

Dear Rosalyn Young

Thank you for your recent email regarding the potential regulation of psychotherapists and counsellors. I hope I might clarify the current situation with regard our project looking at the potential regulation of psychotherapists and counsellors.

First of all, as you will be aware, the work of the PLG was to consider and make recommendations to the HPC Council about the potential statutory regulation of psychotherapists and counsellors. The PLG was an advisory group tasked with looking at 'how' psychotherapists and counsellors might be regulated, in light of the 2007 White Paper, 'Trust, Assurance and Safety - The Regulation of Health Professionals in the 21st Century' which concluded that psychotherapists and counsellors should be regulated and should be regulated by the HPC. The final decision about whether psychotherapists and counsellors should be regulated, and by whom, are decisions for Government and, ultimately, for parliament.

The original timetable for the PLG work did not include a meeting in November 2009. However, this additional meeting was scheduled to take place after the conclusion of the consultation on the PLG's report, primarily to allow the group to discuss and take into account the responses regarding the standards of proficiency. As you mention in your email, this meeting was postponed given the volume of responses we received, to allow more time for proper analysis. Our letter clearly stated that the HPC Council was due to meet on 10 December 2009 (as originally planned in the PLG timetable) to discuss and consider the analysis from the consultation. We also stated: 'Although this is of course properly a decision for the HPC Council to make, we anticipate at this stage, following the Councils considerations, that the PLG will be reconvened to undertake further work in revising the standards of proficiency in light of those considerations and in light of the many detailed comments we have received on the draft in the consultation'. We therefore explained that we intend to do more work on standards of proficiency.

At the Council meeting on 10 December 2009, the HPC Council made a number of conclusions based on the consensus of consultation responses. They were:

1. That there should be a new part of the Register called 'psychotherapists and counsellors'.
2. That the Register should not be structured to differentiate between modalities.
3. That 'psychotherapist' and 'counsellor' should become protected titles.
4. That the approach to dual registration outlined in the PLG report should be adopted.
5. That the transfer of voluntary Registers should follow a three stage process by which information is transferred in advance of the opening of the Register (to ensure that entries in the Register are not duplicated).
6. That the grandparenting period should be three years.

However, the Council did not reach any firm conclusions in relation to a number of points, including the topic of standards of proficiency, which it concluded needed further work and consideration. The remaining areas identified for further work / debate on which no final conclusions were reached (and on which we received strong feedback in the consultation):

1. Differentiation between psychotherapists and counsellors in the structure of the Register (i.e. whether they are one profession or two).
2. Differentiation between children and young people (i.e should the Register separately identify child and adolescent psychotherapists etc).
3. Standards of proficiency
4. Standards of education and training (the threshold level(s) of qualification for entry to the Register on which there was no overall consensus in the consultation).

You can download a copy of the consultation responses and the conclusions paper discussed by the Council by following this link:

<http://www.hpc-uk.org/aboutus/consultations/closed/index.asp?id=93>

With regards to the standards of proficiency, we received a lot of very helpful feedback during the consultation and a number of other respondents made similar comments to those outlined in your email. Although the profession-specific standards of proficiency outlined in the draft were themselves put together by the PLG, a group largely consisting of psychotherapists and counsellors, there was a general consensus in the consultation that the standards needed substantial revision in order to adequately express the proficiencies necessary for entry to the Register as a psychotherapist and/or counsellor. In particular, many felt that the standards would need to change in order to reflect the breadth and diversity of psychotherapy and counselling practice and to ensure that terminology was applicable to all psychotherapists and counsellors and their different approaches to practice.

As such the Council concluded that more work was necessary on the standards of proficiency. At this moment in time we are reviewing our generic standards of proficiency (which currently apply across the 14 professions we regulate) and we anticipate consulting on a new approach to this standards later this year. Once this work has been completed, we will undertake further work with the field on the draft standards of proficiency for psychotherapists and counsellors, taking full account of the responses to the consultation. If the Government decides to proceed with the regulation of psychotherapists and counsellors, we would consult again on the standards of proficiency and the threshold level of qualification for entry to the Register following the approval of the necessary legislation.

The PLG has not 'continued its work in secret' and neither the PLG nor the HPC Council has 'neglected to consider the responses that the HPC and PLG Chairs reported would be necessary'. At the Council meeting in December 2009 the Council agreed that more work was necessary on the topics outlined above, including the standards of proficiency. The Council decided that the PLG should be reconvened and it is currently anticipated that a paper will be considered by the Council at its March 2010 meeting setting out a workplan for the remainder of this work. This plan will also include arrangements for any further engagement events in 2010.

I have not commented on the concluding comments in your email as these are matters for Government.

I have copied this email to Shailesh Vara MP.

Kind regards,

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