

Psychotherapists and Counsellors Professional Liaison Group (PLG)  
19 October 2010

Differentiation between psychotherapists and counsellors

Executive summary and recommendations

### **Introduction**

A key area of ongoing debate is about whether the HPC Register should be structured to separately recognise or 'differentiate' between psychotherapists and counsellors.

This paper brings back to the PLG information about differentiating between psychotherapists and counsellors. This includes information about previous decisions made by the PLG and a summary of responses to the consultation on the PLG's report.

### **Decision**

The PLG is invited to discuss the attached paper.

### **Background information**

The outstanding areas within the PLG's terms of reference are as follows:

- The question of whether the structure of the Register should differentiate between psychotherapists and counsellors.
- The question of whether the structure of the Register should differentiate between those qualified to work with children and young people and those qualified to work with adults.
- The standards of proficiency for psychotherapists and counsellors.
- The threshold level(s) of qualification for entry to the Register

### **Resource implications**

None

### **Financial implications**

None

**Appendices**

None

**Date of paper**

5 October 2010

# **Differentiation between psychotherapists and counsellors**

## **1. Introduction**

- 1.1 The report of the Professional Liaison Group (PLG) published for consultation in July 2009 proposed there should be differentiation in the structure of the Register between psychotherapists and counsellors. (It should be noted that there was not unanimous agreement amongst the group that this should be the approach.)

### **About this paper**

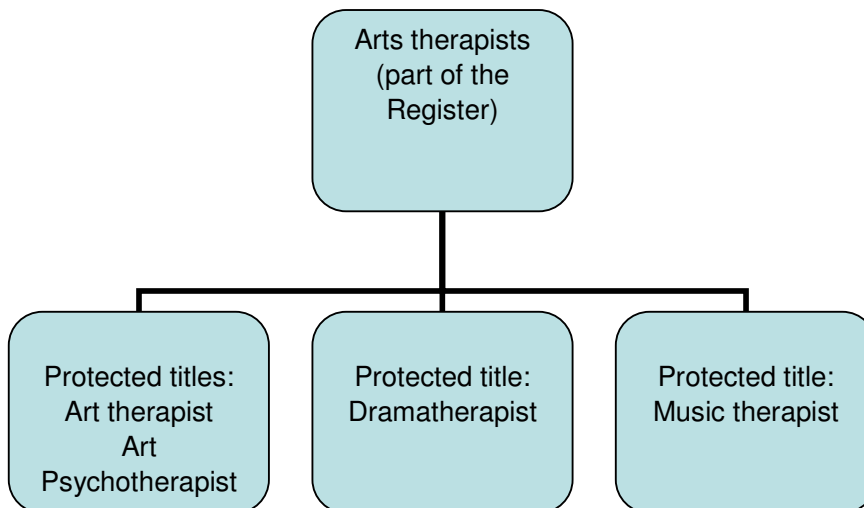
- 1.2 This paper should be considered with regards to the outstanding areas within the PLG's terms of reference, specifically the question of whether the structure of the Register should differentiate between psychotherapists and counsellors. This paper draws together information previously considered by the PLG at its 'first round' of meetings; and the responses to the consultation.
- 1.3 This paper is divided into four sections:
- Section one provides an introduction to the paper.
  - Section two provides background to differentiation and explores issues around differentiation and protecting professional titles.
  - Section three provides a summary of the responses we received to the consultation.
  - Section four identifies points for discussion.

## 2. Differentiation and its impact on the structure of the Register

This information is reproduced from the Report of the Psychotherapists and Counsellors Professional Liaison Group (PLG) published for consultation in July 2009.

### Structure of the HPC Register

- 2.1 The HPC Register ('the Register') is divided into parts. There are currently fifteen parts of the Register which relate to the fifteen professions we regulate. For example, there is a part of the Register for clinical scientists and a part of the Register for orthoptists.
- 2.2 Some parts of the Register have more than one protected title. For example, one of the parts of the Register is for arts therapists (shown below). There are then protected titles for art therapists, dramatherapists and music therapists. Each of these titles has separate standards and separate approved pre-registration education and training programmes. These separate areas are sometimes referred to as 'sub-sections' of the Register.<sup>1</sup> The arts therapists' part of the Register differentiates between those who are art therapists, those who are dramatherapists, and those who are music therapists.



- 2.3 The HPC publishes standards of proficiency which describe the threshold knowledge, understanding and skills necessary for entry to the Register.
- 2.4 In the case of the arts therapists part of the Register, as there is differentiation between art therapists, dramatherapists and music therapists, the HPC publishes both standards common across the three groups and standards specific to each individual group. The HPC then 'approve' pre-registration education and training programmes in art, music and dramatherapy against the relevant standards.

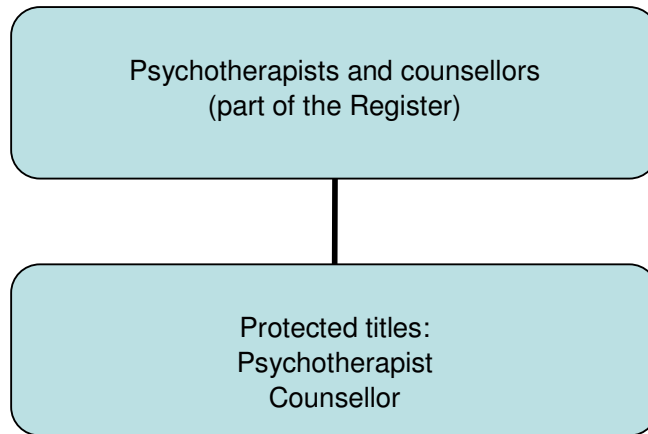
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<sup>1</sup> The term 'sub-section' is shorthand used in this document to refer to the different areas of each part of the Register used for the purposes of clarity, and is not a term that is used in legislation or that the HPC would typically use.

## Differentiation in the structure of the Register between psychotherapists and counsellors

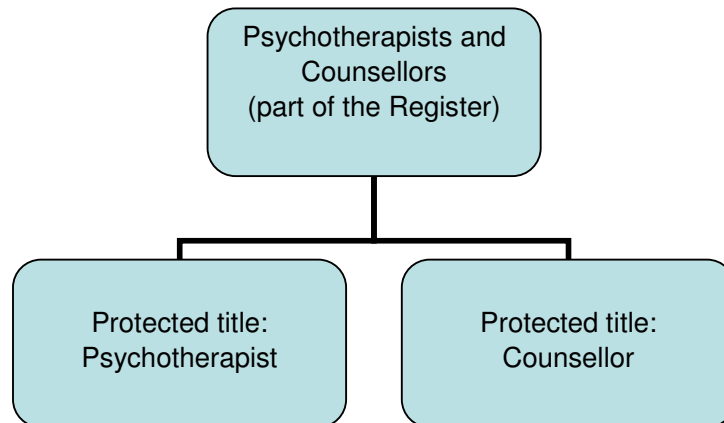
2.5 As part of its deliberations, the PLG considered the implications for standards, titles and education and training of its decision about the structure of the Register. These implications are outlined in paragraphs 2.5 to 2.9 below and overleaf, with diagrams to illustrate each model.

2.6 No differentiation between psychotherapists and counsellors would mean:



- There would be one set of standards of proficiency setting out the standards required for safe and effective practice.
- Registrants would have access to any protected titles for the part of the Register (e.g. they could use both 'psychotherapist' and 'counsellor').
- There would be approved qualifications that lead to the eligibility to register and use any of the protected titles.
- The threshold educational level has to be set at the level necessary to achieve the standards of proficiency. As there would be one set of standards of proficiency, this would mean that only one threshold educational level could be set for entry to the part of the Register. (Please see section 8.)

2.7 Differentiation between psychotherapists and counsellors would mean:



- There would be two sets of profession-specific standards of proficiency setting out the standards required for safe and effective practice in each sub-section.
- Registrants would have access to the protected title(s) for psychotherapists, or the title(s) for counsellors, or both if they were registered more than once.
- There would be approved qualifications for each – i.e. approved qualifications leading to the eligibility to register and use the title(s) for psychotherapists, and approved qualifications leading to the eligibility to register and use the title(s) for counsellors. Some programmes might be successful in being approved for both.
- The threshold educational level has to be set at the level necessary to achieve the standards of proficiency. As there would be two separate sets of standards of proficiency, this would mean that the level could potentially be set at different levels for psychotherapists and for counsellors

2.8 The PLG previously explored whether it might be possible to differentiate between psychotherapists and counsellors, by setting different educational threshold levels, but without producing separate standards of proficiency for each.

2.9 However, this is not possible as in order to differentiate between psychotherapists and counsellors it is necessary to produce differentiated standards of proficiency, as an objective basis on which to differentiate between the two groups and titles in the Register.

### Previous discussion

2.10 The PLG carefully considered all the arguments presented and took into account the regulatory implications of its decision about the structure of the Register.

- 2.11 The PLG discussed that there were clear similarities and commonalities between psychotherapists and counsellors and recognised that questions about the potential differences between, within and across psychotherapy and counselling were the subject of ongoing debate in the field.
- 2.12 After substantial discussion, the PLG agreed that there were subtle yet complex distinctions between psychotherapy and counselling and how they had developed, with each profession having its own characteristics, strengths and equal worth. Having regard to differences in education and training between psychotherapy and counselling, the PLG considered that these differences were significant enough to justify, at a threshold level, differentiation in the structure of the Register between psychotherapists and counsellors.
- 2.13 This was accordingly a topic on which there were also differing viewpoints within the PLG. Although a consensus decision was reached on proceeding on the basis of differentiation between psychotherapists and counsellors, some members of the PLG were of the opinion that there should be no differentiation and that it would not be possible to produce standards of proficiency which would meaningfully support such a differentiation.
- 2.14 The PLG recognised that any decisions it made about the structure of the Register would need to be tested in its later deliberations in that differentiating between psychotherapists and counsellors would rely upon being able to identify separate standards of proficiency for each.

## **Protected titles**

- 2.15 The HPC regulates by protection of title. Each of the professions regulated has at least one title which is protected in law. This means that only someone who is registered in the relevant part of the HPC Register is able to use that protected title.
- 2.16 When the HPC was established in 2002, the number of specific titles that should be protected was the subject of some debate.
- 2.17 Whilst some felt that protecting a range of titles had considerable benefits, others argued strongly for protecting a short range of titles in order to maximise public awareness.
- 2.18 The HPC Council chose a range of simple, recognisable titles, balancing the need to prevent the misuse of professional titles against the need for effective public engagement.
- 2.19 When a title is protected in law, this means (following any grandparenting period) that only someone who is registered with the regulator is able to use that title. This therefore criminalises the behaviour of those who use a protected title whilst not being registered.

- 2.20 As such, it is important to consider the extent to which any proposed protected title is in use by the profession being regulated; by other regulated healthcare professionals; and by others who undertake work in areas that it is not intended to regulate.
- 2.21 Protecting a title that is also in use by individuals outside health, wellbeing or therapeutic interventions and contexts may have the potential to criminalise the behaviour of those who it has not been the intention to regulate.
- 2.22 In addition, regulation on the basis of protecting professional titles only works when the titles which are protected are those which currently exist and are commonly used.



### **3. Consultation responses**

- 3.1 Last year we consulted on the recommendations of the psychotherapists and counsellors Professional Liaison Group (PLG) about the potential statutory regulation of psychotherapists and counsellors.
- 3.2 The consultation covered a number of topics, including differentiation. The responses we received on the issue of differentiation are summarised below. This has been reproduced from 'The statutory regulation of psychotherapists and counsellors - Responses to the consultation on the recommendations of the Psychotherapists and Counsellors Professional Liaison Group (PLG)'.

### **Summary of responses**

- 3.3 The majority of respondents disagreed that there should be differentiation between psychotherapists and counsellors – where this question was answered, 21% of respondents agreed and 78% disagreed. This disagreement was more marked amongst individuals who responded – 81% disagreed. This compares to 56% of organisations.

### **Responses agreeing with differentiation**

- 3.4 The responses we received in support of differentiating are summarised below, grouped by topic.

### **Public protection and understanding**

- 3.5 Differentiation between psychotherapists and counsellors would prevent confusion amongst members of the public and ensure that the public can make informed decisions. The public do not see psychotherapists and counsellors as equivalent.
- 3.6 Differentiation between psychotherapists and counsellors would prevent misrepresentation of skills and training and protect the public from practitioners working beyond their competency.
- 3.7 A failure to differentiate would lower standards for psychotherapists and damage both professions.

### **Education and Training**

- 3.8 Education and training was most frequently cited as the differentiator between psychotherapists and counsellors. There are differences between psychotherapists and counsellors in the length, depth, level, intensity and content of education and training that each group undertakes.
- 3.9 Training in counselling was characterised as more variable compared to psychotherapy training which was seen as more consistent in terms of content and length.

- 3.10 Some respondents said they supported differentiation on the basis that a failure to differentiate would inevitably mean that the threshold level for counsellors would be raised to honours degree or postgraduate level and adversely affect the supply of counsellors and counselling provision, particularly in the voluntary sector. This was a common view amongst practitioners who identified that they worked in the voluntary sector, further education training providers and professional bodies representing a large proportion of practitioners working in the voluntary sector.

### **Different but complementary professions**

- 3.11 Respondents to the consultation often said that there was a difference in role between psychotherapists and counsellors without describing that difference. Others commented generally that differences in education and training therefore meant that there were differences in proficiencies and competencies.
- 3.12 Where that difference was described it was often expressed in terms of the psychotherapist's ability to work with complex and enduring severe mental health problems such as personality disorders and to undertake diagnostic procedures.
- 3.13 Another respondent said that psychotherapists are involved in a more 'deliberate and active engagement with the psychological processes that go awry in psychological disorders' and therefore need a more thorough understanding of those processes. Counselling, by contrast, they argued is often more focused on 'identifying problematic issues of concern to an individual and their social context' and 'aims to maximize psychological and social adaptation' – there is 'less focus' on psychological processes that function pathologically and more on 'optimising normal processes of adaptation'.
- 3.14 Some respondents said that there were differences but acknowledged that the titles 'psychotherapist' and 'counsellor' are often used interchangeably by practitioners and by employers. In contrast, some other respondents said that beyond healthcare contexts the titles psychotherapist and counsellor were not used interchangeably by practitioners.

### **Responses disagreeing with differentiation**

- 3.15 We received the following comments arguing against differentiation between psychotherapists and counsellors in the structure of the Register.

### **Public understanding, protection and choice**

- 3.16 The proposed differentiation would result in no public protection value and would instead be confusing to members of the public by making the regulatory system unnecessarily complicated.
- 3.17 Differentiation would prevent those registered as counsellors from working with severe / enduring mental health problems. This would change the

nature of the treatment provided by therapists, jeopardise clients' access to timely and affordable therapy and might limit the clients' right to choose the therapy appropriate for them.

### **Education and training**

- 3.18 There is a variety in education and training in counselling and in psychotherapy. Some counselling courses are longer than psychotherapy trainings, the trainings often include the same or similar content and a significant proportion of counselling trainings are delivered at degree or postgraduate level.
- 3.19 Differentiation should not be achieved on the basis of academic levels. In particular, there was concern around how differentiation might alienate counsellors that have higher level qualifications above the proposed threshold level.
- 3.20 A few individual respondents described how they had decided to train as psychotherapists but nonetheless still considered that there was insufficient difference between the proficiencies and the therapeutic activities involved in order to justify differentiation.

### **Hierarchy**

- 3.21 The proposed differentiation would create a hierarchy between psychotherapists and counsellors, with counselling appearing to be 'inferior' to psychotherapy. The proposal is designed to elevate the power and status of some psychotherapists when in fact counselling and psychotherapy should be seen as of equal value and equal worth.
- 3.22 There is such a considerable degree of overlap in theory, practice and principles as to make differentiation between psychotherapists and counsellors unworkable.

### **Evidence**

- 3.23 A consistent theme amongst respondents disagreeing with differentiation was that of a lack of evidence. It was argued that there was a lack of evidence to support there being a difference between the proficiencies of a psychotherapist and those of a counsellor, and between the practise of psychotherapy and counselling. It was argued that the PLG had reached its conclusions without sufficient evidence to justify the recommendation.
- 3.24 The draft standards of proficiency were often cited in arguments that there was a lack of evidence to support differentiation. In particular, it was noted in many responses that amongst the standards of proficiency there were 49 common standards and only 2/3 differentiators and it was argued that this was an insufficient basis on which to differentiate.
- 3.25 Respondents also referred to research findings which they said had concluded that the orientation or modality of practice is not a key factor in

the outcome of therapy for the client. This point was used to argue that differentiation was not merited as the experience of the client did not differ on the basis of the 'label' used by the practitioner. This argument was also made in supporting the recommendation not to differentiate between modalities.

- 3.26 A number of respondents said that the proposed differentiation was out of sync with research more generally as well as other developments such as New Ways of Working for Psychological Therapists, Increasing Access to Psychological Therapies (IAPT), and the development of National Occupational Standards by Skills for Health which bridge both fields.

### **Service provision and practice**

- 3.27 We received a number of responses from counselling and psychotherapy service providers who argued that the proposed differentiation had no correlation with the reality of service delivery. These were echoed by many individual respondents.
- 3.28 A common argument was that practitioners in a variety of different environments will have a range of clients including those who might have or potentially have a defined mental illness. Counselling services reported that they employed both psychotherapists and counsellors and that both worked with high levels of distress, trauma and disturbance.
- 3.29 Respondents argued that decisions about which title to use were a matter of personal choice, sector, belief, style of practice and philosophy, rather than a reflection of 'higher' or 'lower' level skills. They argued that the titles were used interchangeably by practitioners, employers and others. These comments were echoed by some service providers who explained that they employed both psychotherapists and counsellors under the label of a counselling service.

### **Unintended consequences**

- 3.30 One of the consultation questions asked about the impact of regulation. Many of the identified impact areas were related to service provision. It was argued that the PLG had failed to properly take into account the impact upon services of the proposed differentiation.
- 3.31 A number of respondents said that the title 'counsellor' was developed and used to move away from the language of 'stigmatisation', 'prejudice' and 'segregation'. Differentiation and protection of title would necessitate counselling services employing both psychotherapists and counsellors including the title 'psychotherapist' in their names, which would increase stigma and prejudice, increase social exclusion and have financial implications for services. It was argued that there was stigma attached to the term 'psychotherapist' which members of the public often saw as being associated with mental illness.

- 3.32 It was argued that the differentiation would result in a reduction in career opportunities for both counsellors and psychotherapists, negatively impacting upon opportunities for career progression by necessitating retraining and limiting access to some jobs.
- 3.33 Individual practitioners responded concerned that they would be excluded by the proposals from undertaking long term or more complex work and would instead (because of the standards of proficiency) have to refer clients on to colleagues despite having the experience and skills to help clients. Although some acknowledged the nature of threshold standards, it was argued that this may nonetheless be an unintended consequence of differentiation.

### **Standards**

- 3.34 Respondents questioned, with reference to the profession-specific standards for psychotherapists, whether psychotherapists could or should undertake diagnosis and treatment for severe medical disorders. They said that they understood this to be the scope of practice of psychologists, psychiatrists and other medical doctors.
- 3.35 The differentiation in the standards is artificial - both psychotherapists and counsellors need to know about and work with mental disorders. Psychotherapists also need to be able to work with life problems. The ability to work with certain disorders is more a matter of experience than title or entry training.

### **Other comments**

- 3.36 A number of individuals and organisations had not reached firm conclusions but instead responded recognising the complexity of the decisions that needed to be made in this area. In recognition of variation across the field, some suggested a 'tiered' approach instead with adjectives such as 'senior' used to denote different levels of competence, education and training and experience.
- 3.37 One respondent suggested that the differentiation between psychotherapists and counsellors was insufficient to reflect the range of the field, suggesting three titles / 'sub sections': counsellor/counselling practitioner, psychotherapeutic counsellor and psychotherapist. A few respondents suggested that psychotherapeutic counsellor should be distinct sub-section or a protected title.
- 3.38 A few respondents suggested that there should be one part of the HPC Register to incorporate psychotherapists and counsellors and the existing arts therapists part of the Register.

## 4. Discussion

- 4.1 This section provides some brief points for discussion by the PLG. It is not designed to be exhaustive and the PLG is invited to consider any points of relevance to the outstanding issue of differentiation between psychotherapists and counsellors.
- 4.2 Differentiation was an area of considerable debate by the PLG and this level of debate was reflected in the strength and number of responses we received to the consultation.
- 4.3 The PLG may wish to focus on the following issues, drawn from the responses to the consultation, as an initial way of approaching this topic:
- **Impact:** What would be the impact upon service provision, practice and practitioners of differentiating; or failing to differentiate? For example:
    - Service providers. To what extent are psychotherapists employed in roles under the title of 'counsellor' and vice versa? (At the PLG's last meeting, one service provider invited to present said that psychotherapists were employed / volunteered under the title 'counsellor' and similar comments were made in the consultation).
  - **Education and training.** What, if any, are the differences between entry-level education and training in psychotherapy and in counselling?
  - **Mitigation.** If the Register is differentiated, or is not differentiated, are there any steps that can be taken to mitigate any impact identified?
- 4.4 As the PLG will be aware (see paragraphs 2.5 to 2.9), the question of differentiation is closely related to the standards of proficiency and the threshold level of qualification for entry to the Register. A summary of the outstanding issues in relation to these areas is included in the paper to note at this meeting: 'Information for organisations invited to present to the PLG'.
- 4.5 The draft standards of proficiency which formed part of the consultation last year, and the summary of responses received about them, are included, for reference, as papers to note. However, given the complex issues that need to be resolved in this area it is not anticipated that the PLG will be working directly on the standards of proficiency at this meeting, in the sense of redrafting the standards.