



Llywodraeth Cymru
Welsh Government

Welsh Government Consultation: Overview of Responses



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

1. Introduction

Local authority counselling services for children and young people and Child and Adolescent Mental Health Services (CAMHS) are in the frontline in supporting children and young people's mental health and wellbeing. The Welsh Government consulted with stakeholders on collaborative working between the two services. The wider context for this is the Welsh Government strategy 'Together for Mental Health', which sets out the aim of people of all ages experiencing sustained improvement to their mental health and wellbeing as a result of cross-government commitment to all sectors working together.

Views were sought on draft guidance on 'Collaborative working between Child and Adolescent Mental Health Services (CAMHS) and local authorities' counselling service'. This report summarises the comments received during the public consultation and the subsequent amendments made: the more detailed responses are documented and retained by Welsh Government/published alongside this summary document. Following initial consultation workshops with stakeholders which informed the development of the draft guidelines, the online consultation began on 16 October 2015 and closed on 11 December 2015.

2. List of respondents

No	Organisation
1	Anon
2	Anon
3	The National Deaf Children's Society
4	North Wales CHC
5	Royal College of Nursing
6	Anon
7	Care Council for Wales
8	Cardiff University
9	Dr Gareth Price
10	Anon
11	Torfaen Schools Counselling Service
12	Aneurin Bevan Community Health Council
13	Anon
14	Conwy County Borough Council, Social Care and Education Services
15	Merthyr Tydfil CBC
16	Neath Port Talbot Council for Voluntary Services
17	Flintshire County Council
18	Caerphilly County Borough Council
19	Royal College of General Practitioners Wales
20	British Association for Counselling and Psychotherapy (BACP)
21	Adoption UK

No	Organisation
22	Llamau
23	National Adoption Service, Wales
24	Neath Port Talbot local authority counselling service (Jigsaw Counselling Service)
25	Royal College of Psychiatrists in Wales
26	Barnado's Cymru
27	SNAP Cymru
28	Tai Pawb
29	Denbighshire local authority counselling service
30	Anon
31	Children's Commissioner

Six respondents chose to keep their response confidential. Not all respondents answered the questions directly; some chose not to answer a particular question and others sent a summary of their views instead of the web-based form. The Welsh Government is grateful to those who took the time to respond to the consultation.

3. Key issues

Referral processes

A number of respondents cited the fact that across Wales not all counselling services can make referrals into CAMHS causing delays in assessment and intervention.

Welsh Government response: The draft guidance sets out that it is good practice for processes to be put in place so that counselling services can make referrals into CAMHS.

There were also calls for referral criteria for both services.

Welsh Government response: There are no specific referral criteria for counselling services, which should be accessible to pupils in Year 6 and 11 to 18 years olds that request the service. Specialist CAMHS support the much smaller numbers of young people with the highest needs. Referral criteria is one of the outcomes considered by the Together for Children and Young People's Specialist CAMHS work stream.

Non-statutory guidance

Some of the respondents wanted the guidance document to require collaborative working. This guidance cannot be made statutory as collaboration between the two services is not underpinned by current legislation., Nonetheless, in line with our prudent healthcare principles, the Welsh Government expects local authorities and CAMHS to have regard to the guidance and to take action to develop closer working relationships in order to benefit children and young people.

4. Matters outside the scope of the guidance

Some respondents wanted the guidance to incorporate other matters, including:

- the need better to publicise the counselling service;
- wider provision for children of refugee families;
- collaboration between other areas (e.g. between CAMHS and school staff, CAMHS and the educational psychology service, CAMHS and the third sector);
- the performance of counselling services, including a service comparison;
- supervision and training and the professional registration of counselling staff;
- how schools can recognise when a pupil requires support from counselling or CAMHS;
- the needs of children who are deaf or who have disabilities;
- CAMHS work on neurodevelopment cases and CAMHS workforce, education and training;
- minimum standards of provision of specialist services;
- the most prevalent issues referred to counselling¹;
- availability of school nurses;
- a third sector organisation being able to make direct referrals into CAMHS;
- the national counselling leads group, which provides the Welsh Government with a direct link to counselling service stakeholders;
- inclusion of social media advocacy;
- information for the third sector for signposting to mental health services;
- support for younger children's mental health;
- support for children and young people during the school holidays;
- transition to adult services;
- support for children who are looked after or adopted;
- support for young people who are away at university or college;
- the importance of early attachment relationships and the long term impact of poor attachment and early trauma on mental health;
- Families First – including Joint Assessment Family Framework and Team Around the Family;
- signposting to mental health services for third sector organisations.

These matters are deemed to be outside the scope of this guidance, which is focussed on collaboration between CAMHS and counselling services. Some of these matters are already addressed in other Welsh Government guidance documents². This feedback will also be considered by officials as part of wider work being undertaken.

¹ For this information, see Charts 7 and 8 of statistical release "Counselling for Children and Young People, 2013/14 (experimental statistics): <http://gov.wales/statistics-and-research/counselling-children-and-young-people/?skip=1&lang=en>

² School-based Counselling Operational Toolkit (joint publication with BACP). <http://gov.wales/docs/dhss/publications/130709camhsen.pdf>

Specialist NHS Child and Adolescent Mental Health Services – Professional advice for service planners: <http://gov.wales/topics/health/publications/health/guidance/camhs/?lang=en>

5. Consultation questions and summary of responses

A number of respondents provided general feedback in response to Questions 1 to 2.

Question 1. Do you feel that the guidelines provide sufficient information on how local authority counselling services and CAMHS are organised?

Answered yes	Answered no	Answered not sure	No direct response
15	4	6	6
48%	13%	19%	19%

Most respondents were satisfied that the guidance provided sufficient information on how local authority counselling services and CAMHS are organised. Given the balance of views, it is not felt necessary to provide further detail in the guidance on how the two services are organised, although other changes will be made in response to some of the feedback received.

There was a request for more detailed information on how services should work together.

Welsh Government response: Given the very different arrangements that are in place in different local health boards and local authority areas, it was felt that it would be unhelpful to set out the detail on how services should collaborate. Services need to develop arrangements that suit their own local circumstances. The case studies show that collaboration is possible, and different areas have taken different approaches to achieve this.

It was suggested that the guidance should not include information on which counselling providers were used in local authority areas, as the guidance would become dated when changes to contractual arrangements occurred.

Welsh Government response: This information will be removed from the final version of the guidance.

It was highlighted that the guidance did not reflect that fact that counselling can also be delivered outside school.

Welsh Government response: We will amend the guidance to reflect this.

One respondent was of the view that referring to CAMHS tiers was inconsistent with the Together for Mental Health Strategy.

Welsh Government response: Whilst we are trying to move away from referring to the CAMHS tiers by using terminology such as primary, secondary/specialist and inpatient, for clarity tiers have been referenced in the guidance to show the range of different services and the adult equivalent.

There were also concerns that the guidance might be premature in view of the Together for Children and Young People Programme.

Welsh Government response: The guidance sets out a way of working which can be followed with immediate effect, but which nonetheless is compatible with longer term aims. Improving collaboration between CAMHS and the counselling service dovetails with the wider strategic agenda, including the Together for Children and Young People's programme.

Question 2. Is there anything missing from the guidelines which you think should be included? (If so please specify.)

Answered yes	Answered no	Answered not sure	No direct response
16	5	4	6
52%	16%	13%	19%

52% of respondents thought that additional information should be included in the guidance, although a number of suggestions were deemed to be outside the scope of the guidance, as outlined at Section 4.

Other suggested changes to the guidance are as follows:

- referring to safeguarding and local safeguarding procedures;
- where local authorities contract out counselling, to include the requirement to collaborate with CAMHS within the tender specification;
- families and carers being part of the collaborative relationship between counselling services and CAMHS;
- referring to where services have to work across borders.

The above suggestions are reflected in the revised guidance.

It was noted that the guidance did not mention any future steps that could be taken towards a uniform approach to good practice.

Welsh Government response: If proposals to reduce the number of local authorities in Wales proceed then this presents an opportunity to work with merging authorities to consider best practice as part of establishing the new Authorities.

Concerns were also raised that the guidance did not reflect that fact that counselling can also be delivered outside school.

Welsh Government response: As set out against Question 1, we will amend the guidance to reflect this.

One respondent raised concerns that children and young people had not been involved in the development of the guidance.

Welsh Government response: Consideration was given to involving young people in the development of the guidance, however this was not felt to be appropriate as the guidance is intended to be a short, technical document, aimed at professionals working in mental health.

Question 3. Are you aware of other examples of good practice in collaboration between counselling services and CAMHS which should be referenced in the guidelines? (If so please specify.)

Answered yes	Answered no	Answered not sure	No direct response
6	15	2	8
19%	48%	6%	26%

All of the case studies in the draft guidance were provided by stakeholders, and some of the respondents to the consultation were able to suggest further case studies.

One anonymous respondent from a local health board noted that whilst the guidance contained case studies from their area, the health board hadn't been named. The reason for this is that those case studies referred to specific young people; the location was not stated because of the risk that those young people might be identified.

Welsh Government officials have contacted some respondents to request relevant additional case studies for inclusion in the guidance.

Question 4. 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.

Further comments	No further comments
20	11
65%	35%

65% of respondents had additional comments. Some of the matters raised are outside the scope of the guidance, as set out in Section 4. Other matters raised are set out below:

Waiting times for CAMHS were also raised as a concern, and the fact that counsellors might then have to continue to support the young person without the skills that the specialist CAMHS professionals would have.

Welsh Government response: The new investment in CAMHS should reduce waiting times and services have prioritised waiting list initiatives this current year, in advance of recruiting staff. In addition, as of November 2015, waiting time targets for local primary mental health services have reduced from 56 days to 28.

The funding of counselling services was also raised as an issue.

Welsh Government response: Funding for counselling was transferred to local authorities' Revenue Support Grant (RSG) in April 2013. The RSG is unhypothecated which means that local authorities decide how it should be spent according to local needs and priorities.

It was suggested that a monitoring process be put in place to track how this work develops, and to enable sharing of good practice with stakeholders. The respondent also cited legislation which aims to increase partnership working across agencies for the benefit of the health and wellbeing of service users.

Welsh Government response: This guidance and its impact will be reviewed in due course, after the reorganisation of local government and work being undertaken on CAMHS, as both of these initiatives will have an impact on how provision is organised within the two services. We expect services to consider legislation that is already in place, to support collaboration between services.

One respondent was concerned that school counselling, as a profession, does not exist on a statutory footing and that not all local authorities contracted out counselling provision. They felt this impinged on the independence of the counselling service.

Welsh Government response: Counselling is not a profession that is on a statutory footing in the UK, however counselling bodies can have a professional register with the Professional Standards Authority (PSA). The PSA independently assesses organisations who register practitioners, who are not regulated by law, working both within and outside the NHS.

The independence of the counselling service refers to the independence of the service from the school, rather than the local authority. As set out in our 'Statutory guidance to Welsh local authorities on the provision of independent counselling services', 'In delivering counselling services the counsellor must be, and must be seen to be, independent of the school or other educational establishments where the service is provided to young people.' That said, counsellors are expected to work as part of the school community, with understanding and respect for the school ethos.

General feedback

One respondent provided detailed editing comments.

Welsh Government response: The draft guidance will be reviewed in the light of these comments, and amended as appropriate.

One respondent referred to the Additional Learning Needs Bill, local government reorganisation and the various reviews of the provision for children and young people with exceptional needs as vehicles for improving collaboration and co-ordinated planning and delivery. He also wanted greater use of secure technology systems for communication and information sharing.

Welsh Government response: We recognise that a collaborative and co-ordinated approach by agencies to all aspects of service delivery is essential to ensuring its effectiveness. This guidance forms but one part of our more general approach to improving multi-agency collaboration. As regards the use of secure technology systems, the Welsh Community Care Information System (WCCIS) will be a common solution across health and social services. Appropriate security and access protocols will apply to the system and any individuals accessing the system will be recorded through the National Intelligent Integrated Audit Solution (NIIAS) tool.