

# Draft School and community-based counselling operating toolkit

## Consultation response form

Your name: Stuart Williams

Organisation (if applicable): NEU Cymru

e-mail/telephone number: stuart.williams@neu.org.uk

Your address: 18 Neptune Court, Vanguard Way, Cardiff. CF24 5PJ.

Responses should be returned by **18 December 2019** to

Health and Wellbeing in Schools  
Support for Learners Division  
The Education Directorate  
Welsh Government  
Cathays Park  
Cardiff  
CF10 3NQ

or completed electronically and sent to:

e-mail: [Mentalhealth.Schools@gov.wales](mailto:Mentalhealth.Schools@gov.wales)

### **About NEU Cymru**

The National Education Union Cymru (NEU Cymru) stands up for the future of education. It brings together the voices of teachers, lecturers, support staff and leaders working in maintained and independent schools and colleges to form the largest education union in Wales.

The National Education Union is affiliated to the Trades Union Congress (TUC), European Trade Union Committee for Education (ETUCE) and Education International (EI). It is not affiliated to any political party and seeks to work constructively with all the main political parties.

Together, we'll shape the future of education.

**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**

Background and Context – Purpose (page 7)

The first sentence in this section, stating that headteachers and governing bodies have day-to-day responsibility for mental health issues in schools is wholly inappropriate. Legal requirements arising from the School Teachers’ Pay and Conditions Document<sup>1</sup> 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”<sup>2</sup>, therefore this statement needs to be amended to reflect this.

This is also stated in the Department for Education’s “Mental health and behaviour in schools Guidance – November 2018” where it states, “schools are required to produce a range of policies which can be used to promote and support mental health and wellbeing, either as a statutory requirement or good practice as recommended by DfE.”

Primarily, mental health issues are the responsibility of the health service, and the experts within it.

1 – Page 42, 46.6

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/832634/School\\_teachers\\_pay\\_and\\_conditions\\_2019.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/832634/School_teachers_pay_and_conditions_2019.pdf)

2 – Page 1, point 2

<https://gov.wales/sites/default/files/publications/2018-12/thinking-positively-emotional-health-and-well-being-in-schools-and-early-years-settings.pdf>

**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?

<b>Agree</b>	✓	<b>Disagree</b>	<input type="checkbox"/>	<b>Neither agree nor disagree</b>	<input type="checkbox"/>
--------------	---	-----------------	--------------------------	-----------------------------------	--------------------------

**Supporting comments**

The content is appropriate and effective. However, 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.

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.

**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

#### Counsellor qualifications and experience Section

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.

#### Supervision of counsellors (page 32)

The first sentence of the 4<sup>th</sup> paragraph states, “*Counsellors should undertake clinical supervision with a supervisor...*” and further on in the paragraph it states, “*Therefore, it is best practice for the supervisor to have a qualification in consultative supervision or extensive professional supervision experience and training within a credible organisation.*”

We feel 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.

**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

#### Counselling as part of a whole-school and whole-system approach Section

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. This will be addressed in one of the What Matters Statements, namely, ‘How we process and respond to our experiences affects our mental health and emotional well-being’.

This training will ensure that they can deliver the best possible service to their learners, especially as there is evidence that well-being is strongly linked to educational outcomes. If the funding for this is not made available to schools, they will not be able to support their learners’ emotional health and well-being, and in turn they will not achieve their full educational potential.

In addition to this, 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.

#### Role of the school and link person

We would welcome assurances that those education professionals who will be responsible for implementing the new toolkit and being the link person in their schools will not see an increase in their current workload.

Workload is a significant cause of stress for the education profession, and we would not want the mental health of professionals to suffer because of the toolkit.

**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

The guidance will also be available in Welsh, for those Welsh medium and bilingual schools, and this will ensure that Welsh is treated no less favourably than English.

However, 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.

**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

See Question 5.

**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.

#### Resourcing

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.

It is important that children and young people have access to a counsellor in their preferred language. This not only should apply for Welsh and English, but for other languages as well as there are some very diverse and inclusive schools in Wales, especially in the National Asylum Support Service dispersal areas of Cardiff, Swansea, Newport, and Wrexham. Consideration needs to be given to what immediate action is required if there is no counsellor available in their language.

#### Funding

The day to day reality of the underfunding (and resourcing as mentioned above) of such services is that many young people will not be able to access the service at all, or only after an often-substantial period of waiting.

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: