

Psychotherapists and Counsellors Professional Liaison Group (PLG)
2 February 2011

Threshold level of qualification for entry to the Register

Executive summary and recommendations

Introduction

This paper has been adapted from previous papers considered by the PLG.

The paper includes:

- The background and key issues involved in considering the threshold level of qualification for entry to the Register.
- The responses to the consultation in 2009 about the structure of the Register.
- Some key points for the group to consider.

The PLG is particularly invited to consider the question of whether the first entry point for counsellors should be set at level 4 or level 5. Level 5 is used in the current working model and this has been the subject of discussion at previous meetings. The PLG is asked to make a formal decision.

Decision

The PLG is invited to:

- discuss the attached paper;
- consider and reach a final conclusion / recommendation to the HPC Council about whether the first entry point for counsellor should be set at level 4 or at level 5 as proposed in the suggested model; and
- give clear reasons for the conclusion / recommendation reached.

Background information

This paper relates to the following in the PLG's terms of reference:

- The threshold level(s) of qualification for entry to the Register

Resource implications

None

Financial implications

None

Appendices

- QCA National Qualifications Framework
- QAA qualification descriptors
- Scottish Credit and Qualifications Frameworks

Date of paper

24 January 2011

Threshold level of qualification for entry to the Register

1. Introduction

1.1 This paper is divided into four sections:

- Section two provides information about the threshold level of qualification for entry to the Register.
- Section three provides a summary of the consultation responses we received about the threshold level of qualification for entry to the Register.
- Section four provides a summary of the salient points from sections one to three and raises some points for the group's discussion.

2. Threshold level of qualification for entry to the Register

- 2.1 At the last meeting, the PLG had some discussion about whether, in a differentiated structure, the entry level for counsellors going forward should be level 4 or level 5 on the National Qualifications Framework or equivalent on the other qualification frameworks.¹
- 2.2 This information is reproduced from the 'Report of the Psychotherapists and Counsellors Professional Liaison Group (PLG)' published for consultation in July 2009. The information includes some background information about the HPC's role in education.
- 2.3 Please note that as the threshold level of qualification for entry to the Register is the threshold level required to deliver the standards of proficiency, it cannot be finally determined until the standards of proficiency are agreed. Should the Government decide to proceed with regulation, the HPC would need to consult on the standards of proficiency and the threshold level before making agreeing the final standards and the level that should be set. This normally takes place following the publication of a Section 60 Order under the Health Act 1999, the secondary legislation required to bring a new profession into statutory regulation.
- 2.4 It is recognised that the issues of the structure of the Register, the standards of proficiency and the threshold level of qualification are to some extent interlinked.

About approval of education and training programmes

- 2.5 The HPC visits education and training providers to approve pre-registration education and training programmes against the standards of education and training. 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).
- 2.6 The HPC approves programmes delivered by a variety of education and training providers, including Higher Education Institutions (HEIs), professional bodies and private providers. There is no requirement for an approved programme to be delivered or validated by a HEI.
- 2.7 The HPC only approves programmes that lead directly to an individual's eligibility to register and gain access to the relevant protected title(s) for their profession.
- 2.8 The HPC ensures professional input in its key processes through the use of partners. For education and training, the HPC uses one type of 'partner' called 'visitors'. Visitors are members of the regulated professions or lay

¹ Level 4 on the NQF is level 4 on the Framework of Higher Education Qualifications (FHEQ) and level 8/9 on the Scottish Credit and Qualifications Framework (SCQF). Level 5 on the NQF is level 5 on the FHEQ and level 8/9 on the SCQF.

people with appropriate academic or practice experience who visit education and training providers on the HPC's behalf.

- 2.9 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. In the case of psychotherapists and counsellors, the visitors would be drawn from the relevant modality or theoretical approach as the programme being approved.
- 2.10 If a programme is approved (having met any conditions if applicable), it is granted open ended approval subject to ongoing checks that the programme continues to meet the requisite standards via the annual monitoring and major change processes.
- 2.11 The HPC does 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, it may re-visit a programme.
- 2.12 This is designed to strike a balance between fulfilling the HPC's duty to ensure that programmes continue to meet our standards, and reducing the anticipated regulatory burden on education and training providers. Once a programme is approved, someone who successfully completes that programme is eligible to apply for registration.

Opening of the Register

- 2.13 The HPC will approve all those education and training programmes, historic and current, that led or lead to registration with one of the voluntary registers that transfers. (Please see section 5.2, paragraph 8.)

About the threshold level of qualification for entry to the Register

- 2.14 The Health Professions Order 2001 does not provide the HPC with an express 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.
- 2.15 The HPC's obligation is to set threshold standards of entry to the Register, 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 award will do so.

About SET 1: Threshold level of qualification for entry to the Register

- 2.16 Standard 1 of the standards of education and training ('SET 1') sets out the threshold level of qualification for entry to the Register.

- 2.17 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 Health Professions Order 2001, 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.
- 2.18 The standard currently reads

1.1 The Council normally expects that the threshold entry routes to the Register will be the following:

Bachelor degree with honours for:

- biomedical scientists (with the Certificate of Competence awarded by the Institute of Biomedical Science, or equivalent);
- chiropodists / podiatrists;
- dietitians;
- occupational therapists;
- orthoptists;
- physiotherapists;
- prosthetists / orthotists;
- radiographers; and
- speech and language therapists

Masters degree for arts therapists.

Masters degree for clinical scientists (with the Certificate of Attainment awarded by the Association of Clinical Scientists, or equivalent).

Foundation degree for hearing aid dispensers*

Diploma of Higher Education for operating department practitioners.

Equivalent to Certificate of Higher Education for paramedics.

Professional doctorate for clinical psychologists.

Professional doctorate for counselling psychologists, or equivalent.

Professional doctorate for educational psychologists, or equivalent.

Masters degree for forensic psychologists (with the award of the British Psychological Society qualification in forensic psychology, or equivalent).

Masters degree for health psychologists (with the award of the British Psychological Society qualification in health psychology, or equivalent).

Masters degree for occupational psychologists (with the award of the British Psychological Society qualification in occupational psychology, or equivalent).

Masters degree for sport and exercise psychologists (with the award of the British Psychological Society qualification in sport and exercise psychology, or equivalent).

*Hearing aid dispensers part of the Register opened on 1 April 2010.

- 2.19 The HPC has 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.
- 2.20 In setting the threshold level of qualification for entry, the HPC is setting the threshold 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 level may be approved.
- 2.21 The threshold level might change over time to reflect changes in the delivery of education and training. Any change in the threshold 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 and the standards for safe and effective practice.
- 2.22 The threshold 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.

Setting the threshold level for psychotherapists and counsellors

- 2.23 In the Call for Ideas the HPC asked what issues should be considered in determining the threshold level of qualification for entry to the Register for psychotherapists and counsellors. Prevalent themes in responses were the need to ensure that the threshold set did not lower the standards of existing provision; and the need to ensure an inclusive approach to existing education and training routes and to maintain the diverse backgrounds of practitioners.
- 2.24 The PLG's model of differentiating between psychotherapists and counsellors and producing standards of proficiency specific to each meant that it could consider, if appropriate, setting a different threshold education level for psychotherapists and a different threshold educational level for counsellors.
- 2.25 As the standards of education and training are the standards necessary for an education and training programme to successfully deliver the standards of proficiency, the starting point for the PLG's discussions was the standards of proficiency which it had drafted.

2.26 The PLG also had regard to the relevant qualifications frameworks, such as the National Qualifications Framework (NQF) published by the Qualifications and Curriculum Authority. For clarity, the levels referred to throughout this report are levels on the NQF. Where helpful, levels on the NQF are also cross-referenced to other qualifications and curriculum frameworks and an indication is given of the types of awards typically included at that level.

Existing provision

2.27 In response to the Call for Ideas, respondents provided information about the names, awards and levels of existing education and training programmes and the information about the sectors in which they were delivered. Some of this information is summarised in the paragraphs below and helped shape the background to the PLG's discussion in this area.

2.28 There are a large number of education and training programmes that train or purport to train psychotherapists and counsellors. There are a range of different qualification titles with some programmes named as programmes in both psychotherapy and counselling. Training is delivered in a variety of sectors including the higher education, further education and the private sectors.

2.29 In psychotherapy, programmes are often delivered by private training institutions, some with the validation of a university, or within the university sector. In response to the Call for Ideas, most respondents said that qualifications in psychotherapy were at masters level / level 7 on the NQF. Level 7 includes the awards of masters degrees, postgraduate diplomas and postgraduate certificates, or equivalent.

2.30 In counselling, programmes are delivered in all sectors, with a significant proportion of qualifications delivered in the further and higher education sectors. In response to the Call for Ideas, respondents said that existing qualifications varied from level 3 on the NQF up to levels 7 or 8 (doctoral level or equivalent), with qualifications at levels 4 and 5 most frequently cited by respondents.

2.31 A number of respondents said that there should be no move towards requiring formal academic qualifications for entry to the Register and that the diversity of approaches to education and training (in both psychotherapy and counselling) should not be adversely affected, particularly the continued provision of education and training, in the further education and private sectors.

Counsellors

2.32 In response to the Call for Ideas, the most frequently suggested threshold level for counsellors was a diploma level threshold (levels 4 and 5 on the NQF) but suggestions varied from level 3 on the NQF up to level 6 (honours degree level).

- 2.33 In arguing for particular levels, respondents focused on the level and awards of existing provision and explained how they saw particular levels as necessary for safe and competent practice. Some of those that argued for a level 6 threshold said that this was important to ensure parity between counselling and other professions.
- 2.34 Other respondents argued that there was no justification for setting a threshold at first degree level. Arguments included that there was no clear rationale for why such a level was necessary; that the threshold level set should recognise existing education and training provision at levels four and five which currently produced safe and competent practitioners; and that setting the threshold for counselling too high would adversely affect the diversity of entrants to the field and the skills and qualities they were able to bring to practice.
- 2.35 The PLG carefully considered the arguments put forward in the Call for Ideas and its discussion mirrored the points summarised in paragraphs 30 and 31, above and on the previous page. The PLG's discussion centred on whether the level should be set at level 5 (which includes diplomas of higher or further education or equivalent) or level 6 (includes bachelor degrees or equivalent).
- 2.36 The PLG agreed to recommend that the threshold level for the counsellors 'sub-section' of the Register should be set at level 5 on the NQF / level 5 on the Framework for Higher Education Qualifications / Level 8/9 on the Scottish Credit and Qualifications Framework.²
- 2.37 The PLG concluded that the threshold should be set at level 5 because it believed that the draft standards of proficiency could be delivered at that level. The PLG also had regard to existing provision in counselling at level 5 and the impact that a higher threshold might have on the diversity of entrants to the profession.
- 2.38 The responses to the Call for Ideas indicate that this is a topic on which there are strongly held, often polarised viewpoints. This was accordingly a topic on which there were also differing viewpoints within the PLG and the PLG's decision was not unanimous. Some members considered that a level 6 threshold was necessary, arguing that this would reflect a movement towards degree level education and training in counselling; that the draft standards of proficiency were consistent with the relevant descriptors for honours degree programmes; and that a level 6 qualification would be necessary to deliver them.

² Qualification and Curriculum Authority, National Qualifications Framework, www.qca.org.uk
Quality Assurance Agency for Higher Education, Framework for Higher Education Qualifications in England, Wales and Northern Ireland, 2008,
<http://www.qaa.ac.uk/academicinfrastructure/FHEQ/EWNI08/FHEQ08.pdf>
Scottish credit and Qualification Framework, www.scqf.org.uk

Psychotherapists

- 2.39 In responses to the Call for Ideas, the most frequently suggested threshold for psychotherapists was level 7 on the NQF (this level incorporates the awards of postgraduate certificates, postgraduate diplomas and masters degrees or equivalent).
- 2.40 Respondents argued that level 7 reflected the existing level of education and training programmes in psychotherapy was linked to safe practice as a psychotherapist and that the level set should not diminish existing standards.
- 2.41 The PLG agreed to recommend that the threshold level for the psychotherapists 'sub-section' of the Register should be set at level 7 on the NQF/ level 7 on the Framework for Higher Education Qualifications / Level 11 on the Scottish Credit and Qualifications Framework.
- 2.42 The PLG concluded that the threshold level for psychotherapists should be set at level 7, having regard to existing provision and the draft standards of proficiency.

3. Consultation responses – threshold level of qualification for entry to the Register

- 3.1 The responses we received to the 2009 consultation about the threshold level of qualification for entry to the Register 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

- 3.2 The majority of respondents disagreed that the threshold educational level for entry to the Register for counsellors should be set at level 5 on the National Qualifications Framework (NQF) / level 5 on the Framework for Higher Education Qualifications (FHEQ) / level 8/9 on the Scottish Credit and Qualifications Framework (SCQF) – where this question was answered, 23% agreed and 74% disagreed. Although overall both individuals and organisations that responded disagreed, there were different trends. Amongst individuals, 82% disagreed with this question, whilst amongst organisations only 49% disagreed.
- 3.3 The majority of respondents disagreed that the threshold educational level for entry to the Register for psychotherapists should be set at level 7 on the NQF / level 7 on the FHEQ / level 11 on the SCQF – where this question was answered 33% agreed and 65% disagreed. This trend was more marked amongst individual respondents – 74% disagreed. However, the reverse trend was true amongst organisations that responded - 62% agreed and 37% disagreed.³

Overall

- 3.4 There was no overall or general support for the threshold levels, although some trends were identifiable. Where these questions were answered, many respondents disagreed with the proposed levels as part of their disagreement with the proposed differentiation between psychotherapists and counsellors. This meant that respondents did not always suggest an alternative level or levels to those proposed. Many respondents responded with their views on differentiation but did not directly answer the related questions about the threshold educational levels or responded in relation to one of these questions but not the other.
- 3.5 As many of the arguments made were contingent on support or opposition for the proposed differentiation between psychotherapists and counsellors, many of the arguments made had common features across different viewpoints. As such, this section provides a summary of comments

³ Please note that these statistics reflect the views of those that responded to the consultation. It should be noted, however, that some professional organisations encouraged individual members to respond to the consultation, whilst others asked registrants to respond to them and sent a collated response. The statistics are therefore for indicative purposes only, indicating the strength of feeling on this particular topic.

received more generally about educational threshold levels and the factors important in determining where the level or levels should be set. The comments we received arguing for and against specific levels are then summarised, with an indication of the types of respondents who made these comments and whether any correlation was identifiable with views on differentiation between psychotherapists and counsellors.

3.6 Responses were generally split into the following areas:

1) NQF level 4 / FHEQ level 4 / SCQF level 8/9 for counsellors and NQF level 7 / FHEQ level 7 / SCQF level 11 for psychotherapists, usually if the Register differentiated between psychotherapists and counsellors but respondents often focused only on one group and/or did not address the differentiation question.

2) NQF level 6 / FHEQ level 6 / SCQF level 10 for psychotherapists and counsellors if the Register did not differentiate between psychotherapists and counsellors.

3) NQF level 5 / FHEQ level 5 / SCQF level 8/9 for counsellors had some support amongst both those who supported the proposed differentiation and those who did not.

3.7 There was no clearly identifiable trend that respondents strongly favoured one level over another and the arguments made in support of particular levels often overlapped.

3.8 The remainder of this section refers to NQF levels for simplicity and clarity.⁴

About threshold levels

We received the following more general comments about threshold levels.

3.9 A common argument, in line with the comments against the proposed differentiation, was that there are insufficient differences between the standards proposed for psychotherapists and those for counsellors which could justify setting different thresholds. The gap between the proposed thresholds was considered to be 'arbitrary' and to fail to recognise the overlap in practice.

3.10 Respondents often argued that the proposed differentiated entry levels were not an accurate reflection of the qualifications of existing practitioners and the level of existing education and training programmes. In contrast others pointed to the level of education and training in support of differentiation. One respondent said that debate about the threshold entry level for counsellors centred on levels 4 to 6, whereas in psychotherapy there was general consensus at level 7.

⁴ National Qualifications Framework (NQF): www.qcda.gov.uk
Framework for High Education Qualifications (FHEQ): www.qaa.ac.uk/academicinfrastructure
Scottish Credit and Qualifications Framework (SCQF): www.scqf.org.uk

- 3.11 One respondent questioned the HPC's role in setting levels as it was not a qualifications body and, as outlined in the PLG report, it could not in any event lawfully refuse approval to a programme which met the remainder of the HPC's standards but was delivered at a different level from those proposed. It was argued that the terms of the standards of proficiency mean that they cannot be easily read across to levels linked to qualifications frameworks such as the NQF.
- 3.12 A common theme was the impact of the threshold set on existing practitioners. There was some anxiety that the level might mean that existing practitioners would have to retrain or would leave the workforce, and some concern, with particular reference to counselling, that the levels set might devalue those practitioners who hold qualifications at higher levels. However others, some of whom argued that the proposed levels were too high, said that the threshold was only a minimum which could be exceeded.
- 3.13 A common argument (particularly amongst individual practitioners who also argued that the proposed threshold for counselling was too high) was that there was no correlation between academic attainment and the ability to practise effectively as a therapist. More generally some respondents equated a level on the National Qualifications Framework (NQF) with academic qualifications delivered in the Higher Education sector.
- 3.14 Some respondents were concerned about the proposed levels lowering existing standards, often referring to the standard required to achieve practitioner accreditation in schemes run by professional bodies. However, others considered the levels to be too high and were concerned about diversity, access to affordable therapy and the impact upon the voluntary sector.
- 3.15 A few respondents talked of the need for consistency and higher standards in education and training – saying they saw this as important for the 'professionalisation' of the field.

Arguments for and against different levels

- 3.16 We received the following comments arguing for and against different threshold levels.

Level 4

- 3.17 Arguments for a level 4 threshold were often made with particular reference to counsellors rather than psychotherapists. We received a number of responses from individual practitioners who responded with their views on this particular question but who did not answer the other consultation questions. However, we did receive some responses which argued that the threshold should be level 4 with no differentiation between the titles.

- 3.18 Level 4 is the 'currently accepted norm' for counsellors and no good rationale has been provided as to why this should change. There is no clear argument to explain why level 4 courses are seen as inadequate and no argument to demonstrate how level 5 would produce better counsellors and better ensure patient and client safety.
- 3.19 Level 4 training delivered in Further Education has successfully produced safe and effective counsellors for a number of years. Level 4 trainings are practical and thorough, equipping students with the ability to work with clients in the real world.
- 3.20 Respondents frequently said that academic achievement was far less important than personal qualities such as intuition, integrity, perception, emotional intelligence and compassion. Level 5 courses and above are more concerned with academic ability, including the ability to undertake research, and not practical ability.
- 3.21 A level 5 requirement would be 'elitist' and 'out of touch with society'. Many students on level 4 courses include groups underrepresented in higher education including mature returners to the study and work, women in the 40+ age bracket returning after a career break and others without prior formal academic qualifications who wish to work in the voluntary sector. A level 5 requirement would increase the length of training, increase the cost, and would be detrimental to the diversity of entrants to the profession. These arguments were made both by education and training providers and individual practitioners.
- 3.22 As a result, the level 5 threshold would affect recruitment into the profession, leading to fewer trainees and in turn adversely affecting the workforce, increasing demand and increasing costs for those needing support. This would also reduce choices for clients.
- 3.23 The reduction in supply of counsellors would adversely impact on the availability of services in the third sector, impacting on the NHS as less counselling is provided voluntarily. The availability of affordable counselling for the financially and socially disadvantaged would decrease as the educational level increased.
- 3.24 Some respondents were concerned about the impact of a level 5 threshold on existing practitioners who did not hold a level 5 qualification. Some were concerned that 'excluding' such practitioners from the workplace or making them retrain would be unfair. Others commented on the impact on existing students already undertaking level 4 courses and the impact on course providers in amending their programmes.
- 3.25 Some recently qualified counsellors or students undertaking counselling programmes at level 4 responded saying that their qualification was excellent and should be allowed to continue.

Level 5

- 3.26 Those who supported a level 5 threshold often made similar arguments to those made for a level 4 threshold level. In particular, that higher levels of qualification would privilege academic ability over proficiency as a therapist and that a level 5 qualification would keep open a route into practice for those wishing to embark on a second career and for those with life experience but a less academic background.
- 3.27 A common theme amongst respondents generally, and with particular reference to the proposed threshold levels, was the need to protect good existing practitioners without existing academic qualifications.
- 3.28 One respondent made a distinction dependent upon the context in which the practitioner was working. Level 5 would be appropriate for those working independently; level 4 would be sufficient otherwise.
- 3.29 A few respondents spoke more generally about oversupply of students graduating from courses in the Further Education sector and of poor courses producing counsellors and psychotherapists who were inexperienced and required lots of close supervision. They argued more generally that level 5 was insufficient for public protection.

Level 6

- 3.30 A level 6 threshold was often cited as a threshold for those who said that there should not be differentiation between psychotherapists and counsellors. Respondents often did not provide a rationale for a level 6 threshold but, where they did, often said that this was necessary to ensure parity with other professions such as teaching, social work and nursing.
- 3.31 Some respondents explained that this was necessary to ensure sufficient theoretical understanding, skill and practical ability necessary to work with clients. A common theme was the need to have a sufficient number of hours with clients and some argued that a level 6 qualification was necessary to achieve this.
- 3.32 Some respondents argued for level 6 but acknowledged that this might be more of an aspiration at this point in time. They argued that level 6 should be the stated future ambition, acknowledging that the threshold might have to be set lower initially. Some suggested the 'stepped approach' outlined in the PLG report, in recognition that many new entrants to the profession currently complete a diploma level qualification.
- 3.33 In contrast, others expressed concern about the possibility that the threshold might be set at level 6, seeing this as unnecessary and preventing continued provision of counselling training in the further education sector. One respondent said that there was insufficient evidence for such a 'radical change'.

Level 7

- 3.34 There was general support for a level 7 threshold for psychotherapists from those who supported differentiation between psychotherapists and counsellors. A very small minority of respondents argued for a level 7 threshold for both psychotherapists and counsellors or saw this as a potential future aspiration.
- 3.35 Some argued that the standards did not support differentiation and the setting of different levels and therefore did not support the setting of a level 7 threshold for psychotherapists. They argued that many psychotherapists are not trained in diagnosis and treatment of severe mental disorders and have not qualified at level 7 on the NQF.
- 3.36 One respondent said that 60% of psychotherapy courses offered no academic award because they were not validated by Higher Education Institutions (HEI) or qualifications bodies and were only approved by professional bodies. They argued that a level 7 threshold was therefore aspirational and asked what would happen to current level 5 and level 6 courses in psychotherapy.
- 3.37 Some disagreed with the necessity of a level 7 qualification arguing that there was no evidence that a postgraduate qualification made someone a better therapist. It was also argued that a level 7 requirement would reduce access to practice placements and reduce the number of people able to practise as psychotherapists.
- 3.38 A few respondents argued that level 7 may be too low for some speciality areas which they argued were at level 8 on the NQF.
- 3.39 A common theme amongst those who disagreed with differentiation was what the status would be of a counsellor who had qualified at level 7. Some suggested that the appropriate approach, if differentiation was retained, would be to allow those counsellors who reached level 7 to also register as psychotherapists. A number of respondents said that if differentiation was retained it would be important for the HPC to ensure that there were education and training programmes so that counsellors could become psychotherapists without having to effectively retrain.

4. Summary and discussion

4.1 This section provides summary of the key points in this paper and some points for discussion by the PLG.

Summary

4.2 The following provides a short summary of some of the key points outlined in this paper.

- The threshold level of qualification for entry to the Register (SET 1) is the level necessary to deliver the standards of proficiency. The standard uses the term 'normally' as the HPC could not refuse approval to a programme which delivered the standards of proficiency and met the remainder of the SETs but which did not result in the form of award specified in SET 1.
- The standard applies to pre-registration programmes seeking approval after the opening of the statutory register; it does not apply to individuals who may have qualified at different levels in the past.
- In the consultation views about the threshold levels proposed were informed by responses to the differentiation issue.

Discussion

4.3 The PLG most recently discussed whether the first entry point for counsellor should be level 4 or level 5 at its meeting in October 2010. In the context of the presentation of the Association of Christian Counsellors (ACC) the following points were made (with reference to the minutes of the meeting):

- The transfer of voluntary registers should be as inclusive as possible to incorporate experienced practitioners who did not hold formal qualifications and to ensure that services were not unfairly affected.
- ACC believed that the threshold level of qualification normally expected for counsellors should be level 4 or level 5 on the NQF. There did not appear to be a significant number of complaints in relation to counsellors who were currently trained at level 4. The ACC believed that a requirement above level 5 could deter people from training as counsellors.
- The group felt that a threshold level of qualification for counsellors of level 4 or level 5 would be an acceptable level.

4.4 At the last meeting, the group indicated that it was minded to set a threshold requirement at level 5. In discussion, the group referred to training models of some organisations where a level 4 qualification was intended to equip a counsellor to work only in counselling agencies; whereas a level 5 qualification was intended to equip a counsellor to work

in any setting, including private practice. However, it was acknowledged, that this was not necessarily the approach that other training providers with level 4 training adopted. It was also noted that the HPC has to set the threshold entry level as that level necessary for safe and effective practice and that practitioners are not restricted as to the environment in which they can work when registered, subject to the provisions in standards regarding scope of practice.

4.5 In reaching its decision the group is invited to:

- have regard to the points outlined in paragraph 8.2;
- have regard to the consultation responses from those who argued for a level 4 threshold and for and against a level 5 threshold;
- consider the impact of the level that is set upon:
 - Service users (i.e. considering any impact on the future availability of services)
 - Practitioners
 - Education providers (i.e. considering the extent of entry-level training currently delivered at level 4 and level 5)
 - Students / trainees now and in the future (i.e. considering any impact upon those who may wish to train as counsellors in the future)
 - Service providers including those in the voluntary sector (i.e. considering whether the level would reduce the availability of practitioners, for example); and
- give clear reasons for its decision(s).



Qualifications and Curriculum Authority



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Rewarding Learning

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.

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The NQF and the FHEQ

National Qualifications Framework (NQF)	
Previous levels (and examples)	Current levels (and examples)
5 Level 5 NVQ in Construction Management † Level 5 Diploma in Translation	8 Specialist awards
	7 Level 7 Diploma in Translation
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
	5 Level 5 BTEC Higher National Diploma in 3D Design
	4 Level 4 Certificate in Early Years
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	

Framework for Higher Education Qualifications (FHEQ)
D (doctoral) Doctorates
M (masters) Masters degrees, postgraduate certificates and diplomas
H (honours) Bachelor degrees, graduate certificates and diplomas
I (intermediate) Diplomas of higher education and further education, foundation degrees and higher national diplomas
C (certificate) Certificates of higher education

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

Quality Assurance Agency (QAA) 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:
 - to evaluate critically current research and advanced scholarship in the discipline;
 - 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:
 - the exercise of initiative and personal responsibility;
 - decision-making in complex and unpredictable situations;
 - 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



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.