



**Dim mwy o greulondeb i blant. DIM.  
Cruelty to children must stop. FULL STOP.**

**NSPCC CYMRU/WALES  
RESPONSE TO:  
SCHOOL-BASED COUNSELLING SERVICES IN  
WALES  
A DRAFT NATIONAL STRATEGY**

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- 1.1 NSPCC Cymru/Wales welcomes the opportunity to respond to this consultation on the draft strategy for school-based counselling services in Wales.
- 1.2 The NSPCC's purpose is to end cruelty to children. Our vision is of a society where all children are loved, valued and able to fulfil their potential.
- 1.3 We seek to achieve cultural, social and political change – influencing legislation, policy, practice, attitudes and behaviours for the benefit of children and young people. This is achieved through a combination of service provision, lobbying, campaigning and public education.

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

NSPCC Cymru/Wales believes that the proposal to initially focus on secondary school children is a fair one, particularly if this is allied to a genuine commitment to expanding provision into primary schools in the future. This initial development would also tie in with our experience through the ChildLine service where two thirds of callers (60%) are aged 12-15<sup>1</sup>. The next biggest group are 5-11 year olds, so we would welcome clear timeframes for the development of this service to primary aged children as there is a demand for support and counselling.

NSPCC Cymru/Wales' provides a school counselling service in Wrexham and we are already exploring and developing different models to provide services in primary schools. We believe that there are opportunities with this age group to link in with other Welsh Assembly Government strategies for supporting families holistically in primary schools, particularly given the important roles of parents/carers in early child development. We would be happy to share the development of this work with the Welsh Assembly Government and other agencies as appropriate.

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

NSPCC Cymru/Wales broadly welcomes these principles and believe them to be appropriate. We are particularly pleased that one of the principles is that the service will enable children and young people to self refer. This is a key principle for this service, as often children and young people have to be referred to support services via a professional and this can result in either a wait for the service they need or not receiving the service as they do not fit the threshold. Self referral allows children and young people to recognise when they have a problem and to seek support at a pace and time that is appropriate to them. We praise the Welsh Assembly Government for including this principle.

We would like to see the reference to the UNCRC broadened from its current use as at present it is referred to primarily in respect of participation. We would like the UNCRC to be clearly referenced as the main, broad underlying principle of providing school-based counselling for children and young people. The provision of school-based counselling does not just relate to the articles around participation, but also relates to the UNCRC articles around protection, such as Articles 19 and 39<sup>2</sup>. We would welcome this being reflected in this consultation, as it has been reflected in other consultations, as the broad underpinning principle behind Welsh Assembly Government's policy for children and young people, e.g. the consultation on *Children and Young People Rights to Action: Planning Guidance and Regulations for Local Authorities and their Partners on Children and Young People's Plans*.

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

NSPCC Cymru/Wales feel that these objectives are appropriate for the strategy and are happy to support them.

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

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<sup>1</sup> ChildLine Annual Report 2005, p.15

<sup>2</sup> Article 19 of UNCRC states: 1. *State Parties shall take all appropriate legislative, administrative, social and educational measures to protect the child from all forms of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse.....*

Article 39 of UNCRC states: *State Parties shall take all appropriate measures to promote physical and psychological recovery and social reintegration of a child victim of: any form of neglect, exploitation, or abuse; torture or any other form of cruel, inhuman or degrading punishment; or armed conflicts. Such recovery and reintegration shall take place in an environment which fosters the health, self respect and dignity of the child.*

As above NSPCC Cymru/Wales feel that these outcomes are broadly appropriate. We would welcome some further detail on how these outcomes will be measured to ensure that school-based counselling is delivering improved outcomes for the children and young people who access it.

We would also welcome a specific outcome or a group of outcomes relating to the service being inclusive of young people with different needs and from diverse backgrounds, e.g. young people with a disability, young people exploring their sexuality, young people from different ethnic and cultural communities, etc.

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

NSPCC Cymru/Wales has no doubt that the strategy will only be as good as the funding that is provided to deliver it. The Welsh Assembly Government need to acknowledge that funding provided for school-based counselling is a valuable early intervention that can identify issues and help to get earlier treatment, which can save money in the long term. It is vital that these services are properly funded by the Welsh Assembly Government so that children and young people can access a decent level of service. We would be concerned if funding was not at an appropriate level and it was left to organisations from the voluntary sector to fill this funding gap.

Whilst we understand the value of looking at existing resources we firmly believe that the provision of school-based counselling should not be instead of other valuable and at times under-resourced services, particularly CAMHS. We look forward to the Welsh Assembly Government announcing a significant resource package to roll out this strategy across Wales.

**6. 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?**

**7. 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?**

NSPCC Cymru/Wales does not see the development of school-based counselling services as an alternative or replacement to providing children and young people with Child and Adolescent Mental Health Services. We firmly believe that it should be viewed as a complimentary service. The benefits of school based counselling are the ability to recognise issues and intervene at an earlier stage. Early intervention may mean that the mental health of a young person improves, so that they will not need a further service. Evidence, based on international research, which is mentioned on p.3 paragraph 1.7 of this strategy, concludes that preventative interventions do reduce escalation of need to higher tier services within CAMHS, and greater savings and benefits to the care sector as a whole.

In saying this it does also need to be acknowledged that some children and young people who come into contact with the service will probably be identified as needing a more comprehensive service delivered by CAMHS. Our experience of CAMHS across Wales has been extremely varied with some services operating longer waiting lists in some areas than others. We are aware from callers to ChildLine that the mental health of a young person waiting for a service can potentially deteriorate rapidly. The result of this may be a need for a more extensive intervention. Often ChildLine will be their only way of coping with waiting for an appropriate service as they have no one else to turn to. School-based counselling may be able to identify these young people earlier and provide them with more support, or refer them to CAMHS at an earlier stage. The self-referral element of school-based counselling may also lead to more children and young people approaching the service and being

identified. This should be viewed positively as children and young people would be recognising that they need help and that there is someone to turn to for them.

NSPCC Cymru/Wales would like to see a well resourced school-based counselling service working hand in hand with well resourced, child centred CAMHS, ensuring that there are clear referral routes. This approach would be beneficial for all children and young people who need help and support in Wales.

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

NSPCC Cymru/Wales welcomes these initial actions and feels very strongly that these are absolutely vital to ensuring a safe, qualitative and professional service. We believe that these initial actions will provide the foundations for further development. It is important that there is a clear understanding of what a counsellor is and what is expected of them.

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

NSPCC Cymru/Wales believe that these individual actions are appropriate. We would urge the Welsh Assembly Government to ensure that when they set timescales for completion of these actions they are realistic and stick to them rigidly. We would like to see this service delivered as soon as possible, but also recognise the need for it to be properly resourced and sustainable.

One of the gaps we perceive in qualifications, skills and training is that child protection and child development does not currently form part of the counselling qualification. We believe that these are the skills needed to fulfil the safeguarding role of school-based counselling and would urge the Welsh Assembly Government to ensure that any qualification includes a required module on these aspects. NSPCC Cymru/Wales would welcome working with partner organisations to develop this module or deliver it.

We welcome the role that the Partnerships will have in commissioning. We feel that there needs to be mention in the guidance of Local Safeguarding Children Boards (LSCB's), as the key statutory body with responsibility for safeguarding. Mentioning LSCB's in the guidance will also reinforce the role of school-based counselling in safeguarding and protecting children and young people.

NSPCC Cymru/Wales welcomed the opportunity to be involved in the development of this strategy, look forward to supporting this strategy and providing further advice and consultation as the strategy develops.

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