

Working online in the counselling professions

Good Practice in Action 047 Fact Sheet
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Fact Sheet

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Context

This resource is one of a suite prepared by BACP to enable members to engage with BACP's current *Ethical Framework for the Counselling Professions* in respect of building appropriate online relationships.

Using Fact Sheet resources

BACP members have a contractual commitment to work in accordance with the current *Ethical Framework for the Counselling Professions*. The Fact Sheet resources are not contractually binding on members but are intended to support practitioners by providing general information on principles and policy applicable at the time of publication, in the context of the core ethical principles, values and personal moral qualities of BACP.

Specific issues in practice will vary depending on clients, particular models of working, the context of the work and the kind of therapeutic intervention provided. As specific issues arising from work with clients are often complex, BACP always recommends discussion of practice dilemmas with a supervisor and/or consulting a suitably qualified and experienced legal or other relevant practitioner.

In this resource, the word 'therapist' is used to mean specifically counsellors and psychotherapists and 'therapy' to mean specifically counselling and psychotherapy.

The terms 'practitioner' and 'counselling related services' are used generically in a wider sense, to include the practice of counselling, psychotherapy, coaching and pastoral care.

1 Introduction and background information

There is no longer a clear distinction between online and offline working in the counselling professions, as we become more used to hybrid or blended approaches to making and keeping in contact with others within many areas of our lives. What varies considerably and impacts most strongly on the work that we do is the extent to which we incorporate aspects of digital technology and the influence that this may have on each of us both professionally and personally.

The rapid acceleration in computerisation and handheld devices in recent years, increased further by the events of the COVID-19 pandemic, has led us to a point where almost all practitioners interact in some way with digital technology. During the pandemic we learned how to deliver services in wide-ranging, innovative ways using this technology and focused on ensuring that such approaches are safe, ethical and secure. We are now learning more about the psychological and emotional impact of mediated therapeutic communication and reviewing the wider impact of the changes that have already taken place and continue to evolve. This resource acknowledges the need for practitioners to reflect closely on these substantial shifts in their own and their clients' lives and to recognise and consider their responsibilities within this context. It explores the key issues involved in continuing to meet the ethics and standards required of BACP members within the *Ethical Framework for the Counselling Professions* whatever the context, setting or medium of delivery of all aspects of professional practice.

The *Ethical Framework for the Counselling Professions* states that:

'We will fulfil the ethical principles and values set out in this Ethical Framework regardless of whether working online, face to face or using any other methods of communication.'

'The technical and practical knowledge may vary according to how services are delivered but all our services will be delivered to at least fundamental professional standards or better.' (Good Practice, point 20).

Practitioners now routinely use a wide range of devices, platforms and software applications in communication with clients and with each other. Some create the context and provide the medium, enabling direct therapeutic interaction between practitioner and client, whilst others are associated with more administrative tasks.

(These include electronic booking systems and diaries, record-keeping, email and text communication and online payment systems.) Some services and independent practitioners devise their own strategies employing a range of coordinated software applications while others subscribe to practice management platforms where these options are professionally integrated in one place. There has been a rapid growth in roll-out of such platforms and practitioners should ensure that the aims of the providers are compatible with good practice information described here and elsewhere. Whichever strategy is chosen, the impact of the technology will be significant.

Within this resource 'working online' refers to digitally mediated communication regardless of the device, equipment or software and 'working in the room' refers to situations where practitioner and clients share physical space and the interaction itself is not directly mediated by digital technology.

Communication may be mediated by text, audio or video communication processes, or a combination of all of these. In recent years automated applications and artificial intelligence have also featured more prominently in mental health care provision. Practitioners communicate using websites, blogs, social media and many other channels. Work is often hybrid and/or blended in that it may include wide-ranging approaches to online communication alongside more traditional 'in the room' meetings. The range of approaches and applications has grown exponentially, alongside shifts in attitudes and concerns.

2 Competences

Practitioners should be sufficiently competent in the use of technology to be able to offer reliable and adequate services for clients and colleagues. The acquisition and assessment of necessary competences are complex. Some skills are transferable from other areas of life whilst others are specialist and require dedicated and more formal training. It is important to keep up to date with developments in both the technology and software used and the regulatory implications and commitments required, all of which can involve a significant investment in time.

BACP's *Online and phone therapy (OPT) competence framework* distinguishes between technological, professional and therapeutic competences involved in working with digital technology.

These are summarised as follows:

2.1 Professional competences

These competences are specific to the delivery of psychotherapeutic interventions involving digital communication and necessitate a full and thorough identification of the legal and ethical challenges that arise when offering OPT. The *Ethical Framework for the Counselling Professions* sets the context for these challenges, which include:

- issues of confidentiality and consent
- data protection including UK-GDPR
- assessment and contracting
- therapy endings
- onward referrals
- equality, diversity and inclusion
- sourcing and engaging in appropriate supervision
- the challenges of working internationally.

2.2 Therapeutic competences

These relate to the communication processes specific to OPT, the impact of remote and distance-based working on all aspects of the therapeutic engagement (especially the psychological and emotional impact of meeting at a distance) and therapist self-care. Identities and relationships can emerge very differently in online spaces from in the room and it is important to gain a working understanding of these phenomena and to use this knowledge effectively. Therapeutic competences translate differently according to the theoretical modality and approach in which the practitioner is trained; the digital environment often becomes a central component of the theoretical approach which may need to be adapted to acknowledge this.

2.3 Technological competences

These refer to the knowledge, practical information and skills involved in setting up and managing different technologies and software.

Practitioners should ensure that they understand not only how to operate the equipment and software safely and appropriately but also that they are familiar with security, software settings and problem-solving implications and are able to offer alternative means of contact in case of technological failure. It is important not only for the practitioner to be proficient in the use of devices and software but also to be able to guide and advise clients in these matters, to facilitate safe and effective communication at both ends of the therapeutic connection.

3 Security and confidentiality

There are always limits to the security and confidentiality that can be offered in the digital world and it is essential that these are understood and clearly articulated by all parties and that risks are minimised, wherever possible. Threats to security may arise through human behaviour or intervention, equipment failure, or inadequate understanding of the platform or software and failure to take adequate steps to protect security and confidentiality. Threats include:

- **Physical intrusion** at either end of the communication, for example by being overheard or someone being present without the knowledge and consent of the person at the other end of the communication. Physical security needs to extend beyond the actual sessions by ensuring that the means of communication are adequately protected and not left open for others to view current transactions or to search for the history of communications. Practitioners are responsible for protecting their end of the communications.
- **Electronic intrusion by third parties** where there are insecure methods of communication, including emails, unprotected wi-fi, inadequate firewalls and virus protection (at both ends of the communication), the use of shared or unencrypted software or devices etc.
- **Electronic intrusion by the online communication provider**, which is increasingly unavoidable due to the nature of online services and the widespread use of cookies which continually monitor our internet use. It is important for practitioners to understand how to assess a platform for suitability and how to manage settings and online environments to minimise these risks. As platforms are constantly updated, they should be regularly reassessed, and alternatives considered. Terms and conditions of service should be clearly understood. Consideration should also be given to the use of all smart devices, including smart speakers, watches, doorbell cameras etc. There are increasing concerns relating to the legal accessibility of data to third parties through these devices; practitioners should be aware of increased risks to privacy and security and take steps to inform themselves and clients appropriately about these.

- **Electronic surveillance** by national security services – a feature of contemporary life. Practice varies between countries in how they balance the protection of public safety against electronic intrusion on private communications. It is important to keep up to date when considering the risks from these intrusions, particularly if working internationally.

Dedicated training is available from independent providers who offer guidance in areas of cybersecurity and confidentiality.

4 Data protection: legal requirements and responding to any breach of security or privacy

All organisations and individuals working online in any capacity must take account of the relevant law concerning data protection. The UK General Data Protection Regulation (UK-GDPR) and the Data Protection Act 2018 set out the legal requirements for anyone who processes data about people in the UK. The legislation aims to protect privacy and to ensure that people, about whom information has been collected, can check the accuracy of that information. Anything that is recorded, stored and/or shared in a written format (whether online or in paper form) constitutes data. Controllers do not have to register with the ICO if they don't process personal information on a computer (this includes smartphones and emails) and anything held in unstructured paper filing systems is not currently subject to data protection legislation; unless you are a public authority (see <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/what-is-personal-data/what-is-personal-data/#pd3>).

To check if you need register with the ICO: see <https://ico.org.uk/for-organisations/data-protection-fee/self-assessment>. For detailed information about specific practitioner obligations under the UK-GDPR see GPiA 105 *the United Kingdom General Data Protection Regulation (UK-GDPR) legal principles and practice notes for the counselling professions*; or for further guidance consult the Information Commissioner's Office (ICO) <https://ico.org.uk>.

In addition to legislative requirements, in the event of any breach of security or privacy the *Ethical Framework for the Counselling Professions* states:

We will ensure candour by promptly informing our clients of anything important that has gone wrong in our work together, and:

- a. take immediate action to prevent or limit any harm*
- b. repair any harm caused, so far as possible*
- c. offer an apology when this is appropriate*
- d. notify and discuss with our supervisor and/or manager what has occurred*
- e. investigate and take action to avoid whatever has gone wrong being repeated*

(Good Practice, point 52).

5 Working internationally

The law differs between countries. When working traditionally where practitioner and client share the same physical space, the applicable law is clearly determined by where the work takes place. When working at a distance using digital technology it is not uncommon for the practitioner and client to be located in different legal systems and subject to different laws. It is then less clear which legal system applies. Uncertainty can be reduced by including an explicit statement in the contract that the work is being undertaken in accordance with the laws of the practitioner's own country and any disputes will be subject to that country's law. This may reduce the degree of uncertainty but does not eliminate it altogether. Insurance companies who agree to cover international working are usually able and willing to assist practitioners in decision-making and the appropriate wording of contracts in individual situations.

Professional titles are protected in law differently across the world, and this can restrict the right to practice using certain titles (this applies to USA, Canada and some other countries). Offering services in these places as a counsellor, psychologist or psychotherapist without the appropriate licence or legal authorisation may be a civil wrong and/or a criminal offence.

Due to ongoing regulatory changes and uncertainty, it is always wise to explore these questions and to seek advice at the time of referral before agreeing to work online internationally.

Working internationally requires the practitioner to pay particular and sensitive attention to issues of cultural understanding between therapist and client as mentioned below in Section 7. It is also important to consider additional challenges that arise relating to risk and client safety when working internationally. It may not be appropriate or possible to implement safeguarding procedures usually available to practitioners working within UK boundaries and additional resources that are helpful for vulnerable clients may be inaccessible. See section 6 for further information about the importance of individualised risk assessment processes and the need for continual reassessment throughout the counselling contract.

It is of paramount importance to consider carefully whether online counselling is appropriate in such circumstances.

6 Working with vulnerable clients: risk assessment and emergency planning

When working with clients who are likely to be vulnerable because of their psychological state or social isolation, it is good practice to conduct an appropriate and fair assessment of their suitability for the services being provided. That includes their suitability for working online. Careful consideration should also be given to how the practitioner will respond should clients require additional services or support. Good practice requires that assessment and contracting processes include clarity about necessary boundaries and limits to the service and that practitioner and client(s) agree the steps that may need to be taken should emergency situations arise. When clients are communicating from a distance the practitioner may be less able or it may be less appropriate to seek additional services on behalf of the clients.

It is helpful when contracting to include specific reference to, and agreement about, the support or assistance that is available should a client become vulnerable or distressed and require urgent support outside the scope of the service, particularly for clients who are working at a distance. Where appropriate, potential additional sources of assistance can be suggested when providing written information about the service or in the contract. The balance of risk may be different in such situations; it is important for those offering such services to seek further training in risk assessment and contracting.

Some clients may react unexpectedly if changes are made to the medium of therapy. Moving between 'in the room' and online sessions can be unsettling and precipitate psychological distress. It is important to reassess risk and vulnerability if changing from one way of working to another and to make informed decisions about client suitability for undergoing the change or for experiencing hybrid or blended approaches. It may be preferable in some situations and for some clients to maintain a single approach and context.

7 Equality, diversity and inclusion (EDI) when using digital technology in the counselling professions

The *Ethical Framework for the Counselling Professions* requires practitioners to provide services that 'avoid unfairly discriminating against clients or colleagues', 'endeavour to demonstrate equality, diversity and ensure inclusion for all clients' and to 'make adjustments to overcome barriers to accessibility, so far as is reasonably possible, for clients of any ability wishing to engage with a service'. (Good practice, point 22).

The use of digital technology and the ability to offer distance-based approaches have extended the reach of counselling services beyond traditional boundaries. Geographical and physical location of services are no longer limiting factors and both clients and practitioners have far more freedom of choice when accessing and offering help. For some this can be transformative. For example, digital technology offers wide-ranging practical solutions where there are physical challenges to communication that may result from disability, enabling many more to access services that were previously only available to the able-bodied and physically mobile. Technology enables practitioners to work with clients over wide distances and from wide-ranging and diverse cultures. To support diverse client groups, practitioners are encouraged to question their personal cultural assumptions and reflect on their possible impact on those with whom they work. With more wide-ranging geographical access to services and the additional element of distance-based and technologically mediated communication these challenges may be complex.

Since the advent of Web 2.0, individuals and services have had opportunities to interact with and be seen by others in previously unimagined ways. This has transformed the dissemination of ideas and information, allowing more people to participate on an equal footing.

It is important that practitioners reflect on the changes Web 2.0 has made to the way they are perceived (their identity).

More guidance on how to address this can be found in GPiA 040 *Social media, digital technology and the counselling professions*. It is particularly important to become aware of any unconscious bias or prejudice that may be portrayed online, as well as to reflect on the way in which ideas are expressed and challenges are made to ensure that ethical values and principles are maintained.

As services become increasingly computerised and practitioners offer more diverse online interventions it is critical to also consider those impacted by digital exclusion. The UK Government has digital inclusion policies and strategies, as does the NHS, and several charities are dedicated to addressing this issue. Not everyone has access to digital devices and to the internet and it is important to ensure that alternative provision and options remain available for those who have no such access or may be unwilling to engage in online working, perhaps for psychological or emotional reasons.

8 Supplementary materials, tools and online links for clients

Services for clients (however the therapeutic intervention itself is offered) can be enhanced by providing supplementary material via digital technology. This may be through websites or platforms or via secure email (where material can also be personalised). Good practice includes:

- ease of reading and clarity of information
- regular updating of material and checking of links to ensure they remain active
- acknowledgement of sources and copyright (always respecting others' intellectual property rights)
- being clear about whether materials are free of charge or subject to payment
- openly declaring if the practitioner has a professional/commercial interest in the materials offered or promoted
- encouraging interaction between service and service-user to generate feedback about such materials.

Where fees are paid online, it is important that clients are provided with full and sufficient information about such payments and that practitioners ensure that online systems provided for payment are secure and reputable. Some commercial platforms use built-in payment systems. Practitioners should take responsibility for checking the security and reputation of any services used, especially if working internationally.

9 Insurance matters

Insurance policies for professional liability vary as to whether and how they cover and/or restrict digital working with clients, including those residing in different geographical locations (see section 6: *Working internationally*). It is essential when offering online services that practitioners ensure that they have suitable insurance for the service being provided and that appropriate information is clearly given to clients at the point of assessment and contracting. This should be regularly reviewed in the light of changing practices and changes in legislation.

10 Practitioner self-care when working online

We will take responsibility for our own wellbeing as essential to sustaining good practice with our clients by:

- a.** *taking precautions to protect our own physical safety*
- b.** *monitoring and maintaining our own psychological and physical health, particularly that we are sufficiently resilient and resourceful to undertake our work in ways that satisfy professional standards*
- c.** *seeking professional support and services as the need arises*
- d.** *keeping a healthy balance between our work and other aspects of life.*

(Ethical framework for the counselling professions Good Practice, point 91)

Although digital technologies automate many processes that were previously manual and time-consuming for the counselling practitioner, the additional challenges of online working bring many new demands, and it is overly simplistic to imagine that such approaches will 'save time' or be 'simpler'. It is probable that the opposite may be true.

Spending much of the working day sitting at a computer or similar device takes a physical toll. Screen fatigue is a well-recognised phenomenon that is increasingly seen as a hazard of online working.

Isolation may also be significantly increased, particularly for independent practitioners or those working exclusively from home. Social interaction during the working day may be limited, and the distinction between working and recreational hours may become blurred. Professional isolation may increase stress.

Practitioners need to take time to reflect on the impact of working online both physically and emotionally and to take steps to reduce negative consequences. It is helpful to reassess workload and administrative demands regularly; practitioners should reflect on this with colleagues and in supervision and make adjustments where appropriate.

11 Supervision

It is important to receive at least some elements of regular supervision through the same medium/media of communication as is/are being used with clients to gain direct experience of both perspectives of the chosen ways of working and to have a shared understanding of their strengths and limitations. The relationship between supervisor and practitioner takes time to develop, and it may be helpful to access additional supervision for any new online work to supplement existing arrangements rather than to change supervisors. Additional supervision is also valuable during any period of change in the medium of practice delivery. Many supervisors are experienced in online practice or have recently undertaken additional dedicated training to meet the rapidly growing demand for online supervision. Supervisors are encouraged to be open and explicit about their own experience and training to work online when advertising their services.

12 Training

Whenever practitioners offer new skills and approaches, they are advised to seek appropriate training. In recent times, many have been thrust into a world of digital communications, regardless of whether they would have chosen to move in that direction or had taken steps to prepare for it. Changing the method or medium of communication may present new and unexpected challenges to the therapeutic relationship itself as well as those which are more practical and structural in nature. These impact on both practitioner and clients in countless ways, some of which are less open to conscious awareness than others.

Online relationships of all kinds are qualitatively different from those manifested in shared physical space. Good practice requires that anyone making significant changes to their practice should give careful consideration to what is involved and take adequate steps to become competent in new ways of working.

Much has already been learned through experience as a result of rapid changes in practice that were implemented through necessity during the pandemic. For those now continuing to offer and perhaps expand online services, it is essential to review their practice and to identify where they may have clear training needs. For some qualified and experienced practitioners, appropriate training to support their online practice may be accessible through Continuous Professional Development (CPD) provision whilst for others, especially those offering more specialised and extensive online services, it will be both important and necessary to complete more substantial and dedicated training courses, offered by specialist providers. Pre-qualification training courses now include information about online working and the use of digital technology in their core curricula as well as encouraging students to engage in some appropriately supported placement work online.

It is the responsibility of all practitioners to reflect on their individual training needs in this area with supervisors and service managers and to seek further advice where needed.

13 Practitioners' use of the internet – managing your digital footprint

Every practitioner has a responsibility to manage all online activity carefully and to ensure that they are aware of what information about themselves is accessible online. This applies to personal as well as professional material. (For further information see GPiA 040 *Social media, digital technology and the counselling professions*). When we publish anything online in a public or semi-public space, we add to our digital footprint.

(A digital footprint is any data that are left behind when users have been online, whether deliberately posted or passively collected via IP addresses, cookies etc.) It can be helpful for practitioners to schedule a regular review of this which includes the following:

- Entering your name into several search engines
- Re-checking privacy settings
- Creating strong passwords and changing them regularly

- Keeping software up to date
- Reviewing apps on devices and deleting those no longer needed or used
- Keeping an inventory of any smart household devices involving internet access; ensuring that any limits to security and privacy involved are understood and carefully managed
- Regularly 'cleaning up' devices by deleting histories, cookies etc.

(Online self-disclosure sometimes occurs inadvertently and out of the awareness of the practitioner.)

14 Ongoing professional vigilance and responsibilities

Digital technologies offer new and life-changing opportunities. They ensured that both personal and professional connections could be maintained throughout the pandemic and have literally saved countless lives. They have become an integral tool for practitioners, bringing with them significant new and additional professional responsibilities.

Counselling has become more accessible to people who traditionally would not or could not use face-to-face, 'in the room' services. The many benefits that this brings are accompanied by risks which should not be underestimated. It takes considerable professional vigilance, both individually and collectively, to maintain an up-to-date understanding of all that is involved in the digital world so we can ensure that benefits outweigh risks. This is an iterative and ongoing process; one that represents a continual and active commitment for all practitioners.

About the author

Kate Dunn (BSc, MA, MBACP) is a psychotherapeutic counsellor, supervisor and trainer/consultant working in private practice, both face to face in the room and online using digital technology. She previously worked in a Higher Education setting as a counsellor, where she introduced an early online therapy provision to extend existing in-the-room services. She has been working with clients and supervisees online since 2008 and has a special interest in the online therapeutic relationship, which has been the subject of her research. She has contributed to academic publications in this area.

Useful resources and references

BACP publications:

BACP GPiA 040 *Social media, digital technology and the counselling professions*. Available at: www.bacp.co.uk/events-and-resources/ethics-and-standards/good-practice-in-action/publications/gpia040-social-media-caq

BACP GPiA 124 CRP: *Social media, digital technology and the counselling professions*

BACP GPiA 125 CRP: *Working online in the counselling professions*

BACP (2018) *Ethical Framework for the Counselling Professions*. Lutterworth: BACP Available at: www.bacp.co.uk/media/3103/bacp-ethical-framework-for-the-counselling-professions-2018.pdf

BACP (2021) *Online and phone therapy (OPT) competence framework*. Lutterworth: BACP. Available at: www.bacp.co.uk/media/10849/bacp-online-and-phone-therapy-competence-framework-feb21.pdf

Key Texts:

Stokes, A. (ed.) (2018) *Online Supervision: A handbook for practitioners*. London: Routledge

Suler, J.R. (2016) *The Psychology of the Digital Age*. Cambridge: Cambridge University Press (See Chapter 15: Electric Therapeutics)

Weitz, P. (ed.) (2014) *Psychotherapy 2.0*. London: Karnac Books.

Worley-James, S. (2022) *Online Counselling: An Essential Guide*. Monmouth: PCCS Books.

Online sources of information:

Information Commissioner's Office: <https://ico.org.uk>

International Society for Mental Health Online: <https://ismho.org>

NHS Digital Inclusion: <https://digital.nhs.uk/about-nhs-digital/corporate-information-and-documents/digital-inclusion>

UK Government Digital Inclusion Strategy: www.gov.uk/government/publications/government-digital-inclusion-strategy/government-digital-inclusion-strategy.