Psychotherapists and Counsellors Professional Liaison Group (PLG)
3 and 4 March 2009

Education and Training

Executive summary and recommendations

Introduction

This paper invites the PLG to discuss the area of education and training.

Decision

The PLG is invited to discuss the attached paper and make any recommendations as appropriate about the area of education and training.

The PLG is not asked to make any recommendations about the threshold level of qualification for entry to the Register at this stage but may wish to discuss this area to inform a subsequent paper on this topic.

The PLG is additionally reminded to bear in mind the potential equality and diversity implications of any recommendations it may make. This includes considering the extent to which any recommendations would have an adverse impact on some groups compared to others.

Background information

- The PLG touched on issues of education and training in its discussion about the structure of the Register and protected titles at its last meeting. Some of the information is reproduced in the paper 'Summary of working regulatory model' on the agenda at this meeting.

- Paper considered by the PLG on 4 December 2008 – Overview of responses to the Call for Ideas.
  http://www.hpc-uk.org/assets/documents/100025ACpsychotherapists_and_counsellors_professional_liaison_group_20081204_enclosure01.pdf

Resource implications

None

Financial implications

None

Appendices

- QCA National Qualifications Framework
- QAA qualification descriptors
- Scottish Credit and Qualifications Framework
- The European Qualifications Framework for Lifelong Learning

Date of paper

19 February 2009

Education and training

The first section of the paper provides background information about the HPC's standards of education and training and our role in approving pre-registration education and training programmes.

The second section outlines the responses we received to the Call for Ideas in the area of education and training.

The third section provides a summary and discussion of some of the issues in order to aid the group's deliberations.

In this document, 'we' and 'our' are references to the Health Professions Council.

Section one: Background and context

This section is divided into three areas:

- The HPC's process of approving pre-registration education and training programmes.

- An introduction to the HPC's standards of education and training.

- Standard one of the standards of education and training – the threshold level of qualification for entry to the Register.

1. Education and training

1.1 Approval of programmes
This sub-section describes our role in approving education and training programmes, outlining the processes we use.

1.1.1 About approval of programmes
We approve pre-registration education and training programmes against the standards of education and training (enclosed with these papers). The standards of education and training are those standards necessary to ensure that someone who successfully completes that programme is able to meet the standards of proficiency for their part of the Register (the threshold standards for safe and effective practice).

Whilst the majority of these programmes are delivered or validated by Higher Education Institutions (HEIs), we also approve other programmes delivered by professional bodies and private providers. There is no requirement for an approved programme to be delivered or validated by an HEI.

We only approve those programmes that lead directly to an individual's eligibility to register and gain access to the relevant protected title(s) for their profession (please see 1.3.4 for an illustration of existing approved programmes).

We also approve a small number of post-registration programmes that lead to annotation of the Register. The programmes approved are:

- Supplementary prescribing programmes for chiropodists / podiatrists, physiotherapists and radiographers.
- Local anaesthetics and prescription only medicines programmes for chiropodists / podiatrists. These components are now a standard part of pre-registration education and training.

The HPC is required to annotate the Register by the Prescription Only Medicines (Human Use) Order, an Order under the Medicines Act 1968.

The HPC is currently undertaking work to explore whether it should approve further post-registration qualifications and annotate the Register to indicate where they are held. The HPC Education and Training Committee is due to agree its approach in this area at a future meeting.

This paper focuses on the approval of pre-registration education and training programmes.

1.1.2 The approvals process[1]
We visit programmes to approve them against our standards of education and training.

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[1] For more information please see 'HPC Approval Process – Supplementary Information for Education Providers' -
http://www.hpc-uk.org/education/providers/download/

Education and training providers are asked to provide us with documentation relating to the programme prior to the visit, to demonstrate that each of the standards of education and training has been met.

This documentation includes:

- A programme specification;
- Descriptions of the modules;
- A practice placement handbook (or equivalent);
- A student handbook (or equivalent);
- Curriculum vitae for relevant staff;
- External examiners' reports for the last two years, if available; and
- A draft agenda for the approval visit.

Education and training providers are also asked to complete two mapping documents. One of these maps the programme being visited against the standards of education and training, cross-referencing the supporting documents provided. The other document maps the learning outcomes of the programme against the standards of proficiency.

At the approval visit the HPC is normally represented by a panel of three (referred to here as 'the HPC panel'). This comprises of an Education Officer (a member of staff from our Education Department) and two visitors (please see 1.1.4 for more information about visitors).

At the visit the HPC panel will meet with the senior personnel of the education and training provider who have responsibility for the programme's resources; the programme team; students (past and present as appropriate); and placement providers and educators. The visit provides the opportunity for the HPC panel to ask the programme team and others questions based upon the documentation submitted, in order to better establish whether the standards have been met. At the end of the approval visit, the HPC panel makes a judgement about whether, or to what extent, the programme meets the standards and makes a recommendation to the Education and Training Committee. There are broadly three outcomes:

- To recommend approval / ongoing approval of the programme.
- To set conditions (linked to the standards of education and training) that must be met before the programme can be approved or have its ongoing approval confirmed (This is the most common outcome from a visit.)
- To not approve the programme / withdraw approval of the programme (if it is already approved).

After the visit, the visitors complete a visit report which is submitted to a panel of the Education and Training Committee. The Education and Training Panel consists of lay and registrant members of our Education and Training Committee. This panel considers the recommendations of visitors outlined in their reports, together with any observations from the education and training provider, and makes decisions about approval.

There is no fee to education and training providers as part of our approval process.

1.1.3 Other processes

Education and training providers may also be involved in other quality assurance processes. These might include internal validation, quality assurance linked to commissioning arrangements (if applicable) or professional body accreditation.

The only documentation we specifically require for the purposes of our approval process are the documents mapping the programme against the standards of education and training and standards of proficiency (see 1.1.2). The remainder of the documentation provided may be the same as that used in internal validation or other quality assurance processes, or would exist for other purposes within the education and training provider (e.g. equality and diversity policies). We also aim to hold approvals visits at the same time as internal validation and professional body accreditation where this is possible. This approach helps to minimise the anticipated burden of our approval and monitoring processes.

We believe that it is important that our role in approval of programmes is carried out using appropriate professional input, and where possible taking account of the role played by other organisations in quality assurance and accreditation. However, it is also important that our role is carried out with impartiality so that a fair and independent decision is reached that ensures that the public is protected.

1.1.4 Visitors

We ensure professional input in our key processes through the use of partners. In education, we use one type of partner called 'visitors'. Visitors are members of the professions or lay people with appropriate academic or practice experience who visit education and training providers on our behalf.

At approval visits, at least one of the two visitors will be from the same profession with which the programme is concerned. In practice, both visitors will normally be from the same profession.

Visitors are recruited against a person specification and more information is available about this role from the HPC website.[2]

1.1.5 Open-ended approval

If a programme is approved (having met any conditions if applicable), we grant 'open-ended' approval subject to ongoing checks that the programme continues to meet the requisite standards via the annual monitoring and major change processes.

This means that we do not undertake cyclical re-visits of programmes (i.e. every five years). However, if information from the annual monitoring or major change processes indicates that further investigation is necessary to decide whether the standards continue to be met, we may re-visit a programme. This might mean that a programme is re-visited more frequently than might be the case in cyclical visit arrangements.

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[2] http://www.hpc-uk.org/aboutus/partners/

This is designed to strike a balance between fulfilling our statutory duty to ensure that programmes continue to meet our standards, and reducing the anticipated regulatory burden on education and training providers.

1.1.6 Annual monitoring[3]

Annual monitoring is a document based, retrospective process where we consider whether a programme continues to meet our standards of education and training and continues to effectively deliver and assess the standards of proficiency.

The annual monitoring process works on the basis of a two-yearly cycle. In year one, the education and training provider completes a declaration form confirming that the programme continues to meet the requisite standards and that any changes to the programme have been notified to the HPC.

In year two, the education and training provider completes an audit submission covering that year and the previous year, with supporting documentation. This includes a mapping document against the standards of education and training, notifying us of any changes to how a standard has been met, and other documents from the education and training provider's internal quality assurance processes.

Audit submissions (and any additional information we may request), are assessed by visitors who make recommendations to the Education and Training Committee. These recommendations can include a re-visit of the education and training provider if there is insufficient evidence to show how the programme continues to meet the necessary standards.

1.1.7 Major change[4]

The major change process requires education and training providers to notify us of changes to the way in which a programme meets the standards of education and training and the standards of proficiency so that we can gather appropriate evidence to show that all the standards continue to be met.

The process involves an advice stage at which we can determine, on the basis of the information from education and training providers, how we should approach a change to a programme. This can include a re-visit if appropriate.

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[3] For more information, please see 'Annual Monitoring – Supplementary Information for Education Providers'
http://www.hpc-uk.org/education/providers/download/
[4] For more information, please see 'Major change – Supplementary Information for Education Providers'
http://www.hpc-uk.org/education/providers/download/

1.1.8 Eligibility to Register[5]

Once a programme is approved, someone who successfully completes that programme is eligible to apply for registration. It is important to note in this regard that the successful completion of an approved programme is not a guarantee of registration.

The application process involves completing registration forms, including providing us with health and character references and declaring any criminal convictions or police cautions. In the vast majority of cases we are able to register someone without the need for any further consideration.

1.1.9 Opening of the Register

On the day that statutory regulation is introduced there will normally be a one-off transfer of one or more voluntary registers (please see the paper being considered at this meeting of the PLG).

Our Education and Training Committee would normally approve those education and training programme which have led to membership of the voluntary registers. We would approve both historic programmes and programmes that continue to run. Arrangements would then be developed to visit programmes over a period of time and approve them against our standards.

This means that someone who was part way through their training when the Register opened, or who could have been a member of one of the voluntary registers but was not on the day that the transfer took place, would be eligible to apply to us for registration via the 'UK approved course' route.

1.1.10 The role of professional bodies

Many of the professional bodies representing the existing professions regulated by the HPC continue to play an important role in education and training.

Some professional bodies continue to visit and accredit pre-registration education and training programmes for the purposes of professional body membership (please see 1.1.3). Some also play a role in approving or endorsing post-registration programmes.

Professional bodies are importantly involved in developing the curriculum guidance or frameworks for the profession (see 1.2.3) and may be involved in providing advice to education and training providers and working in other ways to support and encourage innovation in education.

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[5] The application form and guidance notes for individuals who have completed a UK approved course can be found here:
http://www.hpc-uk.org/apply/uk/
We are currently consulting on guidance for education and training providers, applicants and registrants on health and character declarations:
http://www.hpc-uk.org/aboutus/consultations/index.asp?id=75

1.2 Standards of education and training

This sub-section explains the HPC's standards of education and training, including highlighting areas of the standards discussed or referred to at the Group's meeting on 28 and 29 January 2009.

1.2.1 About the standards[6]

Article 15 (1) (a) of the Health Professions Order 2001 requires the HPC to establish the standards of education and training that are necessary to achieve the standards of proficiency.

Sometimes regulators, professional bodies and others produce 'standards of education and training' that incorporate both proficiency standards and standards relating to the structure and systems of education and training. It is important to note that the HPC's legislation separates standards of proficiency (threshold standards of safe and effective practice for entry to the Register) from standards of education and training (the standards that apply to education and training programmes that are necessary to achieve the standards of proficiency).

The standards are divided into six sections, known as 'SETs'. They are:
- Level of qualification for entry to the Register.
- Programme admissions.
- Programme management and resource standards.
- Curriculum standards.
- Practice placement standards.
- Assessment standards.

The standards are generic across the professions regulated by the HPC and written in broad terms to focus on outcomes - the achievement of the standards of proficiency and therefore fitness to practise. As such the standards (and supporting guidance) are often not prescriptive about the ways in which they can be met.

For example, SET 2.2.4 says that the education and training provider's admissions procedures must 'apply selection and entry criteria, including... appropriate academic and/or professional entry standards'. This standard might be met in a variety of differing ways and we are not prescriptive about this, as it may vary between professions and between education and training providers. However, in assessing this standard, our visitors would want to be assured that the outcomes were met - that the entry standards were appropriate to the programme so that a student or trainee had the appropriate knowledge and skills in order to meet the standards of proficiency by its completion.

We believe that this allows education and training providers the flexibility to plan a programme which meets local needs, or to develop new ways of educating students, within an enabling regulatory framework which ensures that threshold standards are met.

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[6] Standards of education and training and Standards of education and training guidance consultation
http://www.hpc-uk.org/education/providers/download/

A consultation was held on revised standards of education and training and guidance between August and November 2008 and the outcomes are being analysed. As part of this, respondents were asked whether there should be any changes to ensure that the standards (in particular the terminology used) are appropriate to professions that the HPC may regulate in the future.[7]

1.2.2 Standards of proficiency
SET 4.1 explicitly links the learning outcomes of the programme to the standards of proficiency:

'The learning outcomes must ensure that those who successfully complete the programme meet the standards of proficiency for their part of the Register'

As described in 1.1.2, education and training providers are required to complete a document mapping the learning outcomes of the programme against the standards of proficiency. As the standards of proficiency are the threshold or minimum standards necessary for safe and effective practice, some programmes will include learning outcomes beyond what is necessary to meet the standards.

1.2.3 Curriculum guidance
The HPC does not set detailed curricula for the professions it regulates. This means, for example, that the HPC is not involved in setting detailed requirements or expectations for the number of hours of theory or practice, or the number or length of placements.

In the professions currently regulated by the HPC, many of the professional bodies are actively involved in developing and publishing curriculum guidance or frameworks for their professions. These documents often include detailed expectations around the structure of programmes, including the matters referred to above. In this way, the curriculum is owned by the profession rather than by the regulator. As the HPC does not directly set a curriculum, this also provides some flexibility for education and training providers in designing their programmes.

This role of professional bodies (and other organisations) is reflected in the standards of education and training.

SET 4.2 says: 'The programme must reflect the philosophy, values and knowledge base as articulated in the curriculum guidance for the profession.'

In the recent consultation on revised standards of education and training, the following guidance was included to explain the 'reflect' wording of this standard.

'If the programme does not adhere completely to available curriculum guidance, then we would need to gather evidence about how, without following curriculum guidance, you feel the students completing your programme are able to practice safely and effectively.'

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[7] Standards of education and training and standards of education and training guidance consultation
http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=70

Further guidance in relation to this SET is being considered in light of the responses to the consultation.

1.2.4 Equality and Diversity
SETs 2.3 (admissions) and 5.13 (practice placements) require the education and training provider to have appropriate equality and diversity policies (changes to the wording used in these SETs were proposed in the recent consultation).

Equality and diversity is also embedded in the existing generic standards of proficiency. In particular:

' understand the need to respect, and so far as possible, uphold, the rights, dignity, values and autonomy of every service user including their role in the diagnostic and therapeutic process and in maintaining health and wellbeing' (1a.1)

'be able to practise in a non-discriminatory manner' (1a.2)

However, the Group may wish to consider in its future discussion whether there are any profession-specific standards of proficiency that might be necessary in these areas.

1.2.5 Evidence base
SET 4.5 says: 'The delivery of the programme must assist autonomous and reflective thinking, and evidence-based practice'.

Evidence based practice is also included in the generic standards of proficiency:

'be able to use research, reasoning and problem-solving skills to determine appropriate actions
   - recognise the value of research to the critical evaluation of practice
   - be able to engage in evidence-based practice, evaluate practice systematically, and participate in audit procedures
   - be aware of a range of research methodologies
   - be able to demonstrate a local and systematic approach to problem solving
   - be able to evaluate research and other evidence to inform their own practice'

(Standard 2b.1)

This is a generic standard, so all approved programmes (at differing academic levels) have to demonstrate that they allow successful students to meet this standard, and the remaining standards of proficiency.

1.2.6 Practice placements
SET 5 sets standards for 'practice placements' –the areas of the programme that provide the student or trainee with experience of practice with service users. As described in 1.2.1, we do not set detailed requirements for the structure or number of practice placements, although this often forms part of curriculum guidance and frameworks.

The standards in this area include requirements to ensure that there are sufficient numbers of appropriately qualified staff in the placement setting; arrangements for preparing staff educating students or trainees in the placement setting; and that the number, range and duration of programmes is appropriate to achieving the learning outcomes of the programme.

As part of the approvals process, we do not visit and approve practice placements individually. Instead, the education and training provider has overall responsibility for the quality of the placements, including monitoring and quality assuring those placements.

1.3 Threshold level of qualification for entry to the Register
Standard one of the standards of education and training sets out the threshold level of qualification for entry to the Register

1.3.1 HPC's legislative powers
The Health Professions Order 2001 ('the Order') does not provide the HPC with the power to set the qualifications required for entry, but enables it to approve qualifications which meet the standards it has set for entry to the register.

Article 12(1)(a) of the Order provides that:

> " For the purposes of this Order a person is to be regarded as having an approved qualification if he has a qualification... which has been approved by the Council as <u>attesting to the standard of proficiency</u> it requires for admission to the... register ..."

The power to determine that standard of proficiency is set out in Article 5(2)(a), which requires the HPC to:

> "… establish the standards of proficiency <u>necessary</u> to be admitted to the different parts of the register being the standards it considers <u>necessary for safe and effective practice</u> under that part of the register…"

This is supplemented by Article 15(1)(a), which requires it to:

> "… establish… the standards of education and training <u>necessary</u> to achieve the standards of proficiency it has established…"

Thus HPC's obligation is to set threshold standards of entry to its register - that is the minimum standards of proficiency which a newly qualified applicant needs to meet in order to be able to practise safely and effectively. The HPC may then approve a qualification which delivers those standards, but it cannot insist that **only** a specified form of academic award will do so. Setting the standards of proficiency is an outcomes-based process and there is no power in the Order to enable the HPC to specify that the standards can only be met by a particular level of academic award.

1.3.2 About SET 1: Threshold level of qualification for entry to the Register
The purpose of the Standards of Education and Training is to identify the means by which the standards of proficiency can be delivered by a programme of education and training.

SET 1 provides the threshold levels of qualification "normally" expected to meet the remainder of the standards of education and training (and thus the standards of proficiency). The term "normally" is included in SET 1 as a safeguard against the unlawful fettering of the HPC's discretion. Given the terms of the Order, it would be an improper exercise of its powers for the HPC to refuse to approve a programme which delivered the standards of proficiency and the remainder of the standards of education and training solely on the basis that it did not lead to the award of a qualification specified in SET 1.

Every time we open a new part of the Register, we consult on the threshold level of qualification for entry to that profession and add this to the standards.

The standard currently reads:

> 1.1 The Council normally expects that the **threshold** entry routes to the Register will be the following:
> 1.1.1 Bachelor degree with honours for the following professions:
> - chiropody or podiatry;
> - dietetics;
> - occupational therapy;
> - orthoptics;
> - physiotherapy;
> - prosthetics and orthotics;
> - radiography;
> - speech and language therapy;
> - biomedical science (with the Certificate of Competence awarded by the Institute of Biomedical Science (IBMS), or equivalent if appropriate); and
> 1.1.2 Masters degree for the arts therapies.
> 1.1.3 Masters degree for the clinical sciences (with the award of the Association of Clinical Scientists' Certificate of Attainment, or equivalent).
> 1.1.4 Equivalent to Certificate of Higher Education for paramedics.
> 1.1.5 Diploma of Higher Education in Operating Department Practice for Operating Department Practitioners.

We need to set the threshold level at the level necessary for people who successfully complete a pre-registration education and training programme to meet all of the standards of proficiency.

In setting the threshold level of qualification for entry, the HPC is setting the threshold academic level of qualification which it would normally accept for the purposes of an approved programme which leads to registration. As the threshold is the 'minimum', programmes above the threshold academic level may be approved.

The threshold level might change over time to reflect changes in the delivery of education and training. This has happened in a number of the existing professions we regulate – as professions have developed the threshold academic level has increased. Any change in the threshold academic level is one that is normally led by the profession and/or by education providers and employers and which occurs over time. At an appropriate time, consideration might be given to changing SET 1, having regard to the level at which the majority of education and training is delivered.

Our primary consideration in approving a programme, whether at or substantially above the threshold, is that the programme meets the standards of education and training and will allow students to meet the standards of proficiency on completion.

The threshold academic level of qualification for entry to the Register applies to pre-registration education and training programmes seeking approval rather than

to individuals. Therefore, it would not affect individuals who might have followed education and training programmes delivered at levels below the threshold in the past.

1.3.3 Illustrations of the threshold level of qualification for entry to the Register

The following examples illustrate how the current threshold level functions for some of the existing professions regulated by the HPC.

- o   Speech and Language Therapists

The threshold level of qualification for the profession is set at a bachelors degree with honours in speech and language therapy.

We also approve pre-registration post-graduate diplomas and masters degrees in speech and language therapy, above the threshold.

- o   Biomedical Scientists

The threshold level of qualification for the profession is set at a bachelors degree with honours in biomedical science (with the Certificate of Competence awarded by the Institute of Biomedical Science (IBMS), or equivalent).

In biomedical science, some entrants to the profession undertake a first degree, followed by the Certificate of Competence awarded by the IBMS. The Certificate of Competence is an approved qualification which leads directly to eligibility to apply for registration.

However, 'or equivalent' allows the flexibility for the HPC to approve pre-registration programmes that meet the standards of education and training and successfully deliver the standards of proficiency, but do not result in an award of the IBMS. We approve a number of programmes delivered at honours degree level or above which do this and therefore lead directly to eligibility to apply for registration.

The HPC does not approve undergraduate bachelor degrees in biomedical science unless they meet all the requisite standards and therefore lead directly to the eligibility to apply for registration.

- o   Clinical Scientists

The threshold level of qualification for the profession is set at a masters degree (with the award of the Association of Clinical Scientists' Certificate of Attainment, or equivalent).

In clinical science, entrants to the profession undertake a masters degree in a science based subject before undertaking the Certificate of Attainment awarded by the Association of Clinical Scientists. The Certificate of Attainment is an approved qualification which leads directly to the eligibility to apply for registration.

The wording 'or equivalent' allows the flexibility for the HPC to approve programmes which integrate the masters programme with the content of the award of the Certificate of Attainment, if the programme meets the standards of education and training and successfully delivers the standards of proficiency. The Certificate of Attainment is currently the only approved qualification leading to registration as a clinical scientist.

- o Paramedics

The threshold level of entry for the profession is set at equivalent to a Certificate of Higher Education.

In the past, all pre-registration education and training was via the IHCD paramedic award qualification delivered by ambulance training centres. The IHCD is part of the examining body, Edexcel. The IHCD paramedic award is an approved qualification leading directly to the eligibility to apply for registration. The outcome of an IHCD paramedic award is, however, not the formal award of a Certificate of Higher Education, but an IHCD award.

There has been a move to develop paramedic pre-registration education and training delivered by HEIs, and the Council approves a number of HEI delivered programmes at academic levels up to honours degree level.

Section two: Responses to the Call for Ideas on education and training

This section provides an outline to the responses received to the Call for Ideas in the area of Education and Training.

2.1 About the responses to the Call for Ideas

In the Call for Ideas we asked two questions:

- Question 7: We would welcome any information about:

  o the number and names of existing qualifications leading to the practice of psychotherapy and counselling;
  o types of qualifications including the academic level or academic awards of those qualifications;
  o the structure of qualifications including theoretical content and practical experience; and
  o quality assurance processes including existing internal and external quality assurance mechanisms.

- Question 8: What issues should the PLG consider in determining the threshold level of qualification for entry to the Register?

Many of the responses we received answered these questions together. There was some confusion overall, with a number of respondents appearing to conflate the issues of voluntary register transfers, grandparenting and the threshold level of qualification for entry in their responses. In response to our request for information about education and training programmes, the level of detail received varied, with some respondents providing detailed information including course curriula and others saying this information would be available on request.

In section 2.2, an outline is given of the information provided in question 7. This section provides an overview of the information provided (highlighting overall trends and comments rather than each individual response), referring directly to a particular organisation's responses where this might be helpful.

In section 2.3, a more detailed summary is provided of responses to question 8, which often built on the information given in response to question 7.

This section refers to the levels used in the National Qualifications Framework ('NQF') – please see appendices to this paper.

2.2 Information about education and training programmes

We asked respondents to provide us with the information listed above in order to help inform the work of the Group; and to begin an ongoing process of gathering the information necessary to ensure that the HPC Executive is in an informed position in the lead up to the opening of the Register.

In relation to the number and names of existing qualifications and the academic level / awards of those qualifications, this information may be helpful in assisting the Group to make a decision about the threshold level of qualification for entry to the Register.

In relation to the structure of the qualifications and quality assurance processes, this information will primarily assist the HPC Executive team in understanding the education and training arrangements in psychotherapy and counselling and in identifying the potential issues salient to its future role visiting and approving these programmes. However, the information provided across these questions might indicate some other areas that the Group may wish to explore further.

2.2.1 Number names and types of qualifications including academic levels / awards

In response to the questions outlined in 2.1, many organisations gave information relating to their own qualifications or said that this information would be available from professional bodies. In relation to this area, there is significant overlap between the information (and arguments advanced) with that in relation to the question on the threshold level. This section only gives an overview of the main points raised here.

o *Overall*

In their response the British Association for Counselling and Psychotherapy referred to research that they had undertaken which had identified 427 courses purporting to train people as counsellors and/or psychotherapists. They said that within these 427 courses there were 250 different titles of qualification and no one standard route of entry. The following research findings were outlined:

- 28% of training is delivered in private organisations without a formal link to any qualification structure.
- 46% of training links with a qualification from a HEI, 27% of which is delivered in HEIs; 13% delivered by private training organisations in receipt of HEI validation; and 6% are delivered by Colleges of Higher Education with HEI validation.
- 28% of qualifications are linked with Further Education systems of qualification; of which 22% of trainings are delivered in Colleges of Further or Adult Education; and 6% are delivered by private providers delivering the qualification of an Awarding Body.

Some respondents quoted these findings in their responses. Overall, respondents pointed to variation in the names, types, levels and awards of qualifications, and in the sector in which they were delivered, across psychotherapy and counselling. In particular, a number of organisations pointed out that a significant proportion of counselling training was delivered in the Further Education sector.

o *Qualifications, awards and levels*

The responses we received to this question indicated a wide variation in terms of the names of qualifications, the names of awards and the levels of qualifications.

There were differences between psychotherapy and counselling:

- In psychotherapy, most respondents, including education and training providers, said that qualifications were a 'masters degree' or at 'masters level' (level 7 on the NQF). Some respondents indicated that qualifications varied from masters level to doctorate level (level 8 on the NQF).

- In counselling, the most common name of qualification was a 'diploma', with respondents indicating that these were at level 4 or 5 on the NQF. Other respondents said that programmes varied from diploma through post-graduate diploma up to masters or doctoral level. The United Kingdom Association of Psychotherapeutic Counselling and United Kingdom Council for Psychotherapy said that their approved training in psychotherapeutic counselling was at NVQ Level 6 or equivalent.

Some respondents outlined a 'tiered' approach to education and training with different names of qualifications and levels at each stage (examples given below):

- The British Association of Sexual and Relationship Therapists (BASRT) said that they approved two levels of programme:
  - 4 year Masters courses leading to BASRT accreditation and UKCP registration as a psychosexual psychotherapist
  - 2 year Advanced Diploma courses that lead to BASRT accreditation but would not enable learners to achieve UKCP registration.

  They said that these two levels should be reflected in the threshold level for entry.

- The Counselling Society said that from a survey of member training organisations, programmes fell into two categories:
  - A tiered approach commencing with a Foundation Certificate in Counselling Skills, progressing to a Certificate in Counselling and then a full Diploma in Counselling.
  - An approach intended to offer professional training from the beginning.

- The Association of Christian Counsellors said that the providers affiliated to and working with the ACC delivered programmes at introduction (level 2), certificate (level 3) and diploma level (level 4). They said that intermediate level accreditation with them required at least a certificate course; and the top level of accreditation required at least a level 4 diploma.

In their responses, other organisations said that they were focusing on 'clinical training programmes' rather than other programmes in psychotherapy or counselling that did not directly confer the ability to practice. These included theoretical programmes without a practice component or 'top up' programmes for existing practitioners. Some referred to programmes in 'counselling skills' that did not normally confer the ability to practice.

In response to this request for information, a number of respondents said that 'academic levels' and 'academic awards' were far less important than whether trainings equipped trainees with the ability to be effective practitioners (please see 2.3.4).

o *Other*

The Register of Evidence Based Hypnotherapy and Psychotherapy said that the Register should recognise and accept trainings in hypnotherapy.

A small number of respondents said that some existing practitioners in both psychotherapy and counselling would not be able to meet the levels outlined (see 2.3.8).

o *Accreditation*

In their responses, the British Association for Behavioural and Cognitive Psychotherapies (BABCP) and The Association for Rational Emotive Behaviour Therapy outlined their requirements for individuals to be accredited and entered into the Register for Cognitive Behavioural Therapists.

The BABCP said that they accredited many courses. However, 'regardless of the level of training, practitioner accreditation with BABCP has to be done on an individual basis'. They outlined the criteria for applicants to become accredited, reproduced below. Applicants must:

1. Have a relevant professional training to degree level or equivalent
2. Have been accountable for their own professional practice to a senior member of their profession for at least one year since professional qualification.
3. Provide a satisfactory statement of training in the theory and practice of behavioural and/or cognitive psychotherapy related to designated areas of competence.
4. Have on-going C/BT clinical supervision
5. Sign a statement of intent to submit a full accreditation application in 12 months and to sustained commitment to the theory and practice of behaviour and/or cognitive psychotherapy which includes Continuing Professional Development.
6. Demonstrate knowledge and understanding of the therapeutic relationship and competence in the development, maintenance and ending of such relationships.
7. Adhere to Guidelines for Good Practice of the BABCP and to be willing to be scrutinised to this adherence as required.

2.2.2. The structure of qualifications including theoretical content and practical experience

We received a number of very detailed responses to this request for information, particularly from professional bodies and education and providers who often outlined the hours requirements in specific areas of their programmes. We also received a number of documents relating to these programmes.

The responses to this request for information indicated that most, if not all programmes, integrated theory and practice (i.e. supervised work with clients comprised an essential and integral part of the programme). The essential components of programmes cited by respondents overall included:

- requirements for personal therapy or analysis;
- theoretical training;
- practice training – supervised work with clients; and
- assessment (Written, oral and observation of supervised practice).

Some respondents detailed the number of hours required in each area as part of their qualifications or accreditation criteria. These requirements varied enormously between programmes and levels. Summarising their research, the BACP said that across psychotherapy and counselling requirements for practice varied between 40 and 750 hours. Amongst those who set out requirements for level four diplomas in counselling, the figure was commonly given as 100 hours of practice experience.

The British Psychoanalytic Council and the United Kingdom Council for Psychotherapy referred to the European Federation for Psychoanalytic Psychotherapy in the Public Sector (EFPP) and European Association of Psychotherapists. The training standards of these organisations outline minimal requirements for programmes in these areas.

The Manchester College said that approved programmes should 'demonstrate rigour in the application of counselling theory to research and practice and also should recognise delivery of counselling in community settings that may be beyond statutory health service settings'.

2.2.3 Quality assurance processes, including existing internal and external quality assurance mechanisms.
Many respondents answering this question said that the relevant quality assurance processes were those of the professional bodies who accredit their programmes. Other forms of quality assurance referred to by respondents, across the different sectors, included:

- Visits by awarding bodies.
- External examiners and moderators (within all sectors).
- External site visits.
- Feedback from service providers who take trainees.
- Internal validation and re-validation (within all sectors).
- Validation by Higher Education Institutions.

A number of respondents highlighted that a significant proportion of qualifications did not lead to a formal award that was linked to a qualifications framework (i.e. the award was not the award of a qualifications body or a HEI). Therefore the award was not subject to the quality assurance processes of a HEI or awarding body (although may be subject to the quality assurance of a professional body and internal processes). Some said that this was an historic situation and said that they were working towards greater university validation of programmes.

2.4 What issues should the PLG consider in determining the threshold level of qualification for entry to the Register?
The views advanced in response to this question are difficult to categorise in terms of arguments for and against specific thresholds; some respondents did

not give a rationale for their preferred threshold level or discussed the more general issues around setting the threshold level.

It should also be acknowledged here that responses to this question were dependent on responses to other questions, particularly the structure of the Register and protected titles (i.e. particularly on views around differentiation between psychotherapists and counsellors).

This section provides a summary of the responses received, giving an overall indication of the thresholds suggested and outlining specific thresholds suggested where appropriate. The section is divided into the areas that emerged as themes from the responses.

2.4.1 Overall
Amongst those respondents who suggested specific threshold levels, the most frequently suggested were a masters degree threshold level for psychotherapists (equivalent to level 7 on the NQF) and a diploma level threshold for counsellors (levels 4/5 on the NQF). The UKCP and UKAPC suggested a level 6 threshold for psychotherapeutic counselling.

There was broad agreement amongst respondents in the threshold level suggested for psychotherapists – with a masters degree or equivalent suggested by almost all of those who suggested a threshold level. The British Psychoanalytic Council said that a 'useful benchmark' would be the 'newly established IAPT training for high intensity psychological therapists'. They said that this training was 'regarded as being at post-graduate diploma level or equivalent'. Otherwise they said that the threshold entry level 'should be a masters degree or equivalent'.

Much of the debate in responses about the threshold level was focused on the appropriate level for counselling, where suggestions for the threshold level for counsellors varied from level 3 on the NQF up to first degree level (level 6 on the NQF). The CPCAB said that their level 4 diploma provided an 'entry level' qualification in counselling and said that there was no clear rationale for raising this level to an honours degree. They argued that an honours degree level threshold would be detrimental to service delivery because of an adverse impact on counselling services. The Association of Christian Counsellors said that they recognised level 4 diplomas which included a minimum of 420 guided learning hours and also 100 hours of practice. They said that this constituted a '…knowledgeable practitioner who has developed considerable experience'. We were urged by a number of respondents not to set the threshold level too high and to ensure that the level was set in order to reflect current provision.

The BACP said that they avoided the issue of academic qualification in their accreditation criteria. They said that the threshold should be set at the level at which 'graduates are capable of independent, ethical and effective practice, not necessarily the lowest common qualification'.

Some respondents expressed their suggestions for the threshold in terms of the content and structure of education and training programmes. The Metanoia Institute said: 'The level of education and training should cover all aspects of minimum curriculum including the integration of personal development,

theoretical knowledge and supervised clinical practice.' In response to this question The Tavistock Centre for Couples Therapists reiterated their belief that personal therapy requirements should form an integral part of training programmes, a point echoed by some other respondents. An individual said we should keep in mind in setting the threshold that some organisations were invested in making training 'long and convoluted'.

A number of respondents commented on the strength of the existing accreditation systems run by professional bodies. The Bath Centre for Psychotherapy and Counselling suggested that the threshold level might be linked to the accreditation criteria of the BACP rather than to any particular academic level. The Minister Centre commented: 'The main issue for [the] threshold level of qualification should be those as established by the BACP and UKCP, which are not approach specific criteria but are based on adherence to a clear ethical code, demonstrate competence, and a system of being monitored and guided by senior practitioners through required clinical supervision and regular CPD.' The Centre for Freudian Analysis said that the existing system should be maintained.

2.4.2 Parity with other professions

A small number of respondents suggested thresholds on the basis that it was important to ensure that psychotherapy and counselling was on the same level as other professions, including those other professions regulated by the HPC.

One individual argued that the threshold level should put counselling 'on a par' with professions such as teaching, social work and medicine. The Association for Person Centred Therapy Scotland agreed and said that the purpose of registering psychotherapy and counselling was so that the professions could be recognised as equal to these professions. They added: 'These professions all require a combination of theoretical and practice based teaching/study and the successful graduate has to pass both aspects of the training. I think the same benchmark should be used for counselling/ psychotherapy.'

One individual argued that psychotherapy should be a doctorate level entry profession to bring it into line with medicine and psychology.

2.4.3 Existing standards and levels

A number of respondents argued that the threshold level should not lower the existing education and training entry requirements of the existing self-regulatory systems. Those respondents who made this argument mainly did so in relation to psychotherapy.

The United Kingdom Association of Humanistic Psychology Practitioners said: '…it will be impossible to sustain a case for state regulation of counsellors and psychotherapists if HPC registration standards are lower than the present accreditation / registration standards of voluntary organisations such as UKAHPP.' They expressed concern that reference to threshold levels might indicate that 'provisional decisions have been made on lower levels'.

The Increasing Access to Psychological Therapy Workforce Team and New Ways of Working for Psychological Therapists said that the threshold level of qualification should 'reflect the existing standards of qualification used by the

professional bodies'. They acknowledged that trainings did vary between masters and diploma level and said the threshold should be 'consistent with the training required to achieve clinically effective therapists with the competences as laid down by the SfH NOS project'. They suggested that Skills for Health work to develop a qualifications framework for psychological therapists might prove useful here.

2.4.4 Academic qualifications, levels and awards
A number of respondents said that academic qualifications, levels and awards were far less important than the ability to develop a therapeutic relationship with a client.

One individual concluded that academic levels were essentially 'meaningless'. The Counselling Society said '…trainers recognise that a common issue in academically well qualified trainees is the need not to confuse academic growth and potential with counselling ability'.

The Psychoanalytic Consortium said that it was 'traditional in psychoanalysis that the analysis itself is the fundamental training component rather than a particular academic qualification'. They added: 'Training in psychoanalysis is retroactive: one cannot set out to train, then train, then qualify. Rather, one suffers, enters analysis, then realises later on that this is something one wants to do.'

2.4.5 Inclusivity and diversity
Many respondents argued that it was important to ensure an inclusive approach to existing education and training routes and that it was important to recognise and maintain the diverse backgrounds of practitioners. These arguments were particularly advanced in relation to counselling and any suggestion that the threshold might be set at degree level or linked to qualifications awarded by HEIs.

One individual, a student on a counselling programme, argued: '…the profession risks losing diversity and essentially the creativity that brings, as traditionally those of more working class backgrounds and from ethnic minority or socially disadvantaged groups are less likely to engage with education at degree level.' Both the CPCAB and Counselling and Psychotherapy in Scotland (COSCA) made similar arguments in their responses. COSCA said: 'An over emphasis on academic qualifications would be likely to narrow the social mix of people practising as counsellors / psychotherapists…' The British Association for the Person Centred Approach made similar comments in their response but said that a balance was needed between ensuring the profession is accessible to people from backgrounds normally under-represented in Higher Education and the profession having parity with other HPC regulated professions. They concluded that the threshold should be set at degree level.

Respondents also commented more broadly on the undesirability of any move towards formal academic qualifications and the importance of being inclusive of existing education and training providers outside of the University sector. COSCA said that few psychotherapy and counselling courses lead to a formal academic qualification and said that: 'We do not believe it necessary or, for the foreseeable future, practical to require any training courses to lead to academic qualification.' They said that the threshold should not be aspirational and should instead be

reached through a benchmarking process, taking account of qualifications and trainings that are currently acceptable to professional bodies. The entry to the Register should be at the 'fit to practise' level, they argued, and the routes to registration should meet the 'HPC's stated intention not to exclude anyone who works as a counsellor and psychotherapist'. They said that the threshold level of qualification for counsellors working independently should be the same as their Practitioner membership – 300 hours of training in counselling/psychotherapy including at least 3 blocks of 75 hours over a five year period. They said their accredited diplomas exceed these requirements.

An individual expressed concern about the continuing existence of in-house courses run by voluntary organisations and said that it was important that the level set did not discriminate against charities and voluntary organisations that deliver counselling. The Bath Centre for Psychotherapy and Counselling said that the HPC should encourage diversity, and acknowledge courses outside HE where they can demonstrate that they have been benchmarked to the stated level via external moderation of training standards. They said that any arrangements should support APEL (Accreditation of Prior Experiential Learning) procedures to widen access.

2.3.7 A stepped approach
In the Call for Ideas, we said that given the wide range of different training programmes in psychotherapy and counselling, one possible option for the threshold level might be a 'stepped approach' which would see the threshold raised over a period of time. We said that this might ensure that the level of public protection develops over time, providing education and training providers with a lead-in period to make any necessary changes to their programmes.

We received few comments in relation to this suggestion. Relate said that they have been consistently 'raising the bar' of qualification over recent years, and outlined their current and historic qualifications. They said: 'We suggest that consideration should be given to building in an escalator clause at the outset of the statutory register that provides for a stepped increase in qualification thresholds over time.' The College of Psychoanalysts said that they were in agreement, supporting the idea that the threshold that might change over time, and the idea of a lead-in period to allow existing education and training providers to make any necessary changes to their programmes. The British Psychological Society said that they recognised that some pragmatism might be necessary initially.

The Counselling Society and Chrysalis said that they agreed that the threshold 'should start low and be raised over time'. They said that the threshold should be set at Level 3 (with 120 hours of face to face interpersonal tuition and 250 hours total study time) and then be raised to level 4 after three years. They said: 'A recommendation of 240 hours total study time would be achievable by 80% of current trainers.'

2.3.8 Existing practitioners
A small number of respondents expressed concern about the impact of the threshold level upon existing practitioners in the field who may have not achieved a qualification to the level which is set. These arguments were made in relation to counselling.

The International Society of Professional Counsellors (ISPC) said that if we decided on a degree level threshold for counselling '…many good and qualified therapists will be placed out of work and many clients without their therapy before their therapy is completed.' Relationships Scotland said: 'To enable existing counsellors to make a reasonable transition, it is important to approach the issue of qualifications from a minimum standard approach. Should the qualification bar be set too high, significant numbers of our counsellors will be prevented from practising in the future.' Another respondent raised the issue of trainees who will be part way through their training when the Register opens who qualify with a qualification below the threshold level set.

2.3.9 Other comments
Chrysalis said that the HPC should allow trainers to apply for approval as HPC approved schools independently of professional bodies in advance of regulation. They said that 'not to assess training independently prior to establishing a register would completely prejudice' the independence of the HPC from the professional bodies.

An individual said that previous contact with therapy or mental health services was essential for entry to training, a point made by a number of respondents, and highlighted by some respondents as a criterion for admission to their programmes.

The National Association of Counsellors, Hypnotherapists and Psychotherapists (NACHP) were concerned about the introduction of distance learning courses that contained no practical or clinical content. They said that they '…did not want diplomas issued for successful completion of a correspondence course…' They added that they had a period of post-qualifying practice before full membership of NACHP was given, and said that there was 'a good argument for bringing some provision for this into the registration qualification'.

An individual said that programmes should include more teaching of the medical model. Other respondents said that our approach to education should not be based on a desire to foster the medical model or to promote Cognitive Behavioural Therapy (CBT).

The Register for Evidence Based Hypnotherapy and Psychotherapy said that they were concerned about any requirements for placements conducted under supervision in parallel to training. They said this was unacceptable because of the availability of placements and concerns about the ability of those on placement to practise safely and effectively. They suggested instead that therapists should be 'trained first' then undergo a period of probationary practice before becoming fully registered.

Section three: Summary and discussion

This section provides some potential areas for the Group to discuss. This is not intended to be exhaustive and the Group may identify other areas for discussion arising from the information provided about HPC's approval arrangements and the responses to the Call for Ideas.

3.1 Modalities and the approval of pre-registration education and training

The area of education and training was discussed at the last meeting of the Group, particularly in relation to the debate about whether the Register should differentiate between specific modalities. This was around how the 'integrity' of the modalities might be protected through education and training arrangements in the absence of a modality specific approach to registration itself.

3.1.1 Arguments for and against modality specific titles

In the Call for Ideas the arguments advanced for differentiating between modalities at the level of the Register were, in summary:

- To provide information to members of the public to enable informed choices.

- To recognise a clear link between specific education and training in a particular modality and the competence necessary to practise in that modality (and therefore better protect the public).

- To recognise a range of evidence-based modalities.

In the Call for Ideas the arguments advanced against differentiating between modalities at the level of the Register were, in summary:

- Modalities are confusing to members of the public.

- A modality specific approach would run counter to the aims of inclusivity and diversity.

- A modality specific approach would fetter the development of the professions.

3.1.2 Implications for education and training

In the paper considered by the Group at the last meeting, the consequences for the regulatory model of differentiating between modalities on the Register, or not, were outlined. These are repeated as part of background information included in the paper 'Summary of working regulatory model' included in the papers for this meeting. In summary, the implications in the area of education and training would be as follows:

- If a modality specific approach was adopted, programmes would be approved against the standards of education and training to ensure that they delivered the standards of proficiency, including standards specific to each modality.

- If a modality specific approach was not adopted, programmes would be approved against the standards of education and training to ensure that they delivered the standards of proficiency for psychotherapy and/or counselling as appropriate.

In both approaches, the HPC visit panel would include visitors from the relevant modalities in order to ensure that informed decisions are made.

In both approaches, education and training providers would need to demonstrate that their programmes met the full range of standards of education and training. This would include ensuring that the curriculum reflected 'the philosophy, values, skills and knowledge base as articulated in the curriculum guidance for the profession' (Standard 4.2; please see 1.2.3).

Modalities might still be reflected in the standards of proficiency in some way, even if a modality specific approach was not adopted (please see the case study of clinical scientists in 3.1.3 below).

3.1.3 Case study: Clinical scientists
Clinical scientists are an existing HPC regulated profession. They oversee tests for diagnosing and managing disease, advising doctors on using tests and interpreting data. They also carry out research to understand diseases and devise new therapies.

The profession of clinical science has eleven distinct modalities. These modalities are not reflected on the Register, but are reflected in other ways in the HPC's standards and processes.

- *Decision making*

We have a pool of partners who provide the expertise we need for good decision making (these roles include visitors; please see 1.1.4). In clinical science, the pool of partners is large, reflecting the need to ensure that there are sufficient numbers of partners in each modality to, for example, make decisions about fitness to practise cases or applications for registration made via the international route to registration.

As new modalities emerge, we recruit additional partners from those modalities. For example, cellular science became recognised by the professional body, the Association of Clinical Scientists, as a modality and additional partners were recruited from this modality accordingly. When we consider a fitness to practise case, for example, we ensure that we ask the correct partner from the appropriate modality to consider the case.

In an approach which did not differentiate between modalities at the level of registration, modalities might still be reflected in some way in the standards of proficiency.

- *Standards of proficiency*

The standards of proficiency for clinical scientists do not differentiate between the modalities, but are written in a way to reflect that there are distinct modalities

which influence expectations of proficiency. The following standards are taken from the standards of proficiency for clinical scientists with emphasis added (included as an example in the standards of proficiency paper being considered by the Group at this meeting):

- be able to perform a range of techniques employed **in the modality** (2b.4)

- understand the importance of participating in accreditation systems related **to the modality** (2c.2)

- know the basic science **underpinning the modality in which the registrant practises**, understand relevant basic clinical medicine and be aware of the fundamental principles of clinical practice (3a.1)

- understand the principles associated with a range of techniques employed **in the modality** (3a.3)

Standards written in similar terms might be considered for psychotherapists and counsellors.

3.2 Ability to meet the standards of education and training
Overall, we did not receive many responses to the Call for Ideas which indicated that existing programmes would struggle to meet the standards of education and training.

During our recent consultation on revised standards and guidance, most respondents were positive in their feedback on the standards and did not envisage any difficulty in the standards being met. In both the Call for ideas and the standards consultation a small number pointed out that some training was delivered in private institutions without a formal link to an academic award or qualifications framework and suggested that such providers might struggle to meet some of the standards. We are in the process of analysing the responses to the consultation. We expect that some of the changes to the guidance will be to ensure that the terminology used is as widely applicable as possible.

The PLG is invited to consider whether there are any particular issues in relation to education and training in the psychotherapy and counselling field that might impact upon the HPC's role in approving programmes, and which the Group should take account of at this stage.

3.3 The point of registration
As described in 1.1.1, we only approve programmes that lead directly to the eligibility to become registered. We are not involved in approving prior programmes that do not lead directly to the ability to practice (please see 1.3.4 in relation to biomedical scientists).

Those programmes that lead to the ability to practice were described by some respondents in the Call for Ideas as 'clinical trainings'.

3.3.1 Case Study – Forensic Psychologists

In forensic psychology, entrants to the profession will normally undertake an undergraduate programme in psychology, followed by a masters programme in Forensic psychology. They will then undertake stage 2 of the British Psychological Society's (BPS) Forensic Psychology Qualification which confers the eligibility to become Chartered.

The HPC Register opens for practitioner psychologists is due to open later this year, subject to parliamentary approval of the necessary legislation. As we only approve the qualification that leads to eligibility to register (and therefore the entitlement to practice) we will only directly approve the stage 2 BPS qualification. We will not directly approve previous qualifications as they do not confer the eligibility to register.

However, we would want to ensure that the admission requirements for any programme meant that students had the requisite knowledge, understanding and skills in order to successfully meet the standards of proficiency by its completion.

3.3.2 Accreditation

A small number of respondents outlined accreditation requirements rather than / in addition to education and training requirements.

If appropriate, the HPC could potentially approve the awards of professional bodies such as the achievement of accreditation, as an approved programme leading to registration. For example, for clinical scientists, the HPC approves the Certificate of Attainment of the Association of Clinical Scientists and for biomedical scientists approves the Certificate of Competence of the Institute of Biomedical Science. These awards lead to directly to the eligibility to register with the HPC.

In both the examples above, and the example in 3.3.1, those undertaking these awards have the status of 'trainees', working under supervision before they achieve registration and can apply for full posts requiring registration.

The salient issue here as to which programmes the HPC approves is whether the programme or award offers an 'entry level to the profession' or the ability (to some degree) to practise 'independently'. In other words, some salient questions might be: What is the status of the person undergoing accreditation? Are they a psychotherapist or counsellor already but undertaking further training and experience? Or are they still a 'trainee' in this period?

3.4 Individual practitioners

A small number of respondents were concerned about the impact of the threshold level upon existing practitioners who had not achieved education and training to the level that would be set.

The threshold level of qualification relates to education and training programmes on an ongoing basis rather than to individual practitioners. It does not directly affect existing practitioners, including those who may have followed training at different levels in the past.

To reiterate, we would approve those programmes / awards which lead to membership of the voluntary transfers that it is determined should transfer to the statutory register. This approval would be both historic and ongoing. This means:

- We would approve those programmes which led to voluntary registration in the past but which no longer continue to run (or which have closed to new students), known as 'historic qualifications' . This would mean that someone who was not on the voluntary register when it transfers, but who could have been (for example, their membership had lapsed) would be able to register by virtue of holding an approved qualification. This would include people who had qualified a number of years ago with qualifications below the level typically expected today.

- We would approve those existing programmes which lead to voluntary registration. This would mean that someone part way through their training when the Register opens would be able to register by virtue of holding an approved qualification.

The issues raised are salient to the discussion of the Group about the voluntary register transfer and grandparenting.

3.5   Threshold level of qualification for entry to the Register (SET 1)
As the standards of education and training specify the standards necessary to deliver the standards of proficiency, the starting point for setting the threshold level is the standards of proficiency. As such, the Group is not asked to formally agree the threshold level at this meeting.

Typically, a programme provided at the level specified by SET 1 will deliver education and training which exceeds the threshold required by the standards of proficiency. This is because SET 1 is concerned with the level of students' outcomes and typical abilities and does not prescribe content. Programmes which are delivered at the appropriate level will often include content which may not be strictly necessary for the purpose of meeting the standards.

In determining the threshold level of qualification for entry to the Register the Group may wish to take into account:

- The level / awards of existing pre-registration education and training that confer the ability to practice as a psychotherapist and/ or counsellor.

- Relevant qualifications frameworks, such as the Qualifications and Curriculum Authority (QCA) National Qualifications Framework, the Quality Assurance Agency (QAA) Framework for Higher Education Qualifications in England, Wales and Northern Ireland (and related descriptors), and the Scottish Credit and Qualifications Framework and the European Qualifications Framework for Lifelong Learning. These are included as appendices to this paper.

In reaching its eventual recommendation to the HPC Council, the Group must be satisfied that, as part of the standards of education and training, the threshold specified in SET 1 is not more than is **necessary** to achieve the standards of proficiency which it establishes for psychotherapists and counsellors and, in turn,

those standards of proficiency must not be more than is **necessary** for safe and effective practice.

Whilst the Group is not invited to agree the threshold level at this stage, the Group may wish to discuss the points raised in this paper to inform a subsequent paper / the Group's subsequent discussion on this topic.

For learners, parents, teachers, tutors, trainers, careers advisers and employers

The National Qualifications Framework

Helping learners make informed decisions

The National Qualifications Framework (NQF) sets out the levels against which a qualification can be recognised in England, Wales and Northern Ireland.

It helps learners make informed decisions about the qualifications they want to pursue, by comparing the levels of different qualifications and identifying different progression routes.

The accreditation of qualifications makes sure they are of a high quality and that they meet the needs of learners and employers.

Changes to the NQF
In 2004 we started the process of revising the NQF so that it could recognise qualifications more precisely. To achieve this, we increased the number of levels in the NQF from five to nine.

The current levels 4 to 8 (previously levels 4 and 5) broadly compare to the Framework for Higher Education Qualifications (FHEQ), which covers qualifications provided by universities and other higher education institutions.

The increase in levels does not change the number of qualifications available or a qualification's content.

From January 2006 qualifications will be awarded against the new NQF levels. (Higher-level NVQs and related qualifications will continue to be awarded against the previous NQF levels.)

The NQF today
All accredited qualifications are awarded an NQF level. If a qualification shares the same level as another qualification, they are broadly similar in terms of the demand they place on the learner. However, qualifications at the same level can still be very different in terms of content and duration.

The NQF now comprises nine levels (entry level to level 8). Entry level and levels 1 to 3 did not change. Levels 4 and 5 were divided into five levels.

The table over the page shows a selection of individual qualifications and how they appear in the current NQF. It also highlights how the current levels broadly compare to the FHEQ levels.

More information
Visit *openQUALS* – a website comprising all accredited qualifications in the NQF: www.qca.org.uk/openquals

In 2006-8 the regulatory authorities will trial arrangements for a unit and qualifications system underpinned by credit. The outcomes of the trial will inform future developments.

See below for contact information.

The NQF and the FHEQ

National Qualifications Framework (NQF)		Framework for Higher Education Qualifications (FHEQ)
Previous levels (and examples)	**Current levels (and examples)**	
5 Level 5 NVQ in Construction Management [†] Level 5 Diploma in Translation	**8** Specialist awards	**D (doctoral)** Doctorates
	7 Level 7 Diploma in Translation	**M (masters)** Masters degrees, postgraduate certificates and diplomas
4 Level 4 NVQ in Advice and Guidance [†] Level 4 National Diploma in Professional Production Skills Level 4 BTEC Higher National Diploma in 3D Design Level 4 Certificate in Early Years	**6** Level 6 National Diploma in Professional Production Skills	**H (honours)** Bachelor degrees, graduate certificates and diplomas
	5 Level 5 BTEC Higher National Diploma in 3D Design	**I (intermediate)** Diplomas of higher education and further education, foundation degrees and higher national diplomas
	4 Level 4 Certificate in Early Years	**C (certificate)** Certificates of higher education
3 Level 3 Certificate in Small Animal Care Level 3 NVQ in Aeronautical Engineering A levels		
2 Level 2 Diploma for Beauty Specialists Level 2 NVQ in Agricultural Crop Production GCSEs Grades A*-C		
1 Level 1 Certificate in Motor Vehicle Studies Level 1 NVQ in Bakery GCSEs Grades D-G		
Entry Entry Level Certificate in Adult Literacy		

[†] Revised levels are not currently being implemented for NVQs at levels 4 and 5

Quality Assurance Agency (QQA) Qualification descriptors
The framework for Higher Education qualifications in England, Wales and Northern Ireland

Descriptor for a qualification at Certificate (C) level: Certificate of Higher Education

Certificates of Higher Education are awarded to students who have demonstrated:

- knowledge of the underlying concepts and principles associated with their area(s) of study, and an ability to evaluate and interpret these within the context of that area of study;

- an ability to present, evaluate, and interpret qualitative and quantitative data, to develop lines of argument and make sound judgements in accordance with basic theories and concepts of their subject(s) of study.

Typically, holders of the qualification will be able to:

- evaluate the appropriateness of different approaches to solving problems related to their area(s) of study and/or work;

- communicate the results of their study/work accurately and reliably, and with structured and coherent arguments;

- undertake further training and develop new skills within a structured and managed environment; and will have:

- qualities and transferable skills necessary for employment requiring the exercise of some personal responsibility.

Descriptor for a qualification at Intermediate (I) level: Degree (non-Honours)

Non-Honours degrees are awarded to students who have demonstrated:

- knowledge and critical understanding of the well-established principles of their area(s) of study, and of the way in which those principles have developed;

- ability to apply underlying concepts and principles outside the context in which they were first studied, including, where appropriate, the application of those principles in an employment context;

- knowledge of the main methods of enquiry in their subject(s), and ability to evaluate critically the appropriateness of different approaches to solving problems in the field of study;

- an understanding of the limits of their knowledge, and how this influences analyses and interpretations based on that knowledge.

Typically, holders of the qualification will be able to:

- use a range of established techniques to initiate and undertake critical analysis of information, and to propose solutions to problems arising from that analysis;

- effectively communicate information, arguments, and analysis, in a variety of forms, to specialist and non-specialist audiences, and deploy key techniques of the discipline effectively;

- undertake further training, develop existing skills, and acquire new competences that will enable them to assume significant responsibility within organisations; and will have:

- qualities and transferable skills necessary for employment requiring the exercise of personal responsibility and decision-making.

Descriptor for a qualification at Honours (H) level: Bachelors degree with Honours

Honours degrees are awarded to students who have demonstrated:

- a systematic understanding of key aspects of their field of study, including acquisition of coherent and detailed knowledge, at least some of which is at or informed by, the forefront of defined aspects of a discipline;

- an ability to deploy accurately established techniques of analysis and enquiry within a discipline;

- conceptual understanding that enables the student:
    - to devise and sustain arguments, and/or to solve problems, using ideas and techniques, some of which are at the forefront of a discipline; and
    - to describe and comment upon particular aspects of current research, or equivalent advanced scholarship, in the discipline;
    - an appreciation of the uncertainty, ambiguity and limits of knowledge;
    - the ability to manage their own learning, and to make use of scholarly reviews and primary sources (eg refereed research articles and/or original materials appropriate to the discipline).

Typically, holders of the qualification will be able to:

- apply the methods and techniques that they have learned to review, consolidate, extend and apply their knowledge and understanding, and to initiate and carry out projects;

- critically evaluate arguments, assumptions, abstract concepts and data (that may be incomplete), to make judgements, and to frame appropriate questions to achieve a solution - or identify a range of solutions - to a problem;

- communicate information, ideas, problems, and solutions to both specialist and non-specialist audiences; and will have:
    - qualities and transferable skills necessary for employment requiring:
    - the exercise of initiative and personal responsibility;
    - decision-making in complex and unpredictable contexts; and
    - the learning ability needed to undertake appropriate further training of a professional or equivalent nature.

Descriptor for a qualification at Masters (M) level: Masters degree

Masters degrees are awarded to students who have demonstrated:

- a systematic understanding of knowledge, and a critical awareness of current problems and/or new insights, much of which is at, or informed by, the forefront of their academic discipline, field of study, or area of professional practice;

- a comprehensive understanding of techniques applicable to their own research or advanced scholarship;

- originality in the application of knowledge, together with a practical understanding of how established techniques of research and enquiry are used to create and interpret knowledge in the discipline;

- conceptual understanding that enables the student:

  o to evaluate critically current research and advanced scholarship in the discipline;

  o to evaluate methodologies and develop critiques of them and, where appropriate, to propose new hypotheses.

Typically, holders of the qualification will be able to:

- deal with complex issues both systematically and creatively, make sound judgements in the absence of complete data, and communicate their conclusions clearly to specialist and non-specialist audiences;

- demonstrate self-direction and originality in tackling and solving problems, and act autonomously in planning and implementing tasks at a professional or equivalent level;

- continue to advance their knowledge and understanding, and to develop new skills to a high level;

And holders will have:

- the qualities and transferable skills necessary for employment requiring:

  o the exercise of initiative and personal responsibility;

  o decision-making in complex and unpredictable situations;

  o the independent learning ability required for continuing professional development.

Descriptor for a qualification at Doctoral (D) level: Doctoral degree

Doctorates are awarded to students who have demonstrated:

- the creation and interpretation of new knowledge, through original research or other advanced scholarship, of a quality to satisfy peer review, extend the forefront of the discipline, and merit publication;

- a systematic acquisition and understanding of a substantial body of knowledge which is at the forefront of an academic discipline or area of professional practice;

- the general ability to conceptualise, design and implement a project for the generation of new knowledge, applications or understanding at the forefront of the discipline, and to adjust the project design in the light of unforeseen problems;

- a detailed understanding of applicable techniques for research and advanced academic enquiry.

Typically, holders of the qualification will be able to:

- make informed judgements on complex issues in specialist fields, often in the absence of complete data, and be able to communicate their ideas and conclusions clearly and effectively to specialist and non-specialist audiences;

- continue to undertake pure and/or applied research and development at an advanced level, contributing substantially to the development of new techniques, ideas, or approaches; and holders will have:

- the qualities and transferable skills necessary for employment requiring the exercise of personal responsibility and largely autonomous initiative in complex and unpredictable situations, in professional or equivalent environments.

THE SCOTTISH CREDIT AND QUALIFICATIONS FRAMEWORK

scqf
scottish credit and
qualifications framework

SCQF Levels	SQA Qualifications			Qualifications of Higher Education Institutions	Scottish Vocational Qualifications
12				DOCTORATES	
11				MASTERS POST GRADUATE DIPLOMA POST GRADUATE CERTIFICATE	SVQ5
10				HONOURS DEGREES GRADUATE DIPLOMA	
9			PROFESSIONAL DEVELOPMENT AWARDS	ORDINARY DEGREE GRADUATE CERTIFICATE	SVQ4
8		HIGHER NATIONAL DIPLOMA		DIPLOMA OF HIGHER EDUCATION	
7	ADVANCED HIGHER	HIGHER NATIONAL CERTIFICATE		CERTIFICATE OF HIGHER EDUCATION	SVQ3
6	HIGHER				
5	INTERMEDIATE 2 CREDIT STANDARD GRADE				SVQ2
4	INTERMEDIATE 1 GENERAL STANDARD GRADE	NATIONAL CERTIFICATES	NATIONAL PROGRESSION AWARDS		SVQ1
3	ACCESS 3 FOUNDATION STANDARD GRADE				
2	ACCESS 2				
1	ACCESS 1				

NOTES
i. The new Skills for Work courses are National Courses available as Access, Intermediate and Higher Qualifications (SCQF levels 3 – 6).
ii. Ongoing work to credit rate SVQs shows that SVQ units range from SCQF level 4 to level 12. SVQs at 3 and 4 can be placed at different SCQF levels.

The European Qualifications Framework
for Lifelong Learning (EQF)

THE EUROPEAN QUALIFICATIONS FRAMEWORK FOR LIFELONG LEARNING (EQF)

EUROPEAN COMMISSION
Education and Culture

Lifelong Learning: Education and Training policies
Coordination of Lifelong Learning Policies

The European Qualifications Framework for lifelong learning (EQF)

The EQF is a common European reference framework which links countries' qualifications systems together, acting as a translation device to make qualifications more readable and understandable across different countries and systems in Europe. It has two principal aims: to promote citizens' mobility between countries and to facilitate their lifelong learning.

The Recommendation formally entered into force in April 2008. It sets 2010 as the recommended target date for countries to relate their national qualifications systems to the EQF, and 2012 for countries to ensure that individual qualification certificates bear a reference to the appropriate EQF level.

The EQF will relate different countries' national qualifications systems and frameworks together around a common European reference – its eight reference levels. The levels span the full scale of qualifications, from basic (Level 1, for example school leaving certificates) to advanced (Level 8, for example Doctorates) levels. As an instrument for the promotion of lifelong learning, the EQF encompasses all levels of qualifications acquired in general, vocational as well as academic education and training. Additionally, the framework addresses qualifications acquired in initial and continuing education and training.

The eight reference levels are described in terms of learning outcomes. The EQF recognises that Europe's education and training systems are so diverse that a shift to learning outcomes is necessary to make comparison and cooperation between countries and institutions possible.

In the EQF a learning outcome is defined as a statement of what a learner knows, understands and is able to do on completion of a learning process. The EQF therefore emphasises the results of learning rather than focusing on inputs such as length of study. Learning outcomes are specified in three categories – as knowledge, skills and competence. This signals that qualifications – in different combinations – capture a broad scope of learning outcomes, including theoretical knowledge, practical and technical skills, and social competences where the ability to work with others will be crucial.

Background to the EQF's development – where did the EQF come from?

The development of the European Qualifications Framework started in 2004 in response to requests from the Member States, the social partners and other stakeholders for a common reference to increase the transparency of qualifications.

The Commission, with the support of an EQF Expert Group, produced a blueprint proposing an 8-level framework based on learning outcomes aiming to facilitate the transparency and portability of qualifications and to support lifelong learning. The Commission published this for consultation across Europe during the second half of 2005.

The responses to the consultation demonstrated widespread support among European stakeholders for the Commission proposal but also requested a number of clarifications and simplification. In response, the Commission amended the proposal, drawing on the input of experts from all the 32 countries involved as well as the European social partners. The revised text was then adopted by the Commission as a proposal on 6 September 2006. The European Parliament and Council successfully negotiated the proposal during 2007, leading to the EQF's formal adoption in February 2008.

What benefits does the EQF provide for Europe?

The Recommendation will establish a common European reference which will link the various national qualifications systems together and so facilitate greater communication between them. A network of independent but related and mutually understandable qualifications systems will thereby be created.

Using learning outcomes as a common reference point, the Framework will facilitate comparison and transfer of qualifications between countries, systems and institutions and will therefore be relevant to a wide range of users at European as well as at national level.

Most European countries have decided to develop National Qualifications Frameworks reflecting and responding to the EQF. These developments are important to ensure that the European-level cooperation process is properly anchored at national level. The rapid development of NQFs since 2004 demonstrates the need for increased transparency and comparability of qualifications at all levels and shows that the basic principles underpinning the EQF are broadly shared.

This closer relationship between countries' qualifications systems will have many beneficiaries:

- The EQF will support greater mobility of learners and workers. It will make it easier for learners to describe their broad level of competence to recruiters in other countries. This will help employers interpret the qualifications of applicants and so support labour market mobility in Europe. At a very practical level, from 2012 all new qualifications should bear a reference to the appropriate EQF level. The EQF will thus complement and reinforce existing European mobility instruments such as Europass, Erasmus, and ECTS.
- The EQF should benefit individuals by increasing access to, and participation in, lifelong learning. By establishing a common reference point, the EQF will indicate how learning outcomes may be combined from different settings, for example formal study or work, and from different countries,

and can thus contribute to reducing barriers between education and training providers e.g. between higher education and vocational education and training, which may operate in isolation from each other. This will promote progression so that learners do not have to repeat learning for example.

- The EQF can support individuals with extensive experience from work or other fields of activity by facilitating validation of non-formal and informal learning. The focus on learning outcomes will make it easier to assess whether learning outcomes acquired in these settings are equivalent in content and relevance to formal qualifications.
- The EQF will support individual users as well as providers of education and training by increasing transparency of qualifications awarded outside the national systems, for example by sectors and multinational companies. The adoption of a common reference framework based on learning outcomes will facilitate the comparison and (potential) linking together of traditional qualifications awarded by national authorities and qualifications awarded by other stakeholders. The EQF will thus help sectors and individuals take advantage of this growing internationalisation of qualifications.

The EQF is an ambitious and far-reaching instrument which has implications for education and training systems, the labour market, industry and commerce and citizens.

More information is available at:
http://ec.europa.eu/dgs/education_culture/index_en.html

RECOMMENDATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL

of 23 April 2008

on the establishment of the European Qualifications Framework for lifelong learning

THE EUROPEAN PARLIAMENT AND THE COUNCIL OF THE EUROPEAN UNION,

Having regard to the Treaty establishing the European Community, and in particular Article 149(4) and Article 150(4) thereof,

Having regard to the proposal from the Commission,

Having regard to the opinion of the European Economic and Social Committee[1],

Having regard to the opinion of the Committee of the Regions[2],

Acting in accordance with the procedure laid down in Article 251 of the Treaty[3],

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1   OJ C 175, 27.7.2007, p. 74.
2   OJ C 146, 30.6.2007, p. 77.
3   Opinion of the European Parliament of 24 October 2007 (not yet published in the Official Journal) and Council Decision of 14 February 2008.

Whereas:

(1) The development and recognition of citizens' knowledge, skills and competence are crucial for the development of individuals, competitiveness, employment and social cohesion in the Community. Such development and recognition should facilitate transnational mobility for workers and learners and contribute to meeting the requirements of supply and demand in the European labour market. Access to and participation in lifelong learning for all, including disadvantaged people, and the use of qualifications should therefore be promoted and improved at national and Community level.

(2) The Lisbon European Council in 2000 concluded that increased transparency of qualifications should be one of the main components necessary to adapt education and training systems in the Community to the demands of the knowledge society. Furthermore, the Barcelona European Council in 2002 called for closer cooperation in the university sector and improvement of transparency and recognition methods in the area of vocational education and training.

(3) The Council Resolution of 27 June 2002 on lifelong learning[4] invited the Commission, in close cooperation with the Council and Member States, to develop a framework for the recognition of qualifications for both education and training, building on the achievements of the Bologna process and promoting similar action in the area of vocational training.

(4) The joint reports of the Council and the Commission on the implementation of the "Education and Training 2010" work programme, adopted in 2004 and 2006, stressed the need to develop a European Qualifications Framework.

(5) In the context of the Copenhagen process, the conclusions of the Council and the representatives of the governments of the Member States, meeting within the Council, of 15 November 2004 on the future priorities of enhanced European cooperation in vocational education and training gave priority to the development of an open and flexible European Qualifications Framework, founded on transparency and mutual trust, which should stand as a common reference covering both education and training.

(6) The validation of non-formal and informal learning outcomes should be promoted in accordance with the Council conclusions on common European principles for the identification and validation of non-formal and informal learning of 28 May 2004.

(7) The Brussels European Councils of March 2005 and March 2006 underlined the importance of adopting a European Qualifications Framework.

(8) This Recommendation takes into account Decision No 2241/2004/EC of the European Parliament and of the Council of 15 December 2004 on a single Community framework for the transparency of qualifications and competences (Europass)[5] and Recommendation 2006/962/EC of the European Parliament and of the Council of 18 December 2006 on key competences for lifelong learning[6].

(9) This Recommendation is compatible with the framework for the European Higher Education Area and cycle descriptors agreed by the ministers responsible for higher education in 45 European countries at their meeting in Bergen on 19 and 20 May 2005 within the framework of the Bologna process.

(10) The Council conclusions on quality assurance in vocational education and training of 23 and 24 May 2004, Recommendation 2006/143/EC of

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4   OJ C 163, 9.7.2002, p. 1.

5   OJ L 390, 31.12.2004, p. 6.
6   OJ L 394, 30.12.2006, p. 10.

the European Parliament and of the Council of 15 February 2006 on further European cooperation in quality assurance in higher education[7] and the standards and guidelines for quality assurance in the European Higher Education Area agreed by the ministers responsible for higher education at their meeting in Bergen contain common principles for quality assurance which should underpin the implementation of the European Qualifications Framework.

(11) This Recommendation is without prejudice to Directive 2005/36/EC of the European Parliament and of the Council of 7 September 2005 on the recognition of professional qualifications[8], which confers rights and obligations on both the relevant national authority and the migrant. Reference to the European Qualifications Framework levels on qualifications should not affect access to the labour market where professional qualifications have been recognised in accordance with Directive 2005/36/EC.

(12) The objective of this Recommendation is to create a common reference framework which should serve as a translation device between different qualifications systems and their levels, whether for general and higher education or for vocational education and training. This will improve the transparency, comparability and portability of citizens' qualifications issued in accordance with the practice in the different Member States. Each level of qualification should, in principle, be attainable by way of a variety of educational and career paths. The European Qualifications Framework should, moreover, enable international sectoral organisations to relate their qualifications systems to a common European reference point and thus show the relationship between international sectoral qualifications and national qualifications systems. This Recommendation therefore contributes to the wider objectives of promoting lifelong learning and increasing the

employability, mobility and social integration of workers and learners. Transparent quality assurance principles and information exchange will support its implementation, by helping to build mutual trust.

(13) This Recommendation should contribute to modernising education and training systems, the interrelationship of education, training and employment and building bridges between formal, non-formal and informal learning, leading also to the validation of learning outcomes acquired through experience.

(14) This Recommendation does not replace or define national qualifications systems and/or qualifications. The European Qualifications Framework does not describe specific qualifications or an individual's competences and particular qualifications should be referenced to the appropriate European Qualifications Framework level by way of the relevant national qualifications systems.

(15) Given its non-binding nature, this Recommendation conforms to the principle of subsidiarity by supporting and supplementing Member States' activities by facilitating further cooperation between them to increase transparency and to promote mobility and lifelong learning. It should be implemented in accordance with national legislation and practice.

(16) Since the objective of this Recommendation, namely the creation of a common reference framework serving as a translation device between different qualifications systems and their levels, cannot be sufficiently achieved by the Member States and can therefore, by reason of the scale and effects of the action envisaged, be better achieved at Community level, the Community may adopt measures, in accordance with the principle of subsidiarity as set out in Article 5 of the Treaty. In accordance with the principle of proportionality as set out in that Article, this Recommendation does not go beyond what is necessary in order to achieve that objective,

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7 OJ L 64, 4.3.2006, p. 60.
8 OJ L 255, 30.9.2005, p. 22. Directive as amended by Council Directive 2006/100/EC (OJ L 363, 20.12.2006, p. 141).

HEREBY RECOMMEND THAT MEMBER STATES:

1. use the European Qualifications Framework as a reference tool to compare the qualification levels of the different qualifications systems and to promote both lifelong learning and equal opportunities in the knowledge-based society, as well as the further integration of the European labour market, while respecting the rich diversity of national education systems;

2. relate their national qualifications systems to the European Qualifications Framework by 2010, in particular by referencing, in a transparent manner, their qualification levels to the levels set out in Annex II, and, where appropriate, by developing national qualifications frameworks in accordance with national legislation and practice;

3. adopt measures, as appropriate, so that, by 2012, all new qualification certificates, diplomas and "Europass" documents issued by the competent authorities contain a clear reference, by way of national qualifications systems, to the appropriate European Qualifications Framework level;

4. use an approach based on learning outcomes when defining and describing qualifications, and promote the validation of non-formal and informal learning in accordance with the common European principles agreed in the Council conclusions of 28 May 2004, paying particular attention to those citizens most likely to be subject to unemployment or insecure forms of employment, for whom such an approach could help increase participation in lifelong learning and access to the labour market;

5. promote and apply the principles of quality assurance in education and training set out in Annex III when relating higher education and vocational education and training qualifications within national qualifications systems to the European Qualifications Framework;

6. designate national coordination points linked to the particular structures and requirements of the Member States, in order to support and, in conjunction with other relevant national authorities, guide the relationship between national qualifications systems and the European Qualifications Framework with a view to promoting the quality and transparency of that relationship.

The tasks of those national coordination points should include:

(a) referencing levels of qualifications within national qualifications systems to the European Qualifications Framework levels described in Annex II;

(b) ensuring that a transparent methodology is used to reference national qualifications levels to the European Qualifications Framework in order to facilitate comparisons between them on the one hand, and ensuring that the resulting decisions are published on the other;

(c) providing access to information and guidance to stakeholders on how national qualifications relate to the European Qualifications Framework through national qualifications systems;

(d) promoting the participation of all relevant stakeholders including, in accordance with national legislation and practice, higher education and vocational education and training institutions, social partners, sectors and experts on the comparison and use of qualifications at the European level.

ENDORSE THE COMMISSION'S INTENTION TO:

1. support Member States in carrying out the above tasks and international sectoral organisations in using the reference levels and principles of the European Qualifications Framework as set out in this Recommendation, in particular by facilitating cooperation, exchanging good practice and testing – inter alia through voluntary peer review and pilot projects under Community programmes, by launching information and consultation exercises with social dialogue committees – and developing support and guidance material;

2. establish, by 23 April 2009, a European Qualifications Framework advisory group composed of representatives of Member States and involving the European social partners and other stakeholders, as appropriate, responsible for providing overall coherence and promoting transparency of the process of relating qualifications systems to the European Qualifications Framework;

3. assess and evaluate, in cooperation with the Member States and after consulting the stakeholders concerned, the action taken in response to this Recommendation, including the remit and duration of the advisory group, and, by 23 April 2013, report to the European Parliament and to the Council on the experience gained and implications for the future, including, if necessary, the possible review and revision of this Recommendation;

4. promote close links between the European Qualifications Framework and existing or future European systems for credit transfer and accumulation in higher education and vocational education and training, in order to improve citizens' mobility and facilitate the recognition of learning outcomes.

Done at Strasbourg, 23 April 2008.

For the European Parliament
The President
HANS-GERT PÖTTERING

For the Council
The President
JANEZ LENARČIČ

ANNEX I

Definitions

For the purposes of the Recommendation, the definitions which apply are the following:

(a) "qualification" means a formal outcome of an assessment and validation process which is obtained when a competent body determines that an individual has achieved learning outcomes to given standards;

(b) "national qualifications system" means all aspects of a Member State's activity related to the recognition of learning and other mechanisms that link education and training to the labour market and civil society. This includes the development and implementation of institutional arrangements and processes relating to quality assurance, assessment and the award of qualifications. A national qualifications system may be composed of several subsystems and may include a national qualifications framework;

(c) "national qualifications framework" means an instrument for the classification of qualifications according to a set of criteria for specified levels of learning achieved, which aims to integrate and coordinate national qualifications subsystems and improve the transparency, access, progression and quality of qualifications in relation to the labour market and civil society;

(d) "sector" means a grouping of professional activities on the basis of their main economic function, product, service or technology;

(e) "international sectoral organisation" means an association of national organisations, including, for example, employers and professional bodies, which represents the interests of national sectors;

(f) "learning outcomes" means statements of what a learner knows, understands and is able to do on completion of a learning process, which are defined in terms of knowledge, skills and competence;

(g) "knowledge" means the outcome of the assimilation of information through learning. Knowledge is the body of facts, principles, theories and practices that is related to a field of work or study. In the context of the European Qualifications Framework, knowledge is described as theoretical and/or factual;

(h) "skills" means the ability to apply knowledge and use know-how to complete tasks and solve problems. In the context of the European Qualifications Framework, skills are described as cognitive (involving the use of logical, intuitive and creative thinking) or practical (involving manual dexterity and the use of methods, materials, tools and instruments);

(i) "competence" means the proven ability to use knowledge, skills and personal, social and/or methodological abilities, in work or study situations and in professional and personal development. In the context of the European Qualifications Framework, competence is described in terms of responsibility and autonomy.

ANNEX II

Descriptors defining levels in the European Qualifications Framework (EQF)

Each of the 8 levels is defined by a set of descriptors indicating the learning outcomes relevant to qualifications at that level in any system of qualifications.

		Knowledge
		In the context of EQF, knowledge is described as theoretical and/or factual.
Level 1	The learning outcomes relevant to Level 1 are	• basic general knowledge
Level 2	The learning outcomes relevant to Level 2 are	• basic factual knowledge of a field of work or study
Level 3	The learning outcomes relevant to Level 3 are	• knowledge of facts, principles, processes and general concepts, in a field of work or study
Level 4	The learning outcomes relevant to Level 4 are	• factual and theoretical knowledge in broad contexts within a field of work or study
Level 5*	The learning outcomes relevant to Level 5 are	• comprehensive, specialised, factual and theoretical knowledge within a field of work or study and an awareness of the boundaries of that knowledge
Level 6**	The learning outcomes relevant to Level 6 are	• advanced knowledge of a field of work or study, involving a critical understanding of theories and principles
Level 7***	The learning outcomes relevant to Level 7 are	• highly specialised knowledge, some of which is at the forefront of knowledge in a field of work or study, as the basis for original thinking and/or research • critical awareness of knowledge issues in a field and at the interface between different fields
Level 8****	The learning outcomes relevant to Level 8 are	• knowledge at the most advanced frontier of a field of work or study and at the interface between fields

Skills	Competence
In the context of EQF, skills are described as cognitive (involving the use of logical, intuitive and creative thinking) and practical (involving manual dexterity and the use of methods, materials, tools and instruments).	In the context of EQF, competence is described in terms of responsibility and autonomy.
• basic skills required to carry out simple tasks	• work or study under direct supervision in a structured context
• basic cognitive and practical skills required to use relevant information in order to carry out tasks and to solve routine problems using simple rules and tools	• work or study under supervision with some autonomy
• a range of cognitive and practical skills required to accomplish tasks and solve problems by selecting and applying basic methods, tools, materials and information	• take responsibility for completion of tasks in work or study • adapt own behaviour to circumstances in solving problems
• a range of cognitive and practical skills required to generate solutions to specific problems in a field of work or study	• exercise self-management within the guidelines of work or study contexts that are usually predictable, but are subject to change • supervise the routine work of others, taking some responsibility for the evaluation and improvement of work or study activities
• a comprehensive range of cognitive and practical skills required to develop creative solutions to abstract problems	• exercise management and supervision in contexts of work or study activities where there is unpredictable change • review and develop performance of self and others
• advanced skills, demonstrating mastery and innovation, required to solve complex and unpredictable problems in a specialised field of work or study	• manage complex technical or professional activities or projects, taking responsibility for decision-making in unpredictable work or study contexts • take responsibility for managing professional development of individuals and groups
• specialised problem-solving skills required in research and/or innovation in order to develop new knowledge and procedures and to integrate knowledge from different fields	• manage and transform work or study contexts that are complex, unpredictable and require new strategic approaches • take responsibility for contributing to professional knowledge and practice and/or for reviewing the strategic performance of teams
• the most advanced and specialised skills and techniques, including synthesis and evaluation, required to solve critical problems in research and/or innovation and to extend and redefine existing knowledge or professional practice	• demonstrate substantial authority, innovation, autonomy, scholarly and professional integrity and sustained commitment to the development of new ideas or processes at the forefront of work or study contexts including research

Compatibility with the Framework for Qualifications of the European Higher Education Area

The Framework for Qualifications of the European Higher Education Area provides descriptors for cycles. Each cycle descriptor offers a generic statement of typical expectations of achievements and abilities associated with qualifications that represent the end of that cycle.

*   The descriptor for the higher education short cycle (within or linked to the first cycle), developed by the Joint Quality Initiative as part of the Bologna process, corresponds to the learning outcomes for EQF level 5.

**   The descriptor for the first cycle in the Framework for Qualifications of the European Higher Education Area agreed by the ministers responsible for higher education at their meeting in Bergen in May 2005 in the framework of the Bologna process corresponds to the learning outcomes for EQF level 6.

***   The descriptor for the second cycle in the Framework for Qualifications of the European Higher Education Area agreed by the ministers responsible for higher education at their meeting in Bergen in May 2005 in the framework of the Bologna process corresponds to the learning outcomes for EQF level 7.

****   The descriptor for the third cycle in the Framework for Qualifications of the European Higher Education Area agreed by the ministers responsible for higher education at their meeting in Bergen in May 2005 in the framework of the Bologna process corresponds to the learning outcomes for EQF level 8.

**Common Principles for Quality Assurance in Higher Education and
Vocational Education and Training
in the context of the European Qualifications Framework**

When implementing the European Qualifications Framework, quality assurance – which is necessary to ensure accountability and the improvement of higher education and vocational education and training – should be carried out in accordance with the following principles:

– Quality assurance policies and procedures should underpin all levels of the European Qualifications Framework.

– Quality assurance should be an integral part of the internal management of education and training institutions.

– Quality assurance should include regular evaluation of institutions, their programmes or their quality assurance systems by external monitoring bodies or agencies.

– External monitoring bodies or agencies carrying out quality assurance should be subject to regular review.

– Quality assurance should include context, input, process and output dimensions, while giving emphasis to outputs and learning outcomes.

– Quality assurance systems should include the following elements
    – clear and measurable objectives and standards;
    – guidelines for implementation, including stakeholder involvement;
    – appropriate resources;
    – consistent evaluation methods, associating self-assessment and external review;
    – feedback mechanisms and procedures for improvement;
    – widely accessible evaluation results.

– Quality assurance initiatives at international, national and regional level should be coordinated in order to ensure overview, coherence, synergy and system-wide analysis.

– Quality assurance should be a cooperative process across education and training levels and systems, involving all relevant stakeholders, within Member States and across the Community.

– Quality assurance orientations at Community level may provide reference points for evaluations and peer learning.

Publications Office

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