

Digest of ACC's Guidelines and Advice about Counselling Practice in COVID-19 as at August 28th 2020

Government Guidelines

All citizens of the U.K. need to follow government guidelines, and these are subject to regular update.

Here are the starting points, which give the high-level advice that we all need to follow:

<https://www.gov.uk/coronavirus>

<https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/5-steps-to-working-safely>

Then, there are a number of different publications that need to be read, assessed as to whether they apply to the setting you are working in, and monitored for updates.

Counselling and psychotherapy services are not explicitly referenced, so each person and organisation need to work out what guidance is most likely to apply to them as counsellors in private practice or counselling centres and training organisations

Face Coverings <https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own>

Working Safely offices and contact centres: <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/offices-and-contact-centres>

Close Contact Services *may be applicable for certain types of body work psychotherapy* <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/close-contact-services>

Employers obligations and COVID Secure environment (applies to counselling centres and training centres)

https://www.hse.gov.uk/coronavirus/index.htm?utm_source=hse.gov.uk&utm_medium=refferal&utm_campaign=coronavirus&utm_term=banner-2&utm_content=home-page-banner

Education – FE Colleges <https://www.gov.uk/government/publications/coronavirus-covid-19-maintaining-further-education-provision>

Obligations for ACC Registered Counsellors And Counselling Affiliates

1. Check with your insurance provider that you are supported for the variations in practice during the COVID-19 period: on-line, telephone, email/messaging, 'walk and talk', meeting outdoors in gardens or public places, returning to face-to-face/in person practice
2. Conduct (and make a note of) a risk assessment of the Covid-19 security of any indoor setting that you will be seeing clients in and the mitigating actions you have taken to make the environment as secure as is reasonably possible (see guidance section below).
3. Discuss and agree with your supervisor your decision making process and the principles of how you will work with clients together with any specific concerns about individual client or changes that you feel you need to make when these arise.
4. Communicate clearly to clients and prospective clients what you have put in place to make an indoor environment 'Covid-19 secure'; any risks that you can't mitigate against and that they need to be aware of (for example where there are shared areas of the premises used by members of the public for other purposes); and any rules/protocols that they and you need to adopt to minimise the risk of virus transmission when meeting in person whether outside or inside.
5. Make changes as required to your counselling agreement/contract that take into account any additional obligations in relation to meeting in person and/or other changes caused by needing to comply with government regulations, for example disclosing contact details for track and trace, and contingency arrangements for the reintroduction of local or national lockdowns.

Guidance

- ❖ Firstly: no member should feel under pressure to meet with a client in person during the time that infection with COVID-19 remains an issue for the UK.
- ❖ Secondly: many counsellors and psychotherapists have reported how difficult the process of discernment is. It has been challenging for some to work through the decision about what is best to do, especially when balancing the therapeutic benefit to clients versus the risk of virus transmission in returning to face-to-face practice. Living under the cloud of COVID-19 is an inherently stressful situation, complicated by the reality that people within the same profession have different approaches to evaluating and tolerating risks. It may be that you arrange to get together with a colleague to work through the decision and help you undertake a risk assessment and a plan of action.
- ❖ As you need to evidence a risk assessment and the steps you have taken to make your practice 'Covid secure' – we have produced an example of a risk assessment and also a checklist to help guide thoughts and actions. Use them and adapt them as you see fit

Risk Assessment for Returning to Face to Face / In Person Practice

Risk assessment involves thinking about possible future events that can have positive or negative impacts. The purpose of a risk assessment is to help identify things that can be done to avoid something negative happening and/or lessening the impact of it, and to work out what is most important to do. The same process can be done to identify opportunities and plan for an increase in the likelihood of positive things happening in terms of future growth and development. The latter have not been addressed here because the focus is on trying to prevent the likelihood of virus transmission and taking professional care of our clients in changing circumstances. However, as an example, the fact that many counsellors are establishing an on-line practice for the first time is an opportunity that can be built on to grow the reach of their practice. Similarly – peer support groups may be easier to get off the ground when colleagues can meet via Zoom.

Risks are assessed according to the likelihood of them occurring and the degree of impact they could have. Below is an example.

Risk	Likelihood	Impact	Mitigating Actions
Transmission of Virus	Low/Medium	High	<ul style="list-style-type: none"> • Continue to offer on-line/telephone/outdoor counselling for medically vulnerable clients • Mark out 2m/1m physical distance • Have adequate ventilation – keep window open / open window & door between clients • Devise cleaning protocol & make sure that they are followed • Set limits on who can be in building at same time etc. • Ask clients not to attend if they have symptoms
Counsellor and/or clients not following protocols	Medium	High	<ul style="list-style-type: none"> • Put up signs and notices • Position furniture with on seat notices not to move • Have check list for each session, e.g. open windows, cover chairs etc.

Risk	Likelihood	Impact	Mitigating Actions
Harm to client if in person counselling withdrawn because of quarantine/lockdown etc.	Medium	High	<ul style="list-style-type: none"> • Talk it through & have interim arrangement e.g. check-in phone calls • Provide information on local resources & support helplines
Harm to Clients if in person counselling is not resumed in short time frame	High	High	<ul style="list-style-type: none"> • Consider COVID safe connection e.g. by meeting outdoors? • Discuss with supervisor risk/benefit of recommencing in person sessions for vulnerable clients
Legal Action by client or counsellor because of contracting disease	Low	High	<ul style="list-style-type: none"> • Revise contract & gain informed consent • Establish pre-session health checks • Discuss with Insurance company

A template example of risk management in the workplace is provided by the Health and Safety Executive, and can be adapted for counselling centres and private practice <https://www.hse.gov.uk/risk/casestudies/pdf/office.pdf>

Checklist for Returning to Face to Face / In Person Practice

This checklist relates to returning to face to face work. Again, it is something that can be adapted for your circumstances and covers much of the same points as the risk assessment.

	To Do	Done Y/N
1.	Assess your own thoughts and feelings about returning to face to face practice, considering also your personal clinical risk and family/dependent situation)	
2.	Check that your insurance company will cover you for returning to face to face practice	
3	Imagine how clients will arrive and depart and move through the premises and identify where areas of greatest risk of virus transmission may occur, for e.g. arriving and leaving, sharing common areas like halls and toilets etc. Think about how these risks can be mitigated against and what you need to do	
4	Take reasonable actions to make premises and your counselling room 'covid secure' for example: changing room layouts to enable the required social distancing, thinking about how to ensure there is adequate ventilation in and between sessions; replacing soft furnishings with wood or plastic, or purchasing washable throws that can be replaced between client sessions or fabric disinfectant ; considering purchase of Perspex screens etc.	

	To Do	Done Y/N
5	If you use toys, objects or creative resources think about how these can be made safe for each client or alternative (less risky) ways to engage creatively with clients	
6	Think about workarounds for processes which involve touching paper such as signing contracts and taking payments	
7	Research what cleaning regimes are required and what products are adequate/recommended	
8	Devise a COVID-19 specific contact risk protocol for you and your clients to follow prior to and at the end of each session. This may include, for example, checking on each other's health statuses before meeting, how the client will be greeted and gain access to the therapy room, when hand washing/sanitisation takes place, how the client will leave the counselling room and premises, and your commitment to cleaning surfaces, ventilating rooms and disposing of rubbish prior to sessions.	
9	Undertake an impact assessment of the UK and devolved governments test and trace processes on client confidentiality and self-isolation obligations, and determine what changes need to be made to your contract and privacy agreement to ensure that you can fulfil your responsibility to notify authorities of your contacts should you need to.	
10	Think about the implications of having to end face to face counselling at short notice for a period of time due to local or national lock downs or the need to self-isolate – and what arrangements you will may wish to make with your clients during this time, e.g. to offer on-line/telephone counselling	
11	Make all necessary changes to any standard information you provide to clients and the counselling contract/agreement and privacy policies. If applicable update your website explaining what you have put in place to help protect clients from the virus and what their responsibilities are	
12	Discuss with prospective clients their and any family/dependents clinical risk/vulnerability in relation to COVID-19. Ensure and they have given adequate thought to the risks involved in face to face counselling https://www.nhs.uk/conditions/coronavirus-covid-19/people-at-higher-risk/whos-at-higher-risk-from-coronavirus/	
13	Communicate to clients prior to meeting what you have put in place to reduce the risks of transmission and any changes to your practice (for example as above the introduction of pre-session health reviews, how contracts will be signed, payment taken, restrictions on hospitality on offer and/or use of creative interventions) – ensuring that they give informed consent to these arrangements	
14	Discuss potential barriers to engaging for example screens and/or face coverings, being clear about what is negotiable for you and what is not.	
15	Engage with your supervisor about all of the above and keep in view the ethical commitment to act in the best interest of your clients, avoiding their harm, and providing an accountable and professional therapeutic relationship	