

Psychotherapists and Counsellors Professional Liaison Group (PLG)
30 September 2010

The structure of the Register: Children and young people

Executive summary and recommendations

Introduction

The attached paper discusses the issues salient to the question of whether the Register should differentiate between those qualified to work with children and young people and those qualified to work with adults.

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 at this time

Financial implications

None at this time

Appendices

None

Date of paper

20 September 2010

The structure of the Register: Children and young people

1. Introduction

- 1.1 At its January and May 2009 meetings, the PLG discussed the question of whether the Register should be structured to differentiate between those practitioners qualified to work with adults and those qualified to work with children and young people. Some of this discussion focused on child and adolescent psychotherapists.
- 1.2 The PLG did not reach a clear decision on this topic. In the consultation a broad question was asked on the issue. However, there was no clear consensus in responses about the approach that should be adopted. The HPC Council considered that this was one of those areas where it was not appropriate to make a firm conclusion until the opportunity had been taken to further explore the issues.
- 1.3 This paper has been produced to assist the PLG in its consideration, thinking and discussion of this topic. In particular, the paper focuses the PLG's attention on the issues in this area as they pertain to regulation. It is acknowledged that the debate around the needs of children and young people (and other client groups) and how this should influence professional practice is a broader one than that which relates to regulation.
- 1.4 Section two of this paper outlines the previous discussion on this topic including responses to the 'Call for Ideas'; previous discussion at meetings of the PLG; responses to the recent formal public consultation; and the arguments made around reflecting modalities in the structure of the Register.
- 1.5 Section three looks at two specific groups of practitioners mentioned during the debate and consultation process and where representations have been made to the HPC Executive.
- 1.6 Section four provides some background information about the existing HPC Register and outlines the 'conditions' which must be met in order for the Register to differentiate between different groups. Section five provides some background information about some of the existing registers in the field.
- 1.7 Sections six and seven discuss the salient issues and outlines some areas for the discussion of the group.

2. Previous discussion

- 2.1 This area has been discussed on previous occasions by the PLG and we have received some comments in the Call for Ideas and in the recent formal consultation.

Call for ideas

- 2.2 A small number of respondents said that the Register should be structured to differentiate between practitioners who were qualified to work with different client groups, in particular those that were qualified to work with adults and those who were qualified to work with children and young people.
- 2.3 The Association of Child Psychotherapists (ACP) said that it was important that these groups should be differentiated in the Register. They argued that the Register should 'enable members of the public to distinguish the different levels of specialism, and the nature of training'. The British Association of Play Therapists similarly argued that separate standards should be produced for practitioners working with adults and those working with children and young people, in order to provide the public and professionals alike with information about who was qualified to work with certain client groups.

PLG

- 2.4 The PLG has discussed this topic on two occasions – at its second and fifth meetings. That discussion is summarised below:
- 2.5 The minutes of the Group's meeting on 28 and 29 January 2009 record the following discussion on this topic:

'The Group noted that a number of professional bodies had submitted responses which argued that the Register should enable members of the public to distinguish the different levels of specialism and the nature of training and that separate standards should be produced for practitioners working with adults and those working with children and young people.

The Group felt that, in principle, it would not be helpful for the public to structure the information in the way suggested, as this would make the Register overly complex. In discussion, the following points were made:

- the HPC's register did not currently indicate if a professional was qualified to work with vulnerable people, children or young people;
- employers were likely to be best placed to decide if a practitioner was able to work with a particular client group;
- training to work with client groups could either be pre-registration or post-registration. It was suggested that specialisation in a particular

client group might be recognised by an annotation to the Register;

- there were a range of client groups (such as people with learning disabilities and people with eating disorders) which could also be recognised as protected titles;
- a member expressed a view that, historically, child psychotherapy had been recognised as a profession under the Whitley Council. Other members of the Group pointed out this had applied solely within the NHS and had not been for the purposes of statutory regulation or public protection;
- individuals regulated by the HPC were expected to use their own professional judgement about their scope of practice and whether they were practising safely and effectively;
- there was a trend away from delineation by client group and for professionals to work in a multi-professional environment;
- it was possible that the standards of proficiency might include requirements for understanding and knowledge of working with client groups;
- professionals should be able to deal with a range of equality and diversity issues and comply with legislative requirements relating to vulnerable groups; and
- notwithstanding the HPC's decision on whether to protect the title, it was likely that the title of child psychotherapist would continue to be widely used.

The Group agreed that its working approach would be that the Register should not differentiate to specifically identify practitioners qualified to work with children and young people. The Group agreed that this subject might be re-visited in light of subsequent discussion on education and training.¹

2.6 This topic was revisited at the group's meeting in May 2009 and the minutes record the following:

'Some members of the Group felt that there was no additional evidence in the paper to justify differentiation on the basis of client groups. These members noted that the standards of proficiency would require registrants to practise within the legal and ethical boundaries of their profession. However, other members of the Group felt that practitioners required

¹ Psychotherapists and Counsellors PLG, 28 and 29 January 2009, 5.22 and 5.23.
http://www.hpc-uk.org/aboutus/professionalliaisongroups/psychotherapistscounsellors_archive/index.asp?id=442

specialist training and skills to work with children and therefore the Register should differentiate.²

Consultation

2.7 As the PLG did not reach a final conclusion on this topic, the question asked in the consultation was deliberately broad, inviting comments from stakeholders but making no proposal. The question read: 'Do you think that the Register should differentiate between practitioners qualified to work with children and young people and those qualified to work with adults? If yes, why? If not, why not?'

2.8 The broad terms of the question meant that responses to his question were often discursive in nature. Overall, the responses did highlight some confusion about what differentiation might mean for practitioners and for service providers. In summary the following arguments were made in responses:

2.9 For:

- There is serious risk of harm to a vulnerable group if therapy is performed badly or by untrained practitioners.
- Children and young people have specific needs which need to be met by qualified practitioners.
- There are specific competencies that are necessary for working with children and young people.
- A failure to differentiate would mean that the HPC would not be well equipped to make decisions about complaints concerning work with children and young people.
- Child and adolescent psychotherapists are a specific group with distinct entry-level training.

2.10 Against:

- There are different 'entry routes' into work with children and young people including specialist training at entry to the profession; post-qualifying specialist training and those who work with children and young people having undertaken CPD and gained additional experience.
- Many services do not see clients on this basis so differentiation would reduce the available workforce who could work with children and young people, reducing choice for clients.
- There is no greater justification to recognise this group in the structure of the Register than other practitioners working with other client groups.

² Psychotherapists and Counsellors PLG, 26 and 27 May 2010, 9.3
http://www.hpc-uk.org/aboutus/professionalliaisongroups/psychotherapistscounsellors_archive/index.asp?id=447

- The responsibility of ensuring competence to work with any client group rests with the individual and with employers.

3. Specific groups

- 3.1 There are two specific groups where comments were made in the consultation and where representations have particularly been made to the HPC Executive regarding differentiation.

Child and adolescent psychotherapists

- 3.2 The Association of Child Psychotherapists (ACP) accredits trainings in child and adolescent psychotherapy and is the designated authority for the recognition of the qualifications of child and adolescent psychotherapists from European Union countries who wish to work in the United Kingdom.

- 3.3 The following definition of child and adolescent psychotherapy is given on the ACP website:

‘...child and adolescent psychotherapy is a psychoanalytic treatment for children, young people, parents and families. Child and adolescent psychotherapists treat a range of behavioural and emotional problems not easily addressed by other modes of treatment.

Therapists are trained to carefully observe a child or young person and respond to what they might be communicating through their behaviour and play. They also apply their framework of thinking to work with parents, families and carers and to training and supporting other professionals who work with children, young people, parents and families to ensure a deeper understanding of the child's perspective.’³

- 3.4 Child and adolescent psychotherapists work in a variety of settings including Communication and Adolescent Mental Health Services (CAMHS), hospitals, schools, social services, the voluntary sector and in private practice.
- 3.5 In their response to the Call for Ideas, the ACP asked that there should be two distinct sections in the Register to denote those qualified to work with adults and those qualified to work with children, young people and their parents and carers. They asked that the title ‘child and adolescent psychotherapist’ be protected alongside other titles specifically for work with children, for example, ‘psychoanalytic child psychotherapist’.
- 3.6 In the consultation, the most frequently cited specific group was child and adolescent psychotherapists. Some respondents said that recognising this ‘distinct’ group, with its distinct title, was very different from arguing that

³ ACP website, accessed 2 July 2010
<http://www.childpsychotherapy.org.uk/>

practitioners could not work with children unless they had a specific specialist training.

Youth counselling

- 3.7 Youth Access, a national membership organisation for young peoples' information, advice, counselling and support services have made representations to the HPC Executive and in the consultation that consideration should also be given to separate recognition of the role and title of 'youth counsellor'.⁴
- 3.8 Youth Access argues that consideration should be given to protecting this title or similar because there are a distinctive set of skills and knowledge required to work with young people. They also argue that it is consistent with wider Government policy around the reform of the workforce delivering services for children and young people, as demonstrated by the 'Every Child Matters' programme and the work of the Children's Workforce Development Council (CWdC).⁵
- 3.9 In their consultation response, Youth Access argued that there was insufficient available entry-level or post-qualification education and training opportunities available to equip practitioners with the skills required to work with children and young people. They outlined initiatives designed to improve this position including induction programmes, post-qualifying CPD and efforts to produce more formal qualifications to train counsellors to work with children and young people.

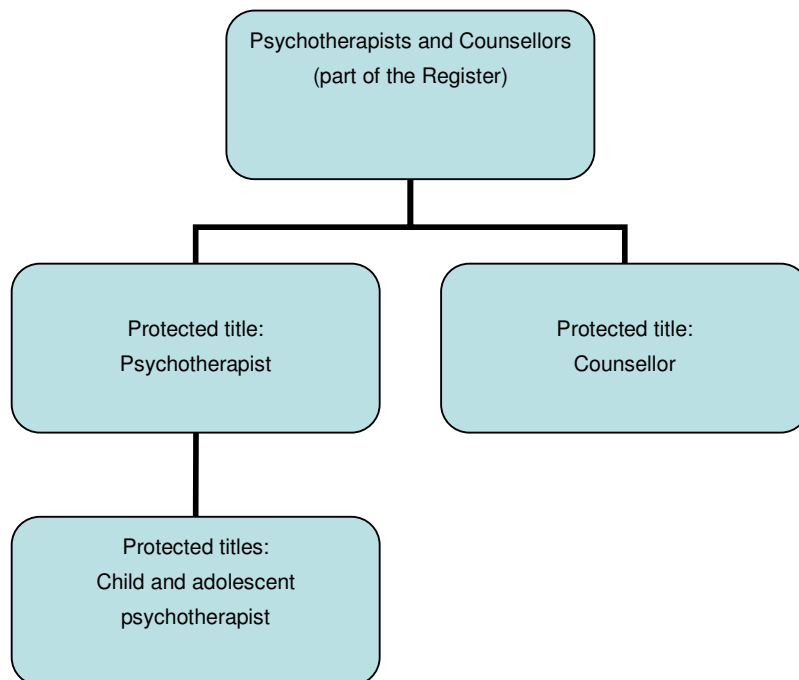
⁴ Youth Access Website:
<http://www.youthaccess.org.uk/>

⁵ Every Child Matters Website:
<http://www.dcsf.gov.uk/everychildmatters/>

4. The HPC Register

Differentiation

- 4.1 The PLG has previously discussed the issues around differentiating in the structure of the Register between psychotherapists and counsellors. For the Register to differentiate between those qualified to work with children and young people and those qualified to work with adults, the same 'conditions' would need to be met.
- 4.2 There would need to be specific education and training programmes (at first entry to the Register and, potentially, post-qualification) which deliver specific standards of proficiency and which lead to the use of a specific professional title or titles which it is possible to protect. The standards of proficiency would need to be capable of providing 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.
- 4.3 For example, the diagram below illustrates how the structure of the Register might look if child and adolescent psychotherapists were specifically recognised in the structure of the Register:



- 4.4 This would mean:

- In addition to the profession-specific standards of proficiency for psychotherapists and for counsellors, there would need to be profession-specific standards for child and adolescent psychotherapists.

- Only someone who successfully completed a programme which met the standards for child and adolescent psychotherapists could use that title. (Although grandparent arrangements would need to exist in the transitional period following registration.)
 - There would be specific approved qualifications leading to registration as a child and adolescent psychotherapist.
- 4.5 To illustrate, differentiation would not be possible where these ‘conditions’ could not be met:

- If there are no specific education and training programmes relating to the title and delivering specific standards of proficiency; or if there are a variety of different routes to ‘qualification’. For example, if practitioners are appointed to posts on the basis of CPD or experience with no specific qualification requirements relating to the role and title.
- If there is no specific title, in common usage and commonly recognised, that it is possible to protect in law and which relates to the group which it is intended to regulate. For example, if employers simply use the title ‘counsellor’ but look for specific experience, training, skills and competence to work with children as part of the appointment process.
- If it is not possible to produce differentiated standards of proficiency which describe the standards required for safe and effective practice.

Existing HPC Register

- 4.6 The existing HPC Register does not differentiate between registrants on the basis of client group. For example, the Register of speech and language therapists does not differentiate between those who work with children and young people, and those who work with adults.
- 4.7 This is because for most of the professions currently regulated by the HPC there is not an explicit link between pre-registration education and training that delivers specialist competencies, conferring a specific title, to equip registrants for work with specific clients groups.
- 4.8 For example, undergraduate physiotherapy programmes will enable students to gain experience of a wide range of settings including physiotherapy for children and for disabled people. Once qualified and registered, a physiotherapist might specialise in a particular area or with a particular client group, gaining additional experience, CPD and education and training to do so.

Information available on the Register

- 4.9 One argument put forward about differentiation relates to the Register providing information to enable informed choices to be made. It is important to note that the HPC Register provides a means by which

someone can check if the practitioner they propose to see or employee is registered and has therefore met the regulator's standards. It does not provide a means by which members of the public can find further information about an individual's background, area of practice or (normally) any additional qualifications or experience.

- 4.10 In some of the existing professions regulated by the HPC, professional bodies and associations often provide a service by which members of the public can find information about registrants who specialise in work with a particular client group or condition in their area. For example, the Association of Speech and Language Therapists in Private Practice (ASLTIP) provides a facility by which members of the public can find practitioners in their area who have a specific interest or specialism in certain areas or with certain client groups.
- 4.11 These facilities therefore also act as a marketing tool, with practitioners often 'self-selecting' their area of specialism / special interest for work with clients. This is one role that professional bodies sometimes perform, in helping to promote the services of their members to members of the public.

Fitness to practise and fitness for purpose

- 4.12 The Register is about fitness to practise, showing that someone has met threshold standards for safe and effective practice and met the regulators requirements relating to their conduct and health. Fitness for purpose is a rather different concept – about whether someone has the specific skills, training and experience for a specific role or to meet specific needs.
- 4.13 In the event that the Register was not structured to specifically identify those qualified to work with children and/or young people, employers (and others), as they do now, could still make their own requirements as to the experience and qualifications of a registrant before being satisfied that they were suitable for a particular role.
- 4.14 For example, an employer might explicitly require accreditation with a particular organisation or look for specific experience for particular role which could include previous experience of working with a particular client group, experience of particular therapeutic interventions or experience of leading or managing a team.

Protected titles and scope of practice

- 4.15 The HPC, in keeping with most of the other professional regulators, normally regulates by protection of title. Each of the parts of the Register has at least one protected title which can only be used by someone who is registered with the HPC.
- 4.16 There are a limited number of examples of protection of function. For example, the fitting and prescribing of contact lens is reserved to those registered with the General Optical Council. The acts of assessing, testing,

and prescribing a hearing aid for the purpose of retail sale or hire is restricted to those registered with the HPC as hearing aid dispensers. Protection of function relies upon being able to identify specific, discrete physical acts in law and the ability to restrict those acts to members of one profession.

- 4.17 It is important to note that even if a title relating to a discrete group working with children and young people was protected, this would not legally prevent someone from working with children, young people, their parents and carers, as long as they did not use a protected title to which they were not entitled. Some of the example job descriptions seen by the Executive use the generic titles 'psychotherapist' and 'counsellor' and are open to both applicants with specific training and voluntary registration relating to children and young people and those who have prior experience of working with these client groups.
- 4.18 In the consultation the broad terms of the question meant that it appeared that respondents were confused as to what differentiation would mean – i.e. would it mean that no one could work with children and young people without a specific formal qualification leading to separate registration? This confusion meant that some were worried about the potential impact on service delivery should individuals who work with children and young people having gained substantial experience and undertaken CPD need to retrain and complete specific qualifications. Some services were concerned about the potential to limit the pool of available staff and therefore detrimentally affect continued delivery of services.
- 4.19 Regardless of whether any additional differentiation is introduced, all registrants, including any who held any 'specialist title' would be bound by the requirement to only practise in those areas in which they have appropriate education and training, experience and supervision and to ensure that they represent their qualifications, experience and the services they offer in a fair and accurate way.⁶

Post-registration qualifications

- 4.20 The HPC has the ability to annotate ('mark') its Register to indicate where a registrant holds post-registration education and training ('Post-registration qualifications').
- 4.21 At the moment the HPC is required to annotate its Register to indicate where a registrant holds a qualification which means that they are able to prescribe under medicines legislation. For example, the Register is annotated to show those podiatrists, physiotherapists and radiographers who have successfully trained to become supplementary prescribers. Only someone annotated on the Register is legally able to act in that capacity.

⁶ HPC Standards of conduct, performance and ethics, paragraphs 6 and 14

- 4.22 The HPC is currently undertaking work to explore whether it should mark the Register to indicate a greater range of post-registration qualifications. From autumn 2010 we anticipate consulting on some broad criteria to use in order to decide whether a qualification should be annotated or not. As part of this we are exploring whether for an annotation to be meaningful to the public it should carry with it a protected title or protected function. We are also consulting on whether podiatric surgeons and neuropsychologists should be the first areas to be annotated on the Register.
- 4.23 We have concluded that we would only normally annotate a qualification in exceptional circumstances – where this would improve the protection of the public.
- 4.24 The area of post-registration qualifications is outside of the PLG's remit. However, the outcomes of the consultation on post-registration qualifications might mean that consideration could be given in the future, after the opening of the Register, to annotating post-registration qualifications in the psychotherapy and counselling field.⁷

5. Voluntary registers

- 5.1 Professional organisations in the field who hold registers / membership lists adopt a variety of different approaches to reflecting whether practitioners work or are qualified to work with children and young people. Not all Registers have specific sections denoting those qualified to work with children and young people and others allow practitioners to indicate where they have a particular interest or specialism in a specific area, in order to provide information to the public and to market their members' work. Some bodies also have special interest groups and the like for members with an interest in this area to develop standards and best practice guidance and to share experience.
- 5.2 It is important to draw a distinction between the statutory register as a register of fitness to practise and other types of register which might also exist to market the skills and experience of practitioners, and special interest groups which exist to provide a forum for discussion amongst practitioners.
- 5.3 A short summary of some of the Registers and search tools available is given below:
- Youth access provides a portal for members of the public to find services providing information, advice and therapy for children and young people, their parents and carers.

⁷ HPC Education and Training Committee, 8 June 2010
http://www.hpc-uk.org/aboutus/committees/educationandtraining_archive/index.asp?id=492 (click on enclosure 6)

- The ACP provides an online portal which allows members of the public to find child and adolescent psychotherapists in their area. These are practitioners who have successfully completed ACP approved training. However, this only includes members who work privately / independently.
- The BPC Register includes those who have undertaken specific ACP recognised training in child and adolescent psychotherapy. Their Register identifies where someone is qualified as a child and adolescent psychotherapist.⁸
- The UKCP Register is not sub-divided to show those specifically qualified to work with children and young people, but does allow practitioners to indicate their experience / interests to the public including children and young people, disability, coaching and family for example. A member of the public can search against these headings to find a therapist. The UKCP also has a faculty – ‘the Faculty for the Psychological Health of Children’ which is open to members and whose goals include to act as voice for practitioners working with children and young people and to uphold good standards in the field.⁹
- The BACP Register allows members of the public to find practitioners by selecting their area of interest. Counselling for Children and Young People (CCYP) is a division of the BACP and supports counsellors working with children and young people including producing best practice guidance.¹⁰

⁸ BPC Register:

<http://www.pschoanalytic-council.org/main/index.php?page=10097>

⁹ UKCP Find a Therapist

<http://members.pschotherapy.org.uk/find-a-therapist/>

¹⁰ BACP Find a Therapist

http://www.bacp.co.uk/seeking_therapist/

6. Discussion

6.1 In this section the HPC Executive have discussed what appear to be the main issues in this area. **This is not intended to be exhaustive.**

6.2 In summary the most salient arguments for and against differentiation between those qualified to work with children and young people and those qualified to work with adults is as follows:

For:

- The risk of harm to vulnerable section of society.
- The need to meet the specific needs of children and young people.
- The need to recognise specific training, delivering specific competencies in order to protect the public.

Against:

- There is no greater justification for recognising this group compared to practitioners working with other client groups.
- There are a variety of different entry routes into work with children and young people, not just formal entry-level or post-registration training.
- The responsibility for ensuring competence to work with any client rests with individuals and their employers.

6.3 The broad terms of the consultation question meant that a number of the issues and arguments appear to be conflated. The terms of this question were necessarily 'abstract' whereas the decisions to be reached need to be more concrete – relating to specific groups which might be recognised in the structure of the Register. It might be observed that as a result of the question asked some arguments made in the consultation conflated the issues pertinent to professional regulation with those more relevant to institutional regulation, education commissioning and service delivery. For example, separate recognition in the structure of the Register would not directly increase the availability of specialist training programmes or increase the availability of service provision for children and young people.

6.4 This debate is categorically **not** about questioning whether the safety and wellbeing of children and young people is important or whether it is more important than that of adults; it is **not** about questioning whether different competencies / attributes are necessary in working with children and young people; and it is **not** about restricting the ability to work with children to a small part of the workforce or restricting service providers' ability to deliver services for children and young people.

6.5 The PLG will need to remain focused on those issues as they pertain to professional regulation of psychotherapists and counsellors. The salient question is not about whether those qualified to work with children and those qualified to work with adults should be differentiated but whether

there are distinct groups working with children and young people which should be and can be reflected in the structure of the Register.

- 6.6 The HPC Executive suggests that there are two main questions for the PLG to consider:

The feasibility question

- Is differentiation between practitioners qualified to work with children and young people and those qualified to work with adults logistically possible?
- Is there a discrete group, with a specific qualification or qualifications that deliver specific competencies which lead to a specific title and a specific role?
- Is that qualification commonly recognised by the field as required in order to perform those roles and to typically use that title?

The 'in principle' question

- Is it necessary or appropriate to differentiate at the level of principle? Would it be fair and equitable to do so (e.g. compared to the needs of other client groups or modalities)?
- Would it enhance public protection or are existing safeguards sufficient? Would it be understood by members of the public or would it make the regulatory system unnecessarily complex?

Child and adolescent psychotherapists

- 6.7 In the consultation, the most frequently cited group was child and adolescent psychotherapists. It was argued that this was a distinct group, with specific education and training leading to a specific title and specific roles within the NHS and other sectors.
- 6.8 It appears that child and adolescent psychotherapists may meet the 'feasibility test' for regulation, as they are a discrete group and there are specific education and training programmes, leading to the specific title of 'child and adolescent psychotherapist' and specific roles as a child and adolescent psychotherapist. This would additionally rely upon being able to produce differentiated standards of proficiency outlining the skills and experience necessary to use this title.
- 6.9 The argument for including child and adolescent psychotherapists in the structure of the Register is different from saying that only psychotherapists with specific entry level or post-qualifying training should work with children and young people. Many practitioners may have developed the competencies to work with children and young people through experience and CPD and do so within their scope of practice and within the modality or orientation in which they practise.
- 6.10 In the consultation no arguments for other specific groups in the area of psychotherapy were advanced. However, in considering the matter of

whether the Register should be differentiated in principle the PLG may wish to consider whether the arguments about this group are distinct from other modalities / orientations given the PLG's previous decision and the HPC Council's decision that the Register should not be structured to reflect modalities. It might be observed that there are a number of modalities where practitioners are trained to work with particular client groups, for example family therapists and relationship therapists.

Counsellors

- 6.11 During the consultation or in previous discussion at the PLG, the HPC Executive has to date not identified any specific groups of counsellors (or, indeed, other groups of psychotherapists) where it would appear the feasibility test has been met for differentiation. That is, there has not been clearly identified a discrete group, with specific education and training, delivering specific competencies, leading to a specific title and a specific role.
- 6.12 Instead, the information gathered seems to indicate that counsellors, like many psychotherapists, train to work with children and young people in a variety of different ways, including some limited direct entry or formal post-qualifying programmes, CPD packages and supervised practice and induction.
- 6.13 The HPC Executive has to date not identified any additional discrete groups with a discrete title that it would be possible to recognise in the structure of the Register. A variety of titles might be used to denote the specialism of a practitioner including the client group with which they work but to date we have not identified a title relating to a discrete group which is in wide currency and commonly recognised by employers and others. Instead, there are a wide variety of titles used and a wide variety of requirements for practitioners working with children and young people. Employers make fitness to purpose decisions about those practitioners who have the skills and experience to work with children and young people. Titles such as 'youth counsellor' or 'children's counsellor' might be used but there is not a clear link between that title and specific education and training that it would be possible to identify and approve.
- 6.14 Whilst the availability of direct entry or post-qualifying training to work with children and young people may increase in the future, at the moment it does not appear that differentiation in the structure of the Register is possible. However, it is important to note that any such conclusion is not saying that it is unnecessary for practitioners to have the skills necessary to work with and meet the needs of specific client groups. However, it is to say, in terms of statutory regulation, that it appears that separate recognition in the structure of the Register is not possible.

7. Conclusions

7.1 The PLG is invited to discuss the information included in this paper and the discussion in section 6. The PLG is also invited to consider the information, evidence and views of those groups that have been invited to present on this subject.

7.2 The PLG is invited to:

- consider whether there are specific groups of practitioners working with children and young people for whom it would be **feasible** to identify in the structure of the Register, to include child and adolescent psychotherapists and any other groups of psychotherapists and counsellors; and
- consider the **principle** of identifying those groups in the structure of the Register.