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Audit of Registrants on the COSCA Register of Counsellors and Psychotherapists

1. Introduction

In the interests of public protection, COSCA will carry out audits of a percentage of its individual registrants on the COSCA Register of Counsellors and Psychotherapists.

The Register is a list of COSCA individual members who have met our standards for registration.

The aim of the Register is to protect the public by providing access to counsellors and psychotherapists who have met our registration standards.

2. The Audit

When registrants renew their registration, they need to confirm that they continue to meet the standards of the Register by completing the Annual Renewal Application.

From April 2014 audits of registrants will be carried out twice per annum to ensure that registrants continue to meet the requirements for registration and that they are compliant with them.

Registrants on the Register for more than a year are eligible for audit. If selected they will be asked to submit their past year's records regarding the following registration requirements:

2.1 Continuing Professional Development

The COSCA Statement of Ethics and Code of Practice (paragraph 2.3 on page 4) states that: 'an individual member is required to take responsibility for and be committed to, his/her own ongoing professional and personal development'.

Registrants must undertake CPD in accord with their particular membership category.

If selected for audit registrants must submit their CPD record, including a record of its outcomes, on the proforma sent to them.

2.2 Client-work Supervision

The COSCA Statement of Ethics and Code of Practice (paragraph 8.1 on page 10) states that 'members must use client-work supervision to ensure the efficacy of their working relationship with clients and to ensure that the needs of their clients are being addressed'.

In the interests of public protection, registrants must have client-work supervision in accord with their particular membership category.

If selected for audit registrants must submit an up-to-date record of their client-work supervision sessions and evidence of how supervision has had an impact on their practice. This can be done by completing the proforma sent to those selected or by submitting the information in another way providing it contains the same information as requested by the sent proforma.

If selected for audit registrants will be asked to provide contact details of their supervisor(s) as COSCA may wish to make contact to confirm their supervision arrangements.

2.3 Indemnity Insurance

Registrants must have adequate, current and ongoing professional indemnity insurance for their work as counsellors and psychotherapists in accord with their particular membership category.

If selected for audit, registrants will be asked to submit a copy of their insurance certificate for the period of the audit as well as a copy of their current insurance certificate.

If registrants are insured through an employer, they will be required to provide confirmation of this insurance cover.

2.4 Complaints Procedure

When applying for individual membership, individuals who have their own complaints procedure must enclose with their application a copy of this procedure.

On becoming a member of COSCA, all members are required to pass information about COSCA's Complaints Procedure onto all their clients and/or those to whom they provide counselling related services including training and supervision.

If selected for audit, evidence of passing information about COSCA's Complaints Procedure onto all their clients must be submitted. This evidence may comprise, for example, a copy of the client contract that clearly informs all clients of the COSCA Complaints Procedure.

If selected for audit individual members with their own complaints procedures must submit them along with a completed copy of the COSCA's Standards for Complaints Procedures. All the 'yes' boxes on the standards form should be ticked prior to submission.

The submitted complaints procedures will be checked by COSCA against COSCA's standards for complaints procedures. Please see a copy of the standards on www.cosca.org.uk – Complaints - COSCA's Standards for Complaints Procedures.

Handling of complaints meet COSCA standards/requirements

If selected for audit, individual members must submit information to COSCA about any complaints about them submitted to COSCA and/or any other professional or statutory body over the previous year.

All individual members who have their own complaints procedures are required to submit to COSCA immediate reports at the conclusion of their complaints proceedings related to counselling and psychotherapy, and notify COSCA of any sanctions applied. COSCA will consider taking appropriate action on receipt of notifications about sanctions.

If selected for audit, individual members with their own complaints procedure must submit their complaints handling record over the previous year, including information on outcomes. This must be submitted on the proforma provided or in another format that includes the information requested in the proforma. Please see www.cosca.org.uk – Complaints - COSCA's Complaints Handling Proforma.

3. Websites and Online presence of COSCA Members

COSCA does not require its members to have their own website or online presence. Members who have their own website or online presence are expected to clearly show that they are members of COSCA. The COSCA logo can be used for this purpose. Please see the policy on how to use the logo on the COSCA website under Members Info.

In addition, and in accord with COSCA's Standards for Complaints Procedures, (see the website under Complaints) all member organisations and individual members with their own complaints procedure must make it accessible online via their website and their own procedure must be compliant with all COSCA's Standards for Complaints Procedures. Individual members who do not have their own complaints procedure and do have a website or online presence are required to clearly refer to the COSCA Complaints Procedure and indicate clearly that this procedure should be used in the event of a complaint against them.

The deadline for meeting the above expectation and requirement was 31December 2015. Members are asked to contact the COSCA office if they foresee any difficulty with complying with this deadline.

4. Registrants Selected for Audit

Registrants selected for audit will be informed about this in writing and given 21 days from the date on the notification letter to provide the information required. Registrants who are unable to submit the required information within the stipulated time period should contact COSCA without delay.

If registrants do not submit the required information within the above timescale, they will be given a further 21 days to do so. Failure to do so will result in the removal of their names from the Register.

On receipt of the requested information, COSCA's Corporate Affairs Group will assess this against the criteria for registration. It may request further information from registrants at this stage.

Registrants will be informed that they must not submit information that would breach client confidentiality.

Information submitted for audit purposes will be safely destroyed on completion of the audit.

5. Outcomes

On completion of the audit, registrants will be advised of one of following outcomes:

- The information submitted meets the standards of the Register
- The information submitted is incomplete and more information is needed
- The information submitted does not meet the standards of the Register and requires registrants to re-submit and/or evidence how they meet the outstanding standards. Failure to do so satisfactorily within the stipulated period will result in the names of registrants being removed from the Register.

If selected for audit registrants who submit information on time will be notified of the audit outcome on average 3 months from the original audit notification.

While the audit is being conducted registrants can continue to practise.

6. Review of Corporate Affairs Group's Decision

Applicants who receive a decision of the Corporate Affairs Group that they do not believe it is justified have the option to request a review of it. This must be done in writing to the Chief Executive within 21 days from the date on the decision letter.

The ground for requesting a review of the above decision is as follows:

 the information submitted has not been fairly and properly assessed against the criteria outlined in Section 3 above.

The request to review a decision must include the following:

- the decision requested to be reviewed
- the date of the above decision
- the reason(s) for the request
- the relevant standard(s)
- evidence that the above decision was affected by the Corporate Affairs Group's failure to fairly and properly assess the information submitted against the criteria outlined in Section 3 above.

The Chief Executive, in consultation with relevant parties, will consider whether the ground has been met for the request for a review to be submitted to the Corporate Affairs Groups. The individual requesting the review will be informed of the outcome of this consideration.

If it is decided that the ground has been met, the request will be submitted to the next meeting of the Corporate Affairs Group for consideration and determination.

The outcome of the review will be sent in writing to the individual concerned within 14 days of the Corporate Affairs Group meeting.

Individuals who have requested a review and are not satisfied with the outcome can appeal against it through the COSCA Appeals Procedure (see below), within three months of the review decision being made.

7. Appeals

COSCA's Appeals Procedure provides a means of appealing against the above decisions of COSCA (Counselling and Psychotherapy in Scotland). Please see a copy of the above procedure under ethics on our website. www.cosca.org.uk

Brian Magee Chief Executive COSCA (Counselling & Psychotherapy in Scotland)