

# **Quality Assurance and Verification**

## **Healthcare Audit Summary Report**

**Audit of the Health Service Executive (HSE) National Counselling Service (NCS) Guidelines on Risk Management and Child Protection in the context of Counselling / Therapy (December 2012) with specific reference to the referral documentation sent by the NCS to TUSLA-The Child and Family Agency**

**Audit Reference Number: QAV004/2017**

<b>Title</b>	<b>Audit of the Health Service Executive (HSE) National Counselling Service (NCS) Guidelines on Risk Management and Child Protection in the context of Counselling / Therapy (December 2012) with specific reference to the referral documentation sent by the NCS to TUSLA-The Child and Family Agency</b>	
<b>Number</b>	QAV004/2017	
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<b>Source of Evidence</b>	<b>Type</b>	<b>Date</b>
	Request for Evidence	Returned 18 September – 20 October 2017
	Site Visits:	
	Harbour Counselling Service	28 September 2017
	RIAN Counselling Service	10 October 2017
	ALBA Counselling Service	25 October 2017
	NCS South East	08 November 2017
	Laragh Counselling Service	14 November 2017
	NCS Midlands – The Arches	06 December 2017
	NCS Midwest – Re Nua	13 December 2017
	AVOCA Counselling Service	16 January 2018
	NCS Northwest – Regional Counselling Service	23 January 2018
	Newcastle Counselling Service	29 January 2018

<b>Report Distribution</b>	
Date: 23 April 2018	
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## ABBREVIATIONS

CHO	Community Healthcare Organisation
CiPC	Counselling in Primary Care
HSE	Health Service Executive
NCS	National Counselling Service
QAV	Quality Assurance and Verification
RFE	Request For Evidence

## **1. BACKGROUND / RATIONALE**

The National Counselling Service (NCS) is a professional, confidential counselling and psychotherapy service available free of charge in all regions of the country. The Service was established in September 2000 by the Irish Government as part of a historic restorative process which aimed to acknowledge and alleviate the suffering of victims of child abuse. Since its inception, primary clients have been adults who experienced abuse whilst in the care of the Irish State as children.

The NCS is managed by Directors of Counselling who meet regularly to ensure that there is consistency across the service nationally in terms of professional and ethical standards and equity of service. Over 70 counsellor/therapists are employed and people wishing to use the service can be referred by healthcare professionals or directly by the individual themselves.

The current procedure in use for responding to individual disclosures of historical abuse is defined within the NCS guideline on Risk Management and Child Protection in the context of Counselling/Therapy (December 2012), known hereafter as the NCS guideline. This guideline is used in conjunction with the Children's First Act (2015), the HSE Child Protection and Welfare Policy (2016) and the Department of Children and Youth Affairs Policy, Children First: National Guidance for the Protection and Welfare of Children (2011).

TUSLA – the Child and Family Agency is a statutory organisation which was established in January 2014 and now acts as the dedicated state agency for improving the wellbeing of children. TUSLA has assumed responsibility for the child welfare and protection services previously operated by the HSE (including family support services). (HSE Child Protection and Welfare Policy 2016)

When counsellor/therapists at the NCS receive a disclosure about historical abuse they must notify TUSLA using both the NCS Template for Retrospective Abuse Notification Form and the TUSLA Standard Report Form.

This audit was requested by the then National Director of Mental Health to seek assurance that the referral documentation issued by the NCS to TUSLA was completed in accordance with the NCS guideline. Additionally, the audit team was requested to review the child protection training and education provided to NCS counsellor/therapists.

## **2. AIM AND OBJECTIVES**

The aim of this audit was to provide assurance that completed referral documentation adhered to the NCS guideline and that counsellor/therapists had received child protection training and education.

The objectives of this audit were:

- To examine the referral documents issued from the NCS to TUSLA in 2016 to determine if the NCS guideline in relation to the referral documentation procedure was adhered to in each case sampled.
- To review a sample of training records of counsellor/therapists working in the NCS with specific reference to child protection training and education.

### 3. METHODOLOGY

Evidence of compliance was determined by:

- A request for evidence (RFE) was sent to all sites to obtain details of the number of referrals to TUSLA in 2016, the number of counsellor/therapists employed and the records of child protection education and training provided to counsellor/therapists. The documentation that was examined included the NCS Templates for Retrospective Abuse Notification Form that were in use pre and post the 19 of April 2016.
- Records of training and education provided to counsellor/therapists on child protection were also reviewed.
- A retrospective on site audit of the NCS referral documentation sent to TUSLA to assess if it was completed in accordance with the requirements of the NCS guideline.
- During the site visit, the audit team met with the Directors of Counselling and individual counsellor/therapists to discuss any gaps in the evidence submitted.
- An exit meeting to discuss the results of site visits was held with the Directors of Counselling.

Draft reports were prepared and issued to the Directors of Counselling at the ten services for review of factual accuracy, comment and management response to the recommendations made. A level of assurance of adherence to the NCS guideline was provided in these reports with regard to the referral documents issued from the counselling services to TUSLA.

### 4. FINDINGS

**Objective 1:** To examine the referral documents issued from the NCS to TUSLA in 2016 to determine if the NCS guideline in relation to referral documentation procedure was adhered to in each case sampled.

#### Referral to the NCS

Referrals to the NCS come from a variety of sources but the majority are self-referrals, i.e., from the client directly, followed by referrals from general practitioner services and the HSE adult mental health services.

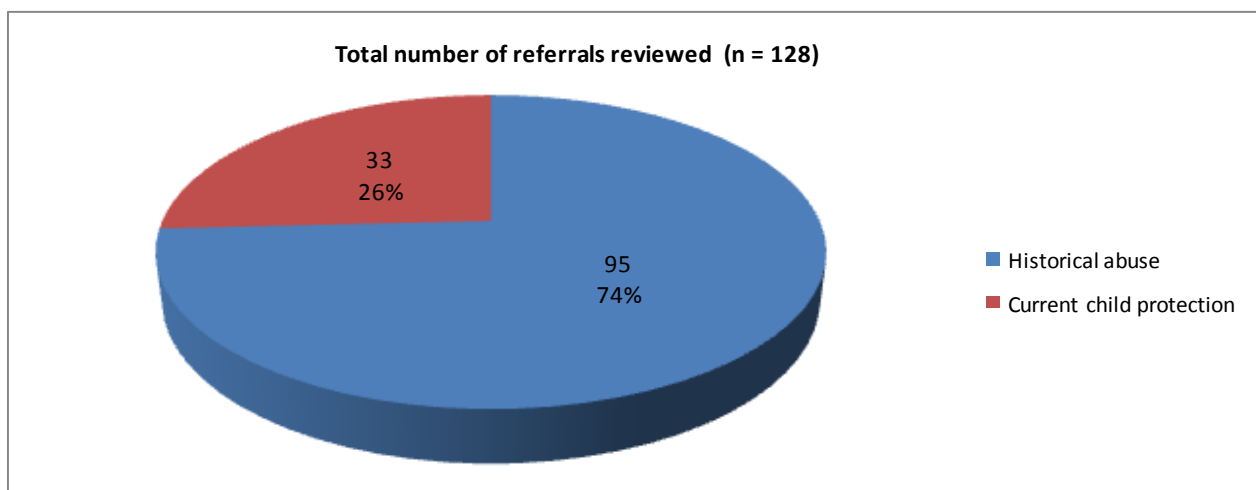
The number of new referrals to the NCS in 2016 varied from site to site and ranged between 111 and 305. The number of historical abuse reports made by each counselling service to TUSLA also varied and in 2016 this ranged from 0 to 29. The audit team noted on the site visits that there was a variation in the number of historical abuse reports made by the NCS to TUSLA across the services and this was due to many reasons including the following:

- The majority of the clients did not wish to identify the alleged perpetrator, as the individual concerned may be associated with and/or related to them,
- The client was afraid to report the abuse and the consequences of same,
- The alleged perpetrator was deceased, and
- The client wished to or had already self-reported to TUSLA and /or the Garda Síochána.

Initially, the audit team had planned to examine referral documents issued to TUSLA for 2016 only, however due to the low numbers at five sites it was necessary to include referrals from 2015 in order to ensure the validity and reliability of the audit findings. One site did not have any referrals to TUSLA for 2015 and 2016.

Figure one illustrates the total number of referrals reviewed on site by the audit team at the ten NCS services<sup>1</sup>.

**Figure 1: The number of referrals reviewed by the audit team**

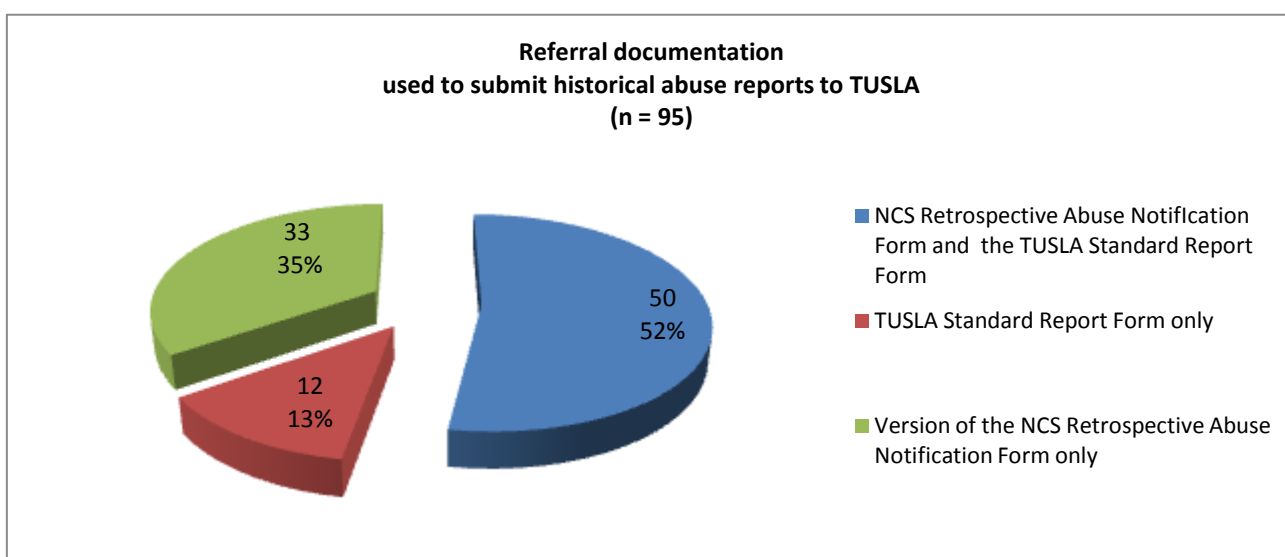


As demonstrated above, a total of 128 referrals were reviewed; 95 historical abuse referrals and 33 current child protection concerns.

### Referral documentation

In 2015, TUSLA requested that all NCS Retrospective Abuse Notification Forms must be attached to the TUSLA Standard Report Form when reports were submitted. Additionally, in 2016, the NCS developed a new version of the NCS Retrospective Abuse Notification Form where it was clearly stated that the form must be submitted attached to a completed TUSLA Standard Report Form. Therefore, when reporting historical abuse cases to TUSLA, the NCS counsellor/therapist must complete a Retrospective Abuse Notification Form and this must be attached to a completed TUSLA Standard Report Form. When reporting current child protection concerns, the TUSLA Standard Report Form only must be completed.

**Figure 2: Breakdown of historical abuse referral documentation**



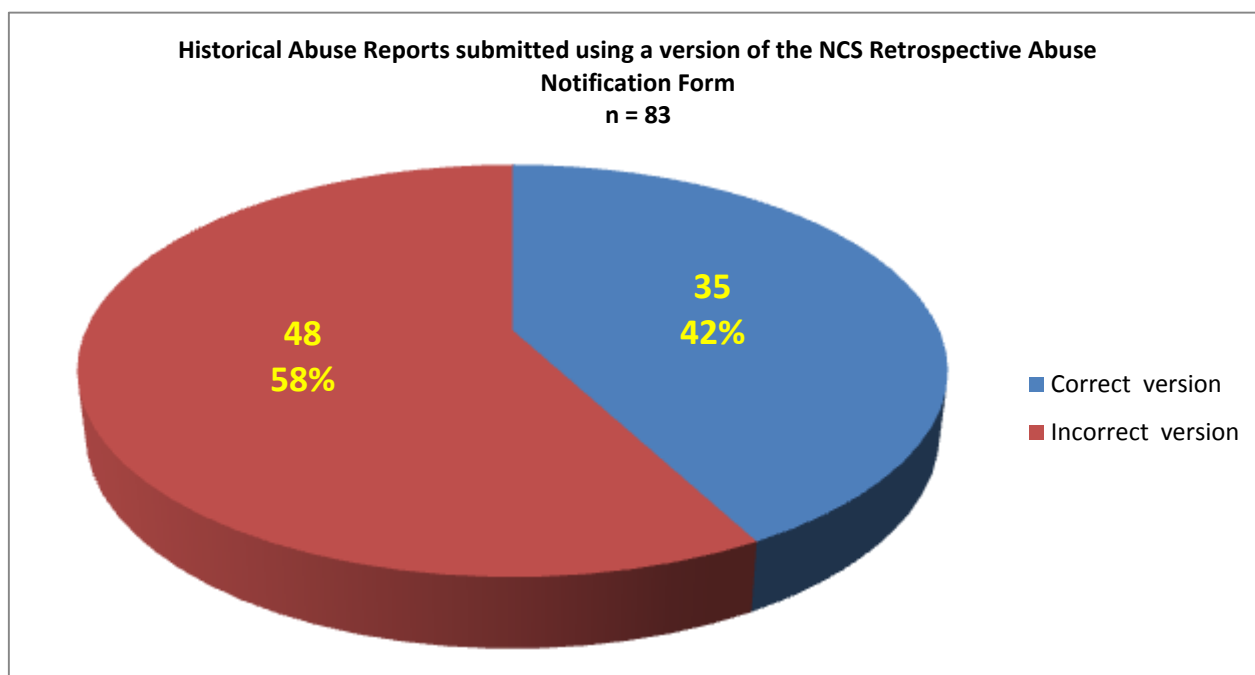
<sup>1</sup> Reports from the NCS to TUSLA for 2015 in five sites were included as the number of referrals for 2016 was low.



Figure two illustrates that of the 95 historical abuse reports submitted to TUSLA, 52% were submitted using both the Retrospective Abuse Notification Form and the Standard Report Form as required. However, 35% used a version of the NCS Retrospective Abuse Notification Form only and 13% were submitted using the TUSLA Standard Report Form only. To summarise, the majority of historical abuse reports were submitted in line with both the requirements of the NCS Guideline and TUSLA.

The following chart focuses on the reports which were submitted to TUSLA in 2015/2016 which used a version of the NCS Retrospective Abuse Notification Form, i.e., either the old versions or the correct 2014/2016 versions. In total, 83 reports were submitted using the Retrospective Abuse Notification Form, however only 42% of these were submitted on the correct 2014/2016 version of the form and the remaining 58% used older outdated versions of the form.

**Figure 3: Retrospective Abuse Notification Form used to report historical abuse**



The NCS Retrospective Abuse Notification Form that should have been used for 2015 and the first six months of 2016 was the 2014 version and for referrals thereafter, the 2016 version should have been used. The audit team found that the outdated version of the NCS Retrospective Abuse Notification Form was still in use at six of the counselling sites audited. In fact, five different versions of this form remained in circulation. Whilst the audit team acknowledge that the information requested on these forms was similar to that required on the 2014/2016 revised versions, this was still highlighted as a non-compliance issue to the sites involved. Additionally the audit team found that an outdated version of the Standard Report Form was also in use at five sites audited and again this non-compliance issue was highlighted.

Table one outlines the level of compliance with the information required on the 83 NCS Retrospective Abuse Notification Forms submitted to TUSLA.

**Table 1: Compliance with the information required on the Historical Abuse Notification Form**

Information required on the NCS Retrospective Abuse Notification Form (Versions 2014 and 2016)	Number of referrals in 2015/2016 (n = 83)	
	Compliant	Non-Compliant
Was the form printed on headed paper	83/83	--
Was the form correctly dated	83/83	--
Were all client demographic details completed	80/83	03/83
Was the address section completed correctly for the counselling service	82/83	01/83
Was the address section completed correctly for the relevant TUSLA social work department	80/83	03/83
Were the details of the alleged abuse / allegations completed	83/83	--
Section regarding contact with Gardai completed	81/83	02/83
*Section re contact with social work services – TUSLA completed	64/83	19/83
**Client consent information completed	69/83	14/83
Had the Counsellor/Therapist provided their contact details on the NCS Retrospective Abuse Notification Form	71/83	12/83
Was the TUSLA Standard Report Form attached	50/83	33/83
Was the form copied to the Director of Counselling	83/83	--

\*In ten of the NCS Retrospective Abuse Notification Forms reviewed, there was no section for completing information relating to social work services/TUSLA as it was not a requirement of the older versions of the form.

\*\*This section was not a part of nine of the NCS Retrospective Abuse Notification Forms reviewed.

As demonstrated above, the majority of sections of the NCS Retrospective Abuse Notification Form were completed correctly when reports were sent to TUSLA. In 33 of the historical abuse reports submitted, the TUSLA Standard Report Form was not attached as required. In 19 of reports submitted, the section regarding contacting social work services/TUSLA was not completed. However, it must be stated that ten of the forms completed were older versions which did not request this information.

In 14 of the cases reported, the client consent information was not completed however, nine of these reports used older versions of the form and this information was also not a requirement. The audit team noted that in 12 of the NCS Retrospective Abuse Notification Forms reviewed, the contact details for the counsellor/therapists were not provided.

The majority of the NCS Retrospective Abuse Notification Forms at one site were completed electronically, then printed and signed by the counsellor/therapist. As required by the NCS guideline, a copy of the form was made for the client files. However, the audit team found that in seven out of 15 copies, the signature of the counsellor/therapist was absent.

The audit team can confirm that in relation to completing the different sections of the referral documentation, eight of the sites audited achieved a high level of compliance and one site a low level of compliance. The remaining site had no referral documentation for the audit team to review and a level of compliance or assurance could not be provided.

### Self-reporting

The audit team was informed by the Directors of Counselling and the counsellor/therapists that the services facilitated clients who wished to self-report historical abuse directly to TUSLA and/or An Garda Síochána. This was in keeping with the NCS guideline and where this occurred, documentary evidence was found in the client files.

## **The NCS guideline**

The audit team noted that the NCS guideline remained in draft format and was dated January 2012. The guideline requires immediate updating to take cognisance of the changes that have occurred over the last five years, i.e., the establishment of TUSLA, the changes in legislation, the Children First Act, the new Retrospective Abuse Report Form issued by TUSLA in December 2017 and the HSE Child Protection and Welfare Policy (2016), and current best practice in child protection. To facilitate the updating of the NCS guideline the guidance provided by the HSE National Framework for the Developing Policies, Procedures, Protocols and Guidelines (2016) should be followed.

During the site visits, the counsellor/therapists informed the audit team that they regularly refer to the NCS guideline during the course of their work and that they would discuss with the Director of Counselling and/or contact the Duty Social Worker in TUSLA if further clarification on specific issues was required. The audit team can confirm that all counselling services followed the NCS Model for Responding to Information/Allegations of Retrospective Abuse as outlined in the NCS guideline.

## **Confidentiality**

The NCS guideline states that 'Confidentiality is a cornerstone of professional counselling/therapy and should only be breached for the most serious and compelling reasons'. In addition it states that the client has a right to be consulted and have their consent sought in all matters related to their therapy and any potential breaches to confidentiality.

The 'Information for clients about Child Protection and Confidentiality' guidance document was developed by the NCS Directors of Counselling. The audit team can confirm that this document was in use at all ten services and additional documentation had been developed locally by the majority of the services, e.g., 'Confidentiality Boundaries in the Counselling Relationship', 'Exploring Confidentiality with Clients', and 'Information on Confidentiality'.

The audit team found evidence at all ten sites that counsellor/therapists discussed the limits of confidentiality in detail with each client at the outset and before the commencement of any counselling and this was found recorded on file. It was made clear from the start and again throughout the counselling intervention that there may be circumstances when confidentiality would be broken with the client's knowledge and preferably, but not necessarily with their consent. This would only occur in circumstances where there was a risk of harm to the client themselves, to children or the wider community.

## **Confirmation of receipt of reports**

On the site visits, the audit team checked to ensure that confirmation of receipt of the reports sent from the NCS to TUSLA was present on the client files reviewed. Five of the sites audited used registered post for this purpose, four sites used regular post and the remaining site had made no reports to TUSLA. The audit team found documentary evidence in 70% of the client files reviewed of An Post receipts for registered post and/or a letter of acknowledgement from TUSLA.

## **Counselling in the primary care setting**

Counselling in Primary Care (CiPC) work under the supervision of the HSE and the NCS. They provide short term time limited counselling (six to eight sessions) in primary care settings to clients aged 18 and over.

Although reports to TUSLA made from CiPC counsellor/therapists were outside the scope of this audit, the audit team was informed by the NCS Directors of Counselling that CiPC counsellor/therapists may on occasion be required to submit historical abuse reports and current

child protection concerns. In such cases, the Directors of Counselling informed the audit team that CiPC counsellors would follow the same processes as counsellor/therapists working directly with the NCS.

**Objective 2:** To review a sample of training records of counsellor/therapists working in the NCS with specific reference to child protection training and education.

### **Child protection education and training**

During the site visits, the audit team met with a total of 40 counsellor/ therapists and from discussions with these individuals and documentation received and reviewed, the auditors can confirm that all sites were engaged in child protection education and training.

All counsellor/therapists had completed the “Introduction to Children First” online training course and the majority had additional training in this area. In nine of the ten sites child protection education and training was not systematically recorded on a central log. The remaining site had developed a central database to record this information which was in place since January 2017. Induction training was carried out when new staff joined the individual services, this involved both local and corporate induction. The Director of Counselling provided additional support in the first few months of the counsellor/therapists employment. One service reported that they had not completed induction training in the past seven years as no new employees had been recruited.

### **Supervision**

Supervision is a working alliance between the supervisor and counsellor/therapist, in which the counsellor/therapist can offer an account or recording of their work, reflect on it, receive feedback and where appropriate guidance (Inskipp and Proctor 2001). External supervision is an essential element of all counselling activity and acts as a support to the counsellor in their work by providing an external space to process the impact of the work that they are doing and to meet with professional accreditation requirements.

A review of minutes of team meetings from the various services showed that child protection issues were regularly discussed and that this also happened during case management meetings and peer supervision. Case management occurred every four to six weeks. This was where the Director of Counselling had an individual meeting with the counsellor/therapist. The audit team saw written evidence of supervision activities on the site visits and can confirm that child protection issues and individual cases were discussed. External and peer supervision was an ongoing activity at all ten sites and the audit team reviewed documentary evidence to support this while on the site visits.

## **5. CONCLUSION**

Based on the documentary evidence reviewed and discussions undertaken with the Directors of Counselling and other counsellor/therapists, the audit team found the following:

- The referral documentation submitted to TUSLA was well completed in eight sites, in one site there was a low level of compliance with completing the information required. The remaining site had no referral documentation for the audit team to review.
- All counselling services followed the NCS Model for Responding to Information/Allegations of Retrospective Abuse and the requirement for confidentiality as outlined in the NCS guideline.
- Counsellor/therapists were aware of and referred to the NCS guideline.

- Evidence that counselling services encouraged and supported clients who wished to self-report historical abuse to TUSLA. This was in keeping with the NCS guideline.
- Documentary evidence that TUSLA had received the historical abuse reports was found in 70% of the client files reviewed.
- Just over half (52%) of historical abuse reports were made using both the NCS Retrospective Abuse Notification Form and the TUSLA Standard Report Form as required.
- There were a number of variations of the NCS Retrospective Abuse Notification Form in use and 58% of historical abuse reports were made on outdated versions of this form.
- There were two versions of the Standard Report Form in use.
- Thirteen percent of historical abuse referrals were submitted using the Standard Report Form only.
- Counsellor/therapists had engaged in education and child protection training activities and such activities were ongoing at all services but were not documented in a systematic manner in nine sites.

To conclude, the audit team provided reasonable assurance that the referral documentation issued to TUSLA from seven counselling sites adhered to the NCS guideline. Two sites received limited assurance and in the remaining site no referrals were made in 2015/2016 therefore no assurance could be provided.



## **6. RECOMMENDATIONS**

The recommendations made in this report identify actions that the National Director, Community Operations must implement to:

1. Ensure that the NCS guideline is updated immediately using the HSE National Framework for Developing Policies, Procedures, Protocols and Guidelines (2016) and to include reference to the following:
  - The changes that have occurred over the last five years i.e. the establishment of TUSLA, the changes in legislation; Children First Act, the new Retrospective Abuse Report Form issued by TUSLA in December 2017 and the HSE Child Protection and Welfare Policy (2016).
  - Provide instruction on the type of referral documentation that must be completed when sending reports to TUSLA.
  - Provide guidance to counsellor/therapists working in CiPC.
  - Once revised, the NCS guideline should be approved and communicated formally to all services that are under the remit of the NCS. The NCS guideline must continue to be reviewed and updated on a regular basis as the need arises.
2. Instruct the Directors of Counselling in the NCS to remove all outdated Retrospective Abuse Notification Forms and Standard Report Forms from circulation.
3. Ensure that the Directors of Counselling develop and maintain a central database of all child protection education and training completed by counsellor/therapists to include the details of training content, attendees and attendance dates.
4. Ensure that all referrals sent to TUSLA are formally acknowledged and that evidence of this is held on the client file.

**Acknowledgements:**

The audit team wish to acknowledge the co-operation and goodwill afforded to them by the management and staff at all National Counselling Services.

Lead Auditor	Ms. Catherine Timoney
Signature	
Date	23 April 2018
AND QAVD	Ms. Cora Mc Caughan
Signature	
Date	23 <sup>rd</sup> April 2018

**7. REFERENCES**

Children First (2011) *National Guidance for the Protection and Welfare of Children*. Department of Children and Youth Affairs, Government Publications, Dublin.

National Counselling Service (December 2012) *Draft Guidelines on Risk Management and Child Protection in the Context of Counselling/Therapy*, NCS.

Health Service Executive (2016) *Framework for Developing Policies, Procedures, Protocols and Guidelines*, HSE, Dublin.

Health Service Executive (2016) *Child Protection and Welfare Policy*, HSE, Dublin.

Inskipp, F. & Proctor, B. (2001) *Becoming a Supervisor*, Cascade, Twickenham.

## 8. MANAGEMENT RESPONSE TO RECOMMENDATIONS

*Management response should be completed by the senior most accountable person with the authority to effect the actions outlined by the recommendations listed.*

Recommendation	Management response	Agreed implementation date	Person responsible
<p><b>1</b> Ensure that the NCS guideline is updated immediately using the HSE National Framework for Developing Policies, Procedures, Protocols and Guidelines (2016) and to include reference to the following;</p> <ul style="list-style-type: none"> <li>• The changes that have occurred over the last five years i.e. the establishment of TUSLA, the changes in legislation; Children First Act, the new Retrospective Abuse Report Form issued by TUSLA in December 2017 and the HSE Child Protection and Welfare Policy (2016).</li> <li>• Provide instruction on the type of referral documentation that must be completed when sending reports to TUSLA.</li> <li>• Provide guidance to counsellor/therapists working in CiPC.</li> <li>• Once revised, the NCS guideline should be approved and communicated formally to all services that are under the remit of the NCS. The NCS guideline must continue to be reviewed and updated on a regular basis as the need arises.</li> </ul>	Agreed	1 <sup>st</sup> July 2018	<p>Anne O Connor HSE National Director Community Operations to provide this direction</p> <p>Directors of Counselling to complete the update and review.</p>
<p><b>2</b> Instruct the Directors of Counselling in the NCS to remove all outdated Retrospective Abuse Notification Forms and Standard Report Forms from circulation.</p>	Agreed	1st July 2018	Anne O Connor HSE National Director Community Operations

Recommendation	Management response	Agreed implementation date	Person responsible
<b>3</b> Ensure that the Directors of Counselling develop and maintain a central database of all child protection education and training completed by counsellor/therapists to include the details of training content, attendees and attendance dates.	Agreed	1st July 2018	Anne O Connor HSE National Director Community Operations to provide this direction. Directors of Counselling to maintain this database
<b>4</b> Ensure that all referrals sent to TUSLA are formally acknowledged and that evidence of this is held on the client file.	Agreed	1st July 2018	Anne O Connor HSE National Director Community Operations to provide this direction Directors of Counselling to instruct Counsellor/ Therapists and to oversee this in regular supervision



## 9. APPENDIX A: SITE SPECIFIC RECOMMENDATIONS

Counselling Service	Recommendations
<b>Harbour Counselling Service</b>	1. All cases of historical abuse reported to TUSLA use the NCS Retrospective Abuse Notification Form dated April 2016 only.
	2. The NCS Retrospective Abuse Notification Form and the TUSLA Standard Report Form are both completed for all historical abuse reports submitted to TUSLA.
	3. Documentery evidence is available on client files regarding the receipt of all referrals sent to TUSLA by registered post.
	4. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.
<b>RIAN Counselling Service</b>	1. All cases of historical childhood abuse are reported using the NCS Retrospective Abuse Notification Form dated April 2016 only.
	2. All older versions of the NCS Retrospective Abuse Notification Form are removed from circulation.
	3. The NCS Retrospective Abuse Notification Form for the client's file and the Director of Counselling contains the signature of the counsellor/therapist.
	4. Documentary evidence is available on client files regarding the receipt of all referrals sent to TUSLA whether by registered post or hand delivered.
	5. All completed child protection education/training activities must be recorded on a database to include details of the content, attendee(s) and attendance dates.
<b>ALBA Counselling Service</b>	1. All historical abuse cases are reported to TUSLA using the NCS Retrospective Abuse Notification Form dated April 2016.
	2. The NCS Retrospective Abuse Notification Form and the TUSLA Standard Report Form are both completed for all historical abuse reports submitted to TUSLA.
	3. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.
<b>NCS South East</b>	1. All cases of historical abuse reported to TUSLA use the NCS Retrospective Abuse Notification Form dated April 2016 only.
	2. All current child protection concerns reported to TUSLA use the TUSLA Standard Report Form only.
	3. All other versions of the NCS Retrospective Abuse Notification Form and HSE Standard Form for Reporting Child Protection and/or Welfare Concerns are removed from circulation.
	4. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.

<b>Laragh Counselling Service</b>	1. All cases of historical childhood abuse are reported using the NCS Retrospective Abuse Notification Form dated April 2016 only.
	2. All older versions of the NCS Retrospective Abuse Notification Form are removed from circulation.
	3. All NCS Retrospective Abuse Notification Forms are attached to the TUSLA Standard Report Form when referrals are submitted to TUSLA.
	4. Documentary evidence is available on client files regarding the receipt of all referrals sent to TUSLA by registered post.
<b>NCS Midlands – The Arches</b>	1. All cases of historical childhood abuse are reported using the NCS Retrospective Abuse Notification Form dated April 2016 only and all other out of date forms are removed from circulation.
	2. The NCS Retrospective Abuse Notification Form and the TUSLA Standard Report Form are both completed for all historical abuse reports submitted to TUSLA.
	3. Documentary evidence is available on client files regarding the receipt of all referrals sent to TUSLA.
	4. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.
<b>NCS Midwest – Re Nua</b>	1. All historical abuse cases are reported to TUSLA using the NCS Retrospective Abuse Notification Form dated April 2016
	2. All older versions of the NCS Retrospective Abuse Notification Form and the outdated HSE Standard Report Form are removed from circulation.
	3. Documentary evidence is available on all client files regarding the receipt of all referrals sent to TUSLA.
	4. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.
<b>AVOCA Counselling Service</b>	1. All cases of historical abuse reported to TUSLA use the NCS Retrospective Abuse Notification Form dated April 2016 only
	2. All NCS Retrospective Abuse Notification Forms are attached to the TUSLA Standard Report Form when referrals are submitted to TUSLA.
	3. All other versions of the NCS Retrospective Abuse Notification Form and the outdated HSE Standard Report Form are removed from circulation.
	4. A complete copy of all historical abuse reports must be made and maintained on the client's file.
	5. Documentary evidence is available on all client files regarding receipt of referrals sent to TUSLA.
	6. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.
<b>NCS Northwest – Regional Counselling Service</b>	1. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.

<b>Newcastle Counselling Service</b>	1. All historical abuse cases are reported to TUSLA using the NCS Retrospective Abuse Notification Form dated April 2016.
	2. All older versions of the NCS Retrospective Abuse Notification Forms and the HSE Standard Report Form are removed from circulation.
	3. The NCS Retrospective Abuse Notification Form and the TUSLA Standard Report Form are both completed for all historical abuse reports submitted to TUSLA.
	4. All sections of the referral documentation are fully completed before being submitted to TUSLA.
	5. Documentary evidence is available on client files regarding the receipt of all referrals sent to TUSLA.
	6. All completed child protection education/training activities must be systematically recorded and include details of the training content, attendee(s) and attendance dates.