

5/03/2024

Tēnā koe

**OIA: 1321016 – Counselling in Schools**

Thank you for your email of 9 January 2024 to the Ministry of Education (the Ministry) requesting information regarding the Ministry's Counselling in Schools initiative. For clarity, your request has been re-numbered, and I have addressed each part in turn below.

Your request has been considered under the Official Information Act 1982 (the Act).

*Topic 1: Data Review and Reporting Process*

1. *What metrics or criteria are used to evaluate the effectiveness of the mental health interventions funded within the Counselling in Schools program?*

Please note, Counselling in Schools (CiS) is not a mental health intervention, rather it is an initiative to enhance the wellbeing of ākonga.

The Education Review Office (ERO) has been contracted to deliver a 3-year evaluation of CiS. Data collected includes:

- Outcomes measures, reported by ākonga and whānau and by school staff.
- Qualitative data from schools and providers.
- Demographics and attendance data.
- Details of service including type of service, referral reason, group size, number of sessions.
- Practitioner information including feedback on challenges in delivering service.

The ERO led research findings will inform the Ministry on the outcomes of the initiative, who is accessing the services, and how the initiative is being received by schools and their community. The evaluation will also inform future policy development in this area.

You can expect to hear further information from ERO on this part of your request, which was transferred on 31 January 2024.

2. *Please describe what efforts are being made to enhance the quality of data collected.*
3. *When are these intended to take effect?*

To support the ERO Evaluation, the Ministry has been considering models of data capture that could provide useful regular monitoring information. Providers have commenced daily inputting of delivery data relating to CiS into the Salesforce platform.

4. *Does the Counselling in Schools program utilize any outcome-based funding models, where providers are remunerated based on the results or impact of their interventions? If so, how are these outcomes measured and verified?*

I can confirm that CiS does not utilise any outcome-based funding models.

5. *What processes are in place to ensure transparency and fairness in the allocation of funds to different service providers under the program?*

The Ministry conducts procurement activities, including for CiS provider services, in accordance with the Government Procurement Rules. An open tender process was conducted for CiS providers, advertised on the Government Electronic Tender Service where any supplier or provider could submit a proposal. Nine providers were contracted via a nationwide Request for Proposal (RFP) process in seven of the eight regions. To support harder to reach communities, the Ministry subsequently introduced a Direct Sourcing process, managed at a regional Ministry level, where regions can work with smaller counselling providers who did not engage with the national RFP process.

Furthermore, the Ministry's Probity Framework also provides guidance to staff on the probity principles and considerations that apply to all procurements conducted by the Ministry. It includes measures to achieve both fairness and impartiality and accountability and transparency in the procurement process.

In each of the eight regions receiving this service, the Ministry has selected schools based on the range of need in their communities. The Equity Index (EQI) is used as part of the selection process, which also takes into consideration other existing supports in their school community. The Ministry allocates hours to schools based on factors including the size of the school roll and the level of need. The Ministry works with the school to determine which provider will work best for them and the needs of their ākonga.

6. *How does the Ministry of Education address conflicts of interest or potential biases in the funding allocation process?*

The Ministry has specific guidance for managing conflicts of interest relating to procurement activities, set out in the Ministry's Procurement Policy and Guidelines for conflicts of interest during procurement activity. Any individuals involved in any procurement activity regardless of value must complete and sign a separate conflict of interest declaration and a confidentiality agreement, including:

- everyone on the procurement team (staff, contractors, temps and consultants);
- all members of the evaluation panel;
- any consultant asked to advise the team;
- anyone involved in making a recommendation;
- anyone involved in approving a recommendation or making an important decision; and

- anyone making a financial approval for the procurement.
- Contractors will be asked to declare any conflicts they may have prior to the RSO being finalised.

Any actual, perceived or potential conflicts of interest in relation to the service provider or any of the named people in the service provider's tender must be declared. Any conflict that impacts on a procurement decision needs to be made through the Procurement conflict of interest process. If there are any conflicts raised – actual or perceived – an appropriate conflict of interest mitigation plan is documented.

During the procurement process, all submissions from service providers and vendors must include a declaration of any conflict of interest. Once a vendor is selected, they must reconfirm there is no conflict (or if there is, how it is to be managed). Since vendors and service providers do not participate in the Ministry's annual conflict of interest declaration process, the contract manager must check in regularly to make sure the vendor's/service provider's circumstances have not changed in a way that could create a conflict of interest.

Regarding the specific amount paid to each provider, this is determined through a commercial contract negotiation process, whereby an hourly rate is negotiated between the Ministry and the provider. The hourly rate includes all aspects of service delivery and may subsequently be re-negotiated, to ensure it is appropriate.

7. *Is there a mechanism for collecting feedback from individuals who have received services under the counselling in schools program? If so, how is this feedback used to improve the quality and effectiveness of the services provided?*

Feedback from ākonga and whānau is collected through the Child Outcome Rating Scale (CORS), which measures their perceptions of change and improvement in relation to the therapeutic process.

Ad hoc narrative feedback is also received from ākonga, and from their whānau and teachers. This is managed by the service provider or given directly to the Ministry's regional-based Lead Advisor Wellbeing.

The Ministry also carries out annual surveys to schools receiving the service to seek their feedback on the programme and how it is designed and delivered in their school. All feedback received by the Ministry is reviewed and actioned where necessary. The Ministry appreciates any feedback that enables and supports the programme to develop to meet the wellbeing needs of ākonga.

An annual review of the School Delivery Plan takes place for each school receiving the programme. This involves a meeting between the provider, the Ministry's Lead Advisor Wellbeing for that region, and the school. This is an opportunity to provide feedback from all parties involved in the delivery.

## Topic 2: Session Data Queries

*Please provide the below information in a table format. For any information that is not available or unable to be shared, please remove it from the table and comment on why it is not available, as opposed to not sharing such a table altogether.*

8. *Sessions delivered each month from the earliest available point to the latest.*

As the programme developed, the Ministry has added to the data it collects. Session data is available from January 2023. For the first quarter of 2023 this was reported quarterly, and thereafter is collected monthly.

The table below shows the number of sessions delivered for the school year 2023.

Time period	Number of sessions
1 January – 31 March	2106
April	1533
May	4925
June	4590
July	2833
August	5683
September	4075
October	4291
November	5919
December	2430
<b>Total</b>	<b>38,385</b>

9. *Any “different types” of sessions collected (i.e., group sessions vs one on one sessions, specific intervention types.)*

CiS is about providing the best solutions for the situation and the people involved. Schools have been working with community-based providers to put support in place for ākonga and their whānau, which can include whole-school or group initiatives. Where needed, referrals will also be made to other services or professionals in the community.

The following table shows the different types of sessions delivered for the full 2023 school year.

Session type	Count of sessions
Individual	32014
Class	890
Large Group (8+)	1274

Session type	Count of sessions
Small Group (2-7)	2491
Whānau	552
Whole school	1164
<b>Total</b>	<b>38,385</b>

*10. Total cost incurred each month.*

Please refer to **table 1** in **Appendix A** for the total expenditure each month for CiS, from the earliest available point to the latest. This includes all Departmental and Non-Departmental costs.

*11. Total cost paid directly to Providers each month.*

Please refer to **table 2** in **Appendix A** for the total costs paid to all CiS providers combined, each month, from the earliest available point to the latest.

There are a small number of months where the payments to providers appear larger than the total expenditure. This occurs because invoices are processed on receipt from providers. Invoices are not always received in the same month the service is delivered and are accrued then reversed in the following month when the invoice is received.

I am withholding a breakdown of funding paid to each individual provider contracted for the CiS initiative under section 9(2)(j) of the Act, to enable a Minister of the Crown or any public service agency or organisation holding the information to carry on, without prejudice or disadvantage, negotiations (including commercial and industrial negotiations).

I can advise however, that the Ministry's current contracts with providers have a service delivery hourly rate range between \$100.00 and \$140.00. This hourly rate takes into consideration all aspects of service delivery including both contact and no-contact time, travel costs and disbursements.

*12. Total cost incurred but not paid to Providers each month.*

*13. A breakdown of what each of these costs are (if specifics are not sharable, please share generally.)*

In response to **parts 12 and 13** of your request, of the total expenditure for CiS set out in table 2, the amount not paid to providers each month comprises:

- Salaries for Ministry Lead Advisors based in the regions and in the National Office.
- Funding for the evaluation delivered by ERO in June 2021, April 2022, and February 2023.

Payments to Kaupapa Māori Education Organisations on behalf of their affiliated Kura are made in October in each year. These have been included in table 3, as they are payments for providers.



Please note, discrepancies between expenditure and what is paid to providers may also relate to invoicing delays from providers where costs are accrued, as set out in my response to part 11 above.

*14. Of payments to Counselling Providers, roughly how much tends to be paid to the practitioner themselves? (i.e., efficiency).*

Counselling staff are employed by contracted community providers to deliver services to schools. The Ministry does not collect counselling staff information, including how much is paid to the practitioners themselves. As such, the Ministry does not hold information on how much is paid to each practitioner. I am therefore refusing **part 14** of your request under section 18(g) of the Act, as the information is not held by the Ministry.

*It's mentioned that "Community providers may employ counsellors, social workers, occupational therapists, psychotherapists, psychologists, creative art therapists, music therapists, teachers, mental health nurses." in the provision of the Counselling in Schools Program.*

*15. Please also include the numbers of each practitioner type supported by the Counsellors in Schools program youth program each month in terms of both total FTEs and total individual staff.*

*16. Number of sessions provided by each practitioner type supported by the program on a monthly basis.*

To respond to the counsellor shortage, and to enable providers who follow a Te Ao Māori approach, the Ministry broadened the definition of who can deliver the CiS service, as per the list of practitioners you set out above. Counselling practitioners are either registered with a professional body, or work under the supervision of a practitioner who is registered to a professional body. This has enabled more flexibility for each region in their delivery model to providers.

It is up to each school and provider to determine which practitioner type is appropriate and for which session. As the Ministry does not collect counselling staff information, we are unable to advise the numbers of practitioner type or the number of sessions provided by each practitioner type. I am therefore refusing **parts 15 and 16** of your request under section 18(g) of the Act, as the information is not held by the Ministry.

*17. Please offer a detailed breakdown of the administrative costs associated with the CiS programme, including staff salaries, office expenses, and other overheads.*

*18. How do these administrative costs compare to the total budget allocated for the programme?*

As set out in my response to parts 12 and 13 of your request, aside from amounts paid to contracted providers and ERO for the evaluation, the costs associated with the CiS programme comprise the salaries of Ministry Lead Advisor staff who support the implementation of the programme.

Overheads for the CiS initiative, including office expenses, are spread across multiple Ministry functions and Lead Advisors also support across several Ministry workstreams, as such we are unable to provide a detailed breakdown of administrative costs or a comparison of these costs

against the total budget. I am therefore refusing **parts 17 and 18** of your request under section 18(g) of the Act, as the information is not held by the Ministry.

*19. Please also explain reasons for any unavailable information in the tables and yearly data.*

Reasons for any unavailable data are provided in response to each part of your request above. Data for 2024 has not been included as your request was received on 9 January 2024, prior to the commencement of the 2024 school year.

### Topic 3: Session Quality Queries

*20. Please share how sessions costs vary, if at all, regarding:*

- a) Practitioner type for that session (types as discussed in topic 2)*
- b) Length of session (i.e., sessions at are 20 minutes, sessions that are 1 hour, etc.)*

Providers are required to employ or contract the required counsellors to deliver the service in the regions they are contracted to deliver in. Schools know their learners best so it is up to them, working with whānau, communities, wellbeing staff and the counselling provider, to decide what supports their students need and how they will be delivered. As such, the Ministry does not hold information on how session costs vary by practitioner type or length of sessions. I am therefore refusing **part 20 a-b** of your request under section 18(g) of the Act, as the information is not held by the Ministry.

*21. How does the Ministry of Education ensure sessions are cross-comparable?*

On 24 January 2024, you clarified part 21 of your request as follows:

*How does the Ministry of Education ensure that sessions that are provided are congruent with each other under whatever data collection system is being used, such that one tracked session can be fairly compared to another, with significant factors including the session length and number of participants. For example, if two schools had ten sessions each, but one school's sessions were an hour and a half and the other school's sessions were 45 minutes, how would the Ministry of Education accommodate this variance to demonstrate first school had more counselling delivered.*

The Ministry does not compare the session length, participant numbers or number of session hours between schools. I am therefore refusing **part 21** of your request under section 18(g) of the Act, as the information is not held by the Ministry.

*22. Type of session delivered (i.e, assumedly clinical staff may be doing assessments that vary in time and price compared to a peer support intervention. Within the same role, an individual may provide different services. How is this accommodated?)*

As stated above, it is up to each school and provider to determine which session type is appropriate for their setting. Practitioners will deliver a range of session types and lengths, depending on the identified area of need. The Ministry does not compare the types of session delivered and associated price. I am therefore also refusing **part 22** of your request under section 18(g) of the Act, as the information is not held by the Ministry.

*23. Please describe the quality controls in place to ensure the sufficiency of sessions provided, including expected session length, modalities, and approach.*

The Ministry does not set specific targets for CiS sessions. Rather, a school delivery plan is developed in consultation with the school, providers, and regional Ministry staff, and contains delivery expectations for each school community. A school delivery plan is developed based on the needs of the school and within the scope of the programme.

As required under section 9(1) of the Act, I have considered the public interest in releasing the information withheld under section 9 in the above response. I do not consider the public interest considerations favouring the release of this information are sufficient to outweigh the need to withhold it at this time.

Please note, we may publish this response on our website after five working days. Your name and contact details will be removed.

Thank you again for your email. You have the right to ask an Ombudsman to review my decision on your request, in accordance with section 28 of the Act. You can do this by writing to [info@ombudsman.parliament.nz](mailto:info@ombudsman.parliament.nz) or to Office of the Ombudsman, PO Box 10152, Wellington 6143.

Nāku noa, nā



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