



The National Counselling Society's Open Letter on the SCoPEd Project for Developing 'Generic Standards' for the UK's Psychological Therapies

Vicky Parkinson

CEO, National Counselling Society

The National Counselling Society (NCS) was first set up in 1999 by a group of counsellors, psychotherapists, hypnotherapists and psychologists. We play an important role within the profession of counselling in the UK, and in May 2013 the Society was one of the first organizations to gain Accredited Register status with the Professional Standards Authority Accredited Register programme.¹ We support and promote counselling and counsellors, offering a wide variety of benefits to our members² and training providers.³ We have also created and published online CPD courses⁴ to support healthcare providers and those in public-facing roles.

Our belief is that counselling (and related activities) should be seen as a vocation (not just a job but a worthy occupation), and that the relationship between counsellor and client is important for the outcome of therapy.

Our ethos is that counselling is a unique vocation and that this should be reflected in all our policies. We act to protect counselling from inappropriate regulation if we feel it could harm our work, and the diversity, creativity and range of training options that currently exist in our profession. We were a central part of making sure that the previous Government's inappropriate plans were dropped (2010) and have welcomed the 'Right Touch Regulation' offered by the Accredited Register programme. The National Counselling Society believes that all Accredited Registers should be seen as equal, all meeting the high standards of Accredited Register status, externally verified by the Professional Standards Authority.

More than holding a register, the NCS is member-led on key areas of policy and we are always open to suggestions and advice from our members – our members, in short, are the source of our expertise. Instead of following a 'top-down'

approach with our members, we aim to involve, encourage and work with them at all levels. We believe this is the only appropriate way of running a counselling organization.

For all these reasons above, we were disappointed to see the announcement by BACP, UKCP and BPC as the counselling organizations working on a project to set standards for counselling and psychotherapy, with what seems to be little regard or consultation with anyone else in the profession.

In case you may not have seen the recent announcement by BACP, UKCP and BPC, they write:

Counselling and psychotherapy are not statutorily regulated. Professional bodies can apply for their own registers to be accredited by the Professional Standards Authority (PSA) under its Accredited Registers programme.

The PSA sets standards for organisations that hold a register in a health or social care profession, and the focus of their programme is public protection.

The PSA-accredited registers in the field of counselling and psychotherapy each has its own distinct standards of training and practice. There are also no agreed common entry or training requirements to enter the field.

This causes confusion for the public, for clients/patients, for employers and commissioners of services about what training and experience to expect when employing a counsellor or psychotherapist.

There is also confusion amongst those who are

considering training in this field as there are disparate standards, with a wide range of courses available at differing academic levels geared to different client groups and professional roles, and sitting within different qualifications frameworks

Whilst we agree there need to be minimum standards for any registrant working with the public, we are concerned that there has been no consultation or discussion amongst fellow Accredited Register holders, training providers, organizations or, importantly, its members – despite the collaboration being near completion on their project. The general lack of consideration, transparency and accountability being shown concerns us.

In addition to the historic monopoly on the employment sector, we felt it necessary to respond on behalf of our members and those who felt devalued, by the way this project has developed. It is felt that those involved in this collaboration appear to be setting themselves above all other organizations, undermining and devaluing the Accredited Register programme and individual counsellors. We responded with the below open letter, inviting any interested party to add their signature of support.

National Counselling Society Open Letter Re: SCoPEd Project

We write to you concerning your stated intention to develop “generic standards for the counselling and psychotherapy professions”. You write that “the PSA-accredited registers in the field of counselling and psychotherapy each has its own distinct standards of training and practice. There are also no agreed common entry or training requirements to enter the field. This causes confusion for the public, for clients/patients, for employers and commissioners of services about what training and experience to expect when employing a counsellor or psychotherapist.”

Our view is that any project to set common standards should be fully inclusive from the outset, with full and equal participation by all Accredited Register holders in talking therapies, alongside other stakeholders such as the Psychotherapy and Counselling Union, Alliance for Counselling & Psychotherapy, Awarding Bodies and training organisations.

It will, surely, only cause further “public, client and employer confusion” for three of the current Accredited Register holders to agree their own new set of standards without reference to the AR programme, especially when NHS guidelines are now focussed on recommending the programme as the one supported by Government.

In addition, we feel that any new setting of standards should be done with full democratic participation by the memberships of stakeholder organisations, using a member-led approach, rather than a top-down approach.

Without these safeguards in place, the SCoPEd project will not succeed in setting standards for the profession, but rather, will be an internal exercise conducted on behalf of particular organisations for their own ends, conducted to the exclusion of many. You are of course welcome to set standards for yourselves – but not to claim that these should be imposed on, or represent,

the profession as a whole, without having equal participation and full support from the wider profession.

We are also concerned that the project could lead to further homogenisation, over-regulation, and further control mechanisms being applied by professional associations on their members. Instead, we would seek to enshrine equality, diversity and the heart of counselling and psychotherapy in any further attempts to define standards. A mechanistic, technical and manualised understanding of therapeutic work can never do justice to the reality of how we practise. We believe a pluralistic approach respectful of diversity, variety and individual client choice is fundamentally important, whilst of course maintaining standards and public safety.

We are also concerned that, unless handled sensitively, any such project could easily lend itself to takeover by a corporatist style of regulation where the profession risks fundamental change with no benefit to counsellors, psychotherapists, or their clients. Do we really want even more prescriptions and controls on practice than there are now?

You speak of the need to avoid “public confusion”. We are not aware of any great public confusion. In the employed sector, counselling in any case has been to some extent bypassed by IAPT, where a very limited number of approaches are used in a very prescribed way. This has led over time to a fundamental undervaluing of counselling and psychotherapy in its richness and diversity. What we are aware of is the public wishing to preserve choice with access to therapy in a timely manner – to select the practitioner and approach that is right for them; to be able to see value in the therapeutic relationship above and beyond issues of professionalisation. We are also aware that counsellors and psychotherapists seek to preserve choice and diversity, and feel that there already exist robust and appropriate standards which allow a place for individuality, creativity and vocation alongside public protection and good practice. These can be fine tuned by the profession as a whole.

There are already existing standards and reference points, including the QAA Benchmark Statement on Counselling and Psychotherapy, the Framework for Higher Education Qualifications, the Regulated Qualifications Framework, Skills for Health National Occupational Standards and the UCL CORE competence frameworks which are not “owned” by any one professional body. These, together with the standards adopted by individual professional bodies, are surely sufficient.

While any organisations are, of course, welcome to collaborate and devise their own standards, what is concerning is that, at the very time that the Accredited Register programme has begun to flourish and allow all register holders to meet, cooperate, and learn to improve standards and governance with the assistance of the Authority, your collaboration threatens to ringfence your own memberships from the wider Accredited Register community, not to mention missed opportunities for equal participation from other stakeholders. The chance to set standards as part of, rather than taken away from, the Accredited Register scheme would have far greater benefits for the entire profession.

We support minimum standards for the profession – if they are,

indeed, created by the profession as a whole. The risk of setting standards in a vacuum is that it is seen as an internal political exercise. This risks greater confusion – not less.

Kind regards

Vicky Parkinson

CEO

With support of –

Jeffery Thomas and Monika Jephcott, PTUK
Tony Ruddle on behalf of Association of Christian Counsellors
Dominic Davies, Pink Therapy
Andrew Samuels, Former Chair, UKCP, Professor of Analytical Psychology, University of Essex
Alliance for Counselling and Psychotherapy
Psychotherapy and Counselling Union
Professor Michael Jacobs
Gail Evans, Programme Director at The Academy: SPACE
Leigh Smith, Heartwood Director
Karl Gregory, Severn Talking Therapy
Kathy Raffles, Kathy Raffles Counselling Services
Marie Easden, Chrysalis Courses
Nathalie Asmall, BACP Accredited and Iron Mill College tutor
Professor Stephen Joseph, University of Nottingham
Dr David Murphy, University of Nottingham
Dr Sue Price, University of Nottingham
Lindsay Cooper, Assistant Professor of Counselling, Course Leader BA (Hons) Humanistic Counselling Practice, University of Nottingham
Dr Katy Wakelin, University of Nottingham
Laura Davies, University of Nottingham
Dr Laura Monk, University of Nottingham
Janet Tolan
Lesley Wilson
Heather Kapelko
Sheila McCarthy-Dodd
Jane Pendlebury
Kris Black MBACP, UKCP CSTD, IAP, MISA, LLB (Hons)
Denise Gregory MBACP (Accred)
Phil Turner MBACP (Accred)
Amanda Young Dip Counselling
LouAnne Lachman MBACP (Accred)

The Responses

We have received responses to our further requests for an inclusive approach to the SCoPEd project. Unfortunately, we are disappointed to see that it seems those collaborating in this project are unwilling to discuss the issues with the wider profession.

Dear Vicky

Thank you for your letter which was discussed at our Steering Group meeting on 25 April. We are pleased to hear that you recognise what an important piece of work this is but it is not

exactly as you state. The project evolved organically from the collaborative discussions between our three professional bodies over the last few years and is specifically to map the current landscape, expressed in evidence-based generic competencies and then to identify any gaps or areas where further clarification is needed using the Roth and Pilling methodology. It is not about developing standards. We have researched the evidence comprehensively and systematically, and continue to do so, in order to ensure that as complete a picture as possible is drawn.

Once the Expert Reference Group has completed its work there will be a consultation with practitioners and external stakeholders. Although the exact form of the consultation has yet to be decided, it will be presenting the work done so far and asking for feedback and input on any further gaps or omissions.

Yours sincerely

Gary Fereday

Chief Executive BPC

(signed on behalf of the SCoPEd Steering Group)

11th June 2018

Dear Vicky,

Thank you very much for your email setting out your further concerns about the SCoPEd project.

As you know this project evolved from work already being undertaken as part of the collaborative work between BACP, BPC and UKCP. Our three organisations have been working together for some years as part of a formal collaboration – the CCoPP. This project is one of several things we are working on together.

SCoPEd is not creating anything new – it is an evidence-based research project mapping existing competences and professional standards. So, the project will set out what already exists. We hope that in the future a wide range of bodies will find the generic competence framework useful.

Thank you for getting in touch. We appreciate your feedback.

Yours sincerely,

Gary Fereday

Chief Executive BPC

(signed on behalf of the SCoPEd Steering Group)

The responses concern ourselves and we are very surprised that the response letter claims that the SCoPEd project is not intended to set standards for the profession. It specifically states on both BACP and UKCP websites that 'BACP, BPC, UKCP are jointly working on a groundbreaking project to set out the training requirements and practice standards for counselling and psychotherapy', in the very first sentence, as well as the below statements:

There was complete agreement between BACP, BPC, and UKCP that a proactive leadership role was needed in the development of generic standards for the counselling and psychotherapy professions.

and

The project is systematically mapping existing competencies, standards, training and practice requirements within counselling and psychotherapy.

Clearly, the publicly stated view of two of the SCoPEd collaborators is that this project is seen by them as a fundamental attempt to 'set standards for the profession' without prior consultation or consent with the profession at large.

We shall continue to post any updates to our website, and hope that as a united voice we can challenge any disruptive policies not created fully inclusively with the whole profession.

Notes

- 1 See www.professionalstandards.org.uk/what-we-do/accredited-registers
- 2 www.nationalcounsellingsociety.org/become-a-member/individual-member/benefits/
- 3 www.nationalcounsellingsociety.org/become-a-member/training-providers/benefits/
- 4 www.counsellingcpd.org/