

**Cyflwynwyd yr ymateb i ymgynghoriad y [Pwyllgor Iechyd a Gofal Cymdeithasol](#)
ar [y gweithlu Iechyd a Gofal Cymdeithasol](#)**

**This response was submitted to the [Health and Social Care](#)
[Committee](#) consultation on [Health and Social Care Workforce](#)**

HSC 36

**Ymateb gan: | Response from: Cymdeithas Cwnsela a Seicotherapi Prydain
| British Association for Counselling and Psychotherapy (BACP)**



Senedd Health & Social Care Committee Inquiry - *A healthier Wales*: our workforce strategy for health & social care

Introduction

The British Association for Counselling and Psychotherapy (BACP) welcomes this important inquiry on the Welsh Government's workforce strategy for Health & Social care. BACP is the leading and largest professional body for counselling and psychotherapy in the Wales, with over 2,441 members, and over 60,000 members across the UK. Our membership has grown by 32% in the last 5 years in Wales.

Our submission focuses on Action Ten of *A healthier Wales*, to develop a multi-professional workforce plan to support the implementation of the Welsh Mental Health Strategy, *Together for Mental Health*. We highlight the need for the strategy to be fully inclusive to all elements of the mental health workforce in Wales and the need to reflect the important contribution made by counselling and psychotherapy in meeting the Welsh Government's stated ambition to provide a *no wrong door approach* to mental health support¹. Without being inclusive, the plan will fall far short of supporting this key objective.

Inclusiveness and Transparency of the Mental Health Workforce Plan

BACP fully welcomes the focused objective to develop a Mental Health Workforce Plan (Action 10) but we are concerned about the lack of transparency in its development and the ability for organisations, including professional bodies, to engage with this critical process.

Previous commitments were made in the *Together for Mental Health Action Plan 2019-23*² for Health Education Improvement Wales (HEIW) and Social Care Wales (SCW) to work with the third sector, local authorities and the NHS to produce a workforce plan for mental health by 2021. Whilst we fully recognise that the pandemic will have impacted on the development timetable we would welcome more clarity on this process from HEIW and SCW and critically how we engage within its development. A lack of transparency is a barrier to engagement.

Publicly, the only up-to-date details we could find about the Mental Health Workforce plan are a single line in the *A healthier Wales Delivery plan*³, (to "Develop a multi-professional workforce plan to support implementation of *Together for Mental Health*") together with a single action for 2020-21 to "Develop a workforce plan to support *together for mental health, focusing on some early priorities around CAMHS, Clinical psychology and perinatal services*".

¹ Stated ambition within Programme for Government 2021 to 2026 (Welsh Government, June 2012)

² Welsh Governmnet, *Together for Mental Health Action Plan*, 2019

³ *A Healthier Wales - A Workforce Strategy for Health and Social Care, Delivery Plan 2021-22*

We are concerned about the narrowness of this approach and lack of transparency in its development.

We would welcome the publication of a draft workforce plan, for consultation, which sets out a detailed timetable for recruitment and includes numbers and roles they are recruiting to, as well as annual progress reports against these targets. Without this detail and a lack of open consultation it is hugely difficult for organisations like BACP to engage with this process. We would also welcome closer dialogue with the team developing the plan within Health Education and Improvement Wales (HEIW) or Social Care Wales (SCW) in advance of publication.

Since the *A healthier Wales*, was launched in 2019, we have not been invited by either Health Education and Improvement Wales (HEIW) or Social Care Wales (SCW) to take part in any discussions, meetings or consultations about this important Mental Health Workforce Plan. We feel this is short-sighted and misses the opportunity to develop a holistic plan which represents the entirety of the Mental Health Workforce in Wales. BACP represents 2,441 counsellors and psychotherapists across Wales BACP members are drawn from the various professional disciplines in the field of counselling and psychotherapy, working in a broad range of settings including education, private practice, healthcare, workplace support and within the third sector, as well as working with clients across all age-groups.

Our members are a capable, highly trained yet underutilised workforce. Our most recent Workforce Survey demonstrates that our members in Wales have capacity to undertake an average of 4.5 additional client hours per week, which amounts to almost 10,000 client hours per week⁴. This untapped resource could play a critical role in fixing gaps in the Mental Health system and ensure that vulnerable people across Wales get the support they most desperately need.

Even before the pandemic many people across Wales were waiting far too long to get the mental health support and treatment they need. A 2019 report from Health Inspectorate Wales found some people were waiting up to two years to access psychological therapies. The pandemic has further increased demand for mental health services underlining the need to fully capitalise on the skills of the whole mental health system. We urgently need a Mental Health Workforce Plan which engages and represents the whole system and provides a holistic response.

A mental health workforce able to meet population health and care needs

As noted above, we remain concerned that without engaging the counselling professions (and other critical sectors) the plan will fail to capture the meet the ambitions. NHS England have identified 12 psychological professions that are working within NHS services in England. This includes **counselling and psychotherapy** for both adults and children. Recognising the breadth of professions working in the NHS, they have reiterated the importance of having a skills mix of psychological professionals embedded throughout the NHS, not just

⁴ BACP, Membership Workforce Survey, Sept 2021

in mental health services, bringing psychological expertise into physical health services too.

We understand that at times there can be confusion about the competencies that different psychological professionals bring to the workforce. We have been working with several other stakeholders representing counsellors and psychotherapists to map the competencies that practitioners have when they leave core training - the SCoPEd project. The working drafts of SCoPEd have been warmly welcomed by NHS England and Health Education England, and seen as providing clarity and confidence for service commissioners when considering which psychological professionals can undertake roles in the workforce.

BACP would welcome the opportunity to present details of the SCoPEd project in greater detail to HEIW and SCW to demonstrate the clarity it can bring when recruiting counsellors and psychotherapists, but also as an opportunity to build further confidence in the professions.

Recruitment by competencies

BACP would also encourage all commissioners to move away from recruitment by arbitrary titles and professional memberships and instead focus on **recruitment by competencies**.

We understand there will be some roles where there will be specific statutory requirements, however, far too often commissioners default to restrictive recruitment practices which unfairly exclude large numbers of counsellors and psychotherapists who have the required competencies for a role but may not have the arbitrarily identified professional membership or professional title. Recruitment in this manner is a lose-lose situation for all parties. Counsellors and psychotherapists are unable to progress in their careers and commissioners, services, and the public, are losing out on a richness of experience and skills from counsellors and psychotherapists - who are far too often undervalued, overlooked, and marginalised.

Our Recommendations:

There are three areas that we would welcome further examination by the committee.

1. Health Education and Improvement Wales (HEIW) and Social Care Wales (SCW) need to reach out to professional bodies across the breadth of the mental health system in Wales, including counselling and psychotherapy. Without involving all parts of the system the plan will not be fit for purpose and will miss critical opportunities to strengthen Mental Health Services with an existing underutilised workforce.
2. We would like to see much more transparency around these processes to develop the plan that partners can engage with effectively. We would like

HEIW and SCW to publish a draft Mental Health Workforce Plan which sets out a detailed and clear timetable for recruitment, including numbers and roles they're recruiting to, as well as annual progress reports. Without this detail it is hugely difficult for professional bodies to engage in this process.

3. We would like HEIW and SCW to commit to consider a focus on competencies rather than focussing the plan on arbitrary titles and professional memberships. Far too often large numbers of counsellors and psychotherapists who have the required competencies are excluded from practice for not having an arbitrarily identified professional membership or professional title. We believe this would help to develop a more holistic mental health offer across Wales.

Contact details

Please contact Four Nations Lead at BACP, if you would like to discuss our submission further.

