working with children and young people and no evidence that any one route is more effective than another'*  
(BACP consultation recommendation to its membership 2009)

..are completely out of step with current policy and thinking, with regard to both good practice and the safety of children and young people in the delivery of emotional and mental health psychological interventions.

In addition, Youth Access's independent survey of its youth counselling workforce (CwDP 2008), across 107 agencies (response rate from Managers of YIACS 63 and counsellors 64%) provides evidence that contradicts the above suggestion.

Youth Counselling Service Managers identified a gap in training and qualification routes for counsellors working with young people and said that there is a:

*"Lack of affordable post qualification training since most certificate/diploma/degree courses are primarily adult focussed."*  
(CwDP research briefing 2008)

A recommendation arising from the above finding/s made at national consultation seminar held with the youth counselling workforce in July 2008 was the need to:

*"Redress the balance of largely adult-focussed counselling training to offer more on the theory, knowledge and skills of working with young people."*  
(CwDP research briefing 2008)

- In order to produce counsellors 'fit to practice' with young people aged 13 to 25 , it has therefore, been necessary for Youth Access to produce:
  - National core values and principles for setting up and delivering responsive, quality provision which delivers the right outcomes for young people

- National Quality Standards for the management, supervision, provision of and delivery of youth counselling with a 360 degree assessment tool including feedback from young people
- A national definition of counselling in the context of delivering counselling to young people
- An on-line induction for counsellors in to working with young people in young person friendly settings
- A post qualification package of professional CPD training for those practitioners trained to work with adults but who want to work with young people and who have not been able to access suitable training. For example with courses on:

- ❖ An introduction to working with young people
- ❖ Introduction to counselling young people
- ❖ Counselling assessment for case work supervisors
- ❖ Counselling assessment for counsellors
- ❖ Assessing and managing risk in counselling assessment for practitioners and supervisors
- ❖ Nurturing young people's mental health in counselling relationships
- ❖ Understanding identity, exploring differences & challenging prejudice
- ❖ Working with Trauma
- ❖ Building on young people's resilience through a solution focused approach
- ❖ Introduction to attachment theory and adolescence
- ❖ Working creatively with YP in the counselling relationship,
- ❖ Supervising youth counsellors
- ❖ Safeguarding

- We are currently in discussion with the University of East London to develop a course or module/s based on the Youth Access CPD training package for youth counsellors. In the very near future, we hope to have in place a validated course available to counsellors to train specifically to work with young people across the 13 to 25 age range.
- We anticipate that at the point the grandparenting arrangements end for the threshold entry level to the statutory register, that this training will be established and have had participants attending for at least a year.

We understand that there are also other courses in development for children and youth counsellors, initiated by the Tavistock and Nottingham Trent University.

*“We definitely think the register should differentiate. As a consequence of both a relative lack of economic power to effect change in young people’s situation and their immediate developmental challenges around identity/autonomy and separation from family, the work as a result presents very different challenges. As a consequence, working with young people demands far greater flexibility, skill and creativity in paying attention and respect to their vulnerability and need to feel some control and choice in the pace, style and modality of therapy.”*

(MAP Norwich, Youth Counselling Service Manager)

**4. Do you agree that ‘psychotherapist’ should become a protected title?  
If not, why not?**

Youth Access agrees

**5. Do you agree that ‘counsellor’ should become a protected title? If not, why not?**

Youth Access agrees

**6. Do you agree with the approach to dual registration outlined in the report? If not, why not?**

Youth Access agrees and believes strongly that:

- The principle of dual registration should also be extended to those counsellors in the children and youth sector workforce who been trained to work with adults and or children and or young people.

**7. How appropriate are the draft criteria for voluntary register transfers?**

They are appropriate to the aim.

**8. Do you have any comments on the outline process for identifying which transfers should transfer?**

Just one - that the HPC education and training committee should have proper representation across the appropriate areas of knowledge, skill and expertise with regard to making transfer decisions.

**9. What evidence might an organisation holding a voluntary register provide in order to support their submission?**

Organisations’ that transfer a register need to demonstrate that they are not acting out of self-interest. They need to show they are acting in the interest of protecting the public not purely their own.

**10. Do you agree that the grandparenting period for psychotherapists and counsellors should be set at two years in length?**

Youth Access thinks the grandparenting period may need to be longer than 2 years to run consistently with training courses that are due to complete the day the register opens. This could be 3 or 4 years.

**11. Do you think that the standards support the recommendation to differentiate between psychotherapists and counsellors?**

No as Youth Access' response indicates in Q1

**12. Do you think the standards are set at the threshold level for safe and effective practice? If not, why not?**

Youth Access does not think so because the standards do not differentiate. They are set for practitioners working with adults and do not include the required standards practitioners need for working with young people, highlighted previously (and in attached table).

Youth Access believes the proposed standards would put children and young people's safety and emotional and mental health at risk for a number of reasons. For example, the Children and Young People's (C+YPs) workforce are required to comply with Safeguarding Legislation and meet requirements of the Common Core.

- All counsellors in the C+YPs workforce will have to be vetted in order to comply with the requirements of Safeguarding legislation. The proposed standards as they stand could for example, allow practitioners in private practice to avoid these checks.
- The C+YPs workforce are required to have a particular set of skills, knowledge, aptitude and experience, very different to working with adults – not reflected in these standards.
- Counsellors working with young people must have for example, theoretical knowledge, skills and an understanding of young peoples' behaviour, development, brain development and adolescent specific mental illnesses. They need to be able to carry out assessments and provide appropriate interventions or know how to refer on to statutory CAMHS and ADMHS – again not covered in the standards.

Please see attached Table of Competencies for counsellors working with young people. The table also lists other specific guidance and legislation for the workforce that counsellors working with young people need to comply with or should adhere to.

**13. Are the draft standards applicable across modalities and applicable to work with different client groups?**

Youth Access thinks they are not for reasons stated previously

**14. Do you think there are any standards which should be added, amended or removed?**

Youth Access does and recommends:

- Standards for working with children and young people to be agreed - see attached Youth Access Table of Competencies for Youth Counsellors to inform standard development.
- The differentiating standards for counsellors and psychotherapists need to either be changed or removed.

**15. Do you agree that the level of English language proficiency should be set at level 7.0 of the International English Language Testing System (IELTS) with no element below 6.5 or equivalent? (Standard 1b.3)**

Youth Access does agree

**16. Do you agree that the threshold educational level for entry to the Register for counsellors should be set at level 5 on the National Qualifications Framework? If not, why not?**

Youth Access does not because:

- This consultation is about the future of counselling training and does not impact on the qualifications of the existing children and young people's workforce. Therefore, Youth Access recommends that future youth counsellors should be trained to a level 6 qualification.

**17. Do you agree that the threshold educational level for entry to the Register for psychotherapists should be set at level 7 on the National Qualifications Framework? If not, why not?**

Youth Access does not for the reasons provided previously. Future psychotherapists should be trained to a minimum level 6 qualification.

**18. Do you have any comments about the potential impact of the PLG's recommendations and the potential impact of statutory regulation?**

Additional Youth Access comments:

- Our member agencies YIACS, as current employers of youth counsellors and recruiters of volunteer counsellors would not employ an adult only trained counsellor to work with a young person. As employers they would expect the counsellor to have either: completed additional training to work with Young People; have a youth work qualification; have agreed to attend the agencies in house-training or will attend the Youth Access programme of CPD training and/or have the experience or combined training to match the above.
- Organisations like Youth Access have a moral duty to ensure that HPC understand and have access to the research evidence (referenced and attached) that the availability and level of current training courses for counsellors to work with young people is not adequate. In light of all the evidence and current policy in the C+YPs workforce the title, standards and the future threshold entry level for youth counsellors must be the right ones, necessary to protect Young People's wellbeing and emotional and mental health from unsafe, inadequately trained counsellors.

Please see attached the CwDP youth counselling workforce findings and recommendations on the current levels of the training, the gaps and what's needed.

**19. Do you have any comments about the potential implications of this work on the future regulation of other groups delivering psychological therapies?**

No

**20. Do you have any further comments?**

Not at the moment

## References Youth Access Counselling publications

### All youth Access publications can be downloaded at:

<http://www.youthaccess.org.uk/publications/>

#### BDBP

Wilson C, (2001). Breaking Down the Barriers Key Findings. London: Youth Access.

Wilson C, (2001). BDBP: Four Case Studies on partnership and joint working between young people's counselling services and SMHS. London: Youth Access.

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#### PTP

Taylor Mohammad F, Wilson C, (2003). Paths to Partnership, Key Findings. London: Youth Access 2003

#### A2C

Young K. Dr, (2005). Youth Access YIACS/CAMHS Survey. London: Youth Access.

Wilson C, (2006). Access to Counselling Key Findings Briefing. London: Youth Access.

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Wilson C, (2007). Commissioning Young People's Counselling Services in YIACS: a Toolkit for Managers and Fundraisers of Services. London: Youth Access.

#### CWDP

Street C. Dr, (2008). Youth Access YIACS Counselling Workforce Survey, young people's consultation and recommendations. London: Youth Access. (2008)

Wilson C, (2008). YIACS Counselling Workforce Key Findings Briefing for policy makers and for young people. London: Youth Access (2008)