

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

HPC information for the Psychological Professions Alliance Group  
(PPAG)

Executive summary and recommendations

### **Introduction**

At previous meetings, the group was informed that a group of professional bodies ('The Psychological Professions Alliance Group') had been undertaking work in an attempt to resolve the outstanding issues around the potential statutory regulation of psychotherapists and counsellors. A number of those professional bodies are represented at the PLG and therefore will be able to provide a more up-to-date picture of the genesis and outcomes of those discussions at the meeting.

In April 2010 the HPC met with the PPAG at an early stage of proposals about a possible approach to differentiation and the structure of the Register. The HPC was asked to consider whether, at that early stage of development, and in principle, those proposals were potentially feasible. The document produced by the HPC following that meeting is attached.

The HPC welcomed the constructive approach of the PPAG to try and resolve these issues and gave its 'initial' and 'in principle' thoughts on the proposals as they stood at that time. We noted that there were a number of issues that would need to be considered in any event and that the PLG would need to discuss any proposals at an appropriate point.

Please note: the attached document represents the HPC's understanding of, and initial thoughts on, the proposals as they stood at the time of writing and therefore this does not reflect the following work and discussion of the PPAG since that time, nor does it necessarily reflect the views of all the organisations involved.

### **Decision**

This paper is for discussion.

### **Background information**

The Psychological Professions Alliance Group comprises of the British Psychological Society, British Association of Counselling and Psychotherapy, British Psychoanalytic Council, United Kingdom Council for Psychotherapy and the British Association for Behavioural and Cognitive Psychotherapies

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**

6 October 2010

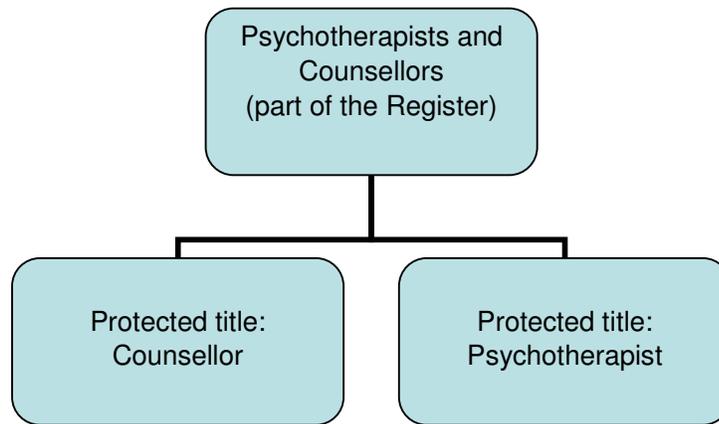
**Information for the Psychological Professions Alliance Group following meeting with HPC on 28 April 2010**

**1. Introduction**

- 1.1 The HPC met with the Psychological Professions Alliance Group ('PPAG') on 28 April 2010 to discuss the regulation of psychotherapists and counsellors, in particular, to discuss a potential proposal for how the Register might be structured.
- 1.2 The PPAG sought advice from the HPC as to the principle of this proposal, including whether the proposal put forward raised any concerns, particularly whether it was legally feasible. Whether such a structure would be problematic in terms of future grandparenting was also raised.
- 1.3 We warmly welcome the discussion of the PPAG to try and consider alternative solutions to the ongoing discussion and debate about differentiation in the structure of the Register. This document sets out our understanding of the proposal put forward at the meeting; we understand that the PPAG may wish to develop this proposal further in light of our comments.
- 1.4 The remainder of this section sets out the background to the structure of the HPC Register and to protected titles. Section 2 sets out the proposed structure and our comments.

## Structure of the HPC Register

- 1.5 In the Report of the PLG published for consultation on 14 July 2009, the following structure of the Register was proposed:



- 1.6 This structure 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

- 1.7 In summary, the structure of the Register relies upon education and training programmes which deliver standards of proficiency which lead to the use of professional titles. The standards of proficiency are key in the question of differentiation as they provide an objective basis on which to differentiate (or not) between the knowledge, understanding and abilities required for safe and effective practise and for access to different protected titles.

## Protected titles

- 1.8 At the meeting we discussed protected titles, in particular the possibility of using adjectival descriptors.
- 1.9 The following are the HPC's key factors in considering the case for protecting titles:
- The need to protect the titles in common usage by members of the professions being regulated.
  - The need to protect those titles readily recognised by members of the public.
  - The potential for the evasion of registration (i.e. by failing to protect a title) and the resulting risk this may pose to the public.
  - The need for effective communication and clarity for members of the public.
  - The potential by protecting a title for criminalising the behaviour, or bringing into regulation, of those that it is not sought to regulate.
- 1.10 At the meeting we touched on the difference between what we term as 'stem titles' and 'adjectival titles'.
- 1.11 An example of an adjectival title we currently protect is 'art psychotherapist'. This is a title protected under the arts therapists part of the Register. This means that anyone using the title 'art psychotherapist' without being registered in this part of the Register could be liable for prosecution. However, the 'stem' of this title, 'psychotherapist', is not currently a protected title.
- 1.12 An example of a non-adjectival title we currently protect is 'physiotherapist'. This is title protected under the physiotherapists part of the Register. This means that anyone using the title 'physiotherapist' without being registered in this part of the Register could be liable for prosecution. However, as the 'stem' is protected, this prevents misuse of adjectival titles that use 'physiotherapist'. For example, someone who said that were a 'musculoskeletal physiotherapist' would need to be registered and could be liable for prosecution if they were not.<sup>1</sup>

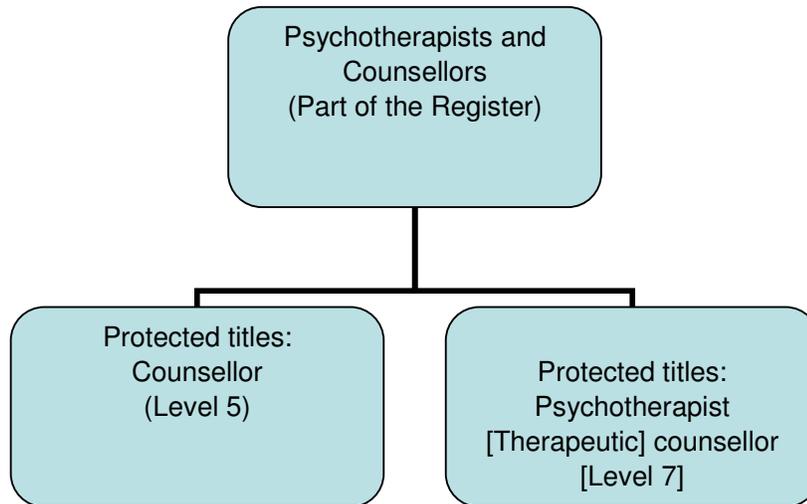
---

<sup>1</sup> Please see:  
[http://www.hpc-uk.org/aboutus/professionalliaisongroups/psychotherapistscounsellors\\_archive/index.asp?id=442](http://www.hpc-uk.org/aboutus/professionalliaisongroups/psychotherapistscounsellors_archive/index.asp?id=442)  
(click on enclosure 3)

## 2. PPAG Proposed structure of the Register

2.1 The HPC understands that two proposed structures were put forward in discussion at the meeting, shown in figures 1 and 2 below and on the following page:

Figure 1

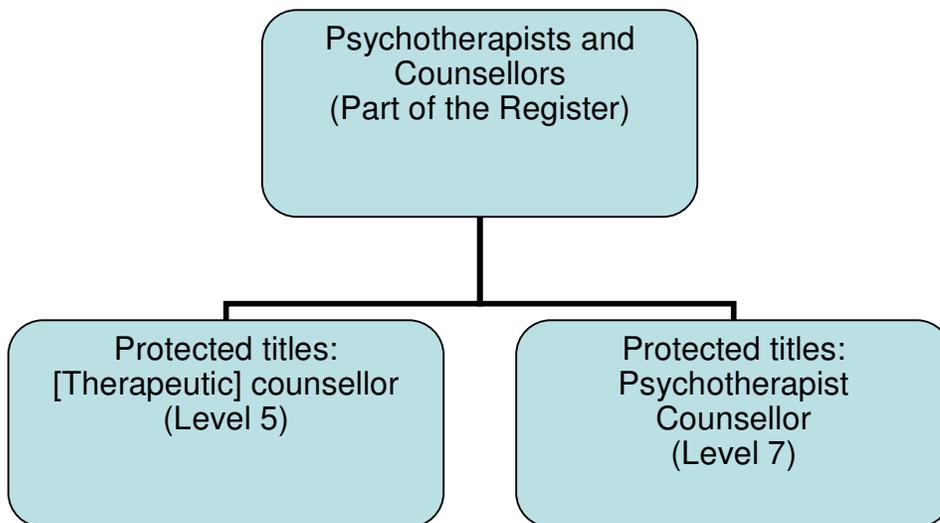


- There would be two sets of profession-specific standards of proficiency, one for counsellors, the other for psychotherapists and therapeutic counsellors (see below).
- Registrants would have access to the protected title for counsellors or the protected titles for psychotherapists and therapeutic counsellors.
- There would be approved qualifications for each – i.e. approved qualifications leading to the eligibility to register and use the title for counsellors and approved qualifications leading to the eligibility to register and the use the titles for psychotherapists and therapeutic 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 two different levels could potentially be set. The threshold levels proposed by the PPAG might be level 5 for counsellors and level 7 for psychotherapists and therapeutic counsellors.<sup>2</sup>

---

<sup>2</sup> Levels are referenced against the National Qualifications Framework (NQF)

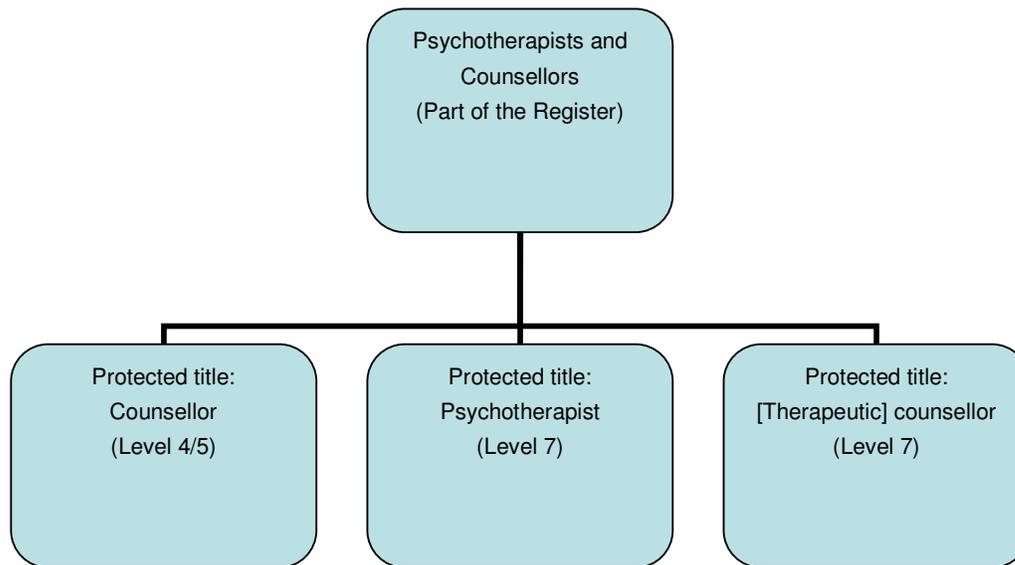
Figure 2



- There would be two sets of profession-specific standards of proficiency, one for therapeutic counsellors, the other for psychotherapists and counsellors.
- Registrants would have access to the protected title for therapeutic counsellors or the protected titles for psychotherapists and counsellors.
- There would be approved qualifications for each – i.e. approved qualifications leading to the eligibility to register and use the title for therapeutic counsellors and approved qualifications leading to the eligibility to register and the use the titles for psychotherapists and 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 two different levels could potentially be set. The threshold levels proposed by the PPAG would be level 5 for therapeutic counsellors and level 7 for psychotherapists and counsellors.

- 2.2 The proposal evolved at the meeting and most of our discussion centred on that shown in figure 1. We understand that this model, or a very similar model, is proposed in order to seek to resolve the current debate as to whether the Register should differentiate between psychotherapists and counsellors. In particular, in the light that many counselling programmes are delivered at postgraduate level and the contention that differentiation in practice may be more possible between counselling education and training delivered at level 5 and psychotherapy and counselling training delivered at level 7.
- 2.3 In the diagrams the adjectival title 'therapeutic counsellor' is given. However, we acknowledge that this is a working title for the purposes of this document only and that the PPAG will wish to discuss whether other titles might be more appropriate. Other suggestions include 'practitioner'.
- 2.4 In the course of discussion we focused on figure 1 which shows the Register structured with the 'stem title' counsellor protected on left hand side, with an adjectival title on the right hand side. We can confirm as discussed that, in principle, this does not in itself present any problems. Such a model has the potential to help resolve some of the concerns around counsellors who are also trained to level 7 and the challenge of putting together differentiated standards of proficiency.
- 2.5 At the meeting we discussed whether it would possible to have the opposite structure, shown in figure 2, where an adjectival title is protected on the left hand / level 4 side of the diagram and the 'stem' title 'counsellor' on the right hand / level 7 side. Having considered this proposal we would be of the opinion that the stem title 'counsellor' would need to be protected on the left hand / level 4/5 side of the diagram, reflecting common existing usage by a majority of practitioners, with the adjectival title protected at the right hand / level 7 side, reflecting a higher level of education and training.
- 2.6 Towards the end of the meeting it was discussed whether the Register could be additionally structured to differentiate between a level 7 psychotherapist and a level 7 counsellor. This structure is shown in figure 3 on the following page.

Figure 3



2.7 In principle, there is no reason why this structure would not be possible. However, this would again rely upon being able to adequately express in threshold standards of proficiency the knowledge, understanding and abilities required for each title / level. The work of the PLG to date and the responses to last year's consultation would seem to indicate that any attempt to make such a distinction would be very problematic indeed and would serve to complicate the structure of the Register still further.

2.8 At the meeting we also discussed the implications for grandparenting if a 'new' adjectival title was created. In the proposed structure as shown in figure 1 we do not believe that this would be problematic and consider that any potential difficulties would be resolved via case by case assessment of applications by relevant members of the professions.

### 3. Next steps

3.1 We understand that the PPAG will wish to further explore these proposals having sought the HPC's initial views and that this might potentially inform discussion by a broader range of a stakeholders at future meetings of the Professional Liaison Group (PLG).

3.2 Some further issues which we consider would need further exploration, and which were identified in responses to the consultation and referred to briefly at the meeting, include:

- the issue of 'conversion routes' if counselling is regulated separately from psychotherapy;
- the impact upon service delivery and practitioners of any differentiation including where titles are currently used interchangeably by employers; and

- issues related to education and training, for example, about how such arrangements would account for 'psychotherapy and counselling' programmes delivered at levels lower than level 7.

3.3 As discussed at the meeting, although we very much welcome PPAG's constructive approach, we would need to seek the views of the wider field on any proposals (as part of the ongoing work of the PLG).