

## Education and Training Committee – 13 September 2012

### Results of profession-specific standards of proficiency consultation for arts therapists

#### Executive summary and recommendations

#### **Introduction**

We are currently reviewing the profession specific standards of proficiency for the professions we regulate. The review of the profession specific standards follows from the Council's approval of new generic standards of proficiency in March 2011.

To ensure the process is manageable, we are reviewing the profession-specific standards in groups of three or four professions at a time. At the start of each review, we contact each of the professional bodies for the relevant professions and ask for their suggestions on any changes that they consider necessary. We then use their suggestions to revise the standards for public consultation.

Following the first round of professional body reviews, we consulted between 18 April and 27 July 2012 on the draft standards for the first professions to undergo review—arts therapists, dietitians, occupational therapists, orthoptists, physiotherapists, and radiographers.

The consultation response analysis and revised draft standards for arts therapists are attached for the Committee's consideration, approval, and recommendation to Council.

Given the volume of responses received to these consultations, we have not been able to review the consultation responses and revise the standards for all of these professions in time for today's committee meeting. The consultation response analyses and revised standards for dietitians, occupational therapists, physiotherapists, and radiographers will be brought to the Committee for consideration at its November meeting.

#### **Decision**

The Committee is invited to discuss, agree and recommend to the Council that it approve the attached consultation response analysis and draft standards of proficiency for arts therapists (subject to minor editing changes and formal legal scrutiny).

#### **Background information**

Paper for Education and Training Committee, 8 March 2012, (enclosure 7 at [www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=587](http://www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=587))

Paper for Education and Training Committee, 17 November 2011 (enclosure 5 at [www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=586](http://www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=586))

Paper for Education and Training Committee, 9 June 2011 (enclosure 19 at: [www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=588](http://www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=588))

Paper agreed by Council on 31 March 2011 (enclosure 6 at: [www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=533](http://www.hcpc-uk.org/aboutus/committees/archive/index.asp?id=533))

### **Resource implications**

The resource implications of this round of consultation are accounted for in the Policy and Standards Department planning for 2011/12. The resource implications of the ongoing process of review and eventual publication of the revised standards of proficiency have been taken into account in the Policy and Standards workplan for 2012/13, and will continue to be taken into account in future years.

### **Financial implications**

The financial implications include the costs associated with a series of public consultations on new draft standards and publication of new standards for all 15 of our current professions. These costs are accounted in department planning for 2011/12 and 2012/13.

We anticipate further costs in 2013/14 for further consultations and publication of further revised standards.

### **Appendices**

- Consultation response analysis for the profession-specific standards of proficiency for arts therapists.

### **Date of paper**

3 September 2012

## **Consultation on proposed profession-specific standards of proficiency for arts therapists**

### **Analysis of responses to the consultation on proposed profession-specific standards of proficiency for arts therapists, and our decisions resulting from responses received**

<b>1. Introduction .....</b>	<b>3</b>
About the consultation .....	3
About us .....	3
About the standards of proficiency .....	3
Reviewing the profession-specific standards of proficiency.....	4
About this document.....	5
<b>2. Analysing your responses .....</b>	<b>5</b>
Method of recording and analysis.....	5
Quantitative analysis .....	5
Quantitative results.....	6
<b>3. General comments.....</b>	<b>7</b>
‘Generic’ profession-specific standards.....	7
English language competency.....	7
‘Be able to’/‘understand’ .....	7
Relationship between standards of proficiency and conduct standards .....	8
How the standards of proficiency are used .....	8
Leadership.....	8
<b>4. Comments in response to specific questions.....</b>	<b>9</b>
Question 1. Do you think the standards are at a threshold level necessary for safe and effective practice?.....	9
Question 2. Do you think any additional standards are necessary? .....	9
Question 3. Do you think there are any standards which should be reworded or removed? .....	9
Question 4. Do you have any comments about the language used in the standards?.....	10

Question 5. Do you support the use of the term ‘service user’ within the standards for arts therapists – is there an alternative term that would be more appropriate? .....	10
<b>5. Our comments and decisions.....</b>	<b>11</b>
Responses to general comments .....	11
Responses to detailed comments about the standards.....	13
Our decisions .....	15
<b>6. List of respondents.....</b>	<b>17</b>
<b>Appendix 1: Draft standards of proficiency for arts therapists .....</b>	<b>18</b>
<b>Appendix 2: Suggested additional standards .....</b>	<b>29</b>
<b>Appendix 3: Detailed comments on the draft standards.....</b>	<b>35</b>

# 1. Introduction

## About the consultation

- 1.1 We consulted between 18 April 2012 and 27 July 2012 on proposed changes to the professions-specific standards of proficiency for arts therapists.
- 1.2 The standards of proficiency set out what we expect professionals on our Register—known as ‘registrants’—to know, understand, and be able to do when they apply to join our Register. We consulted on proposed changes to the standards as part of our regular periodic review of the standards.
- 1.3 We sent the consultation documents to a range of stakeholders including professional bodies, employers, and education and training providers, advertised the consultation on our website, and issued a press release.
- 1.4 We would like to thank all those who took the time to respond to the consultation document. You can download the consultation document and a copy of this responses document from our website: [www.hcpc-uk.org/aboutus/consultations/closed](http://www.hcpc-uk.org/aboutus/consultations/closed).

## About us

- 1.5 We are the Health and Care Professions Council (HCPC). We are a regulator and our job is to protect the health and wellbeing of people who use the services of the professionals registered with us. We regulate the members of 16 different health, social work, and psychological professions.
- 1.6 To protect the public, we set standards that professionals must meet. Our standards cover the professionals’ education and training, behaviour, professional skills, and their health. We publish a Register of professionals who meet our standards. Professionals on our Register are called ‘registrants’. If registrants do not meet our standards, we can take action against them which may include removing them from the Register so that they can no longer practise.

## About the standards of proficiency

- 1.7 The standards of proficiency are the standards that we consider necessary for the safe and effective practice of each of the professions we regulate. They describe what professionals must know, understand, and be able to do in order to apply to join our Register. The standards play an important role in public protection. When a professional applies for or renews their registration, or if concerns are raised about their competence while they are registered with us, we use the standards of proficiency in checking whether they have the necessary knowledge and skills to be able to practise their profession safely and effectively.
- 1.8 There are separate standards of proficiency for each of the professions we regulate. The standards of proficiency complement our other

standards as well as policies developed by employers and guidance produced by professional bodies.

- 1.9 The standards of proficiency are divided into generic standards (which apply to all the professions) and standards specific to each of the professions regulated. The purpose of the generic standards is to recognise commonality across all the professions that we regulate. The purpose of the profession-specific standards is to set out additional standards for each profession related to the generic standard.
- 1.10 We consulted on changes to the generic standards of proficiency between July and October 2010.<sup>1</sup> The new generic standards have now been agreed by our Council and were not the subject of this consultation. Under the new structure, most of the standards of proficiency will be profession-specific, listed under the 15 new generic standards.

### **Reviewing the profession-specific standards of proficiency**

- 1.11 The review of the profession-specific standards is an opportunity to make sure the standards of proficiency are relevant to each profession. We regularly review the standards of proficiency to:
  - reflect current practice or changes in the scope of practice of each profession;
  - update the language where needed to ensure it is relevant to the practice of each profession and to reflects current terminology;
  - reflect the standard content of pre-registration education programmes;
  - clarify the intention of existing standards; and
  - correct omissions or avoid duplication.
- 1.12 In our work to revise the standards prior to consultation, we invited the professional bodies for arts therapists—the British Association of Art Therapists, the British Association for Music Therapy, and the British Association of Dramatherapists—to review the standards of proficiency for their profession and tell us whether they considered any changes were necessary. We carefully considered their comments and other feedback we have received on the standards and produced a proposed set of draft standards for the profession to take to public consultation.
- 1.13 In consulting on proposed changes to the standards, we asked our stakeholders to consider whether the changes we have suggested to the profession-specific standards of proficiency for each profession are appropriate, and whether other changes are necessary. We have used the responses we receive to help us decide if any further amendments are needed.

---

<sup>1</sup> You can find more information about the consultation on our website here: [www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=110](http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=110)

- 1.14 Once the final sets of standards are approved, they will be published. We will work with education providers to gradually phase-in the new standards after they are published.

### **About this document**

- 1.15 This document summarises the responses we received to the consultation. The results of this consultation will be used to revise the proposed standards of proficiency for arts therapists.
- 1.16 The document starts by explaining how we handled and analysed the responses we received, providing some overall statistics from the responses. Section three provides a summary of the general comments we received, while section four is structured around the responses we received to specific questions. Our responses and decisions as a result of the comments we received are set out in section five.
- 1.17 In this document, 'you' or 'your' is a reference to respondents to the consultation, 'we', 'us' and 'our' are references to the HCPC.

## **2. Analysing your responses**

- 2.1 Now that the consultation has ended, we have analysed all the responses we received.

### **Method of recording and analysis**

- 2.2 We used the following process in recording and analysing your comments.
- We recorded each response to the consultation, noting the date each response was received and whether it was submitted on behalf of an organisation or by an individual;
  - We also recorded whether the person or organisation agreed or disagreed with the proposal (please see the section on quantitative analysis below);
  - We read each response and noted the comments received against the proposal, and recorded any general comments;
  - Finally, we analysed all the responses.
- 2.3 When deciding what information to include in this document, we assessed the frequency of the comments made and identified themes. This document summarises the common themes across all responses, and indicates the frequency of arguments and comments made by respondents.

### **Quantitative analysis**

- 2.4 We received 17 responses to the consultation document. Two responses (12%) were made by individuals and 15 (88%) were made on behalf of organisations. The table below provides some indicative

statistics for the answers to the consultation questions. Responses to question six which asked for any other comments on the standards are summarised in section three of this paper.

### Quantitative results

Questions	Yes	No	Partly	Unsure/no response
1. Do you think the standards are at a threshold level necessary for safe and effective practice?	11 (65%)	0 (0%)	3 (17.5%)	3 (17.5%)
2. Do you think any additional standards are necessary?	5 (29%)	7 (41%)	1 (6%)	4 (24%)
3. Do you think there are any standards which should be reworded or removed?	10 (59%)	3 (17.5%)	1 (6%)	3 (17.5%)
4. Do you have any comments about the language used in the standards?	6 (35.5%)	8 (47%)	N/A	3 (17.5%)
5. Do you support the use of the term 'service user' within the standards for arts therapists – is there an alternative term that would be more appropriate?	10 (59%)	1 (6%)	1 (6%)	5 (29%)



### **3. General comments**

- 3.1 We consulted on the standards for arts therapists, dietitians, occupational therapists, orthoptists, physiotherapists, and radiographers at the same time. Respondents to each of those consultations raised similar issues.
- 3.2 The following is a high-level summary of the comments of a more general nature we received in response to all the consultation documents. This includes responses to question six. Where we received general comments which were specific to the arts therapists consultation, these have also been included here. The general comments are grouped under specific headings.

#### **'Generic' profession-specific standards**

- 3.3 Many respondents to the consultation were concerned about new profession-specific standards that were originally detailed generic standards of proficiency in the current standards.
- 3.4 Because these now profession-specific standards were originally generic, a number of them have been transferred into the profession-specific standards for each of the professions we were consulting on concurrently—arts therapists, dietitians, occupational therapists, orthoptists, physiotherapists, and radiographers. Because many of these professions have similar principles reflected in their standards, it appeared to many respondents that some of these principles were actually still generic, and a number of respondents queried why those standards should be considered profession-specific.

#### **English language competency**

- 3.5 A number of respondents were concerned about the English language competency requirements in the standards. Some respondents felt that the requirements should apply equally to all applicants – including those from the European Economic Area (EEA).

#### **'Be able to'/'understand'**

- 3.6 Some respondents felt the phrases 'be able to', 'be aware of' and 'understand the importance of' made the standards more accessible and usable, a number of other respondents were concerned about this choice of construction as they felt it lacks legal strength. Some respondents felt the use of these phrases weakened the standards because they could be interpreted to mean that registrants must only take a passive approach to using the standards, without necessarily being required to be competent in practice, or to put those requirements into action.
- 3.7 Most of the comments on this choice of wording reflected on the difference between requiring a registrant 'must' do something, as

opposed to 'must be able to do'. Some respondents felt the use of 'you must' is more appropriate than 'be able to'.

### **Relationship between standards of proficiency and conduct standards**

- 3.8 A number of respondents commented that there was a general lack of conduct or ethics-related standards within the proposed profession-specific standards of proficiency. Some respondents felt that it is important that the standards of conduct, performance and ethics, and standards of proficiency are more closely aligned, with a few respondents suggesting that the standards should be combined.

### **How the standards of proficiency are used**

- 3.9 Some respondents were concerned by some of the new proposed standards, and queried whether dietitians who had been in practice for a long period of time would be able to meet all the new standards. Some respondents asked for clarification about how current registrants would be tested against the new standards once they come into effect.

### **Leadership**

- 3.10 A number of respondents suggested that principles encompassing the concept of leadership should be added to the standards of proficiency for dietitians. This suggestion comes from recent work carried out by the NHS Institute and the NHS Leadership Academy on the Clinical Leadership Competency Framework (CLCF), which aims to build leadership capability and capacity across the healthcare system by embedding leadership competencies in relevant systems including the standards set by professional regulators.<sup>2</sup>
- 3.11 Some respondents commented that it is important that all regulated professionals understand the principles of shared leadership, and are able to recognise that they are able to contribute to the leadership process within individual organisations. Respondents felt that by adding leadership requirements to the HCPC standards of proficiency, this would drive necessary changes in education and training for the professions we regulate, which would eventually lead to an increase in leadership capability within the national health system.
- 3.12 More detailed suggestions for how these principles could be reflected in the standards are set out in appendices two and three.

---

<sup>2</sup> [http://www.leadershipacademy.nhs.uk/component/docman/doc\\_download/8-leadership-framework?Itemid=251](http://www.leadershipacademy.nhs.uk/component/docman/doc_download/8-leadership-framework?Itemid=251)

## **4. Comments in response to specific questions**

This section contains comments made in response to specific questions within the consultation document.

### **Question 1. Do you think the standards are at a threshold level necessary for safe and effective practice?**

Most respondents agreed that the standards were at the threshold level for safe and effective practice. Respondents commented that the standards reflected existing training provision and the general range of practice of arts therapists.

A few respondents to the consultation felt that some of the standards were not set at a threshold level. They gave the following reasons:

- Some further additions are needed to ensure that all aspects of safe and effective practice for the profession are reflected in the standards.
- The requirement for 'effective' practice is too difficult to measure against the standards in the context of art therapy and should be reconsidered.
- The standards do not include a specific standard around the values of leadership – for a more detailed summary of the comments we received around this issue generally, please refer to section three.

### **Question 2. Do you think any additional standards are necessary?**

Many respondents commented that additional standards were not necessary as the range of competencies and required knowledge for arts therapists was adequately set out in the proposed standards.

However, other respondents felt that more standards are necessary because there are aspects of professional practice that are not reflected adequately within the standards.

All of the additional standards suggested by respondents are set out in appendix two. Suggested standards included:

- Leadership;
- Professional conduct;
- Mentoring, training, and supervising others;
- Building effective relationships or partnerships with different types of service users; and
- Practising in a non-discriminatory manner.

### **Question 3. Do you think there are any standards which should be reworded or removed?**

Some respondents felt that the standards are sufficiently clear that they did not require rewording.

However, most respondents commented that there were some standards that did require rewording. Some suggestions were based on concerns raised about the language used in the standards (for example, the use of 'be able to'). Concerns about this form of wording are set out in the summary about the language used in the standards under question three. We have listed all the proposed amendments to the standards in appendix three.

Respondents suggested changes to the wording of the standards for the following reasons:

- To clarify the ways in which arts therapists should work with others;
- To clarify the expectations set for practice and competency by the HCPC;
- To specify the amount of time arts therapists should devote to participation in clinical supervision; and
- To include leadership principles.

#### **Question 4. Do you have any comments about the language used in the standards?**

Most respondents felt that the language used in the standards is appropriate, clear, and generally easy to understand.

However, other respondents commented that the language was not as clear as it could be. Many of those respondents commented on the use of 'be able to' or other starting phrases as set out in paragraphs 3.6-3.7 above. Many of these respondents felt that standards that are worded in this way are passive and do not place a strong enough requirement on registrants to commit to good practice standards. Other comments we received about the use of specific phrases or words have been listed in appendix three.

Other general comments respondents made about language included:

- Ambiguity of some words or phrases, and how they are meant to be interpreted in practice.
- The use of terms like 'management' to mean clinical or therapeutic interventions, which was felt to be inappropriate for arts therapists.

#### **Question 5. Do you support the use of the term 'service user' within the standards for arts therapists – is there an alternative term that would be more appropriate?**

Most respondents to this question felt that the term 'service user' is the most appropriate term, while acknowledging the difficulty of choosing a term that could be consistently used and understood across the range of practice settings where arts therapists work. Some respondents were less concerned about which term was used, as long as the terms were used consistently throughout the standards for arts therapists.

Some respondents felt that other terms would be more appropriate – including 'client' or 'patient'.

## 5. Our comments and decisions

- 5.1 The following section sets out our response to the range of comments we have received to the consultation. We have not responded to every individual suggestion, but grouped those suggestions thematically and outlined the principles of our response. This section starts with our responses to the general comments we received, before responding to comments about the standards specifically. Our decisions in response to the comments received are set out at the end of this section.
- 5.2 We received a range of similar comments in response to the consultations we ran concurrently on the standards for arts therapists, dietitians, occupational therapists, orthoptists, physiotherapists, and radiographers. We have responded to those comments in the following section on general comments.

### Responses to general comments

This section outlines our response to the general comments outlined in section three.

#### Leadership

- 5.3 We are supportive of the Clinical Leadership Competency Framework (CLCF) which emphasises shared responsibility and accountability of all registered professionals at all levels in contributing towards good quality services and improved outcomes for service users. We consider that the majority of the elements and descriptors included in the CLCF are generic and are clearly applicable across all the different professions we regulate. However, we also note that some of the content of CLCF is more specific to clinicians who work within the National Health Service or within managed environments.
- 5.4 We have considered whether we should change the standards so that 'leadership' as a term is more explicitly used within them. However, we have concluded that it would be more meaningful at this stage (whilst understanding of the CLCF and its definition of leadership develops) to instead ensure good coverage within our standards, where appropriate, of the specific underpinning knowledge, skills, attitudes and behaviours identified in the CLCF. Where we have received comments for amendments to standards or new standards with the aim of embedding the CLCF within the standards, we have considered these carefully to ensure that they are at a threshold level and are not substantially duplicated elsewhere in the standards. We have found that in most cases these competencies are already embedded throughout the standards of proficiency and well reflected in the standards of conduct, performance and ethics. We will publish on our website a position statement setting out our views on the CLCF. As the review of the standards of proficiency progresses, we will publish alongside this example documents showing how the CLCF descriptors map across to our standards.

## **Generic and profession-specific standards**

- 5.5 The majority of the content of the standards was formerly generic. However, some professions expressed concern that these standards were expressed in ways which were not applicable to their practice. As a result, we agreed 15 high level generic statements which will apply to all the professions we regulate. In redrafting the standards of proficiency, we mapped all the current standards which did not become the new generic standards as profession-specific standards. All the principles contained in the current standards of proficiency—where appropriate—remained in place under the new structure.
- 5.6 In the standards of proficiency we consulted on in this round of review—arts therapists, dietitians, occupational therapists, orthoptists, physiotherapists, and radiographers—there were a number of formerly detailed generic standards that have been mapped as profession-specific in each of these profession’s standards. Some respondents felt that because these principles appear to be shared between a number of the professions we regulate, that they should remain as generic standards.
- 5.7 The six professions that were part of this round of review do have a number of shared profession-specific standards. However, it would not be appropriate to reinstate these standards as generic standards, as the standards in question are not generic across all the professions we regulate. There are some professions on our Register which do not share many of the standards that respondents were concerned about. However, we have tried to retain as much consistency between different professions’ standards wherever possible and appropriate.

### **‘Be able to’**

- 5.8 As we stated in the consultation document, we intentionally use phrases such as ‘understand’, ‘know’, and ‘be able to’ rather than ‘must’. This is so the standards remain applicable to current registrants in maintaining their fitness to practise, as well as prospective registrants who have not yet started practising and are applying to be registered for the first time. The standards are also written in a similar way to the learning outcomes set for pre-registration education programmes.
- 5.9 It is important to note the current standards of proficiency use verbs and starting phrases in the same way as the proposed new profession-specific standards of proficiency. We have not experienced any difficulty in applying the current wording of the standards of proficiency in the way some of our respondents anticipated.

## **The standards and scope of practice**

- 5.10 The standards set out the proficiencies required of applicants when they apply to join the Register. Once on the Register, every time registrants renew their registration, they are asked to confirm that they continue to meet the standards of proficiency that apply to their own scope of practice—the area of their profession in which they have the knowledge, skills and experience to practise safely and effectively. We

recognise that a registrant's scope of practice will change over time and that the practice of experienced registrants often becomes more focused and specialised than that of newly registered colleagues. That may mean that some registrants may not be able to continue to meet all the standards of proficiency required at entry to their profession. However, as long as those registrants continue to practise safely and effectively within their own scope of practice, and do not practise in the areas in which they are not proficient to do so, this is not a problem.

### **Relationship between standards of proficiency and conduct standards**

- 5.11 The standards of proficiency and standards of conduct, performance and ethics play complementary but distinct roles in how we set requirements for our registrants. While the knowledge, skills, and experience of a professional play a part in their ability to behave and practise ethically, we consider that it is important that our conduct standards remain separate from those which are purely about a professional's proficiency to practise.
- 5.12 We received some comments about the generic standards of proficiency and the standards of conduct, performance and ethics. These standards were not the subject of this consultation and so we have not reflected them in appendix two or three. However, we will consider these comments when we review each set of standards. We have started our review of the standards of conduct, performance and ethics, and expect to consult on changes to those standards in 2013/14.

### **English language competency**

- 5.13 Some respondents were concerned that the English language requirements do not apply equally to all applicants to the Register. Current European law limits the ability of regulators such as the HCPC to systematically test the language competency of EEA applicants to our Register, so it would not be possible to amend this requirement at the current time.

### **Responses to detailed comments about the standards**

- 5.14 In this section, we have set out our responses to suggestions for additional standards or changes to the existing standards. All the proposed additional standards and suggested changes to specific standards are set out in appendix two and three of this document.
- 5.15 We have not responded to every suggestion individually here, but we have explained the general principles we applied when considering suggested amendments. Where respondents were particularly concerned about certain issues, we have addressed those below under the heading of the relevant standard.
- 5.16 When we receive suggestions for changes to the standards (including revisions to existing standards or proposed additional standards), we consider the following in deciding whether we should make the change:

- Is the standard necessary for safe and effective practice?
  - Is the standard set at the threshold level for entry to the Register?
  - Does the standard reflect existing requirements for arts therapists on entry into the profession?
  - Does the standard reflect existing training provision?
  - Is the standard written in a broad and flexible way so that it can apply to different environments in which arts therapists might practice or different groups that arts therapists might work with?
- 5.17 We write the standards of proficiency in a broad, flexible way and at a higher level of generality so that registrants working in different settings and in different ways can still meet the standards. For this reason, we use words that are able to be understood in their widest sense. When making decisions about whether to make changes to the standards, we must also consider whether the changes would make the standards too specific or would limit the scope of the standards.
- 5.18 The standards set out the abilities necessary to practise in a profession. However, the standards are not a curriculum document nor are they intended to be a list of activities which registrants must undertake in any situation. For example, a registrant needs to ‘be able to maintain confidentiality’ on entry to the Register. However, this is an ability and does not mean that there will not be situations where information might need to be shared with, or disclosed to others in the interests of service users or the public.
- 5.19 Part of our focus for the review of the standards is to ensure that the standards are relevant to the range of practice of each profession. We also aim to avoid duplication in the standards, to ensure they are clearly worded, and to maintain consistency between different professions’ standards wherever possible and appropriate.



## **Our decisions**

5.20 We have made a number of changes to the standards based on the comments we have received in the consultation. We have set out the draft revised standards following consultation in appendix one.

### **Additional standards**

5.21 We have added a standard on understanding the structure and function of health and social care services in the UK and current developments. The standards already include a requirement for arts therapists to recognise the role of other health and social care professions. We felt that it was appropriate to include an additional requirement to understand the wider structure of health and social care services across the UK.

### **Changes to specific standards**

5.22 We have made the following changes to some standards:

#### **‘Service users’**

- We have carefully considered the comments we have received on whether the term ‘service user’ is appropriate to use in the standards for arts therapists. The majority of respondents were content with the use of the term service user in the standards. For consistency and clarity we have decided to use this term throughout the arts therapists’ standards.

#### **Standard 3**

- We have made a minor amendment to clarify our requirements around professional conduct.

#### **Standard 10**

- We have made some minor amendments to clarify the requirements of our record-keeping requirements, and to remove one standard which duplicated requirements set out in other standards.

#### **Standard 13**

- We have made a minor amendment to one standard to clarify the use of art objects within the practice of art therapists, following feedback that this standard was unclear.

#### **Standard 14**

- We have made a minor amendment to a standard to clarify our expectations for arts therapists’ use of information technology.

### **Suggested changes we have not included**

5.23 Some of the changes suggested by respondents were not included in the standards because we felt they would duplicate content already contained within the standards we set, or they would not make our

requirements clearer. This section does not address every suggested change to the standards, but focusses on responding to overarching themes or areas of concern.

### **Leadership**

- For our response to the suggestions for standards related to the issue of leadership, please see paragraphs 5.3-5.4.

### **Training and mentoring others**

- We received a range of suggestions for standards about the requirement for arts therapists to train and mentor others. We considered that these requirements were aimed at a more advanced level of practice than would be relevant for newly-qualified arts therapists.

### **Professional behaviour**

- A few respondents made a range of suggestions for additional standards or amendments on the issue of professional conduct. We consider that the draft standards address these proficiencies in adequate detail.

### **Working with others**

- Some respondents felt additional requirements should be added on the importance of effective working with others. In this area we consider that the draft standards are appropriate for the practice of arts therapists and additional requirements are not necessary.

## **6. List of respondents**

Below is a list of all the organisations that responded to the consultation.

2GETHER NHS FOUNDATION TRUST

Betsi Cadwaladr University Health Board

Board of Community Health Councils in Wales

British Association for Counselling and Psychotherapy

British Association of Art Therapists

NHS Education for Scotland

NHS Leadership Academy

NHS Midlands and East

Northumberland Tyne and Wear NHS Foundation Trust

Public Health Agency (Northern Ireland)

Rampton Hospital, Nottinghamshire Healthcare NHS Trust

South Staffordshire and Shropshire Healthcare NHS Foundation Trust

The British Association of Dramatherapists

University of the West of England Bristol

Velindre NHS Trust

## Appendix 1: Draft standards of proficiency for arts therapists

New standards and added words or phrases are shown in **bold and underlined**. Deletions are shown in ~~strike through~~. The standards in this section are subject to legal scrutiny and may be subject to minor editing amendments prior to publication.

No.	Standard
<b>1.</b>	<b>be able to practise safely and effectively within their scope of practice</b>
1.1	know the limits of their practice and when to seek advice or refer to another professional
1.2	recognise the need to manage their own workload and resources effectively and be able to practise accordingly
1.3	understand the value of therapy in developing insight and self-awareness through their own personal experience
<b>2.</b>	<b>be able to practise within the legal and ethical boundaries of their profession</b>
2.1	understand the need to act in the best interests of service users at all times
2.2	understand what is required of them by the Health and Care Professions Council
2.3	understand the need to respect and uphold the rights, dignity, values, and autonomy of service users including their role in the diagnostic and therapeutic process and in maintaining health and wellbeing
2.4	recognise that relationships with service users should be based on mutual respect and trust, and be able to maintain high standards of care even in situations of personal incompatibility
2.5	know about current legislation applicable to the work of their profession
2.6	understand the importance of and be able to obtain informed consent
2.7	be able to exercise a professional duty of care

No.	Standard
2.8	understand the role of the art, music, or dramatherapist in different settings
<b>3.</b>	<b>be able to maintain fitness to practise</b>
3.1	understand the need to maintain high standards of personal <b><u>and professional</u></b> conduct
3.2	understand the importance of maintaining their own health
3.3	understand both the need to keep skills and knowledge up to date and the importance of career-long learning
3.4	recognise that the obligation to maintain fitness to practise includes engagement in their own arts-based process
<b>4.</b>	<b>be able to practise as an autonomous professional, exercising their own professional judgement</b>
4.1	be able to assess a professional situation, determine the nature and severity of the problem and call upon the required knowledge and experience to deal with the problem
4.2	be able to make reasoned decisions to initiate, continue, modify or cease treatment or the use of techniques or procedures, and record the decisions and reasoning appropriately
4.3	be able to initiate resolution of problems and be able to exercise personal initiative
4.4	recognise that they are personally responsible for and must be able to justify their decisions
4.5	be able to make and receive appropriate referrals
<b>5.</b>	<b>be aware of the impact of culture, equality, and diversity on practice</b>
5.1	understand the requirement to adapt practice to meet the needs of different groups and individuals
5.2	understand the need to take account of psychological, social, cultural, economic and other factors when collecting case histories and other appropriate information

No.	Standard
6.	<b>be able to practise in a non-discriminatory manner</b>
7.	<b>understand the importance of and be able to maintain confidentiality</b>
7.1	be aware that the concepts of confidentiality and informed consent extend to illustrative records such as video and audio recordings, paintings, digital images and other art work
7.2	be aware of the limits of the concept of confidentiality
7.3	be able to recognise and respond appropriately to situations where it is necessary to share information to safeguard service users or the wider public
7.4	understand the principles of information governance and be aware of the safe and effective use of health and social care information
8.	<b>be able to communicate effectively</b>
8.1	be able to demonstrate effective and appropriate verbal and non-verbal skills in communicating information, advice, instruction and professional opinion to service users, colleagues, and others
8.2	be able to communicate in English to the standard equivalent to level 7 of the International English Language Testing System, with no element below 6.5 <sup>3</sup>
8.3	understand how communication skills affect assessment and engagement of service users and how the means of communication should be modified to address and take account of factors such as age, physical ability, capacity, and learning ability
8.4	be able to select, move between and use appropriate forms of verbal and non-verbal communication with service users and others

---

<sup>3</sup> The International English Language Testing System (IELTS) tests competence in spoken and written **the English language**. Applicants who have qualified outside of the UK, whose first language is not English and who are not nationals of a country within the European Economic Area (EEA) or Switzerland, ~~have~~ **must** provide evidence that they have reached the necessary standard. ~~We also accept the TOEFL test as an equivalent.~~ Please visit our website for more information.

No.	Standard
8.5	be aware of the characteristics and consequences of verbal and non-verbal communication and how this can be affected by factors such as culture, age, ethnicity, gender, spiritual or religious beliefs and socio-economic status
8.6	understand the need to provide service users or people acting on their behalf with the information necessary to enable them to make informed decisions
8.7	understand the need to assist the communication needs of service users such as through the use of an appropriate interpreter, wherever possible
8.8	recognise the need to use interpersonal skills to encourage the active participation of service users
8.9	be able to explain the nature, purpose and techniques of therapy to service users and carers
<b>9.</b>	<b>be able to work appropriately with others</b>
9.1	be able to work, where appropriate, in partnership with service users, other professionals, support staff, and others
9.2	understand the need to build and sustain professional relationships as both an independent practitioner and collaboratively as a member of a team
9.3	understand the need to engage service users and carers in planning and evaluating diagnostics, and assessment outcomes to meet their needs and goals
9.4	be able to contribute effectively to work undertaken as part of a multi-disciplinary team
9.5	recognise the role of arts therapists and the contribution they can make to health and social care
9.6	understand the need to establish and sustain a therapeutic relationship within a creative and containing environment
<b>10.</b>	<b>be able to maintain records appropriately</b>
10.1	be able to keep accurate, legible <b><u>comprehensive and comprehensible</u></b> records <b><u>in accordance with applicable legislation, protocols and guidelines</u></b>

No.	Standard
10.2	recognise the need to manage records and all other information in accordance with applicable legislation, protocols and guidelines
10.3	<del>understand the need to use only accepted terminology in making records</del>
<b>11.</b>	<b>be able to reflect on and review practice</b>
11.1	understand the value of reflection on practice and the need to record the outcome of such reflection
11.2	understand the value of case conferences and other methods of review
11.3	understand the role and value of ongoing clinical supervision in an arts therapy context
<b>12.</b>	<b>be able to assure the quality of their practice</b>
12.1	be able to engage in evidence-based practice, evaluate practice, and participate in audit procedures
12.2	be able to gather information, including qualitative and quantitative data, that helps to evaluate the responses of service users to their care
12.3	be aware of the role of audit and review in quality management, including quality control, quality assurance, and the use of appropriate outcome measures
12.4	be able to maintain an effective audit trail and work towards continual improvement
12.5	be aware of, and able to participate in quality assurance programmes, where appropriate
12.6	be able to evaluate intervention plans using recognised outcome measures and revise the plans as necessary in conjunction with the service user
12.7	recognise the need to monitor and evaluate the quality of practice and the value of contributing to the generation of data for quality assurance and improvement programmes
<b>13.</b>	<b>understand the key concepts of the knowledge base relevant to their profession</b>



No.	Standard
13.1	understand the structure and function of the human body, together with knowledge of health, disease, disorder and dysfunction relevant to their profession
13.2	be aware of the principles and applications of research enquiry, including the evaluation of treatment efficacy and the research process
13.3	recognise the importance of working in partnership with service users when carrying out research
13.4	recognise the role of other professions in health and social care
13.5	<b><u>understand the structure and function of health and social care services in the UK and current developments</u></b>
13.6	understand the theoretical basis of, and the variety of approaches to, assessment and intervention
13.7	understand the psychological and cultural background to health, and be aware of influences on the client <b><u>service user</u></b> – therapist relationship
13.8	understand the core processes in therapeutic practice that are best suited to <del>their clients'</del> <b><u>service users'</u></b> needs and be able to engage these to achieve productive outcomes
13.9	understand the therapeutic relationship, including its limitations
13.10	be able to employ a coherent approach to the therapeutic process
13.11	understand how and why different approaches to the use of the arts in arts therapy and in other settings varies according to context and purpose
13.12	know about theories of group work and the management of group process
13.13	know about theories relevant to work with an individual

No.	Standard
13.14	know about: <ul style="list-style-type: none"> <li>- human development;</li> <li>- normal and abnormal psychology;</li> <li>- normal and abnormal human communication and language development;</li> <li>- mental illness, psychiatric assessment and treatment;</li> <li>- congenital and acquired disability;</li> <li>- disorders of social functioning;</li> <li>- the principal psychotherapeutic interventions and their theoretical bases; and</li> <li>- the nature and application of other relevant interventions</li> </ul>
13.15	recognise methods of distinguishing between health and sickness, including diagnosis, specifically mental health disorders and learning disabilities and be able to critique these systems of knowledge from different socio-cultural perspectives
13.16	<b>Art therapists only</b> understand that while art therapy has a number of frames of reference, they must adopt a coherent approach to their therapy, including the relationship between theory, <b>research</b> , and practice and the relevant aspects of connected disciplines including visual arts, aesthetics, anthropology, psychology, psychiatry, sociology, psychotherapy and medicine
13.17	know the practice and process of visual art-making
13.18	understand the role of the physical setting and the art-making process in the physical and psychological containment of emotions
13.19	understand the role and function of the art object <del>as an intermediary frame and</del> within the relationship between client <b>service user</b> and art therapist
13.20	understand the role and use of visual symbols in art that communicate conscious and unconscious processes
13.21	understand the influence of socio-cultural context on the making and viewing of art in art therapy

No.	Standard
13.22	recognise that different approaches to the use of visual arts practice in therapeutic work have developed in different sociocultural and political contexts around the world
13.23	<b>Dramatherapists only</b> understand core processes and forms of creativity, movement, play and dramatic representation pertinent to practice with a range of <del>client</del> <b>service user</b> groups
13.24	understand both the symbolic value and intent inherent in drama as an art form, and with more explicit forms of enactment and re-enactment of imagined or lived experience
13.25	know a range of theatrical representation techniques and be able to engage <del>clients</del> <b>service users</b> in a variety of performance-derived roles
13.26	recognise that dramatherapy is a unique form of psychotherapy in which creativity, play, movement, voice, storytelling, dramatization, improvisation, and the performance arts have a central position within the therapeutic relationship
13.27	recognise that different approaches to the discipline have developed from different histories in Eastern and Western Europe and the Americas
13.28	recognise that the discipline has deep foundations within the many cultural traditions that use ritual, play, drama and performance for the enhancement of health
13.29	know the key principles of influential theatre practitioners and their relevance to the therapeutic setting
13.30	<b>Music therapists only</b> recognise that different approaches to music therapy have developed in different cultures and settings, and be able to apply a coherent approach to their work appropriate to each setting in which they practise
13.31	understand the practice and principles of musical improvisation as an interactive, communicative, and relational process, including the psychological significance and effect of shared music making
13.32	know a broad range of musical styles and genres and be aware of their cultural contexts

No.	Standard
13.31	be able to play at least one musical instrument to a high level, and to use their singing voice and a keyboard/harmonic instrument to a competent level
<b>14.</b>	<b>be able to draw on appropriate knowledge and skills to inform practice</b>
14.1	be able to conduct appropriate diagnostic or monitoring procedures, treatment, therapy, or other actions safely and effectively
14.2	be able to work with clients <b>service users</b> both to define a clear end for the therapy, and to evaluate the therapy's strengths, benefits and limitations
14.3	be able to formulate specific and appropriate management plans including the setting of timescales
14.4	be able to change their practice as needed to take account of new developments or changing contexts
14.5	be able to gather appropriate information
14.6	be able to select and use appropriate assessment techniques
14.7	be able to undertake and record a thorough, sensitive and detailed assessment, using appropriate techniques and resources
14.8	be able to undertake or arrange investigations as appropriate
14.9	be able to observe and record client's <b>service users'</b> responses and assess the implication for diagnosis and intervention
14.10	be able to undertake or arrange investigations, for example setting up an assessment period in order to ascertain the appropriateness of an intervention
14.11	be able to analyse and critically evaluate the information collected
14.12	be able to demonstrate a logical and systematic approach to problem solving
14.13	be able to use research, reasoning and problem solving skills to determine appropriate actions

No.	Standard
14.14	recognise the value of research to the critical evaluation of practice
14.15	be aware of a range of information, research methodologies and their respective limitations in evaluating psychotherapeutic interventions and treatments
14.16	be able to evaluate research and other evidence to inform their own practice
14.17	be able to demonstrate a level of skill in the use of information and communication technologies appropriate to their practice
14.18	<p><b>Art therapists only</b></p> <p>be able to use a range of art and art-making materials and techniques competently and be able to help a client <u>service user</u> to work with these</p>
14.19	<p><b>Dramatherapists only</b></p> <p>be able to use a range of dramatic concepts, techniques and procedures including games, activities, styles and structures and to improvise drama spontaneously with clients <u>service users</u> in a variety of styles and idioms</p>
14.20	<p><b>Music therapists only</b></p> <p>be able to use a range of music and music-making techniques competently including improvisation, structured musical activities, creation and composition of material and music technology where appropriate and be able to help a client <u>service user</u> to work with these</p>
15.	<b>understand the need to establish and maintain a safe practice environment</b>
15.1	understand the need to maintain the safety of both service users and those involved in their care
15.2	be aware of applicable health and safety legislation, and any relevant safety policies and procedures in force at the workplace, such as incident reporting, and be able to act in accordance with these
15.3	be able to work safely, including being able to select appropriate hazard control and risk management, in a safe manner and in accordance with health and safety legislation
15.4	be able to select appropriate personal protective equipment and use it correctly

<b>No.</b>	<b>Standard</b>
15.5	be able to establish safe environments for practice, which minimise risks to service users, those treating them, and others, including the use of hazard control and particularly infection control

## Appendix 2: Suggested additional standards

No.	Standard	
1.	be able to practise safely and effectively within their scope of practice	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• knowing when and from whom to seek help;</li> <li>• knowing when to use skills available to them and when not to;</li> </ul>
2.	be able to practise within the legal and ethical boundaries of their profession	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• person/patient-centred care;</li> <li>• respecting the dignity of service users;</li> <li>• more explicit reference to professionalism and conduct;</li> <li>• requirement to contribute to the development of the profession (through research, role-modelling, mentorship, challenging poor/practice/unprofessional behaviour in others)</li> <li>• reference to specific legislation when dealing with children and vulnerable people/adults, and a requirement to update knowledge in this area;</li> <li>• knowing when disclosure of information is permitted under the law – being aware or when a duty to disclose overrides duty to maintain confidentiality;</li> <li>• knowing what to do or who to contact for help when the professional's views do not correlate with those of a service user (specifically around obtaining consent);</li> </ul>
3.	be able to maintain fitness to practise	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• being able to demonstrate an acceptable and reasonable standard of care;</li> <li>• a list of specific competencies that professionals should have and be able to keep up-to-date.</li> </ul>
4.	be able to practise as an autonomous professional, exercising their own	<p>Respondents suggested a number of different standards covering the following areas:</p>

	professional judgement	<ul style="list-style-type: none"> <li>• requirement to actively promote autonomy by encouraging people who use their service to be active participants in their own care;</li> </ul> <p>Suggested new standards to underpin the Clinical Leadership Competency Framework elements:</p> <ul style="list-style-type: none"> <li>• understand the need to be aware of their own values, principles and assumptions and the impact of their behaviour on others;</li> <li>• be able to act in a manner consistent with the values and priorities of their organisation and profession;</li> <li>• be able to contribute their unique perspective to team, department, system and organisational decisions, as appropriate;</li> </ul>
5.	be aware of the impact of culture, equality, and diversity on practice	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• the ability to demonstrate empathy;</li> <li>• the need to be aware of their own feelings/beliefs/prejudices and the need to put these to one side in providing care;</li> <li>• requirement to take account of sensory/deficits/impairments and modify approach accordingly (could also sit under standard 8);</li> <li>• strengthening the need to maintain appropriate boundaries in arts therapy – specifically around touch and how it can be interpreted in different cultures</li> </ul>
6.	be able to practise in a non-discriminatory manner	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• being able to promote equality and diversity within their practice;</li> <li>• understanding the need to promote equality and culturally sensitive services</li> </ul>
7.	be able to maintain confidentiality	
8.	be able to communicate effectively	<p>Respondents suggested the following standard:</p> <ul style="list-style-type: none"> <li>• understanding of the concepts of motivational interviewing</li> </ul>



9.	be able to work appropriately with others	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• additional requirements around collaborative working;</li> <li>• recognise and understand the roles, responsibilities, and value base of other professionals within the multi-disciplinary team</li> <li>• standards around understanding the importance of teaching and training others (also see comments under standard 14) including: <ul style="list-style-type: none"> <li>– understanding the principles of teaching and learning for undergraduate and postgraduate students;</li> <li>– recognising the importance of the arts therapist's role in teaching and training students and practitioners from all health and social care professions as appropriate;</li> <li>– Supporting students to identify the roles, responsibilities and values of their profession and how arts therapists interact with others in the multidisciplinary team;</li> </ul> </li> <li>• more emphasis on health and social care integration;</li> <li>• understanding the need to maintain professional behaviours and to display these at all times when interacting with users of the service, colleagues and team members;</li> <li>• ability to develop effective/therapeutic relationships with members of the healthcare team;</li> <li>• emphasise importance of rehabilitation and re-enablement;</li> <li>• emphasise the need/importance of involving patients/service users in all decisions, and ensuring that all decisions are person-centred;</li> <li>• ensuring that decisions taken are in the best interests of patients/service users and do not reflect only the values of healthcare providers;</li> <li>• motivating service users to adapt/change behaviour</li> <li>• recognising the roles, responsibilities, and value base of other professionals within the multi-disciplinary team;</li> </ul> <p>Suggested new standards to underpin the Clinical Leadership Competency Framework elements:</p>
----	---	--

		<ul style="list-style-type: none"> <li>• understand the need to work with those who provide services in and across different sectors;</li> <li>• recognise the need to participate effectively in the planning, implementation and evaluation of multi-professional approaches to healthcare delivery by liaising with other healthcare professionals;</li> <li>• be able to contribute effectively to work undertaken as part of a multi-disciplinary team;</li> <li>• understand the value of enabling and empowering service users with the aim of enhancing their access to all services and opportunities which are available to them, as appropriate;</li> <li>• understand group dynamics and roles, and be able to facilitate group work, in order to maximise support, learning and change within groups and communities;</li> <li>• understand the value of encouraging dialogue and debate with a wide range of people including service users, other professionals, support staff and others and recognising different perspectives.</li> </ul>
10.	be able to maintain records appropriately	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• 'minimum standards' about how to record therapy sessions including date, time, and attendance;</li> <li>• examples of what constitutes 'safe' storage of confidential records;</li> <li>• timely completion of documentation</li> </ul>
11.	be able to reflect on and review practice	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• importance of having insight and being self aware, and modifying behaviour where necessary – linked to reflective and conscientious practice;</li> <li>• seeking and responding to feedback, and being seen to demonstrate the same</li> <li>• specifying the number of clinical supervision per month and how many should be spent in face-to-face contact with service users</li> </ul> <p>Suggested new standards to underpin the Clinical Leadership Competency Framework elements:</p>

		<ul style="list-style-type: none"> <li>• recognise the value of multi-disciplinary team review and other methods of review;</li> <li>• be able to change behaviour in light of feedback and reflection, as appropriate;</li> <li>• be able to acknowledge mistakes and treat them as learning opportunities;</li> <li>• understand the need for change and questioning the status quo, as appropriate, and its impact on people and services.</li> </ul>
12.	be able to assure the quality of their practice	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• the need to be able to demonstrate accountability for practice as well as being responsible for it;</li> <li>• being able to provide rationale for all decisions take and demonstrate consideration of alternative courses of action;</li> </ul> <p>Suggested new standards to underpin the Clinical Leadership Competency Framework elements:</p> <ul style="list-style-type: none"> <li>• understand the need to actively contribute to plans to achieve service goals;</li> <li>• understand the value of supporting plans for services that are part of the strategy for the wider healthcare system, as appropriate;</li> <li>• understanding what resources are available, and understanding the need for using resources effectively, safely, and reflecting the diversity of needs;</li> <li>• be able to hold themselves and others accountable for service outcomes, as appropriate;</li> <li>• be able to use evidence, both positive and negative, to identify options;</li> <li>• be able to use systemic ways of assessing and minimising risk;</li> <li>• be able to monitor the effects and outcomes of change;</li> <li>• understand the value in measuring and evaluating outcomes, taking corrective actions where necessary, as appropriate.</li> </ul>
13.	understand the key concepts of the knowledge base relevant to their profession	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• understand and use the principles of shared leadership; - or alternatively the range of</li> </ul>

		<p>standards suggested under generic standards 4, 9, 11, 12, 13, 14);</p> <p>A specific new requirement for music therapists:</p> <ul style="list-style-type: none"> <li>• Have a good working knowledge of psychotherapeutic principles and their application explicitly in music therapy relationships, both one to one and in groups.</li> </ul> <p>Suggested new standards to underpin the Clinical Leadership Competency Framework elements:</p> <ul style="list-style-type: none"> <li>• understand the value of actively contributing to change processes that lead to improving healthcare, as appropriate;</li> </ul>
14.	be able to draw on appropriate knowledge and skills to inform practice	<p>Respondents suggested a number of different standards covering the following areas:</p> <ul style="list-style-type: none"> <li>• responsibility to promote health and healthy lifestyles– identifying when there are problems with a service user’s health generally and knowing when to suggest they should seek support;</li> <li>• understanding of their role as an educator and be able to draw on principles and techniques that facilitate learning in others</li> <li>• understanding of their role as a leader and be able to draw on principles and techniques to underpin their leadership approach; (also see comments under generic standards 4, 9, 11, 12, 13);</li> </ul> <p>Suggested new standards to underpin the Clinical Leadership Competency Framework elements:</p> <ul style="list-style-type: none"> <li>• understand the structure and function of health, education and social care services in the UK and current developments</li> </ul>
15.	understand the need to establish and maintain a safe practice environment	

## Appendix 3: Detailed comments on the draft standards

Respondents' proposed deletions are indicated in the text by ~~strike through~~ whilst additions are shown in **bold**.

This section does not include comments received about the generic standards, as they were not within the scope of the consultation.

No.	Standard	
1.	<b>be able to practise safely and effectively within their scope of practice</b>	
1.1	know the limits of their practice and when to seek advice or refer to another professional	<p>One respondent suggested that this standard should include consideration of the limits of competence as well as practice:</p> <ul style="list-style-type: none"> <li>know the limits of their practice <b>and competence</b> and when to seek advice or refer to another professional</li> </ul>
1.2	recognise the need to manage their own workload and resources effectively and be able to practise accordingly	<p>One respondent suggested the following amendment</p> <ul style="list-style-type: none"> <li>recognise the need to manage their own workload and resources effectively <b>to support service needs</b> and be able to practise accordingly</li> </ul>
1.3	understand the value of therapy in developing insight and self-awareness through their own personal experience	<p>One respondent suggested that this standard should either be removed as 'it is not a requirement for safe and effective practice', or that it should be moved to sit beneath generic standard 13.</p> <p>Some respondents felt that there should be more clarity about the use of the term 'through their own personal experience' and suggested the following amendments:</p> <ul style="list-style-type: none"> <li>understand the value of therapy in developing insight and self-awareness through their <del>own personal experience</del> <b>professional training and ongoing professional development</b></li> <li>understand the value of therapy in developing insight and self-awareness <del>through their own personal experience</del></li> </ul>

No.	Standard	
2.	<b>be able to practise within the legal and ethical boundaries of their profession</b>	
2.1	understand the need to act in the best interests of service users at all times	
2.2	understand what is required of them by the Health and Care Professions Council <sup>4</sup>	
2.3	understand the need to respect and uphold the rights, dignity, values, and autonomy of service users including their role in the diagnostic and therapeutic process and in maintaining health and wellbeing	One respondent was concerned about the use of the term ‘diagnostic’ in this standard, and felt that the precise meaning of the word within this standard should be made clearer, either to clarify that it means ‘psychiatric’ diagnosis, or that it should mean a mental assessment with the aim of offering therapy – which would not be diagnosis.
2.4	recognise that relationships with service users should be based on mutual respect and trust, and be able to maintain high standards of care even in situations of personal incompatibility	<p>Some respondents were particularly concerned about the use of ‘personal incompatibility’ within this standard and felt that it needed further clarification in how it should be applied.</p> <p>Respondents suggested the following amendments:</p> <ul style="list-style-type: none"> <li>• recognise that relationships with service users <b>and fellow professionals</b> should be based on mutual respect and trust, and be able to maintain high standards of care even in situations of personal incompatibility</li> <li>• recognise that relationships with service users should be based on mutual respect and trust, and be able to maintain high standards of care even in situations of personal <del>incompatibility</del> <b>challenge</b></li> <li>• recognise that relationships with service users should be based on mutual respect and trust, and be able to maintain high standards of care even in situations of personal incompatibility <b>between service user and therapist, and know how to seek alternative resolution if appropriate</b></li> </ul>

<sup>4</sup> Subject to parliamentary agreement, the Health Professions Council will be renamed the Health and Care Professions Council.

No.	Standard	
2.5	know about current legislation applicable to the work of their profession	
2.6	understand the importance of and be able to obtain informed consent	
2.7	be able to exercise a professional duty of care	
2.8	understand the role of the art, music, or dramatherapist in different settings	
<b>3.</b>	<b>be able to maintain fitness to practise</b>	
3.1	understand the need to maintain high standards of personal conduct	
3.2	understand the importance of maintaining their own health	<p>Respondents suggested the following amendments:</p> <ul style="list-style-type: none"> <li>• understand the importance of maintaining their own health, <b>well-being, and resilience</b></li> </ul>
3.3	understand both the need to keep skills and knowledge up to date and the importance of career-long learning	
3.4	recognise that the obligation to maintain fitness to practise includes engagement in their own arts-based process	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• recognise that the obligation to maintain fitness to practise includes engagement in <del>their own arts-based process</del> <b>with the arts</b></li> </ul>
<b>4.</b>	<b>be able to practise as an autonomous professional, exercising their own professional judgement</b>	

No.	Standard	
4.1	be able to assess a professional situation, determine the nature and severity of the problem and call upon the required knowledge and experience to deal with the problem	One respondent felt that the term 'professional situation' needed further clarification.
4.2	be able to make reasoned decisions to initiate, continue, modify or cease treatment or the use of techniques or procedures, and record the decisions and reasoning appropriately	
4.3	be able to initiate resolution of problems and be able to exercise personal initiative	
4.4	recognise that they are personally responsible for and must be able to justify their decisions	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>recognise that they are personally responsible for and must be able to <del>justify</del> <b>provide a rationale for</b> their decisions</li> </ul>
4.5	be able to make and receive appropriate referrals	<p>One respondent felt that it would be more appropriate to make and accept appropriate referrals, as they would not be able to control whether a referral was appropriate and would only accept appropriate referrals:</p> <ul style="list-style-type: none"> <li>be able to make and <del>receive</del> <b>accept</b> appropriate referrals</li> </ul>
<b>5.</b>	<b>be aware of the impact of culture, equality, and diversity on practice</b>	
5.1	understand the requirement to adapt practice to meet the needs of different groups and individuals	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>understand the requirement to adapt practice to meet the needs of different <b>diverse</b> groups and individuals</li> <li>understand the requirement to adapt practice to meet the needs of different groups and individuals <b>and the limitations of the organisation</b></li> </ul>



No.	Standard	
5.2	understand the need to take account of psychological, social, cultural, economic and other factors when collecting case histories and other appropriate information	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>understand the need to take account of psychological, social, cultural, economic, <b>spiritual and religious beliefs</b>, and other factors when collecting case histories and other appropriate information</li> </ul>
6.	<b>be able to practise in a non-discriminatory manner</b>	One respondent was concerned that there were no supplementary standards listed beneath generic standard 6 for arts therapists.
7.	<b>understand the importance of and be able to maintain confidentiality</b>	
7.1	be aware that the concepts of confidentiality and informed consent extend to illustrative records such as video and audio recordings, paintings, digital images and other art work	<p>One respondent felt that this standard should either be simplified, or explained in greater detail.</p> <p>Another respondent felt that the term 'other art work' required further clarification</p>
7.2	be aware of the limits of the concept of confidentiality	
7.3	be able to recognise and respond appropriately to situations where it is necessary to share information to safeguard service users or the wider public	
7.4	understand the principles of information governance and be aware of the safe and effective use of health and social care information	
8.	<b>be able to communicate effectively</b>	

No.	Standard	
8.1	be able to demonstrate effective and appropriate verbal and non-verbal skills in communicating information, advice, instruction and professional opinion to service users, colleagues, and others	<p>Respondents suggested the following amendments:</p> <ul style="list-style-type: none"> <li>• be able to demonstrate effective and appropriate verbal, <del>and</del> non-verbal, <b>and written</b> communication skills when interacting with a diverse range of individuals, groups, and communities</li> </ul>
8.2	be able to communicate in English to the standard equivalent to level 7 of the International English Language Testing System, with no element below 6.5 <sup>5</sup>	<p>One respondent suggested that this standard is potentially discriminatory for arts therapists who have trained outside of the UK.</p> <p>Another respondent questioned whether therapists whose primary language is British Sign Language could be included in this standard.</p>
8.3	understand how communication skills affect assessment and engagement of service users and how the means of communication should be modified to address and take account of factors such as age, physical ability, capacity, and learning ability	<p>One respondent suggested that this standard should place more emphasis on the need to vary/amend style of communication to ensure that it is adapted to the needs of individual patients/service users and is person-centred.</p>
8.4	be able to select, move between and use appropriate forms of verbal and non-verbal communication with service users and others	

---

<sup>5</sup> The International English Language Testing System (IELTS) tests competence in spoken and written English. Applicants who have qualified outside of the UK, whose first language is not English and who are not nationals of a country within the European Economic Area (EEA) or Switzerland, have to provide evidence that they have reached the necessary standard. We also accept the TOEFL test as an equivalent. Please visit our website for more information.

No.	Standard	
8.5	be aware of the characteristics and consequences of verbal and non-verbal communication and how this can be affected by factors such as culture, age, ethnicity, gender, spiritual or religious beliefs and socio-economic status	<p>One respondent suggested the following amendments, to ensure consistency with the protected characteristics listed in the Equality Act 2010:</p> <ul style="list-style-type: none"> <li>• be aware of the characteristics and consequences of verbal and non-verbal communication and how this can be affected by factors such as culture, age, ethnicity, gender, <b>sexuality, transgender</b>, spiritual or religious beliefs, and socio-economic status</li> </ul>
8.6	understand the need to provide service users or people acting on their behalf with the information necessary to enable them to make informed decisions	
8.7	understand the need to assist the communication needs of service users such as through the use of an appropriate interpreter, wherever possible	
8.8	recognise the need to use interpersonal skills to encourage the active participation of service users	
8.9	be able to explain the nature, purpose and techniques of therapy to service users and carers	
<b>9.</b>	<b>be able to work appropriately with others</b>	

No.	Standard	
9.1	be able to work, where appropriate, in partnership with service users, other professionals, support staff, and others	<p>One respondent felt that the terms ‘partnership’ and ‘collaboration’ should be used together in this standard as they felt the term ‘collaboration’ is more general and could apply to sharing of information, referrals, or more sustained teamwork, rather than partnership which implies shared decision-making and an equal status.</p> <p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• be able to work, where appropriate, in partnership with service users, other professionals, support staff, communities, and others <b>and encourage their contribution</b></li> <li>• be able to work, where appropriate, <b>in collaboration and</b> in partnership <b>where appropriate</b> with service users, other professionals, support staff, and others</li> </ul>
9.2	understand the need to build and sustain professional relationships as both an independent practitioner and collaboratively as a member of a team	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• understand the need to build and sustain professional relationships as both an independent practitioner and collaboratively as a member of a team <b>and the wider organisation community</b></li> </ul>
9.3	understand the need to engage service users and carers in planning and evaluating diagnostics, and assessment outcomes to meet their needs and goals	<p>One respondent suggested that amendments could be made to this standard to place more emphasis on empowering patients/service-users to take the lead in managing their own care; and the need to engage service users in implementing and leading interventions to meet their needs/goals as well as planning and evaluating them.</p> <p>One respondent was concerned about the use of the term ‘diagnostics’ in this standard, and felt that the precise meaning of the word within this standard should be made clearer, either to clarify that it means ‘psychiatric’ diagnosis, or that it should mean a mental assessment with the aim of offering therapy – which would not be diagnosis.</p>
9.4	be able to contribute effectively to work undertaken as part of a multi-disciplinary team	

No.	Standard	
9.5	recognise the role of arts therapists and the contribution they can make to health and social care	
9.6	understand the need to establish and sustain a therapeutic relationship within a creative and containing environment	
<b>10.</b>	<b>be able to maintain records appropriately</b>	
10.1	be able to keep accurate, legible records	<p>A number of respondents felt that additional requirements should be added to this standard to set clearer requirements around how records should be kept. Suggestions included:</p> <ul style="list-style-type: none"> <li>• be able to keep accurate, <b>timely</b>, legible records</li> </ul>
10.2	recognise the need to manage records and all other information in accordance with applicable legislation, protocols and guidelines	
10.3	understand the need to use only accepted terminology in making records	Some respondents felt that there was a need to clarify what is meant by 'accepted terminology' in records.
<b>11.</b>	<b>be able to reflect on and review practice</b>	
11.1	understand the value of reflection on practice and the need to record the outcome of such reflection	<p>Respondents suggested the following changes:</p> <ul style="list-style-type: none"> <li>• understand the value of reflection on practice and the need to record <b>and critically evaluate</b> the outcome of such reflection;</li> </ul>
11.2	understand the value of case conferences and other methods of review	

No.	Standard	
11.3	understand the role and value of ongoing clinical supervision in an arts therapy context	One respondent was very concerned about the use of 'understand the role of', and felt it should be more clearly stated as a set requirement to participate in clinical supervision.
<b>12.</b>	<b>be able to assure the quality of their practice</b>	
12.1	be able to engage in evidence-based practice, evaluate practice, and participate in audit procedures	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• be able to engage in evidence-based practice, evaluate practice <b>systematically</b>, and participate in <b>clinical and other</b> audit procedures</li> </ul>
12.2	be able to gather information, including qualitative and quantitative data, that helps to evaluate the responses of service users to their care	
12.3	be aware of the role of audit and review in quality management, including quality control, quality assurance, and the use of appropriate outcome measures	
12.4	be able to maintain an effective audit trail and work towards continual improvement	
12.5	be aware of, and able to participate in quality assurance programmes, where appropriate	
12.6	be able to evaluate intervention plans using recognised outcome measures and revise the plans as necessary in conjunction with the service user	

No.	Standard	
12.7	recognise the need to monitor and evaluate the quality of practice and the value of contributing to the generation of data for quality assurance and improvement programmes	One respondent felt that it would be difficult to interpret or apply this requirement in practice.
<b>13.</b>	<b>understand the key concepts of the knowledge base relevant to their profession</b>	
13.1	understand the structure and function of the human body, together with knowledge of health, disease, disorder and dysfunction relevant to their profession	One respondent queried whether this was a necessary competency for arts therapists.
13.2	be aware of the principles and applications of research enquiry, including the evaluation of treatment efficacy and the research process	
13.3	recognise the importance of working in partnership with service users when carrying out research	One respondent felt that the requirement to seek appropriate consent to undertake research with service users should be included in this standard.
13.4	recognise the role of other professions in health and social care	
13.5	understand the theoretical basis of, and the variety of approaches to, assessment and intervention	
13.6	understand the psychological and cultural background to health, and be aware of influences on the client – therapist relationship	

No.	Standard	
13.7	understand the core processes in therapeutic practice that are best suited to their clients' needs and be able to engage these to achieve productive outcomes	
13.8	understand the therapeutic relationship, including its limitations	
13.9	be able to employ a coherent approach to the therapeutic process	
13.10	understand how and why different approaches to the use of the arts in arts therapy and in other settings varies according to context and purpose	
13.11	know about theories of group work and the management of group process	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>know about theories of group work and <b>to hold and contain</b> the <del>management</del> of group process</li> </ul>
13.12	know about theories relevant to work with an individual	



No.	Standard	
13.13	<p>know about:</p> <ul style="list-style-type: none"> <li>- human development;</li> <li>- normal and abnormal psychology;</li> <li>- normal and abnormal human communication and language development;</li> <li>- mental illness, psychiatric assessment and treatment;</li> <li>- congenital and acquired disability;</li> <li>- disorders of social functioning;</li> <li>- the principal psychotherapeutic interventions and their theoretical bases; and</li> <li>- the nature and application of other relevant interventions</li> </ul>	<p>One respondent suggested that the standard should start with 'have some knowledge of' rather than 'know about'.</p> <p>One respondent was concerned about the use of the terms 'normal and abnormal psychology', without a clarifying definition of what constitute 'normal' and 'abnormal', and suggested that an alternative phrase might be more appropriate.</p>
13.14	<p>recognise methods of distinguishing between health and sickness, including diagnosis, specifically mental health disorders and learning disabilities and be able to critique these systems of knowledge from different socio-cultural perspectives</p>	

No.	Standard	
13.15	<p><b>Art therapists only</b></p> <p>understand that while art therapy has a number of frames of reference, they must adopt a coherent approach to their therapy, including the relationship between theory and practice and the relevant aspects of connected disciplines including visual arts, aesthetics, anthropology, psychology, psychiatry, sociology, psychotherapy and medicine</p>	<p>Some respondents felt that this standard required further clarification. One respondent felt that it is important to emphasise the need for art therapists to update their use of theories based on knowledge of updated research, as it is important that art therapists remain up-to-date with appropriate approaches to practise, and ensure they don't continue with approaches that have been proven as harmful.</p> <p>This respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>understand that while art therapy has a number of frames of reference, they must adopt a coherent approach to their therapy, including the relationship between theory, <b>research</b>, and practice and the relevant aspects of connected disciplines including visual arts, aesthetics, anthropology, psychology, psychiatry, sociology, psychotherapy and medicine</li> </ul>
13.16	know the practice and process of visual art-making	
13.17	understand the role of the physical setting and the art-making process in the physical and psychological containment of emotions	
13.18	understand the role and function of the art object as an intermediary frame and-within the relationship between client and art therapist	<p>One respondent felt that the standard needed clarification, and it was value-laden without being clear about the area of competency required of art therapists.</p> <p>Suggested amendments included:</p> <ul style="list-style-type: none"> <li>understand the role and function of the art object <del>as an intermediary frame and within the relationship between client and art therapist</del></li> <li>understand the role and function of the <del>art object</del> <b>visual arts</b> as an intermediary frame and-within the relationship between client and art therapist</li> </ul>
13.19	understand the role and use of visual symbols in art that communicate conscious and unconscious processes	

No.	Standard	
13.20	understand the influence of socio-cultural context on the making and viewing of art in art therapy	
13.21	recognise that different approaches to the use of visual arts practice in therapeutic work have developed in different sociocultural and political contexts around the world	
13.22	<b>Dramatherapists only</b> understand core processes and forms of creativity, movement, play and dramatic representation pertinent to practice with a range of client groups	
13.23	understand both the symbolic value and intent inherent in drama as an art form, and with more explicit forms of enactment and re-enactment of imagined or lived experience	
13.24	know a range of theatrical representation techniques and be able to engage clients in a variety of performance-derived roles	
13.25	recognise that dramatherapy is a unique form of psychotherapy in which creativity, play, movement, voice, storytelling, dramatization, improvisation, and the performance arts have a central position within the therapeutic relationship	
13.26	recognise that different approaches to the discipline have developed from different histories in Eastern and Western Europe and the Americas	

No.	Standard	
13.27	recognise that the discipline has deep foundations within the many cultural traditions that use ritual, play, drama and performance for the enhancement of health	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>recognise that the discipline has deep foundations within the many cultural traditions that use ritual, play, drama and performance for the enhancement of health <b>and wellbeing</b></li> </ul>
13.28	know the key principles of influential theatre practitioners and their relevance to the therapeutic setting	
13.29	<p><b>Music therapists only</b></p> <p>recognise that different approaches to music therapy have developed in different cultures and settings, and be able to apply a coherent approach to their work appropriate to each setting in which they practise</p>	
13.30	understand the practice and principles of musical improvisation as an interactive, communicative, and relational process, including the psychological significance and effect of shared music making	
13.31	know a broad range of musical styles and genres and be aware of their cultural contexts	
13.32	be able to play at least one musical instrument to a high level, and to use their singing voice and a keyboard/harmonic instrument to a competent level	
<b>14.</b>	<b>be able to draw on appropriate knowledge and skills to inform practice</b>	

No.	Standard	
14.1	be able to conduct appropriate diagnostic or monitoring procedures, treatment, therapy, or other actions safely and effectively	
14.2	be able to work with clients both to define a clear end for the therapy, and to evaluate the therapy's strengths, benefits and limitations	
14.3	be able to formulate specific and appropriate management plans including the setting of timescales	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• be able to formulate specific and appropriate management plans including the setting of timescales <b>as part of the therapeutic process</b></li> </ul>
14.4	be able to change their practice as needed to take account of new developments or changing contexts	<p>Respondents suggested the following amendments:</p> <ul style="list-style-type: none"> <li>• be able to change their practice as needed to take account of new developments, <b>technologies</b>, or changing contexts</li> </ul>
14.5	be able to gather appropriate information	<p>Respondents suggested the following amendments:</p> <ul style="list-style-type: none"> <li>• be able to gather <b>and use</b> appropriate information <b>using appropriate methods</b></li> <li>• be able to gather <b>and use</b> appropriate information</li> </ul>
14.6	be able to select and use appropriate assessment techniques	
14.7	be able to undertake and record a thorough, sensitive and detailed assessment, using appropriate techniques and resources	
14.8	be able to undertake or arrange investigations as appropriate	

No.	Standard	
14.9	be able to observe and record client's responses and assess the implication for diagnosis and intervention	
14.10	be able to undertake or arrange investigations, for example setting up an assessment period in order to ascertain the appropriateness of an intervention	
14.11	be able to analyse and critically evaluate the information collected	
14.12	be able to demonstrate a logical and systematic approach to problem solving	
14.13	be able to use research, reasoning and problem solving skills to determine appropriate actions	
14.14	recognise the value of research to the critical evaluation of practice	
14.15	be aware of a range of information, research methodologies and their respective limitations in evaluating psychotherapeutic interventions and treatments	
14.16	be able to evaluate research and other evidence to inform their own practice	
14.17	be able to demonstrate a level of skill in the use of information and communication technologies appropriate to their practice	

No.	Standard	
14.18	<p><b>Art therapists only</b></p> <p>be able to use a range of art and art-making materials and techniques competently and be able to help a client to work with these</p>	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• be able to use a range of art and art-making materials and techniques <b>safely and</b> competently and be able to help a client to work with these</li> </ul>
14.19	<p><b>Dramatherapists only</b></p> <p>be able to use a range of dramatic concepts, techniques and procedures including games, activities, styles and structures and to improvise drama spontaneously with clients in a variety of styles and idioms</p>	
14.20	<p><b>Music therapists only</b></p> <p>be able to use a range of music and music-making techniques competently including improvisation, structured musical activities, creation and composition of material and music technology where appropriate and be able to help a client to work with these</p>	<p>One respondent suggested the following amendment:</p> <ul style="list-style-type: none"> <li>• be able to use a range of music and music-making techniques competently including improvisation, <b>listening approaches</b>, structured musical activities, creation and composition of material and music technology where appropriate and be able to help a client to work with these</li> </ul>
<b>15.</b>	<b>understand the need to establish and maintain a safe practice environment</b>	
15.1	understand the need to maintain the safety of both service users and those involved in their care	
15.2	be aware of applicable health and safety legislation, and any relevant safety policies and procedures in force at the workplace, such as incident reporting, and be able to act in accordance with these	

No.	Standard	
15.3	be able to work safely, including being able to select appropriate hazard control and risk management, in a safe manner and in accordance with health and safety legislation	
15.4	be able to select appropriate personal protective equipment and use it correctly	
15.5	be able to establish safe environments for practice, which minimise risks to service users, those treating them, and others, including the use of hazard control and particularly infection control	