

Accreditation renewal report

Standards 1-8

COSCA (Counselling & Psychotherapy in Scotland)

September 2024

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About accreditation

The Professional Standards Authority (the Authority) accredits registers of people working in a variety of health and social care occupations that are not regulated by law. To become an Accredited Register, organisations holding registers of unregulated health and social care roles must prove that they meet our *Standards for Accredited Registers* (the Standards).

Initial accreditation decisions and Full Renewal decisions are made by an Accreditation Panel following an assessment of the organisation against the Standards by the Accreditation team. The Panel decides whether to accredit or continue to accredit an organisation or not. The Panel can also decide to accredit with Conditions and provide Recommendations to the organisation.

- **Condition** – Issued when a Panel has determined that a Standard has not been met. A Condition sets out the requirements needed for the Accredited Register to meet the Standards, within a set timeframe. It may also reduce the period of accreditation subject to a review or the Condition being met.
- **Recommendation** – Actions that would improve practice and benefit the operation of the Register, but which is not a current requirement for accreditation to be maintained.

This assessment was carried out against our Standards for Accredited Registers¹ (“the Standards”) and our minimum requirements for the Standards as set out in our Evidence framework². More about how we assess against Standard One can be found in our Supplementary Guidance for Standard One³.

We used the following in our assessment of COSCA:

- Documentary review of evidence of benefits and risk supplied by COSCA and gathered through desk research
- Documentary review of evidence supplied by COSCA and gathered from public sources such as its website
- Due diligence checks
- Share your experience responses
- Observation of a Board Meeting on 13th May 2024
- Assessment of COSCA’s complaints procedures.

¹ https://www.professionalstandards.org.uk/docs/default-source/publications/standards/standards-for-accredited-registers.pdf?sfvrsn=e2577e20_8

² https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-evidence-framework-for-standards.pdf?sfvrsn=55f4920_9

³ https://www.professionalstandards.org.uk/docs/default-source/accredited-registers/standards-for-accredited-registers/accredited-registers-supplementary-guidance-for-standard-one.pdf?sfvrsn=3e5f4920_6

The Outcome

The Accreditation Panel met on 27th June 2024 to consider COSCA's application for renewal of its accreditation. The Panel was satisfied that COSCA met with Conditions all the Standards for Accredited Registers.

We therefore decided to accredit COSCA with Conditions.

We noted the following **positive findings**:

- We commend COSCA on its Statement on Conversion Therapy
- We noted that COSCA's approach to registrants' complaints policy, which allows registrants to either adopt COSCA's or develop one that is compliant with COSCA's standard, is commendable

We issued the following Conditions to be implemented by the deadline given:

Conditions		Deadline
Standard 2	1. COSCA should review its Sanctions Policy to include a clear outline of its process for restoring registrants to the Register following disciplinary action	<i>3 Months of publication of report</i>
Standard 5	2. COSCA should review its complaints guidance procedures to make provision for restriction on an interim order basis where there appears to be an immediate risk to the public	<i>3 months of publication of report</i>

We issued the following Recommendations to be considered by the next review:

Recommendations	
Standard 5	<ol style="list-style-type: none">1. COSCA should develop and deliver a programme of recruitment training on EDI to its Board, staff and volunteers2. COSCA should review its guidance on reporting concerns to other agencies, to make it sufficiently broad to include other agencies such as social services3. COSCA should review its complaints procedure to consider investigating complaints older than three years if such investigations are in the public interest, such as in alleged cases of serious breaches

<p>Standard 6</p>	<p>4. COSCA should, in addition to Board Minutes, publish all non-confidential papers circulated for discussion at Board meetings for greater transparency</p> <p>5. COSCA should gather information to demonstrate how they are ensuring business continuity</p>
<p>Standard 7</p>	<p>6. COSCA should keep the PSA updated on its development of a guideline on the risk of suicide or self-harm for its members and registrants</p>

About the Register

This section provides an overview of COSCA and its register.

Name of Organisation	COSCA (Counselling & Psychotherapy in Scotland)
Website	https://www.cosca.org.uk/
Type of Organisation	Private limited Company (registered on Companies House (SC142360), Charity Registered in Scotland (SC018887))
Role(s) covered	Counsellors and Psychotherapists
Number of registrants	787 as of 1 January 2024
Overview of Governance	The day to day running of COSCA is carried out by a small staff team, overseen by a Board of 14 people, two of which are lay.
Overview of the aims of the register	<p>Taken from COSCA's website (https://www.cosca.org.uk/about-us/visions-aims)</p> <p>Aims:</p> <p>As Scotland's professional body for counselling and psychotherapy, COSCA seeks:</p> <ul style="list-style-type: none"> • to advance and support all forms of counselling, psychotherapy, and the use of counselling skills • to promote high quality counselling supervision and continuing professional development for all individuals and agencies delivering counselling services and education in Scotland. <p>Objectives:</p> <p>To advance our Vision and Aims, COSCA's Objectives are:</p> <ul style="list-style-type: none"> • to inform and influence policy making at local and national level on key issues affecting counselling, psychotherapy, counselling skills and supervision of practice • to increase access to a wider range of ethically based services to larger numbers and more diverse groups of people • to increase the access of individuals and agencies to training, knowledge and information on counselling, psychotherapy, counselling skills and supervision of practice

	<ul style="list-style-type: none"> • to develop and promote quality assurance systems and ethical standards for counselling, psychotherapy, counselling skills and supervision of practice • to develop, communicate and market COSCA as Scotland's professional body for counselling, psychotherapy, counselling skills and supervision of practice.
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Inherent risks of the practice

This section uses the criteria developed as part of the Authority's *Right Touch Assurance tool*⁴ to give an overview of the work of COSCA's Counsellors and Psychotherapists

Risk criteria	COSCA Register
<p>1. Scale of risk associated with COSCA's registrants.</p> <p><i>a. What do COSCA's registrants do?</i></p> <p><i>b. How many registrants are there?</i></p> <p><i>c. Where do COSCA's registrants work?</i></p> <p><i>d. Size of actual/potential service user group</i></p>	<p>a. COSCA (Counselling & Psychotherapy in Scotland) is Scotland's professional body for counselling and psychotherapy. As detailed in Form 1a 'the use of counselling as a way of responding to people in distress has grown rapidly in recent years and robust and consistent evidence about the effectiveness of counselling is now accumulating. Several studies have become available that now confirm that counselling achieves results comparable to anti-depressant medication with patients suffering from clinically defined depression (Chilvers et al. 2001; Rowland et al. 2001; Ward et al. 2000). When the effects of medication and counselling are compared over time (after the end of "treatment") results regarding longer-term effectiveness (prevention of relapse) are also broadly comparable (Chilvers et al. 2001; Rowland et al. 2001; Ward et al. 2000)'.</p> <p>b. As of the 1 Jan 2024, COSCA had a total of 787 members on the Register, who are based in the Scotland. The Register only operates in Scotland. To apply for membership of COSCA, applicants need to be resident and practising in Scotland.</p> <p>c. Some of the registrants on the COSCA Register are employed directly or indirectly by Local Authorities to work in schools as counsellors of children and young people. Others are employed by NHS Scotland to work in GP surgeries and other statutory medical settings.</p> <p>d. Counsellor Members are required to deliver on average 5-8 counselling sessions per month. Practitioner Members are required to deliver at least 8 counselling sessions per month. Accredited counsellors</p>

⁴ https://www.professionalstandards.org.uk/docs/default-source/publications/policy-advice/right-touch-assurance---a-methodology-for-assessing-and-assuring-occupational-risk-of-harm91c118f761926971a151ff000072e7a6.pdf?sfvrsn=f537120_14.

	are required to have a minimum practice of 90 client hours per year, involving at least three clients. Some of the above registrants deliver more than the required minimum number of sessions.
2. Means of assurance	<p>The COSCA Register includes counsellors and psychotherapists who have met COSCA's standards for registration.</p> <p>The means of assurance will depend on the practise setting. For managed premises such as NHS settings and schools, there will be criminal records and other pre-employment checks required.</p>
3. About the sector in which COSCA's registrants operate	<p>Registrants are employed by public services such as schools, NHS, local authorities, and other organisations which provide counselling services, such as Employment Assistance Programmes, the armed and police forces, universities, and transport services.</p> <p>Mental health provision within the NHS is generally provided across three main settings: care in the community, inpatient care, and secure care. Services can broadly be categorised as adult services, children and young people's services, urgent and crisis care, and forensic services⁵. Although there are differences in the four UK models, these categorisations tend to broadly apply across all.</p> <p>A significant number of people access mental health and wellbeing support from private practitioners. In some cases, this may be due to long waiting lists for talking therapies on the NHS, or to access treatment that isn't available through the NHS. People can access private providers through a referral from an NHS GP, or by searching for one themselves⁶</p>
4. Risk perception <ul style="list-style-type: none"> • <i>Need for public confidence in COSCA's registrants?</i> • <i>Need for assurance for employers or other stakeholders?</i> 	<p>As many registrants are likely to be self-employed, it is important that members of the public have confidence in the practitioners they choose to deliver therapy. The specific approach of COSCA, which may not always be available as part of mainstream NHS services, makes it important that the public are aware of what to expect from practitioners. Since registrants may be working with children and/or vulnerable adults, it is important that the public can have confidence there are appropriate safeguards in place.</p>

⁵ [The state of the NHS provider sector](#)

⁶ [Private sector mental health support - Mind](#)

Assessment against the Standards

Standard One: Eligibility and 'public interest test'

- 1.1 We are in the process of assessing all current Accredited Registers against Standard One, which was introduced in July 2021. Decisions about Standard One for current Accredited Registers are made separately by the Accreditation Team if no concerns are identified.
- 1.2 We completed our Standard One assessment for COSCA in January 2024. We found that COSCA's register falls within the scope of the Accredited Registers programme. We considered that the work of counsellors and psychotherapists can be beneficial. We found it is in the public interest to have registers of practitioners who meet appropriate standards of competence, conduct, and business practice, as required by COSCA.
- 1.3 Consequently, the Accreditation Team found that Standard One was met. We did not identify during this assessment of Standards two to Eight any new information that could affect Standard One being met.

Standard 2: Management of the register

Summary

The Accreditation Panel found that Standard Two was met. It issued the following Condition:

Condition:

- COSCA should review its Sanctions Policy to include a clear outline of its process for readmitting registrants to the Register following disciplinary action

Accreditation Panel findings

- 2.1 We found that COSCA's register is published, accurate and appears effectively maintained. All routes to registration are clear; the process for appealing registration decisions is clear; membership registration requirements are clearly explained; there is a continuous professional development (CPD) policy to ensure continued practice competence; there is a process in place for recognising decisions made by other regulators; information displayed on the register is constantly checked and updated for accuracy; and the register has all the basic information required by members of the public searching for a therapist. However, restrictions on practice could be made more easily accessible for public access.

The Accreditation Panel discussed several issues in relation to this Standard. The first was around COSCA's sanctions policy. COSCA has a sanctions policy which makes provision for restoration of registrants following disciplinary action. However, the process for doing so is not clearly outlined. This issue had been raised as part of our query system. The Accreditation Panel was not satisfied that the current policy addressed the issue sufficiently and, therefore, issued the following

Condition:

- COSCA should review its Sanctions Policy to include a clear outline of its process for restoration of registrants to the Register following disciplinary action
- 2.2 The Panel agreed that we should prompt COSCA to consider the timeframe for restoration after removal, noting that Accredited Registers and Regulators generally have longer periods (5 years) before allowing applications for restoration to the register. The Panel stopped short of issuing a condition or recommendation.

Standard 3: Standards for registrants

Summary

The Accreditation Panel found that Standard Three was met. It issued no Conditions and Recommendations.

Accreditation Panel findings

- 3.1 We reviewed COSCA's performance in relation to its standards of competence, professional and ethical behaviour, and business practice. We found that COSCA performed well on all the minimum requirements. The Accreditation Panel discussed COSCA's terms and conditions for admitting applicants into its Register and found these to meet our requirement.
- 3.2 The Panel reviewed the relevant COSCA policies: on ethical practice, safeguarding, the requirement for its registrants to have complaints procedures, data protection, and whistleblowing. It also assessed COSCA's position on the need for its registrants to comply with existing advertising legislation. The Panel had no concerns about these.
- 3.3 The panel noted that COSCA's policies and guidance are silent on dealing with the risk of suicide or self-harm and decided to address this with the recommendation issued under S7.

- 3.4 We noted that COSCA’s approach to registrants’ complaints policy, which allows registrants to either adopt COSCA’s or develop one that is compliant with COSCA’s standard, is commendable.

Standard 4: Education and training

The Accreditation Panel found that Standard Four was met. It issued no Conditions and Recommendations.

Accreditation Panel findings

- 4.1 We found that COSCA does not provide training but validates training courses for its registrants. COSCA’s information about the type and level of qualification required for entry into its Register is published variously: on the launch page of the Register on its website, in its membership information leaflet, and in its training information to prospective registrants.
- 4.2 To practise as a counsellor under the auspices of the COSCA Register, registrants must hold as a minimum a Diploma in Counselling, for which there are core competencies to meet. COSCA’s Diploma course is based on the National Occupational Standards for Counselling. COSCA no longer receives applications through its equivalence route for entry into its Register.
- 4.3 We also found that COSCA has a verifiable system of course validation in place to ensure quality assurance of all those involved in the provision of education and training for its registrants. COSCA has a robust system of assessing and assuring the quality of education and training of the validated courses.
- 4.4 Furthermore, all COSCA’s accredited Diploma courses have as a core competency the need “to value and support difference and diversity” in service delivery. The courses also require participants to have basic knowledge of the wider health and social care systems as part of their education and training.
- 4.5 Training providers of COSCA-validated courses are required to submit their organisation’s Equal Opportunities Policy as part of their application.
- 4.6 The Accreditation Panel examined the evidence in detail and had no concerns with COSCA’s arrangements for education and training, and therefore issued no Recommendations or Conditions.
- 4.7

Standard 5: Complaints and concerns about registrations

The Accreditation Panel found that Standard Five was met. It issued the following Condition and Recommendations:

Condition:

- COSCA should review its complaints guidance procedures to make provision for restriction on an interim order basis where there appears to be an immediate risk to the public. This should be completed within three months of publication of this report.

Recommendations:

- COSCA should develop and deliver a programme of recruitment training on EDI to its Board, staff and volunteers
- COSCA should review its guidance on reporting concerns to other agencies, to make it sufficiently broad to include other agencies such as social services
- COSCA should review its complaints procedure to consider determining complaints older than three years if it is in the public interest, such as in serious cases of alleged breaches

Accreditation Panel findings

- 5.1 COSCA has a comprehensive Complaints Procedure which encompasses a clear appeals process. As COSCA's Complaints Procedure is published on its website, it is easily accessible to all its members, registrants, service users and the public.
- 5.2 All vacancies on COSCA's Ethics Committee are advertised to the public and induction training is provided for all new members of the Committee. In addition to its guidelines for complaints panellists, some of COSCA's other policies are all geared towards ensuring that complaints outcomes are consistent.
- 5.3 COSCA's Ethics Committee, which has responsibility for implementing the Complaints Procedure, is not part of the governance structure of COSCA. This means there is a clear separation between management by the Board and the complaints process. Members of the Committee are recruited through open advertisement and, therefore, include lay persons. This helps to ensure that the Board does not get involved in the complaints processes of the organisation.
- 5.4 The Panel's careful review of COSCA's complaints policy identified a gap that needed plugging: the absence of an interim orders process for dealing with a registrant who appears to pose an immediate risk to the public. It

doesn't appear from COSCA's published guidance that they have a process for restricting practice on an interim order basis. Consequently, the Accreditation Panel issued the following **Condition**, to be addressed within three months of publication of the report:

- COSCA should review its complaints guidance procedures to make provision for restriction on an interim order basis where there appears to be an immediate risk to the public.

5.5 The Accreditation Panel also inquired into the issue of recruitment training on equality, diversity and inclusion (EDI). We noted that assessment of Standard 9 EDI evidence was carried out separately by the Accreditation Team, and that COSCA has submitted evidence to the Team. We checked that evidence and confirmed that COSCA's Statement of Ethics and Code of Practice requires members to recognise and respect diversity and differences between people. COSCA also applies diversity in filling all positions in COSCA. However, there is no evidence of COSCA carrying out EDI specific training. On the strength of this confirmation, the Accreditation Panel issued the following **recommendation [recommendations only are being issued on EDI at this stage]**:

- COSCA should develop and deliver a programme of recruitment training on EDI to its Board, staff and volunteers

5.6 A discussion also ensued on the issue of reporting concerns about registrants to other agencies. The signposting in COSCA's guidance relates only to criminal matters. It was the view of the Accreditation Panel that the minimum requirement on this is not fully met, and issued the following **recommendation**:

- COSCA should review its guidance on reporting concerns to other agencies, to make it sufficiently broad to include other agencies such as social services

5.7 On COSCA's prescription that it only considers complaints made not more than 3 years after the incident, the Accreditation Panel had a concern. It was the Panel's view that COSCA should review this to make provision to consider, if it is in the public interest, cases older than three years in some circumstances (e.g. in serious alleged breaches). The panel, therefore, issued the following **recommendation**:

7. COSCA should review its complaints procedure to consider investigating complaints older than three years if such investigations are in the public interest, such as in alleged cases of serious breaches

Standard 6: Governance

The Accreditation Panel found that Standard Six was met. It issued the following Recommendations:

Recommendations:

- COSCA should, in addition to Board Minutes, publish all non-confidential papers circulated for discussion at Board meetings for greater transparency
- COSCA should gather information to demonstrate how they are ensuring business continuity

Accreditation Panel findings

- 6.1 The Accreditation Panel found that overall, COSCA is a well governed organisation, and that the recommendations do not in any way negate that assessment.
- 6.2 COSCA has a long record of making annual returns to both Companies House and the Office of Scottish Charities Regulator (OSCR). It has in place all relevant processes to ensure high levels of transparency, integrity, and accountability.
- 6.3 COSCA's primary objective is public protection, and conflict of interest is well managed with the help of a clear and accessible conflict of interest policy. COSCA's governance structure makes a clear separation between the various bodies dealing with regulatory matters, education, and management of the Register. The Board minutes and other governance documents of the Register are published on its website. It has a complaints policy which is easily accessible and provides for a process that enables anyone to raise a complaint against the Register or its registrants. A stringent process also exists for ensuring all registrants have liability insurance cover.
- 6.4 In terms of its fiscal management, the processes are adequate for ensuring financial transparency. COSCA has a robust data protection policy, and it is registered with the Information Commissioner's Office (ICO). There is in place some sort of business continuity arrangements, including the fact that the Board routinely discusses risk. All governance arrangements are

published, and Board members are clear about what is expected of them through induction training.

6.5 The Accreditation Panel debated the overarching issue of transparency but had no major concerns overall. The debate revolved around what confidential information can COSCA publish and what cannot be published. In the end, the Panel agreed that for greater transparency, non-confidential information circulated for Board meetings can be published. It issued the following **recommendation**:

- COSCA should, in addition to Board Minutes, publish all non-confidential papers circulated for discussion at Board meetings for greater transparency

6.6 The Accreditation Panel also took interest in the critical issue of business continuity. One element of this was single person dependency, which can be found in some organisations. The Panel noted that the Chief Executive of COSCA is also performing the role of Registrar which might constitute a risk to business continuity in the event of unforeseen absence. The Accreditation Panel, therefore, issued the following **recommendation**:

- COSCA should gather information to demonstrate how they are ensuring business continuity.

Standard 7: Management of the risks arising from the activities of registrants

The Accreditation Panel found that Standard Seven was met. It issued the following Recommendation:

Recommendation:

- COSCA should keep the PSA updated on its development of a guideline on the risk of suicide or self-harm for its members and registrants.

Accreditation Panel findings

7.1 COSCA has a detailed risk matrix consisting of several risks (over 30) which may arise from the activities of its registrants as counsellors and psychotherapists, and which could have implications for anyone in contact with those registrants. However, COSCA has also correspondingly identified appropriate actions in each case to mitigate the impact of those risks by

assessing the likelihood of a risk occurring against the potential impact it may have.

- 7.2 The agenda of its Board meetings has a standing item on Risks, where “Risks to Clients” is discussed routinely. The Board uses this opportunity to update the Matrix, ensuring that the latter functions as a tool to identify, monitor, review and act on risks.
- 7.3 COSCA has provided clear information on the efficacy of counselling and psychotherapy. COSCA has published on its website a clear description of what counselling and psychotherapy mean, and the differences between the two concepts. It has also published on its website the limitations of the occupation of its registrants.
- 7.4 As indicated in Standard 3, the Accreditation Panel revisited the critical issue of the risk of suicide or self-harm, which is glaringly missing from COSCA’s matrix of risks. The Panel was keen to know how COSCA ensured that its registrants are practising in line with the most recent evidence, noting the recent reports on suicide mis-assessments.
- 7.5 The Accreditation Panel noted COSCA’s efforts at addressing this issue by initiating the development of a guideline on “working ethically with [suicidal] clients”. The salience of the matter, however, warranted action and the Panel decided that this was the right place to issue a recommendation in relation to suicide risk. The Panel accordingly issued the following **recommendation**:
 - COSCA should keep the PSA updated on its development of a guideline on the risk of suicide or self-harm for its members and registrants.

Standard 8: Communications and engagement

The Accreditation Panel found that Standard Eight was met. It issued no Conditions and Recommendations.

Accreditation Panel findings

- 8.1 COSCA operates a clear and accessible website and has no record of publishing information that is not in keeping with its aims as an organisation or Register. The organisation is also committed to joint working with other Accredited Registers.
- 8.2 COSCA publishes on its website clear and unambivalent information about the accreditation process and PSA’s Accredited Registers programme. Most,

if not all, of its governance processes and procedures are available on its website, including categories of membership and membership criteria.

- 8.3 Through its feedback mechanism, COSCA also seeks the views and input of its members, registrants and service users into its processes.
- 8.4 After a close review, the Accreditation Panel found that this Standard was fully met and issued no recommendations or conditions.

Share your experience

- 9.1 We ran a public consultation for COSCA between April and May 2024. We received no responses. We have also received no information since COSCA's last assessment. The Standards and minimum requirements are, therefore, unaffected by any third-party view.

Impact assessment (including Equalities impact)

- 10.1 We carried out an impact assessment [240604 COSCA Impact Assessment - draft.docx](#) as part of our decision to accredit COSCA. This impact assessment included an equalities impact assessment as part of the consideration of our duty under the Equality Act 2010.
- 10.2 We noted the positive public protection impact of COSCA's statement on Conversion Therapy, the implications of the equal opportunity to all ensured by its CAG's robust processes for quality assuring that applicants meet the registration requirements for entry into the COSCA Register, and the clear and stringent CPD requirements for registrants' continued registration with COSCA. Its processes for the adjudication of justice are also fair and robust.
- 10.3 We identified no specific negative effects of COSCA's work on protected characteristics, which will be considered in detail in our Standard 9 assessment. We note the need for COSCA to enhance its EDI training for decision makers to amplify the impact of its work, and we look forward to receiving COSCA's guidelines on the risk of suicide or self-harm currently being developed for its members and registrants.