

Psychotherapists and Counsellors Professional Liaison Group (PLG)

Voluntary register transfers – draft criteria for transfer

Executive summary and recommendations

Introduction

At its meeting on 4 March the PLG discussed the voluntary register transfer processes and the criteria that should be used to decide which registers should transfer. It was agreed that the proposed criteria would be brought back to a later meeting for the PLG to discuss further.

A paper was brought to the April meeting on criteria for identifying which registers transfer. Owing to time constraints, it was not possible to discuss the paper in the meeting. However, comments were sought via email from PLG members after the meeting.

The following paper has been revised following comments from the PLG members.

Decision

The PLG is invited to discuss the contents of the attached paper and make recommendations on the criteria.

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

Background information

The PLG is invited to take into account the summary of responses to the questions asked in the Call for Ideas, in its discussions.

<http://www.hpc->

[uk.org/assets/documents/100025ACpsychotherapists_and_counsellors_professional_liaison_group_20081204_enclosure01.pdf](http://www.hpc-uk.org/assets/documents/100025ACpsychotherapists_and_counsellors_professional_liaison_group_20081204_enclosure01.pdf)

Resource implications

None

Financial implications

None

Appendices

None

Date of paper

13 May 2009

Outline of the paper

This paper is divided into three sections.

The first section provides general considerations about the transfer of voluntary registers.

The second section provides general discussion around the criteria used for identifying which voluntary registers would transfer to the HPC Register. It also contains recommendations from the HPC Executive on the criteria and suggests evidence that voluntary registers could submitted to show how they meet the criteria.

The third section provides an overview of the process that will be used to identify which registers transfer to HPC.

Section 1: General considerations on the voluntary registers

It is important that only registers which identify practitioners who are practising autonomously, making professional and independent judgments and taking full responsibility for their actions should transfer. This means that registers must distinguish between those in training and individuals who are in practice.

The PLG discussed the structure of the Register for psychotherapists and counsellors at its previous meeting in January. The PLG decided that there should be differentiation between psychotherapists and counsellors in the Register. However, the PLG also agreed that this decision should be revisited as necessary in light of other discussions.

Differentiation between psychotherapists and counsellors would mean that any voluntary register which transferred to the HPC would also have to clearly differentiate between psychotherapists and counsellors. This would rely on accurate information about the register and the individuals on the register. Alternatively, if no differentiation was possible then individuals on the register might have to transfer to both the psychotherapists and counsellors sections.

If there is differentiation, organisations will be asked to identify whether their register is a register of psychotherapists, counsellors or both. The PLG is invited to consider whether organisations should submit evidence to support their identification of profession.

Section 2: Criteria for identifying voluntary registers

At its meeting on 4 March, the PLG discussed proposed criteria for making decisions about which voluntary registers should transfer to the HPC.

The first part of this section outlines the criteria that were proposed at the meeting in March. The second part provides general discussion points which apply to all registers and all criteria. The final part discusses each criterion in more detail.

The criteria proposed at the meeting in March are listed below.

A voluntary register must demonstrate:

1. evidence of robust systems for deciding membership of the voluntary register;
2. evidence of adherence to a code of ethics informing a code of conduct;
3. evidence of robust, open and transparent procedures for dealing with complaints about practitioners, including evidence that the procedures are followed;
4. evidence that members are expected to demonstrate their continuing professional development; and
5. evidence that supervision is required, with an explanation of the term 'supervision' in the particular context of psychotherapy and counselling.

The criteria are considered in more detail below. It is important to stress that only registers which meet all the criteria will be recommended for transfer to the HPC. Therefore, the PLG may want to consider the following general points alongside any comments specific to the individual criterion:

- whether the criteria is necessary for public protection;
- the importance of inclusivity in identifying which registers transfer and therefore the effect of any criterion on achieving inclusivity ;
- the importance of clarity in the criteria including definitions where appropriate; and
- the types of evidence which could be supplied to show how the register meets the criteria.

1. Robust systems in place for deciding membership of the voluntary register

Robust entry systems are vitally important in making sure that only individuals who meet the standards set by an organisation are able to become a member of a register. This criterion is therefore about the systems and standards necessary to make decisions about membership of the register.

In the Call for Ideas, the HPC proposed a number of criteria which could be used to identify which registers transfer. The first of these was that the register should have 'clear criteria for entry to membership (which might include the accreditation or approval of education and training programmes)'.

There was considerable discussion of this criterion at the last meeting of the PLG. However, no firm conclusions were reached in this area.

The importance of quality in the educational standards was emphasised in the discussion. The PLG considered that the criterion proposed by the HPC was not sufficient and instead considered whether this criterion could be strengthened by drawing from criteria used by other organisations. In particular, the PLG considered whether the criterion used by the Complementary and Alternative Medicine (CAM) working group might be appropriate.¹ The relevant criteria taken from the CAM report are listed below:

1. 'The organisation hosting the register should have evidence of ... (b) clear definitions and expectations of educational standards and outcomes (c) demonstrably effective arrangements for the accreditation of educational programmes....'
2. 'With regard to accrediting educational programmes, effective procedures should be in place to (a) approve programmes of study, (b) monitor over a period of time their effectiveness against the stated aims and objectives for the programmes taking account of the success of students in attaining these stated, intended learning outcomes and (c) reviewing over time the continuing validity of these aims and objectives.'
3. 'It should be clear from the organisation that the criteria for inclusion on the professional register include language proficiency, health and fitness to practice, integrity, honesty, comprehension of written and spoken English, conduct and the attainment of minimum educational standards.'

The PLG is invited to consider whether any of the criteria used by the CAM working group would be appropriate. In particular, the Executive invites the PLG to consider whether the requirement to accredit education and training programmes and set health and fitness to practise standards are necessary and can be met by all registers.

The PLG may also want to consider how registers which ran their own grandparenting process would meet requirements around setting education standards for entry to the voluntary register.

Recommendation

The HPC Executive suggests the following criteria:

- The voluntary register must demonstrate clear definitions and expectations of the required qualification(s) and/or experience necessary to register
- The voluntary register must demonstrate processes for assuring that applicants meet the required standards of entry which may include accreditation of educational programmes

¹ The full report can be found at:

<http://www.dh.gov.uk/en/Publichealth/Healthimprovement/Complementaryandalternativemedicine/index.htm>

The first criterion would allow registers which had carried out their own grandparenting process to still meet the requirement that there should be clear entry requirements. The second criterion would be appropriate to organisations which do not accredit their own training but do hold registers.

The voluntary register could submit evidence taken from the admissions process. This could include application forms or guidance notes or information about how the register accredits education programmes (if appropriate).

2. Evidence of adherence to a code of ethics informing a code of conduct

The PLG has previously discussed the importance of each organisation having a code of ethics which informs a code of conduct.

Many organisations may combine their code of ethics and conduct. The executive suggests that the PLG should consider whether it might be more appropriate for the code of conduct and ethics (or similar) to inform a complaints process.

Recommendation

The HPC Executive suggests the following criteria:

- The voluntary register must demonstrate evidence that members are required to adhere to a code of conduct and ethics (or equivalent), which informs the register's complaints process

The PLG is invited to consider how an organisation would demonstrate that the individuals adhered to a code of conduct. This could be through asking members to sign a declaration that they adhere to the code.

3. Evidence of robust, open and transparent procedures for dealing with complaints about practitioners, including evidence that the procedures are followed

The PLG discussed the issue of a complaints procedure and how the criterion might be worded. A complaints procedure was considered particularly important but it was recognised that procedures did vary depending upon the organisation.

The PLG is invited to consider whether the wording above is appropriate and sufficiently flexible to be met by a variety of voluntary registers held by different types of organisations.

The Executive suggests that the PLG should consider how organisations could provide evidence that the procedures were followed, particularly if no complaints had been made against individuals on the register or if the register had been created recently.

The PLG is also invited to consider whether it would be appropriate to specify that the complaints process was independent of the register, perhaps through lay involvement or in the investigation and adjudication of cases.

Recommendation

The HPC Executive suggests the following criteria:

- The voluntary register must demonstrate evidence of robust, open and transparent procedures for dealing with complaints about practitioners, including evidence that the procedures are followed where complaints have been made

The register would have to provide evidence that the complaints process was robust, open and transparent. The evidence that was submitted could include a copy of the complaints procedure and information detailing how it had been used (ensuring compliance with the relevant data protection legislation).

4. Evidence that members are expected to demonstrate their continuing professional development (CPD)

The HPC requires registrants to undertake CPD and audits a sample of registrants to ensure that they meet the HPC's standards for CPD.

At the previous meeting in March, there was discussion of the importance of registers requiring CPD and how this would be demonstrated. There was discussion around whether it would be appropriate for the organisation holding the voluntary register to audit members to ensure compliance with CPD. It was agreed that although this might be one type of evidence that could be submitted, it was not considered necessary for public protection to make this requirement.

The HPC Executive suggests that the PLG should consider how this criterion could be evidenced and whether the wording is appropriate. The register could require that members had a commitment to CPD, rather than require that members of the register have to demonstrate their own CPD.

Recommendation

The HPC Executive suggests the following criteria:

- The voluntary register must demonstrate evidence that members are expected to demonstrate a commitment to CPD.

A commitment to CPD could be demonstrated through a standard within a code of ethics or through a personal declaration which members of the voluntary register sign.

5. Evidence that a voluntary register required supervision of members, with an explanation of the term 'supervision' in the particular context of psychotherapy and counselling.

The PLG discussed the importance of supervision within psychotherapy and counselling. The PLG may want to consider whether it would be appropriate to require the register to require supervision and how this requirement could be monitored and demonstrated.

The HPC Executive suggests that the PLG consider how this criterion could be evidenced and whether the wording is appropriate. An alternative might be that the register requires a commitment to supervision which could then be evidenced through a number of ways.

Recommendation

The HPC Executive suggests the following criteria:

- The voluntary register must demonstrate evidence that members are expected to demonstrate a commitment to supervision consistent with their own theoretical model.

This commitment to supervision could be demonstrated through a standard within a code of ethics or through a personal declaration.

Section 3: Process for identifying which registers transfer

Any criteria which the PLG identify will be considered by the HPC's Council as part of the recommendations made by the PLG about the regulation of psychotherapists and counsellors.

Once considered by the Council, the report will also be available for public consultation over a three month period.

As a result, it is unlikely that the process of inviting organisations to submit evidence to show how they meet the criteria could begin before early 2010.

The process for identifying which registers transfer is outlined below:

1. Organisations are contacted and offered a timeframe to submit documents to the HPC to show how the voluntary register meets the criteria.
2. Organisations will also be asked to identify whether the register is of psychotherapists, counsellors or both.
3. Information supplied by organisations will be scrutinised by a member of the HPC Executive.
4. If further information is required, organisations will be contacted and asked to submit additional information.
5. Once all the information has been received, it will be considered by the HPC against the set criteria. The decisions could be made by a panel of the HPC's Education and Training Committee set up to advise the HPC's Council.
6. If the register meets the criteria, the HPC will recommend it to the Department of Health.

Organisations which demonstrate that they meet the criteria can then be identified and recommendations made to the Department of Health about which registers transfer. It is important to stress that these are recommendations made by the HPC for the government to consider and then take forward. This means that organisations who do not make a submission or whose submission was rejected by the HPC would be able to contact the Department of Health directly.

The HPC will take account of all comments raised in the forthcoming consultation on the recommendations from the PLG and will use those comments to develop the detailed process.

Other process considerations

The administrative burden of transferring one register is reasonably small. However, if a number of registers are recommended for transfer to the HPC it would be logistically problematic to transfer all of the data on one day. It may be necessary to stagger the transfer of registers to ensure that the transfer of data to the HPC happens efficiently.