

BACP's response to Labour's Review of Mental Health led by Luciana Berger

Introduction

The British Association for Counselling and Psychotherapy (BACP) is pleased to provide a submission to this important inquiry being led by our Vice President, Luciana Berger, on behalf of the Labour Party. Our submission focusses on the need to better utilise the existing counselling and psychotherapy workforce within Labour's existing and future policy programme to address longstanding unmet demand for appropriate mental health support which has grown since the pandemic and has been further exacerbated during the cost-of-living crisis. This draws on our analysis of longstanding challenges and is further informed by a dedicated consultation undertaken with BACP's members in England from 16-23 February to which 1,400 members responded.

Headline challenges and opportunities

- The pandemic and ongoing cost-of-living crisis has provided an ongoing toxic legacy of changing circumstances, growing financial and job insecurity, isolation, bereavement, and prolonged uncertainty which has damaged the nation's mental health. Our most recent YouGov survey showed that **three quarters of respondents (76%)** report that their mental health is being impacted by the current cost of living crisis, **which has increased from 53% in 2022.**
- The numbers are particularly high amongst women (80%), those aged under 55 (83%), ethnic minority respondents (81%), LGBT+ people (85%), and those with a disability (81%). They are all more likely than average to say that their mental health has been negatively impacted by the cost-of-living crisis.
- We also know that people are calling for more support from the Government. Data from BACP's Public Perceptions Survey highlighted that **68% of people think** that addressing mental health should be a priority for government. **Only 14% of people felt the UK government has done enough to support people's mental health.**
- Almost nine in 10 people (88%) agree it's important therapy should be accessible to everyone who wants it, and 85% agree it's a good idea to seek counselling or psychotherapy for a problem before it gets out of hand. A third of UK adults have previously sought help from a counsellor or psychotherapist - one-fifth (20%) have considered it but not yet gone through with it. **Cost is the biggest barrier to accessing professional mental health support** with 37% of those who have considered it but not gone through with it giving the cost as a reason.
- A survey of our members to inform this submission showed that **68.9% reported increased demand from clients in the past 18 months.** Additional surveying of BACP members in our Mindometer Report highlighted that **nearly half of the therapists surveyed described demand as being at overcapacity**, resulting in a waiting list and/or referral of clients to other services. This is additionally in the context of 56% seeing clients cutting back or cancelling therapy sessions due to money worries.

Tackling this crisis will require public investment in much more accessible and higher quality mental health services across a range of settings that provide earlier intervention, free at the point of need. Trained yet underutilised counsellors and psychotherapists have a critical role to play within this enhanced offer.

- We have over 57,000 members across England, trained and qualified to provide life changing therapy to help meet the growing demand. Analysis BACP has undertaken through our member's survey (which is circulated on membership renewal), shows that many of our practitioner members are under-deployed. On average they have told us that they have the capacity to undertake 4.9 hours of additional client hours each week. This amounts to over 260,000 hours per week, if funding was in place to utilise this much needed capacity. Our survey to inform this response indicates that this capacity could be even higher, with members on average being able to provide an additional 8 hours per week which equates to over 456,000 hours per week, across our membership in England.
- Our survey also indicated large numbers of members who would be keen to work in public services - in Health settings (67.1%) and Education settings (54.9%) if funded opportunities were available. Additionally, 57.6% noted a keenness to work in the voluntary and community sector.

Labour's existing Mental Health policies

A core part of Labour's Health offer focusses on reducing pressure on the NHS through investing in upstream policies - enabling early intervention and ensuring problems are addressed before they become a crisis which needs more extensive and expensive solutions. We welcome this as this very much reflects the critical role our members are playing in communities across the UK. We've been pleased to advise Labour's Shadow Education Team and Shadow Mental Health Minister on these proposals on an ongoing basis since 2020:

1. The proposal to **guarantee mental health treatment within a month for all who need it** is both crucial and ambitious and would require a significant recruitment drive and extensive workforce planning.
2. The proposal to **recruit 8,500 new staff so that one million additional people can access treatment every year by the end of Labour's first term in office** - we strongly recommend that counsellors and psychotherapists included within this, together with a holistic workforce plan to inform the roll out of these posts. **We also recommend that Labour make a firm commitment to use the existing trained, yet underutilised, mental health workforce rather than simply creating new roles.**
3. We fully support the proposal to **put an open early support hub for children and young people in every community**, providing early intervention, and drop-in services. This very much reflects the Fund the Hubs campaign, which BACP has played an integral role securing funding for 24 hubs from the Shared Outcomes Fund, with the Treasury originally allocating £4.92 million then topping this up with a further £3 million. Counsellors and psychotherapists are key within early support hubs and would want them included within Labour's plans. BACP and Fund the Hubs support the Youth Access YIACS (Youth Information Advice and Counselling

Service) early help model, which calls for access to early support hubs in every community for 11- to 25-year-olds.

4. **We have long supported the need for specialist mental health support and counselling in every secondary school in England** and have campaigned on this issue with Labour over the past decade, having previously successfully lobbied the administrations in Wales, Northern Ireland and Scotland to make this a reality. BACP is currently working in partnership with Citizens UK and have produced a joint policy paper to be shared with the Labour Party providing options for a range of funding models, including a roll out of access to statutory counselling provision to primary schools and colleges.
5. **Giving mental health its fair share of funding** is critical and necessary if Labour, in Government, is to deliver these important ambitions. The issue of adequate funding was highlighted more any other issue by BACP members responding to our survey - a total of 1,800 times in our 1,400 responses.

Recommendations

- A. Labour must make a firm commitment to use the existing trained, yet underutilised, mental health workforce rather than creating new roles.
- B. Counsellors and psychotherapists must be clearly identified within the workforce to deliver Labour's policy commitments for mental health professionals in every school, for the proposed early support hubs for children and young people in every community and within the 8,500 new mental health roles
- C. Mental health policies must be underpinned by extensive workforce planning that looks beyond the statutory sectors and recognises provision across all sectors.

Barriers to Counselling and Psychotherapy in the NHS Workforce

- Successive Government strategies, including the Five Year Forward View and the NHS Long Term Plan, have made mental health a priority; however, these plans have failed to successfully address the chronic shortage in the mental health workforce, meaning any service expansion is hampered by a lack of recruitment of professionals to deliver the services.
- Counsellors and psychotherapists are often an overlooked and underutilised professional group within the NHS workforce skills mix. Part of this is due to an over-dominance of CBT over other forms of therapy. Our members have significant additional capacity that could play a crucial role in helping the NHS meet its expanding workforce targets, as well as helping to reduce the growing and unsustainable waiting lists for therapeutic support.
- Over two thirds of BACP members (67.1%) who completed the survey to inform this submission indicated they would be willing to work in NHS settings if more funded/paid roles were available.
- According to our members, the key barriers facing counsellors and psychotherapists entering and thriving in the NHS workforce are:

1. **Narrow range of psychological therapy services with an over-dominance of CBT** - Whilst the existing services - including NHS Talking Therapies for Anxiety and Depression - have helped large numbers of people, they don't meet the needs of all services users. This is often because of the narrow and prescriptive nature of the interventions offered or because people don't meet the clinical thresholds to access a service. We believe that expanding NHS Talking Therapies services to ensure that other NICE recommended psychological therapies, beyond CBT, are more widely available, in addition to additional services, would mean the NHS is able to meet the needs of more service users. This could include bringing counsellors back into the GP settings through the Primary Care Networks and Additional Role Reimbursement Scheme funding route.
2. **Pay inequity and parity with other professionals** - Too often local NHS employers pay their counsellors on *Agenda for Change* pay bands below those recommended by NHS England nationally, whilst other psychological professionals working in the same services and with clients of the same complexity are often paid one or two bands higher. This acts as a barrier to practitioners entering the NHS workforce, and contributes to practitioners leaving the NHS workforce, fostering a feeling of counselling being undervalued in the NHS. NHS England nationally supports tackling this problem, but adherence to agenda for change pay scales is determined locally. This lack of parity with other professions featured heavily in our consultation with members to inform this response, with many reporting they would currently be unable to afford to work in our National Health Service.
3. **Lack of roles immediately post-qualification** - currently, most NHS roles that counsellors or psychotherapists can apply for require 2-3 years post qualification experience, experience that they are unable to get in paid roles on the NHS. Continuing to develop a clearer entry routes and career pathways in the NHS for counsellors and psychotherapists from qualification throughout their professional journey is vital.

Recommendations

- D. The range of accessible evidence-based interventions available must be extended beyond the current narrow offer in NHS Talking Therapies
- E. The pay parity with counselling and psychotherapy in the NHS must be urgently addressed
- F. NHS England must be mandated to work with BACP to develop recognised training routes and career pathways for counsellors and psychotherapists

Expanding choice to deliver more effective outcomes

- Choice is a vital part of any successful psychological therapy service. This includes choice of therapist, choice of how you access the service and crucially choice over the modality of intervention you access. The importance of choice is also reinforced through the NHS Talking Therapies for Anxiety and Depression manual, which explicitly states that choice is vital. Despite this being supported by professional bodies, service user groups and NHS England, at

local service delivery level choice can often be lacking, with an overreliance on CBT over other proven interventions. Concerns about the inappropriateness and dominance of CBT was mentioned 570 times in responses to our survey by BACP members.

- Third sector services have a critical role to play in expanding choice of high-quality therapeutic interventions and making talking therapies more accessible and acceptable to those who need them. Many services report facing risk of closure in the current financial climate, resulting in loss of specialisms and localism and reducing client choice.
- It's vitally important therefore, that not only is choice built into service specs as a core principle of delivery but that services are sufficiently funded to ensure that full choice is a reality for all people accessing services irrespective of where they are in the country.
- A number of respondents to our survey, and other members we have engaged with, report that their NHS Talking Therapy for Anxiety and Depression service offers a capped number of sessions to service users, most frequently described as 6 sessions. This is in spite of the NICE guidelines, which recommends the modalities on offer are available, working off a 20-session model and NHS England placing no hard cap on session numbers. Whilst this is far from being the case in all services, services and service commissioners must be held to account for delivering a service which fails to offer the full number of sessions to any service users who require them. This should be built in the commissioning frameworks as well to ensure that no service tendering for a contract to provide services to the NHS can drive down the price of their tender by arbitrarily reducing the number of sessions they'll make available to service users.

Recommendations

- G. The range of interventions available beyond CBT must be extended across all geographic areas
- H. Third sector providers must be better recognised valued as part of the mental health landscape and given sustainable funding, nationally and through local ICS/ICB provision
- I. Commissioners must be held to account for delivering services which fail to offer the full number of sessions to any service users who require them.

Urgent support needed for vital VCSE organisations

- Our survey of members and ongoing engagement with Third Sector counselling services demonstrates an urgent need to ensure that trusted third sector providers of mental health services are properly recognised and paid to respond to referrals from NHS services, and that they can offer paid employment to counsellors and psychotherapists. Stakeholders shared the urgent need for ending short-term funding cycles, which prevent proper planning, recruitment and retention of staff.
- Third Sector Services are often well regarded and best placed to provide support for the communities they serve, particularly for clients from marginalised community backgrounds who are not well served by mainstream services. Appropriate, targeted funding could take

strain away from statutory services, especially for issues which are outside of the scope of NHS Talking Therapies for Anxiety and Depression and increase access to those from marginalised community backgrounds. An overwhelming number of responses called for greater recognition of the value of third sector counselling services, and highlighted the fragility of current funding and the difficulty faced by smaller community-based services in obtaining the funding they need to continue.

In its February 2024 'State of The Sector' report, NPC estimate that charities prop up state services by £2.4bn a year. The sector is often seen as a provider of additional resource, leading to many third sector service leaders feeling exploited by the system, in their delivery of public contracts.

- In our survey to inform this submission, many members identified concerns about the Sector's reliance on students on placement and unpaid therapists, increasing the risk of the sector being perceived as a 'cheap option'.

Recommendations

- J. Third sector organisations must be treated as an equal partner in delivery of mental health services, where referral brings commensurate funding to provide adequate treatment to meet the needs of diverse communities.
- K. Commissioners must ensure sustainable, multi-year contracts are provided for third sector services to ensure continuity of delivery and provision of secure paid roles and that procurement processes aren't a barrier to utilisation of community specialism

Putting school counselling at the heart of Labour's education offer

- Our survey of members demonstrated extensive support for Labour's objective to *put a Mental Health Professional in Every School*, with many expressing the need to have parity with Scotland, Wales and Northern Ireland, who all place counsellors in schools through nationally funded programmes.
- Many members who expressed a desire to practice in education settings highlighted the need to ensure that rates of pay were commensurate with therapists in other sectors, to ensure these roles would be viable and sustainable.
- Many members also highlighted the importance of ensuring that supervision was included within this offer.

Recommendations

- L. Trained and qualified school counsellors must remain a key component of Labour's mental health offer in schools.
- M. Salary levels must adequately reflect these specialist roles and that on-costs, including supervision, is included within Labour's offer

Improving productivity and employability in Workplaces

- A recent report from Mental Health UK revealed that one in five workers (20%) needed to take time off due to poor mental health caused by pressure or stress in the past year, and that the UK risked becoming a 'burnt-out nation'. This placed significant cost on employers and on the economy - approximately £56bn. Poor mental health now accounts for more than half of all work-related illnesses, around 51% of long-term sick leave is due to stress, depression, or anxiety.
- Research has shown that workplace counselling can halve sickness absence in organisations that have accessible services, provided as part of an EAP programme or otherwise, and that staff return to work sooner, are more resilient, productive and less likely to become long-term sick.
- However, for many organisations, particularly SMEs, the cost of investment in occupational health and allied mental health interventions remains to be a significant barrier.

Recommendation

- N. Labour must consider additional measures, including tax incentives, which would encourage employers to invest in and access appropriate multidisciplinary services, including workplace counselling and therapeutic coaching delivered by trained therapists

Removing financial barriers to therapy

- Any additional cost, particularly during these challenging financial times, represents a significant barrier to vulnerable people accessing vital mental health support when they need it; anything that provides or improves access to mental health support should be facilitated and encouraged. The current anomaly where counselling and psychotherapy services are subject to VAT -whilst similar psychological therapies such as psychology, art and drama therapy are not - is an unnecessary financial barrier. The removal of VAT on counselling and psychotherapy services is long overdue and would remove a needless obstacle to people accessing care.

Recommendation

- O. A review into the cost and benefits of removing VAT on counselling and psychotherapy provision must be undertaken and prioritised as a medium-term objective.