

Guidance and criteria for delivery of online creative arts therapy and Supervision

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Introduction

These guidelines are intended for creative arts therapists who provide therapy and/or supervision using online platforms. We wish to thank IACP for the use of their [guidelines](#) as a template and support in compiling this document.

Online provision of creative arts therapies is increasing alongside practitioners of other theoretical orientations. Online should not replace conventional face to face therapy with clients nor suggest that all practitioners will wish to pursue technological methods for helping clients. As technology is evolving at a very fast pace, it would be impossible to provide information here about every facet of it, or to give answers to the many issues which individual practitioners may encounter while using it.

These guidelines are of relevance to all practitioners engaging in online therapy and should be read and considered alongside the IACAT Code of Ethics.

The following areas are the principal focus of the guidelines:

- Practitioner Competence and Training
- Contracts and client suitability
- Professional and legal considerations
- Client confidentiality and security

Methods of communication referred to in the text

As noted earlier, technology and the internet are changing at a rapid pace which means that it is impossible to enumerate the ever-evolving methods of communication it encompasses. However, the purpose of this document is to offer guidelines for good practice in several specific areas and contexts.

Evans (2009) refers to methods of online communication which are conducted in real time as synchronous and describes communication where there is a delayed reaction as asynchronous (Evans, 2009: 88, 89).

- **Telephone** : therapy where the context is a verbal exchange between client and practitioner and is conducted in real time. This can be a specific choice or alternative if the internet signal fails or buffers.

Telephone is regarded as the most secure method of digital therapy.

- **Email** : private written communication between client and practitioner where there is a delayed response. Messages can be composed and sent at any time by either client or practitioner or an agreed time/day to receive and expect a response from the therapist is negotiated and set.

Email's need to be encrypted. If emailing or sending something created by the client before or during the session, encourage the use of password protection or the use of a secure encrypted server such as Egress.

“Please ensure that when artworks are sent, they are password protected by your clients and that storage of artworks sent electronically is also password protected.” (BAAT, 16.03.2020)

- **Video applications:** communication is both verbal and visual and is conducted in real time via the internet.

There are various opinions about the suitability of using video applications due to issues of GDPR and HIPAA. “It is simply not acceptable for clients to see when you, their therapist, is or is not online, and vice versa, it is not OK for you to see when a client is or is not online. What is great and helpful amongst families and friends is simply intolerable for psychotherapists working professionally... (ACTO), 14.08.2017)

Many of the same concerns exist if you consider using Skype, WhatsApp Video, Facebook Video or Google Hangouts.

Professional Video Conferencing software is recommended to protect client data and adhere to EU GDPR and HIPAA requirements.

Suggested platforms are : Zoom, Thera-link, Vsee and Whereby.

IACAT does not endorse any specific provider of an online platform.

- **Instant messaging** : real time programme which notifies when contacts are online. The messages written in return are received instantly

“The live chat function on either Skype or Skype for Business does not provide a suitable level of security for the therapeutic use as the text is still available at a later date and could be misused (think about for example a jealous partner using tracking software).” (Association for Counselling and Therapy Online (ACTO), 14.08.2017)

ACTO also raise the issue of cookies and how Skype and Microsoft use these across their products which may also breach GDPR. Many of the same concerns exist if you consider using WhatsApp Video, Facebook Video or Google Hangouts.

Practitioner competence and training

Online practice as a specialised area of creative arts therapy

Training in the specialised area of online creative arts therapy, should, like training in any other specialist area of psychotherapy and counselling, be considered a priority by any practitioner hoping to work in this medium. Courses in pre-qualification training are not readily available in Ireland at present and are limited in number. Post-qualification training is increasingly available and should be considered for all practitioners hoping to work online with clients.

Some models of therapy appear to work more effectively than others online. This means that the limitations of each practitioner's theoretical orientation should be a major consideration before making a decision to work in this way. This highlights the importance of providing clients with explicit and relevant details about the practitioner's experience, theoretical orientation and methods of working beforehand. Such information should also focus on any intrinsic limitations a particular approach may have in relation to online working.

Practitioner experience

The range of issues clients may bring to therapy online means that inexperienced or novice practitioners are unlikely to be in a position to offer the kind of support they need. Since online provision of therapy now covers vast geographical areas, potential clients may access any site of their choice, and may do so with a myriad of complex issues. These variables mean that experience and training are essential requirements for anyone wanting to work with clients in this context. The IACAT Code of Ethics makes clear that practitioners are obliged to work within their experience. This applies to technological ways of working with clients, just as it applies to other, more traditional, approaches in therapy. A diploma level qualification (or equivalent international qualifications) is a desired prerequisite for anyone seeking to work with clients online. However, it is recognised that training in this area is limited in Ireland at present. Other specialist areas of therapy require additional training and experience. These areas include, for example, eating disorders, addictions, and working in a multi-cultural way. Online therapy with clients deserves the same level of expertise and commitment as face to face. It is therefore

the practitioner's duty to be aware of regulatory issues, including complaints procedures, and to inform potential clients of these.

Specialist training

Specialist training is advisable for any practitioner intending to work online. This training should include the ethical, theoretical and practical dimensions of working with clients online. In addition to the theoretical elements of training, it is more beneficial if such courses also incorporate experiential learning online. Indeed, the delivery online of the training course could have the advantage of permitting trainee practitioners to gain experience of working this way from the outset. Effective work online necessitates proficiency in IT skills, and an awareness of how electronic data and information are stored, along with the ethical and legal requirements of their service delivery. Competence in the maintenance of electronic information and the safeguarding of client records is an essential component of online training courses. Security and confidentiality are basic components of online work, and practitioners should be proficient in the skills necessary to ensure they are never compromised.

The following is a summary of essential components of training:

- Due to the absence of visual and auditory signals, communication via email presents certain difficulties which are not present in face to face therapy with clients, and necessitates the development of further practitioner skills and training in this context
- Understanding of client dis-inhibition: Clients sometimes disclose information and emotion very quickly online. Practitioners need to understand the dynamics underpinning this kind of response so that they can work effectively with clients who exhibit it
- Clarification as an aid to understanding. In order to avoid mistakes or misunderstanding, practitioners should be aware of the importance of greater clarification when communicating with clients via email or telephone
- Awareness of fantasy and idealisation of the practitioner by the client (which may be erotic or romantic) and stems from the increased transference and projection accompanying online therapy
- How to proceed when clients 'disappear' through change of email addresses or other contact details
- The importance of 'netiquette' or the rules of online etiquette, and how this applies to posting messages and replies online
- How to maintain a responsible 'presence' online, especially in relation to personal practitioner details which may compromise the individual therapist or that of the profession

- Some training in the wider ethical implications of working online, especially in relation to the instigation of dual relationships with clients through social networking sites.

Research

Working in the fast-moving sphere of online technology means that practitioners should keep abreast of ongoing research and development in the field of therapy. Being a member of an organisation or organisations dedicated to the understanding of online mental health research and development is recommended. Examples of these include:

- The International Society for Mental Health Online (SMHO)
- The Association for Counselling and Therapy Online (ACTO)
- The Online Therapy Institute

Familiarity with other online organisations dedicated to providing clients with information about therapy, what it entails and how it can be accessed, is also desirable. One example is:

- Counselling and Psychotherapy – Mental Health.ie

All information provided on a practitioner or service provider's website should be clear, unambiguous and up to date.

Proficiency in the use of technology

It is the practitioner's responsibility to ensure that the technology they use is safe and fit for purpose. This includes ensuring that anti-virus, firewall, encryption and spam blocking software are all in place. It also means ongoing maintenance of other technological tools necessary for safe practice with clients. Courses in online practice with clients should include details about the installation of software and maintenance of safety online. In addition, clients should be made aware of system requirements and warned of the risks of technological failure and how to protect against this. As part of the initial assessment procedure, clients should be given all the information necessary to avoid threats to their privacy and to ensure their safety online. This information to clients should include:

- The importance of using a personal computer with firewall and anti-virus protection installed.
- The importance of encryption for ensuring that information received is confidential.

- The need for password protection for access to computer and email account.
- To avoid sending or receiving emails at Wi-Fi hotspots unless sure that connection is secure.
- Checking the 'to' address field before clicking to 'send'.

Practitioners are also responsible for ensuring that the technology they use, including all hardware and software, is up to date, stable and capable of functioning efficiently. Though practitioners should be willing to adapt to a client's preferred software when necessary, this should only be done when the client is made aware of any security difficulties this might entail.

Accreditation

Training for online therapy is a specialist form of training, and as such should come after the practitioner's core training is complete.

Therapy conducted via technological methods of communication can be used in support of accreditation criteria relating to Continuous Professional Development (CPD) and professional (personal) development. In order to meet the criteria, however, practitioners must demonstrate the following:

- Completion of appropriate specialist training and competence to work online with clients; and
- Show that work with clients is contracted counselling and not any other activity where counselling skills are used.

It is important to note that courses in online therapy do not currently meet the IACAT eligibility criteria for core practitioner training. Training for practice online is not recommended for inexperienced practitioners or those without access to continuing support and guidance from experts.

Supervision and professional support

There are an increasing number of online courses available for trained practitioners who wish to become online supervisors. Some courses offer training to diploma level, while others may be short and conducted over a few days or a weekend period. Practitioners of online therapy have a duty to ensure that their work is adequately supervised in a way that will support their work with online clients. The way in which practitioners receive supervision is a consideration and may represent a choice between face to face supervision and supervision online. There is currently no firm consensus about which is preferable, though online supervision seems more suitable since it serves to uncover parallel processes and other important dynamics when both practitioner and supervisor are working in the same medium. Supervisors need to have a comprehensive understanding of all the issues, both theoretical and practical, which impinge on the practitioner's work with online clients. Practitioners

too, should understand that they need this level of competence and expertise to support their online work with clients. There are pressures which are unique to online work with clients, which means that practitioners are advised to consider their personal self-care as a valid priority and a necessary prerequisite for maintaining safe practice with clients. Maintaining self-care (and by extension safe practice) includes, among other things, being aware of boundaries, especially in relation to practitioner availability and response to clients.

Verification and confirmation of therapist details

There are certain details which should be available to prospective clients from the outset. These details, which should be clear and specific, are provided in pre-therapy information by the practitioner. They include the following:

- The practitioner's identity
- The practitioner's qualifications and credentials
- Information about training bodies relevant to the practitioner's qualifications
- Whether the practitioner works privately or as part of an organisation
- Whether the therapy provided is free at the point of delivery or not
- Details of affiliation to a professional body for counselling and psychotherapy
- Information about which specific guidelines or ethics code for online work the practitioner and / or organisation subscribes to
- Verification details of professional organisations should be supplied so that prospective clients may check these. Clients need to know how they can contact professional bodies or organisations to which the practitioner belongs or works
- All the information on the service provider's website should be clear, up to date and accurate.

Contracting and client suitability

Assessment

Service providers of online therapy have a duty to follow guidelines for identification of clients who are suitable for (and are likely to benefit from) contact online. Some clients may not have the level of computer literacy needed to benefit from online support, while others may lack the communication skills and general literacy required for this medium. Clients, who, because of disability, have restricted access to online support, may not benefit from online provision either. If prospective clients seem unlikely to benefit from this approach, procedures should be in place to guide them towards appropriate help. This rule applies to clients who, for example, may be at risk through self-harm or harm to others, or those who seem beyond the

practitioner's level of competence. Practitioners should be realistic about their own level of competence in certain contexts when assessing clients for online work.

Informed consent

Steps should be taken during assessment to ensure that information gained from clients is equivalent to that obtained in face to face work with clients. Assessments may be conducted via online questionnaire or via personal communication or both. Safe practice would suggest that both methods of assessment is preferable. Therapists should know if the client is old enough to consent to the legal terms of service for example Zoom Video Conferencing. Consent may be needed from their parent/guardian (for child) or carer (for vulnerable adults).

Establishing an online contract

Prospective online clients need to have certain details, including pre-therapy information and contractual issues, and this should be available on the practitioner's website. In addition, this information should be replicated via email once communication between client and practitioner is established. Clients may quickly scan initial details, including terms and conditions, on a website without actually absorbing all the details, thus the importance of repeating them. To avoid misunderstanding, the language used to convey this information should be clear and unambiguous. If there are financial implications for the client, or for a specific organisation, this should be clearly stated too. The establishment of an online contract can help to reduce the potential for misunderstanding or disagreement between client and practitioner and can serve as a useful reference point if conflict or misunderstanding arises during the course of therapy. Practitioners need to consider their own boundaries and limitations when working online, just as they would in face to face work with clients. This applies to practitioners working alone, as well as to those working within organisations.

Contract information

The contract, which sets an agreement between client and practitioner, is the foundation of the relationship. It provides information for the client who will then know what to expect. It also establishes the boundaries of the therapeutic relationship and is designed to ensure that the client understands how the practitioner is going to work.

The following are specific aspects of working online:

- Information about how you work online. Is this done synchronously or asynchronously? Is it done via email, telephone or visual platform?
- Details about session booking, dates and times of contact, as well as times of response from practitioner to client. The amount of time per session.
- Details of security for confidentiality.

- The client's responsibility in relation to electronically stored or printed material either sent to or received from the practitioner.
- The ethical framework or code of ethics that you adhere to.
- Details of fees and how payment is accepted. For example, is payment per session or payment per block of sessions ?
- What can realistically be expected by the client and what may be achievable through therapy.
- What should happen in the event of technology failure or an emergency, and what are the alternative means of contact?
- What are the arrangements for you or the client if either becomes ill or if someone dies?
- The difference between communication used for making practical arrangements, and the content material of therapy sessions. For example, using a mobile phone to confirm or cancel appointments, but not for personal or confidential communication.
- Policy about sending or accepting email attachments and the use of technological resources including blogging and public forums.
- General referral procedures and procedures in the event of emergency or crisis and the additional help available in emergency or crisis.
- Consideration of where the therapy is actually taking place.

Working with couples, families and groups

There is any number of support groups online which generally operate without a leader. Participants in these groups value the communication, help and shared experience which they receive from other members. In addition, group members tend to value the anonymity which many online support groups provide. However, therapy led online groups is very different, and should not involve the anonymity characteristic of support groups. In fact, the rules of participation and behaviour between members in a therapy led online group, should be just as carefully considered as they are in traditional group facilitation. This applies to all aspects of group facilitation, including intake procedures and the management of conflict within the group as well as the management of endings. Participants should be aware of the terms of membership of the group, as well as the group rules and what happens if there is a breach of these.

It is increasingly possible for practitioners, who wish to do so, to use technological means of working with couples, families and groups. Working online in this way pre-supposes and requires specialist training in traditional therapy with these client group beforehand. Couples, family and groupwork are multifaceted areas of therapy when conducted online and require further in depth training in the complexities of these models. All the ethical considerations which apply to individual therapy with clients, apply also to working online with couples, families and groups.

Professional and legal considerations

Professional indemnity insurance

Practitioners who wish to work online through distance therapy provision should ensure that their professional indemnity insurance covers their work in this medium, and that it extends to coverage of relevant jurisdictions and the laws which apply in these. Not all agencies which offer insurance for face to face therapy are willing to extend insurance to online practice, which means that practitioners should clarify this before embarking on this type of practice. Many insurers will stipulate certain security conditions that should be met before insurance for online work with clients is granted. It is worth stating that practitioners who engage in distance therapy as part of their practice should understand that they may be subject to regulations and laws in the client's jurisdiction as well as their own.

Websites and intellectual property rights

Practitioners need to ensure that their website content does not contravene anyone else's intellectual property rights. This includes copyright, domain names, logos, art work and trade names. In addition, practitioners should not imply endorsement of their work by a particular organisation, including IACAT, except when this is authorised, or trade on the reputation of others.

Payment for online work

Clients need information about fees and how these should be paid. This information forms part of the contract between client and practitioner. Practitioners need to ensure that online systems provided for payment are secure and reputable.

Confidentiality in relation to data protection and storage

Risks and possible infringement

Practitioners who provide online services for clients must protect and maintain confidentiality, especially in relation to the data and information relating to them. This is an ethical requirement in every model of therapy, it is especially significant in online work. This mode of delivery is particularly vulnerable to breaches of confidentiality. Maintaining the protection needed pre-supposes that practitioners are well informed about the potential risks to confidentiality before using online

technology. Practitioners can only acquire this knowledge through prior training. Further information about data protection can be obtained through consultation with technology experts in this field.

Potential risks to confidentiality may occur during use of search engines and participation in social networking sites. Practitioners must be aware that any information on the internet can be intercepted by a third party at any time or by someone (including a relative) with access to their personal computer.

Practitioners must inform their clients about the limits of confidentiality, including the risk of possible access to, or disclosure of, confidential information which can occur during service delivery. Included here is the risk of access to telephone calls or email when practitioner and client are communicating via either of these mediums. Online supervision is another area vulnerable to loss of confidentiality when data and stored information is not adequately protected. Practitioners should be aware of Irish law on data protection: this is included in the Data Protection Act 1988 (as amended by the Data Protection (Amendment) Act 2003) and deals with data protection for phone, email, SMS and internet use. Section 51 of the British-Irish Agreement Act 1999 is also of relevance in relation to cross-border matters of data protection.

Confidentiality and security safeguards

Practitioners working online need to consider how best to work securely so that confidentiality is not compromised. Online client confidentiality is just as important as it is in face to face consultations with clients. Online clients who are at risk, or those in crisis situations, are covered by the same guidelines as those in face to face therapy. Practitioners must inform their clients about the possibility of disclosure in certain situations, when working with them online. Clients should also be informed and consulted if case material is used in supervision or research. Several other important points arise in relation to client confidentiality and online data, including the following:

- Practitioners must maintain electronic records in accordance with relevant laws and statutes.
- Clients should be informed about the way records are stored and protected electronically.
- Practitioners should assess if a client is aware of any third party who might wish to intercept their communication, and arrange for referral if necessary.
- Clients should be asked about their computer access and warned that security may be compromised if using a work, library or cybercafé computer.
- Encryption and other security measures should be assigned to records.
- Password protection should be in place and changed regularly so that access to confidential electronic messages is restricted. Especially important is the use of password protection for opening email attachments.

- Practitioners who are in doubt about specific security issues should seek relevant professional help on devising and maintaining online systems which are required for client confidentiality.
- Organisations have specific systems in place for holding and protecting client data. Practitioners who are employed by organisations should comply with the specific requirements dictated.
- Websites should include policy detail about the security measures in place, and any circumstances in which data could be shared or disclosed.
- Practitioners should regularly check that electronic links are working and are appropriate for professional use.
- All confidential printed material, including emails and client information should be safely stored in line with security measures for client face to face notes as indicated in the IACAT Code of Ethics.

Summary of Guidelines

Considerations

When deciding whether to offer therapy by phone or internet services you might want to consider:

- The age of the clients (in particular with relation to using online tools). Clients must be old enough to consent to the legal terms of services used. Consent from the client and their parent/guardian (for child) or carer (for vulnerable adults).
- The client's ability to engage in therapy in this way (any sensory processing issues or the clients comfort using technology)
- The technical requirements to allow the session to take place without interruption.
- The policy and guidance of any organisation you are working for or subcontracted by regarding alternative therapy provision
- The safety and confidentiality issues around this method of therapy.

The chosen approach

- 'Synchronous': live and immediate, in real time, delivered via Instant Messenger [IM] or video/audio link.
- 'Asynchronous': the exchange of pre-considered material, usually delivered by email.

The assessment of client suitability for online therapy

- Assess client/s proficiency in using technology when practising online creative arts therapy.
- Consider clients/s suitability for online creative arts therapy.
- Discuss advantages and disadvantages of online creative arts therapy.
- Evaluate client/s ability to communicate when undertaking online creative arts therapy.
- When providing online services to a client under the age of 18 years or a vulnerable adult consider any circumstances and/or conditions that may impact their understanding of informed consent when securing informed consent at a distance.
- Re-contract with your client/s to address the circumstance driving change to working online.

Ethics

- Make sure that purpose, type and duration of online therapy are clearly defined.
- Obtain and document informed consent when providing professional services online, adhering to IACAT's code of ethics. Include the way in which you will work with your client/s online and how you will respond to electronic based communications from clients. Within the consent form also include information about the potential charges/or fee reduction incurred for any service interruptions or failures should they occur and awareness of charges on exceeding monthly data plans.
- Explain to clients how you will interact with them using the specific technologies involved. Be mindful of GDPR/HIPAA legislation and include what client information will be stored and for how long, how the information will be stored, how it will be accessed.

Confidentiality

- Discuss the specific issues related to working online surrounding confidentiality and consider the client/s environment. For example, does the clients living situation mean that they are likely to be disturbed during an online session? To ensure that the conversation can't be overheard by other people in the same building, the use of headphones by both client and therapist is advised.
- Switch off listening devices for example : Siri, Alexa etc.

Technical Issues

- Be clear about the technical issues that may arise during an online session. Establish whether both your own and your clients internet connection is sufficient prior to proceeding with online creative arts therapy. Establish a pre-arranged agreement as to how to resume communication if a technology breakdown occurs, for example by telephone within a specific time frame.
- Also consider the use of art materials and the potential safety implications of their proximity to laptops/keyboards.

Insurance

- If you are thinking of providing online creative art's therapy services first check with your insurer that you are covered.

Finance

- For your own and your client's protection, it is advisable to have secure arrangements in place for the transfer of money, for example, Stripe, PayPal. It is usual practice for payment to be made before an online session takes place.
- There may be considerations around fair pricing for offering online or phone sessions.

Session Times

- Where possible, sessions should be arranged to take place at the client's usual time for their regular face to face sessions. In some cases, adjustments may need to be made to find a time when the client is able to have the privacy to make the call from their own home.

Use of recording – audio and video

- Audio or video data is not recommended to be recorded by therapist or client. However, should a situation arise and both parties agree to a recording the client will be informed before sessions begin and a separate consent form will be used to give permission for such recordings.

Reference

Association for Counselling and Therapy Online (ACTO). (14.08.2017). Is Skype a suitable tool for online therapy? ACTO Board of Directors.

BAAT. (16.03.2020). BAAT emergency guideline on managing art therapy practice and looking after clients during the COVID-19 pandemic . The British Association of Art Therapists.

Evans, J. (2009). Online Counselling and Guidance Skills: A Practical Resource for Trainees and Practitioners. London: Sage Publications.

RESOURCES AND FURTHER INFORMATION

Association for Counselling and Therapy Online: <https://acto-org.uk/>

American Psychological Association (APA) Available at: <https://www.apa.org/practice/guidelines/telepsychology>

British Association for Counselling & Psychotherapy: <https://www.bacp.co.uk/about-us/contact-us/faqs-about-coronavirus/>

Irish Online Counselling
<https://www.counsellingonline.ie/iocps-irish-online-counselling-psychotherapy-service/terms-of-use>

Irish Association for Counselling and Psychotherapy: <https://iacp.ie/onlinecounselling>

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